

August 7, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

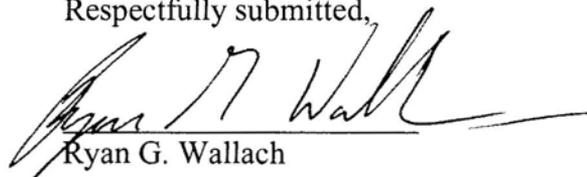
Re: In re Recommendations of the Independent Panel Reviewing the Impact of
Hurricane Katrina on Communications Networks, **EB Docket No. 06-119**

Dear Ms. Dortch:

On behalf of our client, Comcast Corporation ("Comcast"), we hereby submit the attached document for inclusion in the above-captioned proceeding.

The attachment describes some of Comcast's emergency response, system reliability, and public safety efforts, and it details Comcast's experiences during Hurricane Isabel in 2003; Hurricanes Charley, Frances, Ivan, and Jeanne in 2004; and Hurricane Katrina in 2005.

Respectfully submitted,



Ryan G. Wallach

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Attachment

ATTACHMENT:

Relevant Portions of

Comcast's Ex Parte Letter

Filed in Docket No. 05-192 (Nov. 22, 2005)



ORIGINAL

EX PARTE OR LATE FILED

November 22, 2005

RECEIVED

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Ms. Marlene Dortch
Secretary

Federal Communications Commission
445 12th Street, S.W.
Room TWB204
Washington, DC 20554

Federal Communications Commission
Office of Secretary
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**Re: Ex Parte Presentation in MB Docket No. 05-192,
Applications for Consent to the Assignment and/or
Transfer of Control of Licenses, Adelphia
Communications Corporation, Assignors, to Time
Warner Cable Inc., Assignees; Adelphia
Communications Corporation, Assignors and
Transferors, to Comcast Corporation, Assignees and
Transferees; Comcast Corporation, Transferor, to Time
Warner Inc., Transferee; Time Warner Inc.,
Transferor, to Comcast Corporation, Transferee**

Dear Ms. Dortch:

On November 14 and 17, 2005, representatives of Comcast Corporation ("Comcast") made two presentations to the FCC staff providing additional detailed information regarding the substantial public interest benefits that will result from the license transfers and assignments for which Comcast seeks the Commission's approval in the above-captioned proceeding (the "Transactions").¹ The first of these presentations focused on the improved local programming and customer service, and increased community involvement, that Comcast will bring to communities currently served by Adelphia Communications Corp. ("Adelphia"). The second presentation addressed the variety of new and improved advanced services that Comcast will offer to Adelphia subscribers following approval of the Transactions. What follows is a detailed discussion of the public interest benefits described in each of the presentations. As demonstrated herein, these benefits are tangible, substantial, and quantifiable.²

¹ *Ex Parte* Presentations of Comcast Corporation, MB Docket No. 05-192 (Nov. 15, 2005 & Nov. 18, 2005).

² Pursuant to the Protective Order adopted in this proceeding, Comcast is submitting this presentation in redacted form. Order Adopting Protective Order, MB Docket No. 05-192 (rel. June 16, 2005). The presentation contains proprietary and confidential information. In accordance with the Protective Order, Comcast also will file an unredacted version of the presentation with the Secretary's Office under separate cover, with two copies delivered to Julie Salovaara of the Media Bureau. The unredacted version of this presentation is available for inspection, pursuant to the terms of the Protective Order, at the offices of Wiley Rein & Fielding LLP. Arrangements for inspection may be made by contacting Martha Heller (202.719.3234) or

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centralized operations with localized systems tailored to the needs of specific communities. For example, in the San Francisco Bay area, Comcast replaced a centralized operating center with five system offices, each with its own area vice president and directors of marketing, finance, human resources, technical operations, and government affairs. As a result, San Francisco customers report in local customer service surveys that they are generally more satisfied with their Comcast service than they were with AT&T Broadband.

Again, Comcast's AT&T Broadband experience provides the Commission with a strong indication of what Comcast will do in the Adelphia systems. In short, Comcast has made dramatic customer service improvements where it has acquired systems from other cable operators and it will do so again with the Adelphia acquisitions.

2. Emergency Response, System Reliability, and Public Safety

With millions of subscribers in hurricane-affected areas, Comcast has a responsibility to assist its communities and its customers before, during, and after hurricanes and floods. As powerful hurricanes have ripped through these areas in recent years, Comcast has met and exceeded its responsibilities by responding immediately to restore service to damaged neighborhoods, introducing life-saving technology to spread information, and providing financial help and volunteer assistance to those in need.

Comcast's response and clean-up work during the past three hurricane seasons demonstrates the extent to which the company emphasizes preparation for storms and restoration of service to affected subscribers. In the days before a storm, Comcast employees work through a pre-storm checklist that ensures minimal service disruptions and immediate response to post-storm problems.⁵² All of Comcast's buildings that house transmission equipment, operations, or call centers are powered by stand-by generators capable of indefinitely supporting normal operations. Comcast employees top off fuel tanks on those generators and fill storage areas with enough food and water to get employees and their families through the post-storm cleanup period. Comcast also pulls in additional employees from other regions to ease the strain on its existing staff. If a call center is projected to be in the heart of the area affected by a storm, Comcast initiates its call-center back-up plan, which closes affected call centers and reroutes calls to alternate locations.⁵³ After Hurricane Isabel in 2003, the plan worked extremely well. Ninety percent of service calls were answered in 30 seconds or less.⁵⁴ Comcast also has in place a large network of redundant fiber

⁵² Linda Haugsted, *Ops Geared for Isabel*, Multichannel News, Sept. 22, 2003.

⁵³ Linda Haugsted, *'Time of Crisis'*, Multichannel News, Sept. 5, 2005.

⁵⁴ K.C. Neel, *Hurricane Isabel Takes Its Toll On Virginia Cable Systems*, Cable World, Sept. 29, 2003, at 10.

paths and backup generators. For example, it utilized more than 250 generators in Virginia after Hurricane Isabel.⁵⁵

Through three unprecedented storm seasons, Comcast's employees have surpassed all expectations. In September 2003, more than 600 Comcast workers responded to Hurricane Isabel in Virginia, with technicians working up to 21 straight days. In Richmond, where 90 percent of customers lost service, Comcast restored service to many customers within hours of the storm, with trucks following right behind Dominion Power's.⁵⁶ As the *Richmond Times-Dispatch* reported, although Comcast cable service was restored immediately and simultaneously after electricity came back on, some customers had to wait more than a week for their phone service provided by other companies to work again.⁵⁷

In Florida the following year, Comcast's workers were well equipped to respond to Hurricanes Charley, Frances, Ivan, and Jeanne. Following these storms, Comcast trucks worked on poles immediately after Florida Power and Light had completed their work. When Charley knocked down cell-phone towers, Comcast workers were prepared with satellite phones.⁵⁸ When the storms damaged workers' homes in Port Charlotte, Comcast wheeled in a luxury motor home to serve as temporary housing for employees and their families as they worked around the clock to restore service.⁵⁹

When Hurricane Katrina hit Florida, Alabama, and Mississippi this fall, Comcast employees were able to draw on their experiences during the previous two seasons to respond quickly and adeptly.⁶⁰ Ninety percent of Comcast's

⁵⁵ *Hurricane Isabel: Hearing Before the Joint Commerce and Labor Committee*, 2003 Leg. Sess. (Va. Dec. 1, 2003) (testimony of Kirby Brooks, Area Vice President and General Manager, Comcast Metro Richmond).

⁵⁶ *Id.*

⁵⁷ Greg Edwards, *Verizon, Comcast Restoring Services*, *Richmond Times-Dispatch*, Oct. 7, 2003.

⁵⁸ I.M. Stackel, *Utilities Taking Lessons from Last Year to Heart*, *Naples (FL) Daily News*, July 5, 2005.

⁵⁹ Linda Haugsted, *Big Wind, Huge Mess*, *Multichannel News*, August 23, 2004.

⁶⁰ In addition, Comcast and its employees responded to the devastation of Hurricane Katrina with an unprecedented showing of support and generosity. To help provide direct assistance to victims and evacuees, Comcast immediately pledged \$10 million worth of advertising time to the American Red Cross, along with \$50,000 cash. *Worst case brings out the best*, *Phila. Bus. J.*, Sept. 2, 2005. It also contributed surplus fuel, food, and water that it had acquired in preparation for the storm to families in need in the community. When Cox Communications lost use of its facilities in the New Orleans region, Comcast lent a helping hand by offering space in Comcast's Denver Media Center to Cox Sports Television, the regional sports network home of the New Orleans Saints and the New Orleans Hornets. Linda Haugsted, *Through the Wire*, *Multichannel News*, Sept. 12, 2005. And when some of New Orleans' musical legends organized a benefit concert, Comcast aired "From the Big Apple to the Big Easy" on its VOD system and gave all of the \$19.95 purchase price to the fundraising effort. *'Big Apple' Raises \$9M for 'Big Easy'*, *Multichannel News*, Oct. 11, 2005. Comcast also used VOD to distribute Red Cross updates and information on helping the relief effort. In order to promote charitable giving toward the

employees on the Gulf Coast came to work the day after the storm. As a result, Comcast restored service to 90 percent of its South Florida customers within three days.⁶¹ In Hattiesburg, Mississippi, 72 percent of subscribers had cable service restored before the end of September.⁶²

To help subscribers prepare for impending storms, Comcast systems in Florida, Georgia, South Carolina, and Alabama introduced “Hurricane on Demand” in June 2005.⁶³ Part of Comcast’s VOD package, “Hurricane on Demand” provides subscribers with on-demand, short segments about how to get ready for a storm, from evacuating an area to putting together a Family Disaster Supplies Kit—and how to recover after a storm hits, such as what areas to avoid and how to deal with insurance companies.⁶⁴

With 27,000 field technicians and the eighth largest truck fleet in the country, Comcast is well equipped to respond to a wide variety of emergencies. For example, in the mid-Atlantic region, Comcast technicians have joined the Amber Alert system, a national emergency alert system for abducted children.⁶⁵ They have been trained to watch for suspicious vehicles and people, and they immediately are notified by pager and cell-phone whenever law enforcement officials in Maryland, Delaware, or Washington, D.C. issue an Amber Alert. In Maryland, the program represents the first of its kind between a corporation and a local law enforcement agency.⁶⁶

rebuilding efforts in Mississippi, Comcast created a PSA series in conjunction with the “Mississippi Rising” relief fund established by Mississippi Governor Haley Barbour. Comcast ran \$15 million in PSAs cross-channel in markets across the country. Various celebrities, including Faith Hill, Morgan Freeman, and Brett Favre, participated in the campaign.

⁶¹ Stephanie Armour, *Employers Move to Help Workers in Stricken Areas*, USA Today, Sept. 1, 2005.

⁶² Nikki Davis Maute, *Comcast Works Hard to Restore Service to Customers*, Hattiesburg (MS) American, Sept. 29, 2005.

⁶³ Steve Donohue, *Timely Disaster Advice – Plus VOD Ads*, Multichannel News, June 20, 2005.

⁶⁴ Comcast runs Hurricane on Demand in partnership with The Weather Channel.

⁶⁵ Sudarsan Raghavan, *Comcast Technicians Join Amber Alert System*, Wash. Post, May 5, 2005, at SM03.

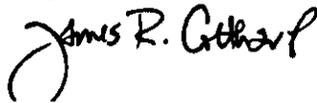
⁶⁶ In fact, Comcast has a well-established track record of assisting law enforcement. With thousands of technicians out in the field at any one time, it is no surprise that Comcast employees sometime arrive at emergencies before other first responders even hear of the situation. For that reason, Comcast offers CPR certification classes to its field employees. Recently, that training helped save a life. While they were making a service call to an apartment complex near Seattle, Washington, Comcast technicians Todd Hickam and Ryan Thornhill found 10-year-old Jamario Covington at the bottom of a pool. They jumped in while still in full gear to save the boy. When they saw that Jamario was not breathing, they administered CPR, called paramedics, and eventually revived him. Paramedics said Jamario would not have lived without Hickman and Thornhill. Good Morning America (ABC television broadcast June 17, 2005). Three months later, technician Melvin Smith of Pittsburgh, Pennsylvania also performed a heroic feat when he

Once the Transactions are approved, Adelphia subscribers will be able to rely on Comcast's extensive experience and notable track record in responding to a range of natural disasters and other emergency situations.

IV. CONCLUSION

Comcast is pleased to amplify the substantial, tangible, and quantifiable public interest benefits that will flow from its proposed acquisition of Adelphia cable systems. We respectfully request that the Commission find that the Transactions will be in the public interest and provide timely and unconditional approval in order to let us begin delivering these benefits to current Adelphia subscribers.

Respectfully submitted,



James R. Coltharp

cc: Best Copy and Printing, Inc.
Donna Gregg
Sarah Whitesell
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Royce Sherlock
Marcia Glauberman
Julie Salovaara
Wayne McKee
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Kimberly Jackson
Neil Dellar
Ann Bushmiller

noticed a three-alarm fire while traveling to a service appointment, and he used his truck ladder to save a woman trapped in her second-story apartment. Caitlin Cleary, *Cable Worker to the Rescue in Penn Hills Apartment Fire*, Pittsburgh (PA) Post-Gazette, Sept. 14, 2005.