

July 24, 2009

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **In the Matter of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video and Audio Programming, GN Docket No. 09-26;**
Ex Parte Communication

Dear Ms. Dortch:

On July 23, 2009, Jim Coltharp, Chief Policy Advisor for FCC & Regulatory Policy at Comcast Corporation (“Comcast”), and Stephanie L. Poday and the undersigned of Willkie Farr & Gallagher LLP, representing Comcast, met with David Konczal, Mary Beth Murphy, Alison Neplokh, and Sarah Whitesell of the Media Bureau. Jay Opperman, Director of Online Security for Comcast, and Catherine Fox, Regulatory Counsel for Comcast, joined the meeting by phone.

The discussion in the meeting focused primarily on the points summarized in the attached handout. Mr. Coltharp summarized the various parental control technologies that Comcast offers its video and High-Speed Internet customers and how customers can access those controls. Mr. Coltharp emphasized that Comcast dedicates significant resources to empowering parents with the ability to control the content that their children are exposed to and that these efforts are ongoing. As an example, Mr. Coltharp noted that on July 22, 2009, Comcast launched the award-winning Kidzui Internet portal for its High-Speed Internet customers. The attached press release announcing Comcast’s launch of Kidzui and printouts of the screenshots of the Kidzui welcome page on Comcast.net, <http://kidzui.comcast.net/>, were provided to the Media Bureau staff. Kidzui is a free portal that includes a kid-friendly browser, search engine, and online community. Kidzui also offers a premium membership for \$39.95 per year that provides parents with enhanced parental control tools and reports (for example, the ability to add favorites to children’s accounts, monitor online activity for the past 90 days, and view kids’ interests by their online activity) and premium features such as Homework Helper.

Marlene H. Dortch

July 24, 2009

Page 2

In response to a question about whether Comcast's parental controls for its video services could provide the functionality that TiVo's KidZone provides -- which was described as creating a "walled garden" of parental-approved programming by searching for content that was designated by broadcasters as "educational and/or informational" or that contained third-party ratings information -- Comcast explained that its parental controls do not currently have that particular ability. However, it was noted that Comcast's parental controls could be used by parents to create their own "walled garden" and that TiVo's set-top boxes are compatible with Comcast's cable service so that parents who want TiVo's KidZone features can use that service. In response to a staff question, the Comcast representatives indicated that they did not know whether the Comcast set-top box that utilizes TiVo's software includes the KidZone feature but that they would inquire further. The results of that inquiry are that the Comcast TiVo set-top box does not currently support the KidZone feature although it does support other parental control features.

Consistent with its reply comments, Comcast also discussed its experience and concerns with TV Guardian. It was noted that there were copyright concerns regarding the TV Guardian technology but that Comcast went ahead with research to determine consumer interest in the technology. Mr. Opperman explained that the results from the research showed that the technology would not garner sufficient consumer interest and that Comcast customers found the technology of limited utility to support a business case.

Mr. Coltharp noted that the marketplace has delivered advanced parental control technologies without a government mandate and that Comcast continues to explore new technologies to meet parents' demands. Mr. Coltharp suggested that mandating specific technology solutions could raise significant risks of stifling innovation at a time when the marketplace is developing a range of products and tools that could be of significant benefit to parents.

Kindly direct any questions regarding this matter to my attention.

Respectfully Submitted,

/s/ Ryan G. Wallach
Ryan G. Wallach

cc: Sarah Whitesell
Alison Neplokh
May Beth Murphy
David Konczal

COMCAST DELIVERS ON ITS COMMITMENT TO GIVING PARENTS CONTROL OVER THE CONTENT IN THEIR HOMES

Comcast Empowers Parents To Control the Television Content Their Kids Can Access.

- Parents can block programming they find objectionable. Comcast will block any channel parents deem offensive or inappropriate for children upon request and for no charge.
- For analog subscribers, signal traps or set top boxes can be used, depending on their system, to block unwanted programming.
- With digital cable, parents can block programming by channel, program title, and rating (including both TV and MPAA ratings). In fact, parents can create a customized “family tier” by using the “favorites” feature to select channels they want and using parental controls to block channels and programs they do not want.
- The controls similarly allow parents to block or limit access to VOD content and to programs recorded using Comcast’s DVR service. The controls even allow parents to hide the titles of unwanted shows or shows with certain ratings from appearing in the electronic program guide.
- To help parents determine whether content is appropriate, Comcast requires by contract that all linear programming networks that it carries provide ratings.

Comcast Enables Parents To Protect Their Children Online.

- Comcast offers McAfee parental controls at no cost to its High-Speed Internet subscribers that permit parents to not only filter content, but also to monitor Internet activity to help parents protect their children against online predators, identity theft, and exposure to unwanted content.
- Comcast provides other tools including Comcast SafeSearch, a kid-safe Internet search tool powered by Google; KidZui, a Web browser, search engine, and community for children; and an e-mail feature that enables parents to restrict from whom their children may receive e-mail.

Comcast Educates Subscribers About the Parental Control Tools Available to Them.

- Every new Comcast customer receives parental control instructions in his or her Customer Welcome Kit. Once a year, Comcast also provides a prominent statement on bills that informs customers about the tools available to them and where to find more information.
- Comcast offers a dedicated hotline at 1-866-781-1888 to assist parents with its parental control tools. Comcast promotes the hotline number in its Welcome Kits and online.
- Comcast customers can learn about Comcast’s parental control tools at www.comcast.com/Corporate/Customers/ParentalControls.html. A parental controls instructional video is also available on Comcast’s VOD service.
- Comcast partners with Common Sense Media to make available on VOD and on Comcast.net detailed, age-based information about various media including TV shows, movies, and websites.
- Comcast provides information about keeping children safe online at the Comcast.net Security Channel, www.comcast.net/security.
- Comcast participates in a number of efforts to educate parents and protect children, including iKeepSafe, PointSmart.ClickSafe., and FOSI. In addition, a Comcast executive was recently named to the NTIA’s Online Safety and Technology Working Group.



PRESS RELEASE
Comcast
One Comcast Center
Philadelphia, PA 19103
www.comcast.com

FOR IMMEDIATE RELEASE

COMCAST LAUNCHES AWARD-WINNING KIDZUI, A SAFE, COMPREHENSIVE INTERNET PORTAL FOR KIDS

KidZui Simplifies Access to Fun Online Sites like Disney, Webkinz, Club Penguin and Homework Helper for Millions of Comcast Households Nationwide

Philadelphia, PA and San Diego, CA – July 22, 2009 – Comcast Interactive Media (CIM), a division of Comcast Corporation (Nasdaq: CMCSA, CMCSK) dedicated to developing and operating online and cross-platform entertainment and media businesses, and KidZui (www.KidZui.com), the Internet for kids, today announced a partnership to deliver a comprehensive Internet portal for kids and families to millions of households across the country.

Designed for ages 3-12, KidZui serves as a safe portal that connects kids to games, activities, videos and educational materials.

“Working with Comcast to share KidZui with their community has resulted in a very rewarding and powerful partnership,” said Cliff Boro, CEO KidZui. “The demand from kids to explore the Internet has grown at a rapid rate, and through our collaboration with Comcast we’re meeting that demand with a best-in-class Internet experience for kids.”

“KidZui is like an online theme park that has Disney, Webkinz, Club Penguin, animal videos and other age-appropriate content for kids,” added Scott Bailey, Senior Vice President and General Manager of Comcast.net for Comcast Interactive Media. “However, it’s not just about fun and games because KidZui also offers a way for parents to help their kids with schoolwork through Homework Helper. We are excited to partner with KidZui and bring this experience to our customers.”

Now, Comcast High-Speed Internet subscribers will have convenient access to over 2 million kid-friendly games, Web sites and videos via KidZui. A customized Comcast edition of KidZui is available at no additional charge at <http://kidzui.comcast.net>. A premium version of KidZui is available for a fee. Comcast’s partnership with KidZui is also reflective of their continued dedication to provide Internet safety awareness and education and family oriented content online to their community of subscribers nationwide.

The announcement comes on the heels of a recent Nielsen Online report that kids are adopting the Internet at a faster overall rate than the general Web population. According to Nielsen, time spent online among kids, ages 2-11 has increased by 63 percent over the past five years. As a result, entertaining kid-safe portals like KidZui are providing a much needed, age-appropriate destination to meet a rapidly growing demand.

Comcast is headquartered in Philadelphia, Pennsylvania.
KidZui is headquartered in San Diego, California.

About Comcast Interactive Media

Comcast Interactive Media (CIM), a division of Comcast Corporation (Nasdaq: CMCSA, CMCSK), dedicated to developing and operating online and cross-platform entertainment and media businesses, including Comcast.net (www.comcast.net). CIM's products include Fandango.com, a top movie and entertainment destination, selling movie tickets at over 16,000 screens; Fancast.com, a national online entertainment site; DailyCandy, the daily e-mail newsletter and website; thePlatform, the industry-leading provider of digital media publishing solutions over broadband and wireless networks; and Plaxo, an online social networking based platform.

About Comcast.net

Comcast's premier broadband service, (www.comcast.net) combines extensive content with a suite of online tools for Comcast High-Speed Internet customers, including email, McAfee Security, a Universal Address Book, mobile access to content and email, and the ability to check voicemail online for Comcast Digital Voice customers. Comcast.net packages the Web's best content sources for news, sports, finance, entertainment and more, and features one of the Web's deepest libraries of professional video content. The site offers more than 150,000 video clips from providers such as ABC News, CBS News, Fox Sports, Disney, E!, G4, The Weather Channel, CelebTV, and others. Comcast.net is one of the most visited and deeply engaging sites on the Web; 293 MM visits from over 17.1 MM monthly unique visitors, consuming 4.3 billion page views.

About KidZui

KidZui (www.KidZui.com) empowers the very best Internet experience for kids. Designed for children ages 3-12, KidZui unlocks a revolutionary online experience that brings families closer together, breeds independence and confidence in kids, and gives parents peace of mind knowing their children are safely exploring the Internet. KidZui encourages kids to express themselves by sharing content with friends and family, and creating an avatar and web page inspired by their personalities. KidZui's award-winning experience is curated by an editorial team of teachers and parents dedicated to combing the Internet for the very best websites, videos, pictures and games for kids. What Google is for search, what YouTube is for content and what Facebook is for community, KidZui is for kids. KidZui is compatible with PC, Mac, Linux and comes as a Firefox extension.

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FREE

KidZui, The Internet for Kids.

Over 2 million games, websites and videos reviewed by parents like you.

A Web browser, search engine & community for kids.

Get KidZui 4.0
Free Download

Awards

"KidZui has changed my classroom! Kids are engaged and active in learning again!"

Tim Price
2nd Grade Teacher

"Busy parents can simply set up KidZui and trust that their kids will be safe online."

THE WALL STREET JOURNAL

56% of parents said that using KidZui to explore the Internet has increased their kids' curiosity about the subjects they learn in school

Fun for Kids

KidZui is a Web browser, search engine and community for kids 3 to 12.

Kids have the freedom to learn, play, search and discover over two million Web pages, games, videos and photos on their own. KidZui has the largest number of websites, videos, photos and games reviewed by parents and teachers anywhere. Kids can find what they need to help with schoolwork, by themselves.

Kids can safely express themselves, with their avatar, backgrounds, tags and online status.

Smart for Parents

KidZui eliminates the need for parents to constantly watch over their kids' shoulder when they are online.

Parents know what their kids are doing online and they can connect by sharing content. KidZui sends you a weekly email that tells you what your kids are doing online. The KidZui parent account lets you share content and set limits.

[Kid Features](#)

[Parent Features](#)

Search

Search is essential for kids, as they learn all the things that will make them productive adults.

KidZui Search is tailored to the needs of kids. KidZui Search provides:

- Suggestions and spelling correction
- Search results with content relevant to kids
- Graphical presentation that is easy for kids to understand



[Enlarge](#)

Search Designed for Kids

Your kids can search any topic from Aardvarks to Zebras, Art to Science and everything in between. KidZui has two million games, websites and videos reviewed by parents and teachers.

KidZui provides spelling suggestions based on what is typed. Suggestions are in order of kid popularity.



[Enlarge](#)

Search with Suggestions

KidZui Search helps kids with spelling. When kids start typing, KidZui suggests words or phrases that complete what has been typed. KidZui displays a picture next to each suggestion to help children who are learning to read. The suggestions are ordered by kid popularity, so that kids can quickly find what they are looking for.

KidZui tries to correct spelling when no results are found, to help kids when they misspell. KidZui displays related searches with the results, to further help kids find what they are looking for.



[Enlarge](#)

Search with Relevant Content

When kids use search engines for adults, they often find content that is neither relevant nor appropriate for kids. KidZui has the largest number of websites, videos, photos and games reviewed by parents and teachers anywhere. Kids searching on KidZui find relevant and appropriate content for their age and interest. The search results are ordered by kid popularity and filtered based on age.

The Internet for Kids

Over 2 million kid-friendly websites, photos and videos reviewed by parents like you.

[Download KidZui](#)

Contact KidZui



contact@kidzui.com
1-888-KidZui8
(1-888-543-9848)

Looking For Help?
Find answers in our [knowledgebase](#)

Questions? Comments? We'd love to hear from you.
contact@kidzui.com



Search with Graphical Results

KidZui presents search results graphically so that kids can quickly find what they are searching for. Kids choose whether to search for web pages, videos or photos. Each content type is indicated with an icon and a picture that provides a simple visual cue.

Search results are influenced by kid popularity, so that kids are more likely to find what they are looking for.

[Enlarge](#)



Related Channels

KidZui displays channels related to search results. Related Channels help kids refine their searches. Related channels also suggest related topics to encourage kids to explore.

[Enlarge](#)

Browsing

KidZui has the largest number of websites, videos, photos and games reviewed by parents and teachers anywhere. Kids can browse all this content easily and independently. KidZui give kids tools to explore all this amazing content easily.



Channels

Kids can save their favorite channels as they browse. The favorite channels are displayed on the KidZui home.

KidZui has created thousands of channels filled with approved content for kids. New content is added daily as kids search for new things on KidZui.

[Enlarge](#)



Home

KidZui displays interesting websites, videos and photos on the home screen. KidZui also selects websites, videos and photos that kids are tagging, in addition to what KidZui editors select.

Kids can view additional content from games, most popular, most tagged and ZuiPicks. KidZui editors select new ZuiPicks themes every week.

[Enlarge](#)



Most Visited Web Pages

KidZui displays the websites that are most visited by a kid on the home screen. The most visited web page help kids find their favorite places quickly.

[Enlarge](#)



History

Kids can always find where they have been by visiting their History. KidZui remembers every place kids visit, so that it can be easily found.

[Enlarge](#)

Content

KidZui has the largest number of websites, videos, photos and games reviewed by parents and teachers anywhere. Kids can browse all this content easily and independently.

Kids can share and tag all the content in KidZui.



Websites

Kids can enter web addresses to go to websites that have been approved by parents and teachers. Parents can modify the settings as they desire. Kids can also find web pages by searching or browsing.

[Enlarge](#)

When kids visit a website they can do the following:

- Tag websites to express their opinion
- Share websites with their friends
- Add websites to their favorites
- See what other kids think

Videos

KidZui has a large number of videos that kids can find through searching and browsing. Videos are very popular amongst kids.



[Enlarge](#)

When kids visit a video they can do the following:

- Tag videos to express their opinion
- Share videos with their friends
- Add videos to their favorites
- See what other kids think

Photos

KidZui has a large number of photos that kids can find through searching and browsing.



[Enlarge](#)

When kids view a photo they can do the following:

- Tag photos to express their opinion
- Share photos with their friends
- Add photos to their favorites
- See what other kids think

Tagging

Kids can tag all content in KidZui to express their opinion and see what other kids are tagging. Tags are very popular amongst kids.



[Enlarge](#)

Kids can tag the following content:

- Websites
- Games
- Videos
- Photos

My Favorites

Kids can save all their favorite content in My Favorites. KidZui will remember every favorite to help kids find them quickly.



[Enlarge](#)

Account

A KidZui account gives kids the freedom to learn, play and discover over 2 million games, websites, videos and photos approved by parents like you.

Kids can now safely express themselves with their Zui, backgrounds, tags and online status.



[Enlarge](#)

Backgrounds

Your kids can pick a theme from over 100 new backgrounds. Themes include everything from animals to soccer and dinosaurs to music.



[Enlarge](#)

What's Up

Kids can tell their friends what's up through their online status. KidZui editors have pre-selected moods and activities for kids to choose from.



[Enlarge](#)

My KidZui

Every Zui has their own MyKidZui page. Kids can visit their friends' MyKidZui and watch as they come online, gain points and share cool stuff they've tagged.



Help

Kids can answer their own questions by clicking the Help button. The organized answers, pictures and video will help kids navigate through KidZui.

[Enlarge](#)

Friends

The KidZui community is tailored to kids as they learn all the things that make them productive adults. It's 100% safe with no chat, no written text and no email.

The KidZui community allows kids to:

- Add and block friends
- Share content with friends
- Ping friends to say "Hi"
- See friends come online and their interests



Add a Friend

Kids can add friends to their community. KidZui provides a Search For Friends box to enter Zui names. Kids can also add friends by clicking a Zui's picture and the Add Friend button.

Parents can approve or block any friends through the parent account.

[Enlarge](#)



Sharing

Kids can select any game, website, video or photo in KidZui and share it with their friends. Received shares will appear in their KidZui inbox. Sharing helps kids safely connect with friends and discover new content.

Parents can share content with their kids from the parent account.

[Enlarge](#)



Kid's Inbox

Your kids can see received shares by checking their KidZui inbox. The KidZui inbox holds up to 30 shares from friends. Kids can see who and what content has been shared with them.

[Enlarge](#)

Have You Tried

- Site Index
- Horoscopes
- Community Forums
- Anti-Virus and Firewall
- Photo Center
- Help

Quick Links

- Weather
- Local
- Comcast.net Blog
- Travel
- Jobs
- Games

Cool Tools

- TV Listings
- What's On Demand?
- Free Credit Report & Score
- Mobile Email & Ringtones
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- Coupons

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- Finance
- News
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Fancast	Fandango	Fearnet	G4	Golf Channel	Movies.com
PBS Kids Sprout	Plaxo	Style Network	TV One	Versus	

Add Comcast Services:

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