

LAWLER, METZGER, KEENEY & LOGAN, LLC

2001 K STREET, NW  
SUITE 802  
WASHINGTON, D.C. 20006

CHARLES W. LOGAN  
PHONE (202) 777-7724

PHONE (202) 777-7700  
FACSIMILE (202) 777-7763

October 28, 2009

*Via Electronic Filing*

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

Re: Application of CIMCO Communications, Inc., Assignor, and  
Comcast Phone, LLC, Comcast Phone of Michigan, LLC, and  
Comcast Business Communications, LLC, Assignees  
WC Docket No. 09-183

Dear Ms. Dortch:

As requested by the Commission staff, the Assignees in the above-referenced transaction (Comcast Phone, LLC, Comcast Phone of Michigan, LLC, and Comcast Business Communications, LLC) hereby provide the following information to supplement the record in this proceeding:

1. Appendix A attached hereto lists the states in which Comcast Corporation (Comcast) is providing voice service and the states in which Comcast is providing video and data services. Please note that, as explained on pages 7-8 of the Application, Comcast offers retail interconnected voice-over-the-Internet protocol (VoIP) service to residential and business customers. To provide this service, Comcast's VoIP subsidiaries, which operate as uncertificated information service providers, obtain wholesale telecommunications services from Comcast's state-certificated competitive local exchange carrier (CLEC) subsidiaries, with the Comcast CLECs entering into interconnection agreements with incumbent local exchange carriers.<sup>1</sup> Appendix A lists the states in which Comcast's CLEC subsidiaries provide wholesale local interconnection service.

---

<sup>1</sup> Assignees' VoIP affiliates may also lease interconnection facilities from unaffiliated telecommunications carriers.

2. Appendix B attached hereto are charts setting forth the name and state of incorporation/state of formation of each of the intermediary entities between Comcast Corporation and each of the three Assignees, as well as ownership information for each such intermediary entity.
3. Appendix C attached hereto sets forth, for each of the three Assignees and any operating subsidiary companies of the Assignees, (1) the entity's service territory; (2) a description of the services provided by the entity; and (3) whether the entity holds a 10% or greater interest in any other telecom provider.
4. As stated in the application, Mr. Brian L. Roberts, Comcast Corporation's Chairman and Chief Executive Officer, is the beneficial owner of stock that represents 33-1/3 percent of the combined voting power of the two classes of Comcast Corporation's voting common stock. Mr. Roberts' stock interest is held through his control of BRCC Holdings LLC, a Delaware limited liability company, and certain trusts. Comcast Corporation is a publicly traded corporation whose stock is widely held by members of the public. Based on information available through the Securities and Exchange Commission and other publicly-available information, no other individual or entity beneficially owns directly or indirectly a 10 percent or greater equity or voting interest in Comcast Corporation.

Please do not hesitate to call if you have any questions.

Sincerely,

/s/ Charles W. Logan  
Charles W. Logan  
Counsel to Assignees

cc: Tim Stelzig  
Dennis Johnson  
Sumita Mukhoty

## Appendix A

### States in Which Comcast Offers Voice Service

- |                         |                    |
|-------------------------|--------------------|
| 1) Alabama              | 20) Minnesota      |
| 2) Arkansas             | 21) Mississippi    |
| 3) Arizona              | 22) Missouri       |
| 4) California           | 23) New Hampshire  |
| 5) Colorado             | 24) New Jersey     |
| 6) Connecticut          | 25) New Mexico     |
| 7) Delaware             | 26) New York       |
| 8) District of Columbia | 27) Ohio           |
| 9) Florida              | 28) Oregon         |
| 10) Georgia             | 29) Pennsylvania   |
| 11) Illinois            | 30) South Carolina |
| 12) Indiana             | 31) Tennessee      |
| 13) Kansas              | 32) Texas          |
| 14) Kentucky            | 33) Utah           |
| 15) Louisiana           | 34) Vermont        |
| 16) Maine               | 35) Virginia       |
| 17) Maryland            | 36) West Virginia  |
| 18) Massachusetts       | 37) Washington     |
| 19) Michigan            | 38) Wisconsin      |

### States in Which Comcast Offers Video and Data Services

- |                         |                    |
|-------------------------|--------------------|
| 1) Alabama              | 21) Minnesota      |
| 2) Arkansas             | 22) Mississippi    |
| 3) Arizona              | 23) Missouri       |
| 4) California           | 24) New Hampshire  |
| 5) Colorado             | 25) New Jersey     |
| 6) Connecticut          | 26) New Mexico     |
| 7) Delaware             | 27) New York       |
| 8) District of Columbia | 28) North Carolina |
| 9) Florida              | 29) Ohio           |
| 10) Georgia             | 30) Oregon         |
| 11) Idaho               | 31) Pennsylvania   |
| 12) Illinois            | 32) South Carolina |
| 13) Indiana             | 33) Tennessee      |
| 14) Kansas              | 34) Texas          |
| 15) Kentucky            | 35) Utah           |
| 16) Louisiana           | 36) Vermont        |
| 17) Maine               | 37) Virginia       |
| 18) Maryland            | 38) West Virginia  |
| 19) Massachusetts       | 39) Washington     |
| 20) Michigan            | 40) Wisconsin      |

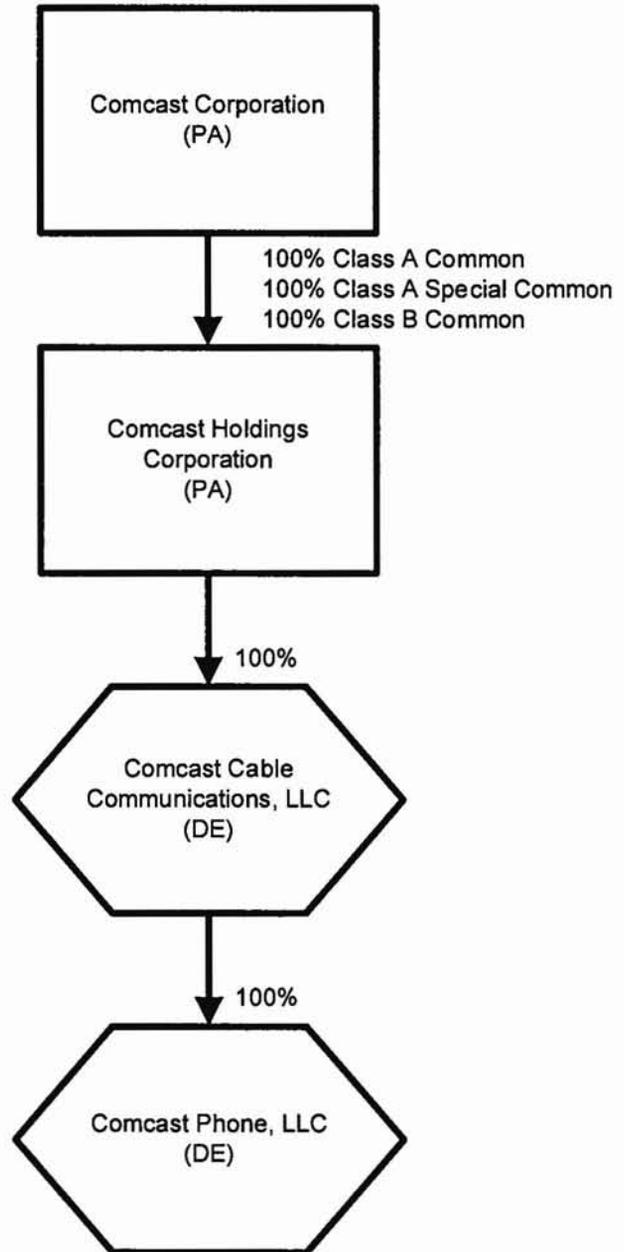
**Appendix A (continued)**

**States in Which Comcast Subsidiaries Provide  
Certificated Local Interconnection Service (Wholesale Service)**

- |                         |                    |
|-------------------------|--------------------|
| 1) Alabama              | 20) Minnesota      |
| 2) Arkansas             | 21) Mississippi    |
| 3) Arizona              | 22) Missouri       |
| 4) California           | 23) New Hampshire  |
| 5) Colorado             | 24) New Jersey     |
| 6) Connecticut          | 25) New Mexico     |
| 7) Delaware             | 26) New York       |
| 8) District of Columbia | 27) Ohio           |
| 9) Florida              | 28) Oregon         |
| 10) Georgia             | 29) Pennsylvania   |
| 11) Illinois            | 30) South Carolina |
| 12) Indiana             | 31) Tennessee      |
| 13) Kansas              | 32) Texas          |
| 14) Kentucky            | 33) Utah           |
| 15) Louisiana           | 34) Vermont        |
| 16) Maine               | 35) Virginia       |
| 17) Maryland            | 36) West Virginia  |
| 18) Massachusetts       | 37) Washington     |
| 19) Michigan            | 38) Wisconsin      |

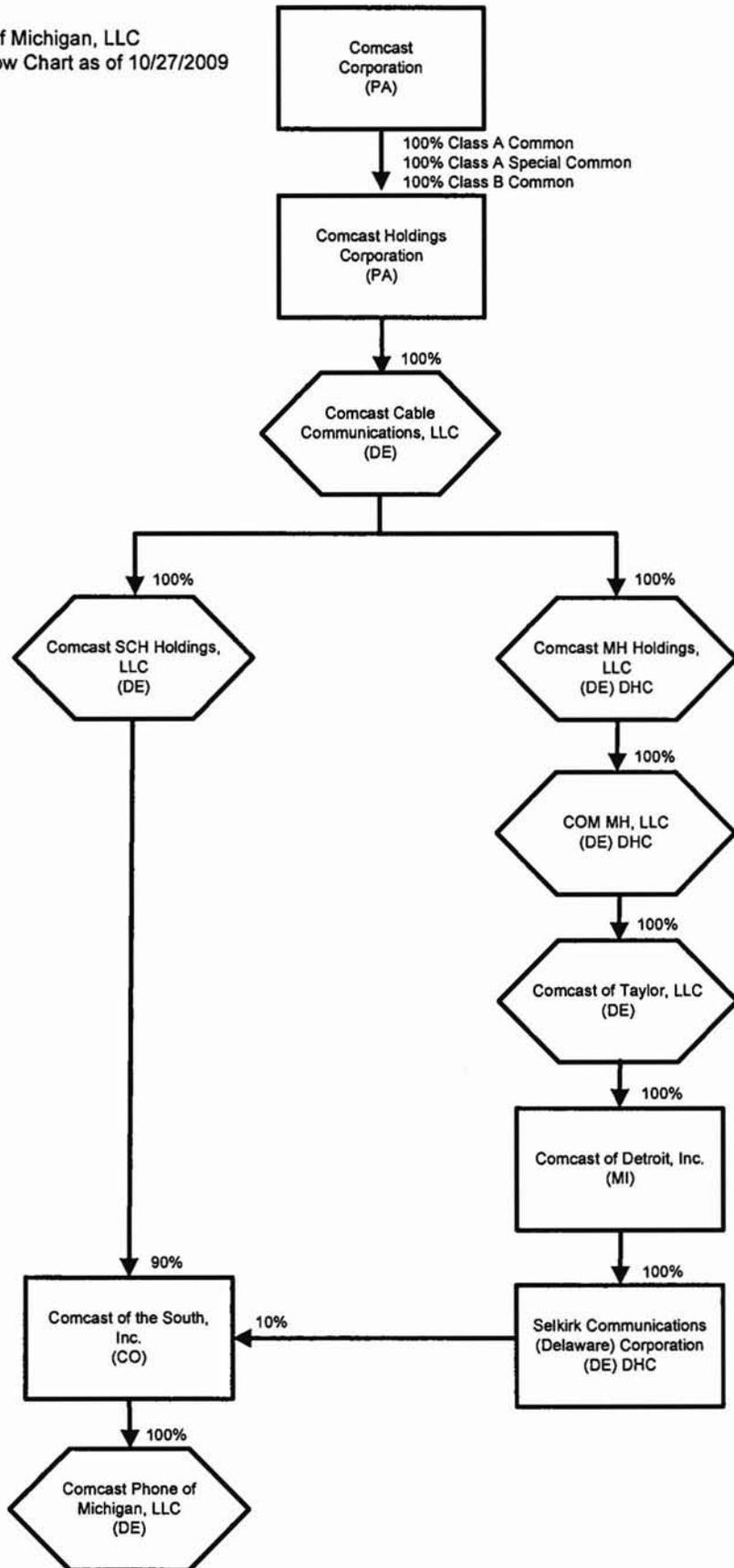
**Appendix B**

Comcast Phone, LLC  
Organizational Flow Chart as of 10/27/2009



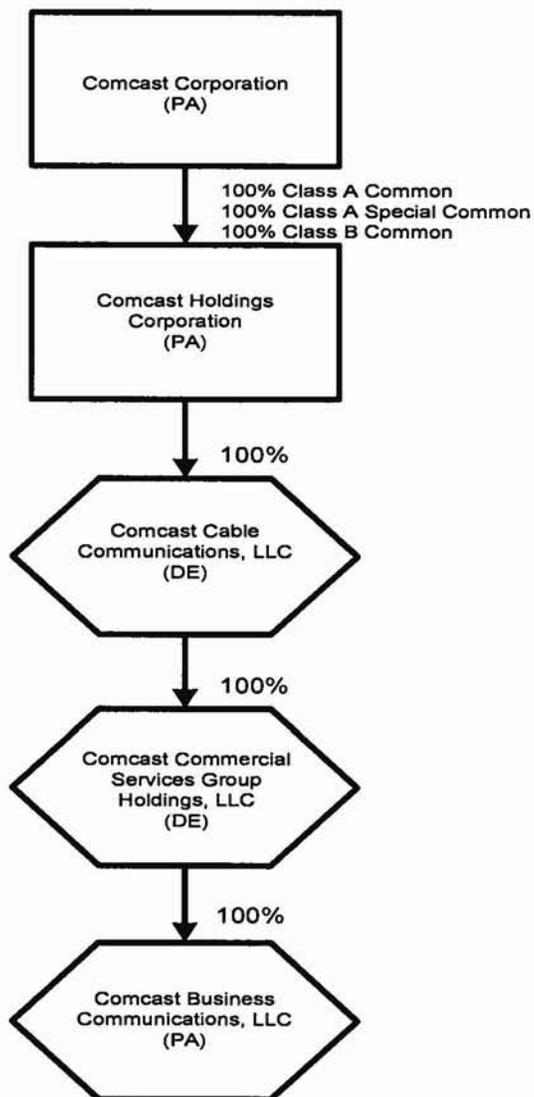
Appendix B (continued)

Comcast Phone of Michigan, LLC  
Organizational Flow Chart as of 10/27/2009



## Appendix B (continued)

Comcast Business Communications, LLC  
Organizational Flow Chart as of 10/27/2009



## Appendix C

### Information Concerning Assignees

#### Comcast Phone, LLC

Comcast Phone, LLC, through its wholly-owned operating subsidiaries, provides local interconnection (wholesale) service, telecommunications services to schools and libraries, interstate and intrastate switched access service, and inter-exchange services in the states listed below (as indicated in the list below, there is a separate operating subsidiary in each such state). Neither Comcast Phone, LLC nor its operating subsidiaries hold a 10 percent or greater direct or indirect interest in any other telecommunications provider.

- 1) California – Comcast Phone of California, LLC
- 2) Colorado – Comcast Phone of Colorado, LLC
- 3) Connecticut – Comcast Phone of Connecticut, Inc.
- 4) Florida – Comcast Phone of Florida, LLC
- 5) Georgia – Comcast Phone of Georgia, LLC
- 6) Idaho – Comcast Phone of Idaho, LLC
- 7) Illinois – Comcast Phone of Illinois, LLC
- 8) Iowa\* – Comcast Phone of Iowa, LLC
- 9) Louisiana – Comcast Phone of Louisiana, LLC
- 10) Maine – Comcast Phone of Maine, LLC
- 11) Massachusetts – Comcast Phone of Massachusetts, Inc.
- 12) Minnesota – Comcast Phone of Minnesota, Inc.
- 13) Montana\* – Comcast Phone of Montana, LLC
- 14) Nebraska\* – Comcast Phone of Nebraska, LLC
- 15) Nevada\* – Comcast Phone of Nevada, LLC
- 16) New Hampshire – Comcast Phone of New Hampshire, LLC
- 17) North Carolina\* – Comcast Phone of North Carolina, LLC
- 18) North Dakota\* – Comcast Phone of North Dakota, LLC
- 19) Ohio – Comcast Phone of Ohio, LLC
- 20) Oklahoma – Comcast Phone of Oklahoma, LLC
- 21) Oregon – Comcast Phone of Oregon, LLC
- 22) Pennsylvania – Comcast Phone of Pennsylvania, LLC
- 23) Rhode Island\* – Comcast Phone of Rhode Island, LLC
- 24) South Dakota\* – Comcast Phone of South Dakota, LLC
- 25) Texas – Comcast Phone of Texas, LLC
- 26) Utah – Comcast Phone of Utah, LLC
- 27) Vermont – Comcast Phone of Vermont, LLC
- 28) Virginia – Comcast Phone of Virginia, LLC
- 29) West Virginia – Comcast Phone of West Virginia, LLC
- 30) Washington – Comcast Phone of Washington, LLC

\* Comcast Phone, LLC is obtaining state certificates of authority to provide telecommunications services in the states marked with an asterisk in anticipation of acquiring CIMCO subscribers located in these states upon receiving Commission approval of the proposed transaction as well as the appropriate state regulatory approvals.

## **Appendix C (continued)**

Comcast Phone, LLC's section 214 authority is also utilized by the wholly-owned operating subsidiaries of Comcast Phone II, LLC, which provide local interconnection (wholesale) service, telecommunications services to schools and libraries, interstate and intrastate switched access service, and interexchange services in the following states (with the operating subsidiary for each such state also listed):

- 1) Alabama – Comcast Phone of Alabama, LLC
- 2) Arkansas – Comcast Phone of Arkansas, LLC
- 3) Arizona – Comcast Phone of Arizona, LLC
- 4) Delaware – Comcast Phone of Delaware, LLC
- 5) District of Columbia – Comcast Phone of D.C., LLC
- 6) Indiana – Comcast Phone of Central Indiana, LLC
- 7) Kansas – Comcast Phone of Kansas, LLC
- 8) Kentucky – Comcast Phone of Kentucky, LLC
- 9) Maryland – Comcast Phone of Northern Maryland, LLC
- 10) Mississippi – Comcast Phone of Mississippi, LLC
- 11) Missouri – Comcast Phone of Missouri, LLC
- 12) New Jersey – Comcast Phone of New Jersey, LLC
- 13) New Mexico – Comcast Phone of New Mexico, LLC
- 14) New York – Comcast Phone of New York, LLC
- 15) South Carolina – Comcast Phone of South Carolina, Inc.
- 16) Tennessee – Comcast Phone of Tennessee, LLC
- 17) Wisconsin – Comcast Phone of Wisconsin, LLC

### **Comcast Phone of Michigan, LLC**

Comcast Phone of Michigan, LLC operates only within the state of Michigan. It provides local interconnection (wholesale) service, telecommunications services to schools and libraries, interstate and intrastate switched access service, and interexchange services. Comcast Phone of Michigan, LLC has no operating subsidiaries and does not hold a 10% or greater direct or indirect interest in any other telecommunications provider.

### **Comcast Business Communications, LLC**

Comcast Business Communications, LLC provides local interconnection (wholesale) service, interstate and intrastate switched access service, dedicated access service, Metro-Ethernet service, cell backhaul service, and/or inter-exchange services in the states in which Comcast offers video and data services (see Appendix A, second list). Comcast Business Communications, LLC has no operating subsidiaries and does not hold a 10% or greater direct or indirect interest in any other telecommunications provider. Comcast Business Communications, LLC has obtained state certification to operate as a CLEC in the following states:

- |             |                 |
|-------------|-----------------|
| 1) Delaware | 5) New Jersey   |
| 2) Florida  | 6) Pennsylvania |
| 3) Maryland | 7) Virginia     |
| 4) Michigan |                 |