

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Consumer Information and Disclosure	)	CG Docket No. 09-158
	)	
Truth-in-Billing and Billing Format	)	CC Docket No. 98-170
	)	
IP-Enabled Services	)	WC Docket No. 04-36

**REPLY COMMENTS OF COMCAST CORPORATION**

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October 28, 2009

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## SUMMARY

The record in this proceeding demonstrates that the intensely competitive marketplace for video, data, and voice services ensures that providers disseminate to consumers complete and easy-to-understand information about their products and services. Numerous providers, including Comcast, indicate that they are making a wealth of information available to consumers at all stages of the customer relationship. They also report that they invest substantial resources on customer surveys, focus groups, and other consumer research, which is used to improve the customer experience. In short, in this competitive marketplace, providers have strong incentives to provide detailed information to consumers or risk losing customers or potential customers to other providers.

Comcast always is open to considering additional consumer-friendly ways to disseminate information. However, in light of marketplace realities and the existing federal and state regulations in this area, the Commission should exercise caution in assessing proposals to impose new disclosure mandates. For example, the broadband disclosure label proposed by New America Foundation would require the disclosure of a quantity of highly-technical information that would be of no demonstrated usefulness to the majority of consumers and would likely make it harder, not easier, for consumers to make buying decisions. The label as proposed would do nothing to help consumers understand the wide array of customer options that may be offered with any particular service, and would unduly restrict the range of information that consumers say they want, and have come to expect, when subscribing to a service.

Finally, the Comcast-specific claims made by Free Press are without merit. Contrary to Free Press's claims, Comcast's website fully discloses the eligibility and pricing terms of its service bundle offerings. Free Press's proposal that providers disclose the "true cost of service" in their advertisements fails to account for the fact that the final price paid by any particular

customer will vary depending on (among other things) the service and equipment options that the customer selects during the ordering process. Likewise, Free Press's claims regarding the speed of Comcast's High-Speed Internet services are inaccurate. Based on Comcast's extensive experience operating a broadband network, diligent traffic engineering and network maintenance, and internal speed test results, our customers regularly achieve speeds at or above their provisioned speeds because of PowerBoost. Free Press's criticisms of Comcast's legal policies also are unfounded. Comcast makes these policies readily available to its customers, including a non-technical description of its Acceptable Use Policy.

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**REPLY COMMENTS OF COMCAST CORPORATION**

Comcast Corporation (“Comcast”) hereby responds to the comments that were filed in the above-captioned Notice of Inquiry.<sup>1</sup> The initial round of comments demonstrates that, in the highly competitive marketplace for video, data, and voice services, providers are making detailed information available to consumers. Comcast always is open to discussing ways in which providers can improve disclosures to consumers in language that consumers understand but continues to believe that, given marketplace realities and existing federal and state regulations over customer disclosures, the Commission should exercise restraint in this area. Finally, the Comcast-specific claims made by Free Press are without merit and should be disregarded by the Commission.

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<sup>1</sup> See *In the Matter of Consumer Information and Disclosure; Truth-in-Billing and Billing Format; IP-Enabled Services*, Notice of Inquiry, 24 FCC Rcd. 11380 (2009) (“Notice” or “NOI”).

**I. COMMENTS FILED IN THIS PROCEEDING DEMONSTRATE THAT PROVIDERS MAKE A SUBSTANTIAL AMOUNT OF INFORMATION AVAILABLE TO CONSUMERS.**

Numerous commenters underscore that the intensely competitive marketplace for video, data, and voice services compels providers to make more and clearer information available to consumers at all stages of the customer relationship, or else risk losing customers to competitors.<sup>2</sup> As Time Warner Cable explains, “[s]uch competition gives TWC powerful incentives to innovate and to differentiate its services, including by ensuring that its communications with customers are helpful at every stage of the relationship.”<sup>3</sup> Sprint notes that providers have “every incentive to ensure consumers are well-informed.”<sup>4</sup> Likewise, the Independent Telephone and Telecommunications Alliance concludes that “[i]ncreased competition . . . increases the imperative for carriers to address consumer satisfaction.”<sup>5</sup> In short, as Verizon notes, “[t]he current competitive environment, in which providers are motivated to give consumers the information they need to make well-informed decisions, is working to serve consumer interests.”<sup>6</sup>

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<sup>2</sup> See, e.g., NCTA Comments at 13-14 (explaining that “market forces, . . . not government mandates, . . . drive cable operators to adopt highly effective consumer information and disclosure practices”); Qwest Comments at 2 (explaining that existing competitive marketplace forces, which require providers to disclose much information, and generally-available information about providers and products, combined with existing truth-in-billing rules, provide consumers with more than ample information to make educated choices and to navigate the selection of products among a wide range of service providers); MetroPCS Comments at 4 (explaining that “because wireless services are competitive at the retail level, carriers already provide a wealth of information to consumers” and consumer disclosures, therefore, can be “regulated by normal competitive forces, rather than by regulatory fiat”).

<sup>3</sup> Time Warner Cable Comments at 5.

<sup>4</sup> Sprint Comments at 1-2.

<sup>5</sup> ITTA Comments at 2.

<sup>6</sup> Verizon Comments at 6. Commenters also note that consumers have access to a wealth of information from independent third parties. See, e.g., Dish Network Comments at 4 (“Customers have ready access to information regarding [MVPDs’] services from a variety of sources, and thus have become more informed and

(footnote continued...)

Various providers also report that they regularly conduct surveys, focus groups, and other consumer research, which is used to improve the customer experience. AT&T, for example, notes that these surveys “reveal growing consumer satisfaction as to the quality of the information available to them and the plans and providers they ultimately select.”<sup>7</sup> And Verizon points to the Commission’s industry-wide complaint data showing that “less than one one-thousandth of a percent each of wireless or wireline subscribers raised complaints with the Commission about billing and rates per month in 2008” and adds that “the Commission cites no data at all regarding consumer confusion or complaints with regard to billing for video, broadband Internet access, or interconnected VoIP service.”<sup>8</sup>

In sum, the record shows that competition demands that providers disseminate to consumers complete and easy-to-understand information about their products and services. Given existing marketplace incentives and existing federal and state regulations in this area,<sup>9</sup> the

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(...footnote continued)

savvy than consumers at the time Congress enacted the 1992 Cable Act.”); CTIA Comments at 36 (“Independent third parties also assist consumers in their choices. Multiple web-based sources offer reviews and provide guidance on how to shop for a service provider and choose a mobile device.”).

<sup>7</sup> AT&T Comments at 28; *see* Sprint Comments at 1 (“[C]onsumers . . . are receiving accurate and timely information as evidenced by declining trends in complaint data and inclining trends in customer satisfaction.”); Verizon Comments at 2 (noting that independent third parties are reporting increasing customer satisfaction with service providers).

<sup>8</sup> Verizon Comments at 6-7. The Commission receives far fewer video-related complaints as compared to other complaints, and most of the video complaints are focused on program content and other programming-related matters, not billing or customer service issues. *See, e.g.*, News Release, FCC, *Quarterly Report on Informal Consumer Inquiries and Complaints Released* (Sept. 8, 2009) (noting that, for the first quarter of 2009, there were 4,113 complaints for cable and DBS as compared to 188,558 for broadcast, and that of the 4,113 complaints, 2,635 were programming-related).

<sup>9</sup> *See* Comcast Comments at 24-26 (detailing federal, state, and local disclosure rules); NCTA Comments at 11-13 (same); *see also* California Public Utilities Commission Comments at 2 (noting that several California laws generally require carriers to provide sufficient information for subscribers to make informed choices).

Commission should exercise caution in assessing proposals to impose new disclosure mandates on communications providers.

## **II. ADDITIONAL GOVERNMENT MANDATES RISK IMPEDING INNOVATION AND HARMING CONSUMERS.**

Comcast recognizes that managing our relationships with our customers is a dynamic process. As we explained in our comments, we constantly are looking for new and innovative ways to improve the customer experience, respond to customer needs, and empower customers to make informed decisions regarding their service.<sup>10</sup> We are open to suggestions about even more consumer-friendly ways to disseminate information. For example, we believe that proposals to establish an industry “code of conduct” or “best practices” guidelines merit further consideration.<sup>11</sup> Any such code or guidelines, or any mandates that the Commission may consider imposing, should appropriately apply both to services offered by facilities-based providers and to those providing services using the Internet. Transparency and disclosure to consumers are no less important when the services or applications are provided via the Internet.<sup>12</sup>

We also think it would be useful to review proposals regarding the types of information that should be made available to consumers to help them make informed purchasing decisions. However, any Commission action in this area must be approached with caution since it risks disrupting marketplace-driven disclosure practices, impeding innovation, and overwhelming

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<sup>10</sup> See Comcast Comments at 4.

<sup>11</sup> See, e.g., Time Warner Cable Comments at 14-20 (recommending that the Commission work collaboratively with industry in developing best practices); AT&T Comments at 36-39 (proposing industry code of conduct); Verizon Comments at 53-54 (advocating “best practices” approach).

<sup>12</sup> See Eric Schmidt, Chairman and CEO, Google, & Lowell McAdam, President and CEO, Verizon Wireless, *Finding Common Ground on an Open Internet*, Oct. 21, 2009, at <http://googlepublicpolicy.blogspot.com/2009/10/finding-common-ground-on-open-internet.html>.

consumers with information they neither want nor need.<sup>13</sup> The standardized broadband disclosure label proposed by the New America Foundation and attached to the Free Press comments provides a case in point.<sup>14</sup> It would require the disclosure of information, such as border router speeds, round-trip latency, and traffic management techniques, that is not of demonstrated usefulness to the majority of subscribers. Insisting that consumers be presented with such arcane and highly technical information at the point of sale or in advertising would increase, not reduce, consumer confusion and would make it harder, not easier, for consumers to make buying decisions. These disclosures also would run contrary to Free Press's asserted interest in ensuring that disclosures are "consumer friendly" and "easily comprehensible."<sup>15</sup>

Furthermore, standardized disclosure requirements may not be well-suited for the vibrant and complex communications industry, where new products, services, and pricing arrangements are being introduced at a rapid pace and where the underlying networks to deliver such services vary widely and are evolving constantly. As Qwest points out, "[b]ecause the communications market has become so competitive, each provider has its own suite of offerings, often easily tailored or customized," and "[i]t is precisely this aspect of personalization or customization -- the antithesis of standardization -- that so many customers find appealing."<sup>16</sup>

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<sup>13</sup> See Comcast Comments at 27-29 (discussing potential problems with standardized disclosure requirements); see also Time Warner Cable Comments at 17-19; Qwest Comments at 13-29; Verizon Comments at 54-59.

<sup>14</sup> See Comments of Consumer Federation of America, Consumers Union, Free Press, Media Access Project, New America Foundation, and Public Knowledge ("Free Press Comments") at 26 & App. C.

<sup>15</sup> See *id.* at 26.

<sup>16</sup> Qwest Comments at 3.

Given these consumer preferences for customization, there is a significant risk that a standardized approach that forces providers to describe their services in a rigid and generic format would be more confusing than helpful to consumers.<sup>17</sup> For example, the standardized label proposed by the New American Foundation would fail to account for the wide array of customer options that are offered with varied broadband services. The proposed label also includes a proposed list of “Other Fees,” but fails to explain that these fees may or may not apply depending on the equipment, contract, and other options selected by the consumer during the ordering process. Likewise, the proposed label would unduly restrict the range of information that consumers say they want, and have come to expect, when subscribing to a service.<sup>18</sup> The Commission should consider such consumer harms when assessing these types of proposals. It may well be that a “Schumer Box”-like approach is simply not the most effective means of providing useful and readily comparable consumer information in such a dynamic marketplace.

### **III. THE COMCAST-SPECIFIC CLAIMS MADE BY FREE PRESS ARE WITHOUT MERIT.**

#### **A. Contrary To Free Press’s Assertions, Comcast’s Disclosures Regarding The Cost Of Service Bundles Are Complete And Accurate.**

Free Press claims that “[s]ervice providers deliberately obscure the true monthly cost of services” and points to Comcast’s online ordering process for service bundles as an example of misleading disclosure practices.<sup>19</sup> Free Press asserts that: “Comcast’s online ordering process

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<sup>17</sup> *See id.*; *see also* Comcast Comments at 29.

<sup>18</sup> Standardized disclosures also may not account for the different media in which communications providers typically market their services. For example, due to time constraints, disclosures in TV and radio advertisements will often differ from disclosures in print and online media. Free Press does not explain how the proposed label could be standardized across these different media, nor does it indicate whether or how the information in the label should be explained if the consumer is ordering service via telephone.

<sup>19</sup> Free Press Comments at 8, 11.

offers consumers a special price of \$19.99. Yet, the ordering process fails to mention the \$99 installation fee, the \$5 per month cable modem lease fee (or the \$139 fee to purchase one), and the requirement to bundle the service with voice or cable service to receive that price.”<sup>20</sup> The statements of Free Press are inaccurate.

As an initial matter, Comcast’s website fully discloses the eligibility and pricing terms of the offer referenced by Free Press. The “Shop” page of the Comcast website prominently notes that the special promotional price is for existing Comcast video or voice customers.<sup>21</sup> In addition, the ordering process provides detailed and clear information about various installation and equipment options, including full disclosure of all applicable charges. Above and beyond these disclosures, the “Review & Submit” page gives customers another opportunity to review the options they have selected and any associated charges, and to make whatever changes they wish.<sup>22</sup>

Free Press’s comments also reflect a basic misunderstanding as to how services are priced. The “base” price referenced on Comcast’s “Shop” page necessarily differs from the final price paid by the customer because the customer has the opportunity during the ordering process to select from among a variety of options that may suit his or her needs and that can affect the final price. The website offer cited by Free Press illustrates the point. After a consumer reviews the descriptions of the available Internet service plans and selects a plan by placing it in the

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<sup>20</sup> *Id.* at 11.

<sup>21</sup> *See* Attach. A (a screen shot of the shopping portal on Comcast.com, which lists a promotional price of \$19.99/month and plainly explains that “This special price is for customers who currently subscribe to Comcast Cable or Comcast Digital Voice® service.”).

<sup>22</sup> *See* Attach. B (a screen shot showing the “Review & Submit” page for a sample transaction where the customer has chosen to lease a modem and has selected basic installation).

online shopping cart, he or she is presented with multiple equipment and installation options on the very next page in the online shopping process.<sup>23</sup> As Attachment C shows, new Comcast High-Speed Internet customers can choose to use a cable modem they already own (including a cable modem purchased at retail), lease a cable modem from Comcast, utilize a Comcast cable modem already in use for another Comcast service, or purchase a cable modem from Comcast.<sup>24</sup> The applicable charge (if any) for each of these options is clearly shown. In addition, the ordering process gives customers several installation and home networking options -- each with a description of the service provided and the applicable charge.<sup>25</sup> The “true cost of service” will vary depending on the options that the customer selects during the steps in this ordering process, but it is always provided to the customer for final review before an order is completed.

To the extent Free Press is proposing that all of these service and equipment options be disclosed in one place, along with the base price,<sup>26</sup> such an approach would produce a cluttered and confusing web page and lead to customer frustration, contrary to the goals the Commission is pursuing.<sup>27</sup> Comcast firmly believes that our current ordering process -- which reflects the input of customer surveys and other outreach efforts -- produces a much better outcome for consumers. We empower consumers by giving them easy-to-understand information and the

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<sup>23</sup> See Attach. C (a sample screen shot showing a Washington, D.C. customer’s equipment and installation options during the online ordering process).

<sup>24</sup> See *id.*

<sup>25</sup> See *id.* Taxes and fees, such as franchise and PEG-related fees, can vary by cable system, and also are subject to change.

<sup>26</sup> See Free Press Comments at 22-23.

<sup>27</sup> See Comcast Comments at 10 (“Comcast’s customers have told us in surveys and focus groups that, when too much information is presented on a page, they become confused or frustrated and opt to call Comcast instead of completing the purchasing process online.”).

ability to select the pricing plans, equipment options, and installation packages that best suit their needs.

**B. Free Press's Claims Regarding The Speed Of Comcast's High-Speed Internet Service Are Inaccurate.**

Free Press asserts that Comcast's Internet services are "falsely labeled with theoretical maximum rather than actual speeds and other performance characteristics" and then cites as an example the advertising for the PowerBoost service.<sup>28</sup> The claims of Free Press are off the mark. Comcast's provisioned speed represents the speed that a customer's cable modem is configured (and the last-mile network is engineered) to deliver on a regular basis.<sup>29</sup> PowerBoost is a technology developed by Comcast that allows customers to exceed their provisioned speeds. Based on Comcast's extensive experience operating a broadband network, diligent traffic engineering and network maintenance, and internal speed test results, our customers regularly achieve speeds at or above their provisioned speeds because of PowerBoost.<sup>30</sup> Of course, there are many variables that can affect a user's Internet speeds that are outside the control of service providers, including, among other things, the capabilities and configuration of the user's computer, home gateway device, and other home networking equipment, the type of connection used to access the Internet, the presence of malware on a user's computer, and the software and

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<sup>28</sup> Free Press Comments at 11-13; *see id.* at 25-26 (proposing that providers be required to disclose "actual" speeds).

<sup>29</sup> *See, e.g.*, Comcast Comments, GN Dkt. No. 09-51, at 4 (Aug. 31, 2009).

<sup>30</sup> For those consumers who have an interest in determining the actual speed of their Internet connections, Comcast has launched a "speed test" tool for Comcast High-Speed Internet customers, and there also are a variety of third-party websites that provide free tools for measuring Internet connections speeds. *See* Comcast Comments at 23 (referencing such tools). Comcast also makes detailed technical information about our network available to those customers who want it. *See* Comcast Corp., *Network Management Policy*, at <http://www.comcast.net/networkmanagement> (last visited Oct. 26, 2009).

server capabilities and capacity of the website with which the consumer is communicating. Even the quality of the wire connecting the customer's cable modem to the computer makes a difference. Without an effective way to control for these and other variables in every instance, it is not possible to discuss meaningfully "actual" speeds in a broad context.

Free Press's assertions that Comcast's representation of PowerBoost causes consumer confusion also are unfounded. PowerBoost enables High-Speed Internet customers to experience speeds *above* their provisioned speeds, on a capacity-available basis, when they transfer files over the Internet. Comcast is able to dynamically allocate available network capacity to deliver an improved customer experience *at no additional cost to the customer*. Comcast discloses PowerBoost's limitations and Free Press does not claim otherwise. However, Free Press believes that Comcast's disclosures are confusing and do not explain adequately the nature of PowerBoost.<sup>31</sup> It is significant that Free Press provides no evidence whatsoever that any customers have indicated that they are confused by what PowerBoost is (or, for that matter, by any other descriptions of any other Comcast service or product offering). In fact, as is readily ascertainable at Comcast's website, we provide abundant information about PowerBoost,<sup>32</sup> in addition to disclaimers accompanying PowerBoost ads which state the limitations of the service, among other information.<sup>33</sup> Indeed, the National Advertising Division of the Better Business

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<sup>31</sup> See Free Press Comments at App. B, Exs. 1-2.

<sup>32</sup> See Comcast Corp., *PowerBoost FAQs*, at <http://www.comcast.com/customers/faq/FaqCategory.ashx?CatId=377&INTCMP=ILC-SRCPROMOCOM0078&fss=powerboost> (last visited Oct. 26, 2009).

<sup>33</sup> For reasons known only to Free Press, it failed to include the disclaimers that accompanied the Comcast advertisements that Free Press reproduced in Appendix B of its comments. The full and complete advertisements with the disclaimers are included in Attachment D herein. Moreover, contrary to Free Press's claims, the advertisement reproduced as Exhibit 1 to Appendix B of its comments specifically includes the "up to" qualifier in the text accompanying the \$29.99 offer. Likewise, the advertisement reproduced as Exhibit 2 to Appendix B of its (footnote continued...)

Bureau, an expert independent agency in the review of advertising, recently confirmed that Comcast's advertising of PowerBoost is neither false nor misleading under Lanham Act principles.<sup>34</sup>

**C. Free Press's Criticism Of Comcast's Terms Of Service Is Misplaced.**

Free Press asserts that “[a]n analysis of Comcast’s legal policies reveals that the company places a variety of unreasonable restrictions on customers” and that “most customers are still unaware of the numerous restrictions and lack of rights that come with the service.”<sup>35</sup> Free Press urges the Commission to require service providers to disclose “in simple and non-technical but comprehensive terms” any limitations on customers’ services.<sup>36</sup> Free Press’s allegations are baseless. The simple fact is that we provide consumers with extensive details about our services and restrictions on the use of those services -- details that are comprehensive, easy-to-understand, and easy-to-find.

For example, in addition to posting our Acceptable Use Policy,<sup>37</sup> Comcast *already* provides on our website a non-technical description of our Acceptable Use Policy for our High-

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(...footnote continued)

comments uses the “up to” qualifier in two separate places. A potential customer reading these advertisements and associated disclaimers is *not* likely to conclude that the stated connection speeds are provided at all times.

<sup>34</sup> See NAD Reviews Comcast ‘PowerBoost’ Claims Following Challenge by Qwest, Oct. 20, 2009, at <http://www.nadreview.org/start.aspx>.

<sup>35</sup> See Free Press Comments App. A at 5. Free Press concedes that Comcast has “improved the *format* of its acceptable use policy.” *Id.* (emphasis in original).

<sup>36</sup> *Id.* at 26-27.

<sup>37</sup> See Comcast Corp., *Acceptable Use Policy*, at <http://www.comcast.net/terms/use/> (last visited Oct. 26, 2009).

Speed Internet Services.<sup>38</sup> These “Frequently Asked Questions” explain why Comcast has an Acceptable Use Policy, what the policy says, and how the policy is enforced, among other things. We also post on our website copies of the general Terms of Service, which has even more detail about the services, as well as extensive information about how our broadband network is managed.<sup>39</sup> In short, Comcast gives consumers the necessary information to make informed choices in a competitive marketplace -- and does so *without* any government mandates.<sup>40</sup>

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<sup>38</sup> See Comcast Corp., *Frequently Asked Questions About the Comcast Acceptable Use Policy for High-Speed Internet Services*, at <http://customer.comcast.com/Pages/FAQViewer.aspx?Guid=5cecde5b-651a-48e1-a447-43d332b50ff4> (last visited Oct. 26, 2009). These FAQs are included herein as Attachment E.

<sup>39</sup> See Comcast Corp., *Comcast Agreement for Residential Services*, at <http://www.comcast.net/terms/subscriber/> (last visited Oct. 26, 2009); see generally Comcast Corp., *Comcast Terms of Service*, at <http://www.comcast.net/terms> (last visited Oct. 26, 2009). These policies also are provided to new customers as part of Comcast’s Welcome Kit.

<sup>40</sup> While Free Press attempts to frame this as a disclosure issue, its real complaint appears to be with the policies that Comcast has adopted. See, e.g., Free Press Comments at 26 (claiming that Comcast’s policies are “vague and overbroad”); *id.* App. A at 5 (describing Comcast’s policies as “unreasonable”). As such, Free Press’s complaints are beyond the scope of this proceeding. In any event, Comcast believes that our policies are reasonable, lawful, and pro-consumer.

#### IV. CONCLUSION

Comcast urges the Commission to recognize that providers have marketplace incentives to provide information to consumers and are doing so, and that the Commission should exercise restraint as it considers proposals to expand existing disclosure requirements.

Respectfully submitted,

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October 28, 2009

# ATTACHMENT A



English Your location: 20009 | Reset

Learn

Shop

Programming

Customers

About

Search Comcast.com

SEARCH

1 Products

2. Customize

3. Customer Info

4. Installation

5. Review & Submit

Faster Internet

Better TV

Smarter Phone

Bundles

Questions? Call 1-877-870-4310.

Shopping Cart

Your Cart is currently empty

Current Comcast Customers

Add new products or upgrade existing products. It's easy and convenient.

LEARN MORE

More About High-Speed Internet

Protection with McAfee Security Suite  
Easy self-installation

### Performance

Get download speeds up to 12 Mbps and uploads up to 2 Mbps with PowerBoost® for only \$19.99 a month for 6 months!

- The perfect upgrade from DSL so you can download music, upload photos and chat with friends faster than ever before.
- McAfee® Security Suite (\$120 value).
- SmartZone® Communications Center with 7 e-mail accounts, each with 10GB of storage.
- ESPN360.com on Comcast.net.

This special price is for customers who currently subscribe to Comcast Cable or Comcast Digital Voice® service.

[Minimum System Requirements](#)  
[Terms and Conditions](#)  
[Learn More](#)



Special Comcast.com Price!

# \$19.99

for the first 6 months  
\$42.95 per month thereafter

Add to my cart >

### Economy Internet Service

Way faster than dial-up with downloads up to 1 Mbps and uploads up to 384 Kbps.

- No dialing in required and no tying up the phone line.
- Download speeds that are way faster than dial-up.
- The highly-acclaimed, McAfee Security Suite—a \$120 value!
- The SmartZone® Communications Center, which combines e-mail, Comcast voice mail and contacts into one convenient place online.
- Seven e-mail accounts, each with 10GB of storage.
- Access to Comcast.net to share photos, check e-mail and more.

This starting price is for customers who currently subscribe to Comcast Cable and/or Comcast Digital Voice service.

[Minimum System Requirements](#)  
[Terms and Conditions](#)  
[Learn More](#)



# \$24.95

 per month

Add to my cart >

# ATTACHMENT B



Learn

Shop

Programming

Customers

About

English Your location: 20009 | Reset

Search Comcast.com

SEARCH

1. Products

2. Customize

3. Customer Info

4. Installation

5. Review & Submit

If the information below is correct, click on **Start Live Chat** to begin a chat session with a Comcast representative. This is the final step to complete your order. If you would like to make changes, please select **Edit** from the appropriate section.

Start Live Chat

Questions? Call 1-877-870-4310.

Current Comcast Customers

Add new products or upgrade existing products. It's easy and convenient.

LEARN MORE

Step 1 Review Your Customer Information edit

Billing Contact:

MR JOHN CUSTOMER

Billing Address:

Same as service address

Service Address:

Step 2 Review Your Order Summary edit

	One-time Fees	Promotional Price*
<b>Performance</b>	-	\$19.99 for 6 months
Lease a modem	-	\$3.00
Professional Installation for one computer	\$99.00	-
<b>SUB TOTALS</b>	<b>\$99.00</b>	<b>\$22.99</b>

**TOTAL \$121.99\***

Your first bill will be higher than usual to account for any installation charges or yearly subscriptions. Your subsequent bills will reflect your regular monthly charges. **Your 2<sup>nd</sup> month bill will be approximately \$22.99.**

Monthly Charges: \$45.95 per month after 6 months

Step 3 Review Your Installation Request edit

Installation Questions

Are you a renter or a home owner?

# ATTACHMENT C

1. Products

2. Customize

3. Customer Info

4. Installation

5. Review & Submit

Step 1 Select Your Internet Service Options

Select a Modem Option

- Own a modem**  
Select this option if you own a Comcast approved modem. For listing of approved modems, [click here](#).
- Lease a modem \$3.00 per month**  
Select this option if you would like to lease a modem.
- Already leasing a Comcast modem**  
Select this option if you are a Comcast Digital Voice customer. The EMTA modem you are required to lease will also be used for your internet service.
- Purchase a modem (with one-time fee of \$139.00)**  
Select this option if you would like to purchase a modem.

Select an Installation Option

- Professional Installation for one computer (with one-time fee of \$99.00)**  
Select this option if you would like to have Performance professionally installed on one (1) computer.
- Professional Comcast's Home Networking Install (with one-time fee of \$149.00)**  
Select this option if you would like to install a wireless router to connect up to 5 computers in your home. Comcast Home Networking allows you to share access to the Internet, so the whole household can share a High-Speed connection at the same time.

Select Home Networking Equipment (Optional)

- I need to lease a wireless G Class router \$2.00 per month**  
Select this option if you are subscribing to Comcast Home Networking service. (A leased wireless router is required to subscribe to this service). **A wireless G class router is capable of speeds up to 20Mbps wirelessly.**
- I need to lease a wireless N Class router \$5.00 per month**  
Select this option if you are subscribing to Comcast Home Networking service. (A leased wireless router is required to subscribe to this service). **A wireless N class router is capable of speeds up to 140Mbps wirelessly.**

Select a Wireless Card (Optional)

- Purchase PC-compatible wireless G card/adapters (with one-time fee of \$30.00 each)**  
Select this option if you have chosen to lease a G class router. You can purchase up to 5 PC-compatible wireless G cards/adapters. Price is per card/adaptor.
- Purchase Mac-compatible wireless G cards/adapters (with one-time fee of \$30.00 each)**  
Select this option if you have chosen to lease a G class router. You can purchase up to 5 Mac-compatible wireless G cards/adapters. Price is per card/adaptor.
- Purchase N class wireless PCMCIA card/adapters (with one-time fee of \$59.99 each)**  
Select this option if you have chosen to lease an N class router and you are installing Comcast Home Networking service on a laptop. You can purchase up to 5 wireless N cards/adapters. Price is per card/adaptor.
- Purchase N class wireless USB adapters (with one-time fee of \$69.00 each)**  
Select this option if you have chosen to lease an N class router and you are installing Comcast Home Networking service on a laptop or desktop. You can purchase up to 5 wireless USB adapters. Price is per card/adaptor.

Questions? Call 1-877-870-4310.

Shopping Cart

	Monthly Fees
<b>HIGH-SPEED INTERNET</b>	
Performance Promo <a href="#">[Remove]</a>	\$19.99
<b>Total Monthly Fees</b>	<b>\$19.99</b>

Prices do not include applicable taxes and fees.

**Current Comcast Customers**  
Add new products or upgrade existing products. It's easy and convenient.

[LEARN MORE >](#)

# ATTACHMENT D



# The fastest fast is here.



Comcast High-Speed Internet now has the fastest speeds out there. Sign up — and hold on.

Dear friend,

Here's good news for speed lovers: You're cleared for takeoff.

Comcast High-Speed Internet with PowerBoost® now offers speeds of 15, 20 and 30 Mbps. And now you can even get 50 Mbps with Extreme 50 from Comcast High-Speed Internet, so you can download HD movies, music, games, photos and more — even faster!

And when it comes to the Internet, who wants to wait? No matter whether you're into intense online gaming or just sharing photos with the grandkids, you can do it faster with Comcast.

Plus, Comcast High-Speed Internet comes with lots of valuable extras, including:

- McAfee® Security Suite — with parental controls, pop-up blocker, virus protection, personal firewall and spam filtering. A \$120 value, included.\*
- 7 e-mail accounts.
- 1 GB of online storage.
- Share, store and transfer photos in a flash with the Comcast Photo Center powered by Snapfish. Order prints, too.

Sign up for Comcast High-Speed Internet now, with packages starting at

**\$29.99**  
a month  
for 12 months.\*

Blast!® from Comcast High-Speed Internet. Download at up to 20 Mbps — way, way faster than DSL. Plus, get all the valuable extra features.

Call now. (And hurry — this offer will be gone fast.)  
1-800-COMCAST

Sincerely,  
Comcast



\*Offer ends 6/30/09, is only available in wired and serviceable areas in participating Comcast systems (and may not be transferred) and is limited to new residential customers satisfying applicable eligibility criteria. Offer may not be available to certain current customers, to former customers with unpaid balances, and customers that have had service in the past 60 days. Not all programming and services available in all areas. Offer limited to 16.0 Mbps Blast! High-Speed Internet. After the 12-month promotional period, or if any service is cancelled or downgraded, regular charges apply. Comcast's current monthly service charge for 16.0 Mbps Comcast High-Speed Internet ranges from \$52.95 to \$69.95, depending on area and level of service subscribed to. High-Speed Internet service limited to a single outlet. Service subject to Comcast standard terms and conditions. Prices shown do not include equipment and installation charges, taxes and franchise fees. May not be combined with other offers. Speed comparison between Comcast 16.0 Mbps service and 1.5 Mbps DSL (downloads only). PowerBoost® provides bursts of download and upload speeds for the first 20 MB and 10 MB of a file, respectively. Many factors affect speed. Actual speeds vary and are not guaranteed. Cable modem required. Not all features, including McAfee, compatible with Macintosh systems. \$120 value based on retail price of product sold separately. Call for restrictions and complete details. Comcast ©2009. All rights reserved. All other trademarks are the property of their respective owners.

You won't believe your eyes – or your ears

# GET READY!



**Comcast Digital Starter** delivers programming and features that will change the way you watch TV.

- Up to 100 of your favorite cable channels, including 45 Digital Music Channels.
- On Demand offers over 10,000 movies and programs, all ready to watch when you are.
- An INTERACTIVE PROGRAM GUIDE with parental controls.



**Blast!® from Comcast High-Speed Internet** offers speeds up to **20 Mbps** with PowerBoost®.

**Comcast now delivers the fastest fast with speeds of 12, 16, 22 Mbps and up to 50 Mbps with Extreme 50!**

Plus lots of valuable extras including:

- McAfee® Security Suite – including parental controls and virus protection. A \$120 value, included.\*
- 7 e-mail accounts and 1 GB of online storage.
- Share and store photos with the Comcast Photo Center powered by Snapfish.



**Comcast Digital Voice® Unlimited** combines features, benefits and value that the phone company doesn't match. Compare what you're currently getting – and paying – and you'll see what we mean!

- Save over 25% over Verizon.
- Unlimited nationwide calling to the US, Puerto Rico and Canada – all for one low price.
- 12 Popular Calling Features like Caller ID, plus Voice Mail at no additional cost.
- Rated #1 in Call Clarity. So no word goes unheard.††





Six Flags is heart-pounding, high-flying speed.

Six Flags America features our triple threat: *Mind Eraser*, *Batwing* and *Superman: Ride of Steel* plus other fast and furious coasters. Let the lil' ones ride and play all day long in *Looney Tunes Movie Town* with 10 rides just for them. Splashin' good times in *Hurricane Harbor with Tornado, Hurricane Bay wave pool and Buccaneer Beach*, a dual pool just for the little tikes. Have more fun close to home at Six Flags America. More Flags. More Fun. Six Flags! Check out our complete line up of exciting acts coming to Six Flags America this summer as part of the **STARBURST® Summer Concert Series**. Go to [sixflags.com](http://sixflags.com) for more information.



## Choose the offer that's right for you!

Comcast Digital Starter  
and Blast® from Comcast  
High-Speed Internet

\$**69**<sup>99</sup>  
for only per month  
for 12 months!\*

Comcast Digital Starter  
and Comcast Digital Voice®  
Unlimited

\$**69**<sup>99</sup>  
for only per month  
for 12 months!\*

Digital Starter, Blast® from  
Comcast High-Speed Internet  
and Digital Voice® Unlimited

\$**99**<sup>99</sup>  
for only per month  
for 12 months!\*

Plus sign up today and get 2 FREE  
tickets to Six Flags America†

Courtesy of Comcast

**1-888-COMCAST**



Comcast.



# Comcast and Six Flags America are bringing you more this summer!

1-888-COMCAST



Act now and get 2 FREE tickets to Six Flags America  
Courtesy of Comcast

\*Offer ends 8/7/09, and is limited to new residential customers. Not available in all areas. \$69.99 for 12 months offer limited to Comcast Digital Starter with Comcast Digital Voice® Unlimited or Blast!® from Comcast High Speed Internet and requires subscription to Comcast Digital Starter video service. \$99.99 offer requires subscription to Comcast Digital Starter, Comcast Digital Voice® Unlimited and Blast!® From Comcast High-Speed Internet. After promotional period, or if any service is cancelled or downgraded, regular charges apply. Comcast's current monthly service charge is \$34.00-\$63.30 for Digital Starter depending on area, and \$52.95 for Internet service and \$39.95 for Digital Voice with subscription to Comcast video service. Limited to service to a single outlet for Video and Internet. Equipment, installation, taxes, the Regulatory Recovery Fee and other applicable charges (e.g., per-call, toll or international rates) extra. \$29.95 activation fee applies for Digital Voice. May not be combined with other offers. Digital Cable: Certain services available separately or as part of other levels of service. Basic service subscription required to receive other levels of service. On Demand selections subject to charge indicated at time of purchase. Digital Voice: Unlimited calling applies to direct-dialed calls from home to locations in the U.S., Canada, Puerto Rico and certain other U.S. territories Service (including 911/emergency services) may not function after an extended power outage. EMTA required (\$3.00/month). Savings claim based on comparison between Comcast Digital Voice® Unlimited Local and Long Distance Service, with Comcast Digital Cable and High-Speed Internet service subscription, and Verizon Freedom Essentials Package with comparable features, as listed on [www.verizon.com](http://www.verizon.com) as of 1/21/09. High-speed Internet: Service subject to Comcast standard terms and conditions. Speed comparison between Comcast 16.0 Mbps service and 1.5 Mbps DSL (downloads only). PowerBoost® provides bursts of download and upload speeds for the first 20 MB and 10 MB of a file, respectively. PowerBoost® not available with Extreme 50 level of service. Many aspects affect speed. Actual speeds vary and are not guaranteed. Cable modem required. Not all features, including McAfee®, compatible with Macintosh systems. \$120 value based on retail price of product sold separately. Call for restrictions and complete Comcast ©2009. All rights reserved.

† Customers meeting minimum eligibility requirements will receive voucher in mail 2-4 weeks after new services are installed. Voucher valid for two admissions on one of the special Comcast Days, at Six Flags America, Baltimore/Washington, DC during the 2009 season. Dates are: 6/29, 7/10, 7/16, 7/22, 8/1, 8/9, 8/14, 8/18, 8/20, 9/5, 9/13, 9/19, 9/27, 10/3 & 10/11. See voucher for more details. SIX FLAGS and all related indicia are trademarks of Six Flags Theme Parks Inc.®, TM and © 2009. LOONEY TUNES and all related characters and elements are trademarks of and © Warner Bros. Entertainment Inc. SUPERMAN, BATMAN, and all related characters and elements are trademarks of © DC Comics.

††Based upon independent study performed by Keynote dated November 2008, Wave 6 study.

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BEL-060 D

# Full-throttle FEATURES

**Comcast and Six Flags America are bringing you more this summer!**

Act now and get 2 Free tickets to Six Flags America<sup>†</sup> courtesy of Comcast.



# ATTACHMENT E

# Frequently Asked Questions about the Comcast Acceptable Use Policy for High-Speed Internet Services

The following Frequently Asked Questions are intended to further explain how Comcast uses and enforces its Acceptable Use Policy, in particular the "Conduct and Information Restrictions." Comcast is providing these FAQs to help you better understand your rights and obligations as a Subscriber to the Comcast High Speed Internet Service, and to help you understand how Comcast uses this policy in practice.

[What is an "Acceptable Use Policy" and why do you have one?](#)

[Why does it matter what kind of content I transmit or post, and why are the "Conduct and information restrictions" so broad and general?](#)

[Won't the restrictions on conduct and information, and Comcast's right to enforce them have a "chilling effect" on online communications? Do I need to worry about Comcast monitoring my communications to see whether I am abiding by the Acceptable Use Policy? How do I know when or how Comcast will enforce these rules?](#)

[Doesn't Comcast have a lot of discretion in enforcing these rules? How do I know Comcast won't come after me if I'm merely reporting or complaining about indecent or hateful speech, for example, merely because I am retransmitting it in the process? What if an organization or person who doesn't like me, or disagrees with me, complains that I'm violating the Acceptable Use Policy? What will Comcast do?](#)

[What if I believe the policy should be changed? How can I have input into Comcast's practices?](#)

**What is an "Acceptable Use Policy" and why do you have one?**

An Acceptable Use Policy is not law; it's a description of the general rules of the road for using an Internet service, in this case the Comcast High-Speed Internet Service. Users of any Internet service, including the Comcast High-Speed Internet Service, can affect each other, other users of the Internet, and the "infrastructure"—the network—that gives them access to the Internet. Because our Subscribers are part of a larger community of interdependent Internet users, Comcast and most other Internet service providers offer general guidance on how Subscribers can and should use our services in a law-abiding, courteous way. We also tell our Subscribers what we require of them and steps we may take to protect the community of users to help ensure that everyone who subscribes to the service can be assured of access to the Internet through a safe, secure, reliable high-quality network. In the answers to frequently asked questions, below, Comcast also describes our usual practices in more detail, so that Subscribers have a better idea of what to expect from us.

**Why does it matter what kind of content I transmit or post, and why are the "Conduct and information restrictions" so broad and general?**

There are a number of different kinds of "conduct and information restrictions" in the Acceptable Use Policy, and there are several different reasons for them.

1. Comcast and its Subscribers must obey the law, and Comcast has set and enforces certain rules as a result:
  - Certain activities and communications are inherently criminal or dangerous, no matter where and how they are communicated. Some examples are threatening someone's life, encouraging or promoting other violent, illegal activity, or harassing someone online.
  - Some activities that may no seem harmful at first glance may still be illegal, including taking someone else's intellectual property and using or sharing it without permission.
  - Some kinds of communications violate other general legal standards or rules, for example because they include child pornography, are hateful or violent or are otherwise harmful to someone else, or because they are defamatory (they

say harmful and untrue things about a person - especially someone who is not a public figure - that a court finds will damage that person's reputation).

2. Some activities are prohibited because they use the Comcast High-Speed Internet Service to interfere with Comcast's network or services or the security of other individual users.
  - Sending spam is an example of an activity that harms the network and other users, because it can interfere with receipt and delivery of legitimate e-mail across the network and can interfere with the e-mail accounts of other users.
  - Large-scale or automated collection of very large numbers of e-mail addresses or other identifying information may make it easier for you or someone else to send spam and may promote "identity theft."
  - For criminal purposes, sending messages that are disguised or altered so that they appear to be coming from someone or somewhere else may interfere with the orderly transmission of information on the Internet. This is often done to hide other criminal activity.
  - Sending too many messages can disrupt a server, newsgroup, or other service. We have found that sending more than 1,000 e-mails in a 24-hour period may also indicate that the sender's computer has been infected with a virus, and is sending e-mails without the sender's knowledge. See [Comcast's e-mail FAQs](#) for more information on this and other security issues, including how to protect yourself from computer infection and how to disinfect a computer.

**Won't the restrictions on conduct and information, and Comcast's right to enforce them have a "chilling effect" on online communications? Do I need to worry about Comcast monitoring my communications to see whether I am abiding by the Acceptable Use Policy? How do I know when or how Comcast will enforce these rules?**

Comcast supports and encourages free and open communication among our Subscribers and on the Internet generally, within the limits of law and public safety that govern all social interaction. Comcast does not routinely monitor the content of customer communications, except to take commonplace (and largely automated) security precautions to protect our customers, for example by setting up spam filters and detecting viruses and other malware that may be introduced into our network. Comcast does, however, reserve the right to take action based on alleged violations of the Acceptable Use Policy. For example, the following are some situations in which Comcast might act, depending on the circumstances:

1. A user contacts us about threats, and we reasonably believe there may be immediate danger to someone.
2. Law enforcement officials present Comcast with a valid subpoena, court order, or search warrant.
3. Comcast receives evidence of proper legal process in connection with a civil legal claim (a subpoena, court order, or injunction).
4. We become aware of activities that violate the Acceptable Use Policy and are potentially harmful or illegal. In such a case, where there is no imminent danger, Comcast notifies the Subscriber, and works with the Subscriber to understand and resolve the situation.
5. If Comcast receives a claim that a Subscriber is posting or transmitting material that may infringe someone else's intellectual property, Comcast follows the process established under the Digital Millennium Copyright Act that requires an Internet Service provider to take down such material (generally by requesting that the Subscriber do so), and provides a means for disputing infringement claims. (A summary of the provisions of the Digital Millennium Copyright Act is provided by the U.S. Copyright Office here: <http://www.copyright.gov/legislation/dmca.pdf>)

**Doesn't Comcast have a lot of discretion in enforcing these rules? How do I know Comcast won't come after me if I'm merely reporting or complaining about indecent or hateful speech, for example, merely because I am retransmitting it in the process? What if an organization or person who doesn't like me, or disagrees with me, complains that I'm violating the Acceptable Use Policy? What will Comcast do?**

Comcast is not an enforcement agency. Comcast publishes the Acceptable Use Policy so that Subscribers themselves will understand and abide by the "rules of the road" for using Comcast's network and the Comcast High Speed Internet Service. We would not consider legitimate retransmission of speech that might otherwise violate the AUP (for example, for educational purposes, for political purposes, or to report it to authorities or to Comcast) to be a violation of the AUP and would not take action against a user for this kind of transmission in nearly all cases. We do not try to investigate and resolve every dispute between or among our Subscribers or take sides between Subscribers, or between Subscribers and third parties. Without proper legal process or a reasonable, independent belief that content or activity is clearly and obviously illegal, or that it interferes with other users or could damage or disrupt Comcast's network or service offerings, Comcast prefers to have disputes and complaints about alleged violations of the Acceptable Use Policy resolved directly between or among all interested parties.

Comcast will act when it receives appropriate, legally sufficient legal process (subpoena or court order, for example), and will permit disputes between users to be settled by them or in the courts rather than investigating the merits of contrasting views. Comcast will however, exercise its own judgment about when and how to act to protect itself, its Subscribers, and its network from harm or liability, if necessary.

Finally, Comcast works with its Subscribers to resolve issues. When there is any ambiguity in a situation, or even in some cases where a policy violation has pretty clearly taken place, Comcast will nearly always communicate directly with the Subscriber in question about the situation, and will provide an opportunity for the Subscriber to address the problem before taking any independent action. While we generally do not look for policy violations, we do respond to Subscriber concerns and would make reasonable efforts to investigate and rectify any error in enforcement of the Acceptable Use Policy.

**What if I believe the policy should be changed? How can I have input into Comcast's practices?**

Comcast is constantly trying to evolve and improve its policies and practices. We welcome thoughtful advice and input from Subscribers and others who can help us develop more effective, meaningful, and respectful policies for the use of Comcast's network and services, and we will continue to review all advice and incorporate suggestions as we update and revise the Acceptable Use Policy from time-to-time. You can [contact Comcast](#).