

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Applications of Comcast Corporation,)	MB Docket No. 10-56
General Electric Company)	
and NBC Universal, Inc.)	
)	
For Consent to Assign Licenses or)	
Transfer Control of Licensees)	

JOINT OPPOSITION TO REQUEST TO STOP MERGER PROCEEDINGS

Comcast Corporation, General Electric Company, and NBC Universal, Inc. (collectively “Applicants”) hereby jointly oppose Mabuhay Alliance’s “Petition Opposing Comcast Acquisition of NBC Universal on Behalf of Asian Americans and Request To Stop Merger Proceedings until There Are Widespread Public Hearings,”¹ which seeks to disrupt the Commission’s transaction review process and grind it to a halt just days after it has formally begun.²

Applicants are aware of no Commission precedent in at least the past ten years granting such an extraordinary request to stay the transaction review process prior to the initial pleading

¹ Mabuhay Alliance, Petition Opposing Comcast Acquisition of NBC Universal on Behalf of Asian Americans and Request To Stop Merger Proceedings until There Are Widespread Public Hearings, MB Docket No. 10-56 (Mar. 23, 2010) (“Mabuhay Request”). The Mabuhay Request was styled as “an amendment to Mabuhay Alliance’s filing of March 15th entitled, ‘Opposition to Comcast Acquisition of NBC Universal: Potential Threat to 15 Million Asian Americans.’” Mabuhay Request at 1. To the extent these filings address substantive issues concerning the transaction, Applicants will address such issues in the “Responses to Comments/Oppositions to Petitions” round of the pleading cycle.

² See *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees*, MB Docket No. 10-56, Public Notice, DA 10-457 (Mar. 18, 2010) (“Public Notice”).

cycle to allow for public hearings (and Mabuhay Alliance cites no precedent). In fact, public hearings at *any* stage of a transaction review are exceedingly rare.³

Further, the Mabuhay Request simply ignores Applicants' substantial participation in various public *fora* concerning the transaction. The proposed transaction has also been the subject of four separate congressional hearings at which the merits of the transaction and various parties' concerns were amplified.

Apart from the information already disseminated about the transaction, the Commission has established a relatively lengthy pleading cycle for interested parties to participate in the transaction review process.⁴ There is ample time – indeed, more than is typically provided in a transaction review proceeding – to develop a robust record, and Applicants welcome and anticipate widespread public participation in the review process. But the dilatory and obstructionist tactics proposed here should be rejected.⁵ There is no reason to call a stop to the Commission's orderly review process.

For these reasons, Applicants respectfully request that the Commission deny Mabuhay Alliance's "Request to Stop Merger Proceedings."

³ In the past decade, a public hearing in a transaction review proceeding has occurred only in the AOL/Time Warner (7/27/00), AT&T/Media One (2/4/00), and MCI WorldCom/Sprint (4/5/00) proceedings – all roughly ten years ago.

⁴ See Public Notice at 1 (providing 45 days for Comments/Petitions, 30 days for Responses to Comments/Opposition to Petitions, and 15 days for Replies to Responses/Oppositions).

⁵ For similar reasons, Mabuhay Alliance's "request that the FCC appoint a Special Master" should be denied. See Mabuhay Request at 1.

Respectfully submitted,

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