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April 30, 2010

Janet F. Moran  
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**VIA ECFS**

Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

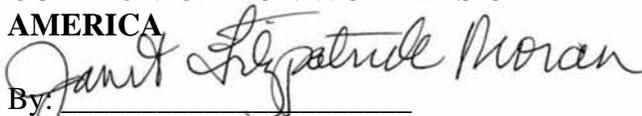
**Re: *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees, MB Docket No. 10-56***

Dear Ms. Dortch:

On behalf of Communication Workers of America (“CWA”), enclosed please find CWA’s Reply to the Joint Objection to Disclosure of Confidential and Highly Confidential Information and Withdrawal of the Request to Disclose Confidential and Highly Confidential Information pursuant to the First Protective Order and the Second Protective Order, respectively, as to CWA’s Telecommunications Policy Director and Research Economist, Debbie Goldman.

Respectfully submitted,

**COMMUNICATION WORKERS OF AMERICA**

By: 

Janet Fitzpatrick Moran  
PATTON BOGGS LLP  
2550 M Street NW  
Washington, DC 20037  
(202) 457-6000

*Its Counsel*



Ms. Marlene H. Dortch  
April 30, 2010  
Page 2

cc: Michael H. Hammer, Counsel for Comcast Corporation  
A. Richard Metzger, Counsel for General Electric Company  
Bryan N. Tremont, Counsel for NBC Universal, Inc.  
Arthur Burke, Counsel for Comcast Corporation  
James Bird, FCC  
Marcia Glauberman, FCC  
Jessica Almond, FCC  
Vanessa Lemmé, FCC

Enclosures

JFM:mcg4

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

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

**REPLY TO JOINT OBJECTION TO DISCLOSURE OF  
CONFIDENTIAL AND HIGHLY CONFIDENTIAL INFORMATION  
AND WITHDRAWAL OF REQUEST FOR DISCLOSURE OF CONFIDENTIAL AND  
HIGHLY CONFIDENTIAL INFORMATION PURSUANT TO THE PROTECTIVE  
ORDER AND SECOND PROTECTIVE ORDER**

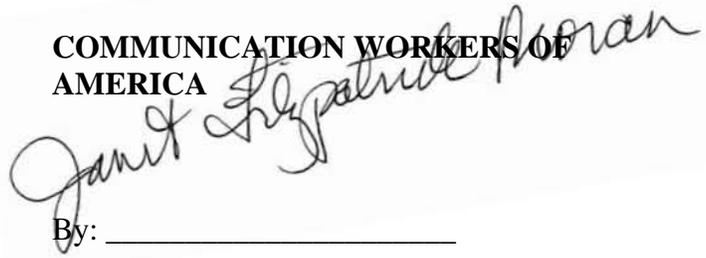
On March 4, 2010, Communication Workers of America (“CWA”) filed requests for disclosure of Confidential and Highly Confidential Information pursuant to the First Protective Order and Second Protective Order, respectively, as to Debbie Goldman, CWA’s Telecommunications Policy Director and Research Economist. (Exhibit 1). On April 28, 2010, Comcast Corporation, General Electric Company, and NBC Universal, Inc. (“NBCU”) (collectively, “Applicants”) objected to the disclosure of Applicants’ Confidential and Highly Confidential Information.

CWA hereby withdraws, without prejudice, its requests for disclosure of Confidential and Highly Confidential Information pursuant to the First Protective Order and Second Protective Order, respectively, as to Debbie Goldman, CWA’s Telecommunications Policy Director and Research Economist. In withdrawing its requests, CWA does not concede that Ms. Goldman fails to qualify as a person entitled to disclosure of such information pursuant to the First and Second Protective Orders. Should CWA file new requests for disclosure pursuant to either, or

both, of the Protective Orders, it will respond substantively to the arguments in opposition to Ms. Goldman's access to the Confidential and Highly Confidential Information set forth by the Applicants in their Joint Objection.

Respectfully submitted,

**COMMUNICATION WORKERS OF  
AMERICA**



By: \_\_\_\_\_

Janet Fitzpatrick Moran  
PATTON BOGGS LLP  
2550 M Street NW  
Washington, DC 20037  
(202) 457-6000

*Its Counsel*

Date: April 30, 2010

## **EXHIBIT 1**

Requests for Disclosure of Confidential and Highly Confidential Information



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April 23, 2010

Janet F. Moran  
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**VIA ECFS**

Mr. William Lake  
Chief, Media Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: *Acknowledgements of Confidentiality, Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer of Control of Licenses, MB Docket No. 10-56***

Dear Mr. Lake:

On behalf of Communication Workers of America (“CWA”), pursuant to paragraphs 7 and 10 of the Protective Order and paragraphs 4 and 9 of the Second Protective Order, please find enclosed copies of the Acknowledgements of Confidentiality from CWA’s Telecommunications Policy Director and Research Economist, Debbie Goldman.

Pursuant to paragraph 8 of the Protective Order and paragraph 12(b) of the Second Protective Order, we request a complete set of the Confidential and Highly Confidential documents, including those in electronic format, to be provided at our expense for CWA’s Telecommunications Policy Director and Research Economist.



Mr. William Lake  
April 23, 2010  
Page 2

Copies of this letter and the enclosure are being served today on counsel for Submitting Parties. If you have any questions, please contact me at (202) 457-5668.

Respectfully submitted,

**COMMUNICATION WORKERS OF  
AMERICA**

By: Janet F. Moran/rea

Janet F. Moran  
PATTON BOGGS LLP  
2550 M Street NW  
Washington, DC 20037  
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*Its Counsel*

cc: Michael H. Hammer, Counsel for Comcast Corporation  
A. Richard Metzger, Counsel for General Electric Company  
Bryan N. Tremont, Counsel for NBC Universal, Inc.  
James Bird, FCC  
Marcia Glauberman, FCC  
Best Copy and Printing, Inc.  
Jessica Almond, FCC  
Vanessa Lemmé, FCC

Enclosures

JFM:rea

## APPENDIX A

## Acknowledgment of Confidentiality

## MB Docket No. 10-56

I hereby acknowledge that I have received and read a copy of the foregoing Second Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Second Protective Order and that I shall not disclose or use Stamped Highly Confidential Documents or Highly Confidential Information except as allowed by the Second Protective Order. I acknowledge that a violation of the Second Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Second Protective Order is due solely to my capacity as Outside Counsel or Outside Counsel of Record or Outside Consultant to a party or other person described in paragraph 12 of the foregoing Second Protective Order and that I will not use such information in any other capacity nor will I disclose such information except as specifically provided in the Second Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Highly Confidential Documents and Highly Confidential Information are used only as provided in the Second Protective Order; and (2) Stamped Highly Confidential Documents are not duplicated except as specifically permitted by the terms of the Second Protective Order, and I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Highly Confidential Documents or Highly Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Second Protective Order.

Executed at Washington DC this 16<sup>th</sup> day of April, 2010

Rebbie Goldman

[Name]

[Position]

[Address]

[Telephone]

Rebbie Goldman  
Telecommunications Policy Director  
and Research Economist  
Communications Workers of America  
501 Third St NW  
Washington DC 20005  
202-434-1194

## APPENDIX A

## Acknowledgment of Confidentiality

## MB Docket No. 10-56

I hereby acknowledge that I have received and read a copy of the foregoing Protective Order in the above-captioned proceeding, and I understand it. I agree that I am bound by the Protective Order and that I shall not disclose or use Stamped Confidential Documents or Confidential Information except as allowed by the Protective Order. I acknowledge that a violation of the Protective Order is a violation of an order of the Federal Communications Commission.

Without limiting the foregoing, to the extent that I have any employment, affiliation, or role with any person or entity other than a conventional private law firm (such as, but not limited to, a lobbying or advocacy organization), I acknowledge specifically that my access to any information obtained as a result of the Protective Order is due solely to my capacity as Counsel or consultant to a party or other person described in paragraph 4 of the foregoing Protective Order and that I will not use such information in any other capacity, nor will I disclose such information except as specifically provided in the Protective Order. I hereby certify that I am not involved in "competitive decision-making" as that term is used in the definition of In-House Counsel in paragraph 4 of the Protective Order.

I acknowledge that it is my obligation to ensure that: (1) Stamped Confidential Documents and Confidential Information are used only as provided in the Protective Order; and (2) Stamped Confidential Documents are not duplicated except as specifically permitted by the terms of the Protective Order. I certify that I have verified that there are in place procedures at my firm or office to prevent unauthorized disclosure of Stamped Confidential Documents or Confidential Information.

Capitalized terms used herein and not otherwise defined shall have the meanings ascribed to them in the Protective Order.

Executed at Washington, D.C. this 16 day of April, 2010



Debbie Goldman  
Telecommunications Policy Director and Research  
Economist  
Communications Workers of America  
501 Third Street NW  
Washington, D.C. 20001  
202-434-1194

## Your submission has been accepted

**ECFS Filing Receipt - Confirmation number: 2010423760716**

### Proceeding

Name	Subject
10-56	In the Matter of Application of Comcast Corporation General Electric Company and NBC Universal Inc. for consent to assign license or transfer control of licensees.

### Contact Info

**Name of Filer:** Communication Workers of America  
**Lawfirm Name** Patton Boggs LLP  
 (required if represented by counsel):

### Address

**Address For:** Law Firm  
**Address Line 1:** 2550 M Street NW  
**City:** Washington  
**State:** DISTRICT OF COLUMBIA  
**Zip:** 20037

### Details

**Type of Filing:** OTHER

### Document(s)

File Name	Custom Description	Size
2010-04-23 DGoldman_Ack.pdf		285 KB

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## Certificate of Service

I, Rory Adams, hereby certify that copies of the foregoing Reply to Joint Objection to Disclosure of Confidential and Highly Confidential Information and Withdrawal of Request for Disclosure of Confidential and Highly Confidential Information Pursuant to the Protective Order and Second Protective Order were served on April 30, 2010 by electronic mail and U.S. mail to the following:

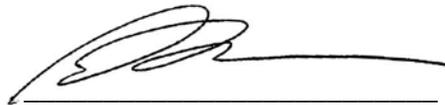
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Rory Adams