

June 10, 2010

BY ECFS

William T. Lake
Chief, Media Bureau
Federal Communications Commission
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, Supplement to Request for Enhanced Confidential Treatment

Dear Mr. Lake:

NBC Universal, Inc. (“NBCU”), pursuant to section 1.41 of the Commission’s rules¹ and the *Second Protective Order* in the above-referenced proceeding,² submits this supplemental letter to provide further detail regarding the category entitled “NBCU Detailed Financial Data” described in the confidentiality request file by Comcast Corporation, General Electric Company, and NBCU on June 8, 2010.³ NBCU is seeking enhanced confidential protection under this category for data being submitted in its response to the Commission’s Requests 17 and 18.⁴ Of particular concern for this supplement, NBCU will be submitting profit and loss (“P&L”) data disaggregated at the film studio level for total film studios, and disaggregated at the network level for UCP, UMS, Digital Studio, NBC Entertainment, CNBC, MSNBC, News, Sports,

¹ 47 C.F.R. § 1.41.

² *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*, Second Protective Order, MB Docket No. 10-56, DA 10-371 ¶ 3 (MB rel. Mar. 4, 2010) (“*Second Protective Order*”).

³ See Letter from Michael H. Hammer, A. Richard Metzger, Jr., and David H. Solomon, Counsel for Comcast Corporation, General Electric Company, and NBC Universal, Inc., MB Docket No. 10-56, at Section I.K, p. 7 (June 8, 2010).

⁴ See *id.*

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Olympics, and NFL. While these data are not provided at the level of granularity specified in the “NBCU Detailed Financial Data” category, the data are nevertheless highly sensitive and should be accorded enhanced confidential treatment under the *Second Protective Order*.

The P&L data in question are current through 2009 and will be presented in a highly disaggregated form. The revenue data are disaggregated by revenue source (i.e., by advertising sales, affiliate sales, license fees and other sources) and the cost data is disaggregated by specific cost category. NBCU treats such revenue and cost figures as highly confidential and does not release, either to the public or to financial analysts, financial data disaggregated at this level.

Indeed, access to NBCU’s revenue and cost data disaggregated in this fashion would be of significant commercial value to NBCU’s competitors and customers. Release of the cost data would give competitors and customers insight into sensitive competitive issues such as what NBCU pays for programming. Similarly, the revenue data would give competitors insight into NBCU revenues and the sources of its revenues. Further, the data in question, coupled with other information NBCU is providing, would enable competitors and customers to infer NBCU’s operating margins and other highly sensitive information. In short, disclosure of these financial data to NBCU’s competitors or parties with whom NBCU does business would place NBCU at a severe competitive disadvantage.

NBCU respectfully requests that the Commission confirm that the P&L data NBCU will be submitting in response to Commission Requests 17 and 18 may be treated as “Highly Confidential Information” under the *Second Protective Order* and made available solely to Outside Counsel of Record, their employees, and *bona fide* Outside consultants and experts. If you have any questions, do not hesitate to contact the undersigned.

Sincerely yours,

/s/ David H. Solomon

David H. Solomon
Counsel to NBC Universal, Inc.