

*Before the*  
**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, DC 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 Licenses )

To: The Commission

**REPLY TO JOINT OPPOSITION TO REQUEST FOR EXTENSION  
OF TIME TO FILE PETITIONS TO DENY AND COMMENTS**

Bloomberg, L.P., (“Bloomberg”), through counsel, pursuant to Sections 1.46(b) and 1.45(c) of the Commission’s Rules,<sup>1</sup> hereby respectfully submits this Reply to Joint Opposition to Request for Extension of Time to File Petitions to Deny and Comments in the above captioned proceeding.<sup>2</sup>

Comcast Corporation (“Comcast”) and NBC Universal, Inc. (“NBCU”) released their documents to the Media Bureau on Friday, June 11, 2010. Bloomberg requested the documents that same day. Having marked the documents confidential and subjecting their production to the delay built into the protective orders in this matter,<sup>3</sup> Comcast provided its documents to

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<sup>1</sup> 47 C.F.R. § 1.46(c).

<sup>2</sup> Bloomberg Request for Extension of Time to File Petitions to Deny and Comments, MB Docket No. 10-56 (filed June 14, 2010) (“Request for Extension”).

<sup>3</sup> The protective orders allow for a two business day delay for providing documents that are subject to the protective order. See *Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc., For Consent to Assign Licenses or Transfer Control of Licenses*, Protective Order, , MB Docket No. 10-56, DA 10-370, 25 FCC Rcd 2133 ¶ 7 (2010); *Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc., For Consent to Assign Licenses or Transfer Control of Licenses*, Second Protective Order, MB Docket No. 10-56, DA 10-371, 25 FCC Rcd 2140 ¶ 12(b)(3) (2010).

Bloomberg on Monday, June 14, 2010 and NBCU provided its documents on Tuesday, June 15, 2010. The total number of pages amounts to well over 60,000.

Bloomberg simply cannot digest this massive amount of information within time to provide meaningful comments and a comprehensive petition to deny by the June 21, 2010 deadline.<sup>4</sup> It is inapposite that Comcast and NBCU provided “an abundance of information long before their recent responses to the Information Requests.”<sup>5</sup> The reality is that Bloomberg has an additional 60,000-plus pages to review. Permitting less than one week to review and analyze the documents, address any issues those documents present, and prepare comprehensive filings before the Commission is unreasonable, if not impossible. Bloomberg therefore urges the Commission to grant a reasonable extension of 45 days to review the filing information and prepare its filing.

Comcast and NBCU’s argument that Information Requests typically come after the deadline for petitions and comments overlooks the atypical nature of this proceeding. The Commission has explicitly directed public comments to address all substantive matters up front.<sup>6</sup> Bloomberg will not have a later opportunity to address the filing information because the

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<sup>4</sup> *Commission Announces Revised Pleading Schedule for its Review of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. to Assign and Transfer Control of FCC Licenses*, Public Notice, MB Docket No. 10-56, DA 10-636, 25 FCC Rcd 4407 (2010).

<sup>5</sup> Comcast Corporation, General Electric Company, and NBC Universal, Inc.’s Joint Opposition to Request for Extension of Time to File Petitions to Deny and Comments, MB Docket No. 10-56 (filed June 15, 2010) (“Joint Opposition”).

<sup>6</sup> *Commission Seeks Comment on Applications of Comcast Corporation, General Electric Company, And NBC Universal, Inc., To Assign and Transfer Control of FCC Licenses*, MB Docket No. 10-56, DA 10-457, 25 FCC Rcd 2651 (2010).

Commission prohibited raising new issues on reply.<sup>7</sup> An extension is therefore necessary to allow all issues to be raised up front.

The Commission may grant an extension of time when necessary to adequately consider new information and provide a meaningful opportunity to develop a complete record.<sup>8</sup> It has even done so in this case when Comcast, General Electric Company (“GE”), and NBCU (together, the “Applicants”) filed amendments and supplemental information last month.<sup>9</sup> An expeditious process should not come at the cost of the public interest. The public interest, however, will be prejudiced by the hurried and forced review of thousands of pages to wedge in comments and petitions to deny by the current deadline.

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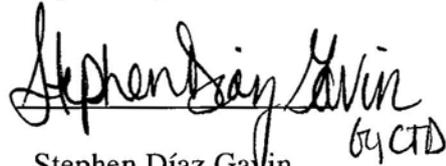
<sup>7</sup> *Id.* (“New issues may not be raised in responses or replies.”).

<sup>8</sup> See, e.g., *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, WT Docket No. 09-66, DA 09-1419, 24 FCC Rcd 8490 (WTB 2009) (granting 14-day extension for “development of a complete record on the issues”); *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 23 FCC Rcd 3741 (MB 2008) (extending comment deadline “to enable commenters to adequately review, investigate, and comment on the specific issues raised in the NPRM and respond to the extensive comments filed in response thereto”); *Applications for Consent to the Assignment and/or Transfer of Control of Licenses, Adelphia Communications Corporation, et al.*, Order, MB Docket No. 05-192, DA 05-1780, 20 FCC 11145 (2005) (extending deadline in light of additional information); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005)(extending the deadline 30 days to permit parties “sufficient time to review the complex technical, economic and competitive issues being raised in this proceeding”); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd 26604, ¶ 2 (WCB 2003); see also cases cited in Request for Extension at 4 n.10.

<sup>9</sup> See *Commission Announces Revised Pleading Schedule for its Review of Applications of Comcast Corporation, General Electric Company, and NBC Universal Inc. to Assign and Transfer Control of FCC Licenses*, Public Notice, MB Docket No. 10-56, DA 10-636, 25 FCC Rcd 4407 (2010) (extending the time to submit petitions to deny and/or comments after the Applicants submitted additional information on May 4, 2010; see also *Applications for Consent to the Transfer of Control of Licenses, General Electric Company, Transferor, to Comcast Corporation, Transferee, Applications and Public Interest Statement*, Order, MB Docket No. 10-56, DA 10-662, 25 FCC Rcd 3802 (2010).

For the foregoing reasons, the public interest is served by the requested extension of 45 days of the petition to deny and comment deadline in the above-captioned proceeding to August 5, 2010.

Respectfully submitted,

A handwritten signature in black ink that reads "Stephen Díaz Gavin". To the right of the signature, there are initials "CTD" written in a smaller, less legible hand.

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Dated: June 16, 2010