

JUN 18 2010

FCC Mail Room

June 16, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. to Assign and transfer Control of FCC Licenses, MB Docket No. 10-56; Comments of Network Creative Group, LLC.

Dear Ms. Dortch:

These comments are filed on behalf of Network Creative Group, LLC (“Company”), the independent owner and operator of the cable television network called BlueHighways TV (“Network”). The Company is privately held and privately funded; it is unaffiliated with any of the Applicants, any other cable, DBS or other distributor or any other network.

The Network is a twenty-four (24) hour a day, seven (7)-day a week, satellite-delivered advertiser-supported programming service consisting solely of family friendly entertainment containing lifestyle, arts and crafts, documentaries, American Roots music (Blues, Bluegrass, Classic Country, Jazz, Folk, Gospel and Western), outdoor activities, storytelling and equestrian programming woven together with interstitial segments that celebrate the stories, humor, pastimes and culture of America; American West and Native American cultures are showcased through travel shows, documentaries and special gatherings for storytelling and cowboy poetry, and American craftsmen and artisans are spotlighted through art festivals and special artist community documentaries.

The Company has entered into a distribution agreement for the Network with Comcast Cable Communications, LLC (“Comcast Cable”), which is affiliated with Comcast Corporation. The Network is not yet distributed by any Comcast Cable systems, although the Company is currently engaged in discussions with Comcast Cable regarding the launch of the Network by several Comcast Cable systems that are eager to do so.

In the Application, the Applicants make 16 “voluntary public interest commitments,” including “Commitment # 13,” which is the sole focus of these comments. Pursuant to Commitment # 13, Comcast generously promises that, as soon as its company-wide digital migration is completed, but, in any event, no later than 2012, it will launch “two new independently-owned and-operated channels to its digital line-up each year for the next three years....” The Applicants explain, at pages 112-113 of the Application, that the digital migration is expected to be completed in 2011, and define an independently-owned and –operated channel to be a network that is not “currently carried by Comcast Cable, and [is] unaffiliated with Comcast, NBCU or any of the top 15 networks... .”

As the Network falls squarely within this definition, the Company enthusiastically welcomes Commitment # 13. However, although the Company is poised to immediately begin offering its programming to Comcast Cable’s subscribers, the Company also anticipates that, as defined, Commitment # 13 may contain some unintended obstacles to the Network’s rapid deployment by Comcast Cable. For example, if Commitment # 13 is adopted by the Commission as is, it most likely means that, even in a best case scenario, the Network is not likely to get launched before sometime in 2011 on any Comcast Cable system set to add it now. In a worst-case scenario, those launches won’t occur until sometime in 2012.

Why is that? Because the phrase “currently carried” is somewhat ambiguous. If it refers to currently carried as of the time Comcast completes its digital migration, for example, then, even if only 1 Comcast Cable system adds the Network now, Comcast won’t get any credit for it against Commitment # 13. This would mean that Comcast would have to find channel capacity to add at least 2 more independent networks later, either after its digital migration is completed in 2011 or, if not completed then, sometime in 2012.

The Network proposes what appears to be a simple solution to this conundrum: The Commission should specify that the phrase “currently carried” means current as of March 18, 2010, the release date of the Commission’s Public Notice seeking comment on the Application, and make clear that Comcast will get credit under Commitment # 13 for any newly launched network even if the launch occurs prior to completion of its digital migration. This would remove this regulatory impediment to Comcast’s launching the Network now.

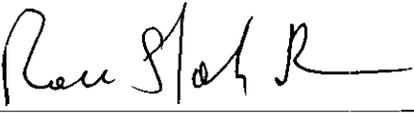
Commitment # 13 also is somewhat vague about what type of networks or channels would qualify under it. However, the discussion leading up to Commitment # 13, at pages 107-122 of the Application, points to only full time, national TV programming services, as virtually all of the examples cited are full time, national TV programming services. Moreover, a commitment to do anything less would seem to diminish, if not defeat, the public policy benefits underlying it. Although the Company has no reason to believe that this was Comcast’s intent, to avoid any ambiguity, the Network also proposes that the Commission further clarify that the

networks or channels referred to in Commitment # 13 mean full time, 24x 7, national, audio-visual programming services, and do not include local or regional networks and channels.

The Company appreciates this opportunity to bring these narrowly focused, but nonetheless critical issues to the Commission's attention, and respectfully requests that the Commission adopt the Company's proposed amplification of Commitment # 13 set forth above.

Respectfully submitted,

NETWORK CREATIVE GROUP, LLC

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