



July 8, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 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:

I am writing on behalf of Pace Americas, Inc. ("Pace") to express Pace's strong support for the proposed Comcast-NBCU joint venture. Pace is a provider of cable set-top boxes and other equipment to Comcast and other U.S. cable operators.

Comcast has been a leading innovator in the multichannel video programming marketplace. Comcast's networks have evolved rapidly over the last 20 years -- from one-way analog networks offering about 30 channels of analog programming, to state-of-the-art digital networks that offer consumers hundreds of channels of high-definition ("HD") and other digital programming and thousands of video-on-demand selections, innovative interactive services, digital phone service, and DOCSIS 3.0 high-speed Internet service. Comcast is now launching services like TV Everywhere that provide content to consumers where and when they want it on the PC, mobile handsets, and other consumer devices.

Pace has worked with Comcast on several pro-consumer initiatives, including successful efforts to bring new HD products, DVR products, and digital transport adapters ("DTAs") to consumers. The DTAs have proven particularly important to Comcast's efforts to digitize its plant and reclaim analog bandwidth for faster Internet services, more HD channels, and other digital services, thereby expanding consumer choices and improving the consumer home entertainment experience. In markets where DTAs have been deployed, Comcast has been able to double the number of HD channels to over 100, roll out DOCSIS 3.0 service, and offer substantially more Spanish-language and other diverse programming services. In these and other ways, DTAs are also helping to advance the Commission's broadband, program diversity, and digitization goals.

Pace believes that the Comcast-NBCU joint venture will provide many new benefits to consumers who want the ability to access as much content as possible, as seamlessly as possible, on their TVs, PCs, and other devices, thereby accelerating the development of exciting new services such as the TV Everywhere initiative.

In light of these and other public interest benefits, we urge prompt Commission approval of the venture.

Respectfully submitted,

/s/ Michael V. Pulli

Michael V. Pulli

President

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