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**VIA ELECTRONIC FILING**

William T. Lake  
Chief, Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc.*, MB Docket No. 10-56

Dear Mr. Lake:

DIRECTV submits this letter to request that certain information it will be submitting in connection with its reply comments in this proceeding be afforded protection as “Highly Confidential Information” pursuant to the *Second Protective Order*.<sup>1</sup> Specifically, in support of its comments, DIRECTV intends to cite to data it has obtained from surveys of its former and current customers. The data at issue constitutes some of DIRECTV’s most sensitive business information. Specifically, the survey data include information on which MVPD a new subscriber was coming from and which MVPD a departing subscriber was going to, including certain causes for such switching.

Granting Highly Confidential protection to this data would be consistent with the protections the Commission has already granted in the *Second Protective Order*. There, it granted Highly Confidential status to Comcast’s “[d]etailed [c]ustomer [d]ata” from which “competitors could discern trends over time.”<sup>2</sup> The data at issue here would not just allow competitors to “discern trends over time”; it actually reveals those trends directly — *i.e.*, the switching habits of DIRECTV’s customers. Because this information would give competitors a significant competitive advantage, it is akin to the information already protected under the Second Protective Order.

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<sup>1</sup> *Comcast Corporation, General Electric Company and NBC Universal, Inc.*, Second Protective Order, 25 FCC Rcd. 2140 (MB 2010) (“*Second Protective Order*”).

<sup>2</sup> *Id.*, ¶ 6.

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DIRECTV represents that it keeps these data confidential, that the data at issue are not available from public sources, and that the data would, if released to competitors, allow those competitors to gain a significant advantage in the marketplace. Accordingly, the data should be granted Highly Confidential protection.

Respectfully submitted,

/s/ William M. Wiltshire

William M. Wiltshire  
*Counsel for DIRECTV*