

August 20, 2010

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth 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 Licenses, MB Docket No. 10-56*

Dear Ms. Dortch:

On August 19, 2010, representatives of Comcast Corporation met with Jessica Almond, Neil Dellar, Paul de Sa, William Freedman, Marcia Glauberman, Jamila-Bess Johnson, Paul LaFontaine, Nicole McGinnis, Erin McGrath, Elizabeth McIntyre, Virginia Metallo, Chuck Needy, Dana Scherer, and Jennifer Tatel relating to the above-captioned proceeding. Wayne Dunham from the Department of Justice also attended the meeting by phone. Comcast was represented at the meetings by Matthew Fradin, Jordan Goldstein, Hank Oster, Jeff Shell, and Kathryn Zachem, all of Comcast Corporation; and James Casserly and Brien Bell of Willkie Farr & Gallagher LLP (collectively, “Comcast”).

Mr. Shell is President, Comcast Programming Group, and he provided background information regarding the history and current operations of Comcast’s national and regional networks. In response to a staff question, Mr. Shell explained that while Comcast may offer a discounted price on one network to secure expanded distribution for another network, it does not require carriage of any network as a condition of access to another and that such a strategy would have more risk than benefit.

Discussing Comcast’s practices and plans with respect to selling content for other MVPDs’ authentication platforms, Mr. Shell explained that the TV Everywhere principles announced by Comcast and Time Warner, Inc. envision an “open and non-exclusive” approach to online video under which online video is made available to customers of “cable, satellite and telco video distributors”

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alike. Accordingly, as Comcast has said in response to congressional questions months ago, with respect to Comcast's content today, or new NBCU's content in the future, to the extent that Comcast makes it available online to Comcast-authenticated subscribers at sites like Xfinity TV, Comcast intends to make it available on reasonable terms to other MVPDs to provide online to their authenticated subscribers. Mr. Shell also stated – consistent with congressional testimony from Comcast Chairman and CEO Brian Roberts – that Comcast has no intention of changing NBCU's relationship with Hulu or NBCU's decision to provide certain of its content to Hulu. Similarly, Comcast expects that the programs that are delivered over-the-air by NBC today and then are available at the nbc.com website for online viewing will continue to be made available in that fashion, and will not migrate into the TV Everywhere model. Of course, while Comcast has no plans to change current practices, the dynamism of the online video sector makes it unwise to set in stone any plans with respect to putting content online in any particular fashion; Comcast and the new NBCU will need to preserve the freedom to innovate and change distribution methods as business models evolve, as has occurred with Hulu even during the pendency of this transaction.

Mr. Oster is Senior Vice President and General Manager of Comcast Spotlight. He explained the pervasive and long-standing division of advertising time between networks and MVPDs, and the role of Spotlight in selling the two minutes per hour of advertising time typically provided to MVPDs. Messrs. Oster and Shell described the abundant opportunities available to advertisers and advertising agencies in a diverse and competitive marketplace (including broadcast TV and radio, cable, newspapers, direct mail, billboards, the Internet, local directories, and so on). They also compared and contrasted the different sorts of advertising options Comcast's networks and Spotlight make available (including, in Spotlight alone, local zoned ads, regions within a market, and national spots). In response to a staff question, they explained that neither Comcast's networks nor Spotlight requires any advertiser to buy time on any particular network in order to purchase time on another network desired by the advertiser or restricts advertisers from buying time from other parties. Mr. Oster also described Spotlight's role in representing other MVPDs in selling ad avails and the benefits this offers to advertisers.

Kindly direct any questions regarding this matter to my attention.

Respectfully submitted,

/s/ James L. Casserly

James L. Casserly

cc:	Jessica Almond	Neil Dellar	Paul de Sa	William Freedman
	Marcia Glauberman	Jamila Bess Johnson	Paul LaFontaine	Nicole McGinnis
	Erin McGrath	Elizabeth McIntyre	Virginia Metallo	Chuck Needy
	Dana Scherer	Jennifer Tatel		