



Comcast Cable
One Comcast Center
Philadelphia, PA 19103-2838

September 21, 2010

FILED/ACCEPTED

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

SEP 22 2010

Federal Communications Commission
Office of the Secretary

Attention: Chief, Pricing Policy Division, Wireline Competition Bureau

Re: *Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation of Section 254(g) of the Communications Act of 1934, as amended*, CC Docket No. 96-61
Amended Annual 254(g) Certifications - Rate Integration and Geographic Rate Averaging

Dear Ms. Dortch:

Comcast Phone, LLC ("Comcast Phone"), based on information and belief as then available, filed its annual certification of compliance with the Federal Communications Commission's ("FCC" or "Commission") geographic rate averaging and rate integration requirements on April 21, 2010.¹ Since that time, however, Comcast Phone has become aware of limited instances of non-compliance with those rules due to the acquisition of another company's customer base. Comcast Phone, therefore, hereby amends its certification accordingly, explains the reason for the limited non-compliance, and describes the measures that it is undertaking to resolve the matter.

On March 15, 2010, the Commission granted an Application, in part, filed by Comcast Phone, LLC, Comcast Phone of Michigan, LLC and Comcast Business Communications, LLC (collectively, "Comcast Entities") and CIMCO Communications, Inc. ("CIMCO") seeking approval for the assignment of certain CIMCO assets to the Comcast Entities.² The transaction was consummated, consistent with the Commission's approval, on March 16, 2010.³ As noted above, Comcast Phone submitted its annual geographic rate averaging and rate integration

¹ 47 C.F.R. §§ 64.1801; 64.1900; *see also* 47 U.S.C. § 254(g).

² *Applications Filed for the Acquisition of Certain Assets of CIMCO Communications, Inc. by Comcast Phone LLC, Comcast Phone of Michigan, LLC and Comcast Business Communications, LLC*, Memorandum Opinion and Order, 25 FCC Red 3401 (2010).

³ *See* Letter to Marlene H. Dortch, Secretary, Federal Communications Commission from Gunnar Halley, Lawler, Metzger, Keeney & Logan, LLC, Counsel to Comcast Entities, WC Docket No. 09-183 (dated April 15, 2010).

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certification shortly thereafter.⁴ Subsequent internal audits conducted by Comcast Phone uncovered evidence that the interstate long distance rates for certain former CIMCO customers had not been properly geographically averaged and integrated in accordance with Comcast Phone's April 21, 2010 certification. The non-compliance with geographic rate averaging and rate integration requirements is limited to the interstate domestic interexchange service rates for a portion of those customers acquired by Comcast Phone from CIMCO.⁵ The interstate domestic interexchange rates for all other Comcast Phone customers have been – and remain in – compliance with geographic rate averaging and rate integration requirements.

Comcast Phone is in the process of completing a comprehensive audit of the interstate interexchange rates, terms, and conditions applicable to former CIMCO customers and plans to properly integrate and geographically average the interstate domestic interexchange rates of all former CIMCO customers on or before November 1, 2010. Comcast Phone does not anticipate repetition of this error because the customer accounts acquired from CIMCO are now being overseen and managed by Comcast Phone employees. Comcast Phone's employees with this oversight responsibility are trained in and are familiar with the FCC's geographic rate averaging and rate integration rules and have consistently maintained Comcast Phone's compliance with those requirements. The unfortunate and limited non-compliance was an isolated incident related strictly to Comcast Phone's acquisition of CIMCO's customer base.

In light of the foregoing, Comcast Phone hereby submits an amended certification concerning its compliance with the requirements of section 254(g) of the Communications Act of 1934, as amended.⁶ In accordance with section 64.1900(b) of the Commission's rules,⁷ the certification is signed under oath by an officer of Comcast Phone.

Sincerely,



Brian A. Rankin
Vice President, Deputy General Counsel
Chief Regulatory Counsel

Attachments (2)

⁴ See Certification of Rate Averaging and Rate Integration – Section 254(g) by Comcast Phone, LLC (April 21, 2010) (attached hereto as Attachment 1).

⁵ In addition to addressing CIMCO's non-compliance described above, Comcast Phone also was required to integrate the rates it and CIMCO charged for the same classes of service. Comcast Phone has taken this step after a transition period following the closing.

⁶ 47 U.S.C. § 254(g).

⁷ 47 C.F.R. § 64.1900.

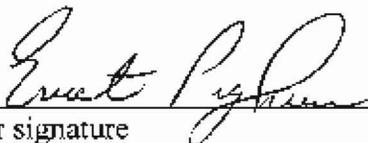
Re: *Amended annual certification of geographic rate averaging and rate integration in accordance with Section 254(g) of the Communications Act of 1934, as amended*

AMENDED CERTIFICATION

Ernest Pighini being duly sworn, states as follows:

1. As Senior Vice President, Controller, I am an officer of Comcast Phone, LLC ("Comcast Phone") and I am authorized to execute this certification on behalf of Comcast Phone.
2. Pursuant to section 64.1900 of the rules of the Federal Communications Commission ("Commission") rules, I hereby certify, to the best of my knowledge, information, and belief, that Comcast Phone is providing interstate domestic interexchange services in compliance with its geographic rate averaging and rate integration obligations set forth in section 254(g) of the Communications Act of 1934, as amended, and section 64.1801 of the Commission's rules, with the limited exception noted herein.¹

Further affiant sayeth not.



Officer signature

Subscribed and sworn to before me this 21 day of September 2010.



Notary Public
My Commission Expires 02-08-2011

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
GREGORY A. LOWE, Notary Public
City of Philadelphia, Phila. County
My Commission Expires February 8, 2011

¹ Comcast recently discovered, through the course of internal audits, that the long distance rates for certain former CIMCO customers, acquired by Comcast Phone on March 16, 2010, had not been properly geographically averaged and integrated. Comcast Phone will complete the integration and averaging of the rates for this small class of customers on or before November 1, 2010.

ATTACHMENT 1



Comcast Cable
One Comcast Center
Philadelphia, PA 19103-2830

FILE COPY

APR 27 2010

RE: Certification of Rate Averaging and Rate Integration - Section 254(g)
Comcast Phone, LLC.

CERTIFICATION

Ernest Pighini being duly sworn, states as follows:

1. That I am the Senior Vice President, Controller of Comcast Phone, LLC and am authorized to make this certification on the company's behalf.

2. That I hereby certify that, to the best of my knowledge, information and belief, Comcast Phone, LLC is providing service in compliance with the geographic rate averaging and rate integration obligations pursuant to Section 254(g) of the Communications Act of 1934, as amended.

Further affiant sayeth not.

Ernest Pighini
(Officer Signature)

Subscribed and sworn to before me this 19th day of April, 2010.

Gregory A. Lowe
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
GREGORY A. LOWE, Notary Public
City of Philadelphia, Phila. County
My Commission Expires February 8, 2011