



Jerald N. Fritz
Senior Vice President
Legal and Strategic Affairs
Tel: (703) 647-8747
Fax: (703) 647-8740
jfritz@allbrittontv.com

November 11, 2010

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Notice: Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. For Consent to Assign Licenses or Transfer Control of Licensees, MB Docket 10-56

Dear Ms. Dortch:

In compliance with Section 1.1206(b) of the Commission's rules, the undersigned submits this *ex parte* notice relating to the above-captioned proceeding.

On November 10, 2010, Frederick J. Ryan, Jr., President of Allbritton Communications Company, and the undersigned met with Edward Lazarus, Chief of Staff to Chairman Genachowski, and John Flynn, Office of the General Counsel, regarding the proposed acquisition of NBC Universal by Comcast. The discussion centered on the implications of the combined entities' operation in Washington, DC, on the viability of the locally-owned, all-local news channel operated by Allbritton Communications, NewsChannel 8, in the Washington market.

Specifically, the launch of an all-local news channel by WRC-TV, the NBC-owned and operated station in Washington, was highlighted along with the potential for discriminatory treatment in favor of that station as against NewsChannel 8. The incentives to favor its own programming will exist as to rates paid to NewsChannel 8, channel placement, tier carriage, Internet applications and sales activities leading to the very real possibility of the loss of a locally-owned, independent news voice in this critical market. Bundling of retransmission consent authority for Allbritton's several broadcast stations with the carriage agreement for NewsChannel 8 was also discussed. Possible conditions to the approval of the acquisition were noted, ranging from divestiture of the owned stations in markets where Comcast has a significant presence to enforceable requirements for non-discriminatory carriage terms at marketplace rates.

Additionally, the combined sales force of the Comcast-owned "Spotlight" sales organization with the WRC-TV local sales group was discussed, with particular reference to Spotlight's current sales representation of both the Cox cable system in Fairfax County, Virginia, and the Verizon FiOS system throughout the Washington market, giving it unprecedented power in the television sales arena. That position will dramatically increase with the acquisition of a sales force representing the NBC station *and* its new local news channel, further exacerbating the anxiety over both the horizontal and vertical aspects of the Comcast – NBC Universal combination.

In accordance with the Commission's rules this *ex parte* notice is being filed electronically in the above-referenced docket. Please contact the undersigned should you have any questions regarding this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jerald N. Fritz", with a large, sweeping flourish extending to the left.

Jerald N. Fritz
Senior Vice President,
Legal and Strategic Affairs

cc: Edward Lazarus
John Flynn