

December 10, 2010

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 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:

On December 9, 2010, Gregory Rosston, on behalf of Comcast Corporation (“Comcast”), met with Jonathan Baker, Chief Economist of the Commission, to discuss the proposed Comcast-NBC Universal transaction. Dr. Rosston discussed EarthLink’s proposed condition related to wholesale broadband and, in particular, the report submitted by Dr. Simon Wilkie in support of EarthLink’s proposed condition. Dr. Rosston explained the reasons why the assumptions on which Dr. Wilkie’s conclusions depend, especially the assumption regarding the independence of the value distribution for video and broadband, are unrealistic and unsupported by any empirical evidence. Dr. Rosston also explained that Dr. Wilkie failed to provide any empirical evidence that supports his conclusions regarding price differences between Time Warner Cable and Comcast for high-speed broadband.

In addition, Dr. Rosston discussed the regulatory implications of EarthLink’s proposed wholesale broadband condition. He pointed out the historical difficulties in implementing mandated wholesale regulation in the cellular telephone business that led to higher cell phone prices in California, and the difficulties in pricing and monitoring for sales of unbundled network elements. In addition, Dr. Rosston described the negative impact that a wholesale broadband requirement would have on Comcast’s incentives as a provider of bundled video and broadband services. In particular, Dr. Rosston pointed out that the proposed condition could blunt Comcast’s incentives to reduce the bundled price – reducing the benefits from the transaction’s efficiencies – which would be detrimental given that the vast majority of Comcast’s customers subscribe to video services. Indeed, Dr. Rosston pointed out that Dr. Wilkie actually performed no analysis of the transaction’s benefits for this large group of Comcast customers. Finally, Dr. Rosston reiterated that a wholesale requirement was not costless, but could have many different and potentially unintended results that would further jeopardize the benefits from the merger.

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Kindly direct any questions regarding this matter to my attention.

Respectfully submitted,

Michael H. Hammer

Michael H. Hammer
Counsel for Comcast Corporation

cc: Jonathan Baker