

December 27, 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 22, 2010, Zoom Telephonics, Inc. (“Zoom”) filed a letter in this docket seeking to tie its recent complaint filed against Comcast to the instant transaction review process.¹ This tactic must be rejected, as the issues raised in Zoom’s complaint are not transaction-specific and have been addressed in the separate complaint proceeding. Specifically, the Zoom complaint raises issues about testing standards for retail cable modems – *an issue that no commenter raised in this proceeding at any point during the time specified for public comments on the transaction.*² In any event, Zoom’s complaint is without merit, as Comcast demonstrated in its answer filed on December 20 in the separate proceeding.³

¹ Letter from Matthew Berry, Counsel to Zoom Telephonics, to Marlene Dortch, Secretary, FCC, MB Docket No. 10-56 (Dec. 22, 2010).

² More than three months after the pleading cycle had closed, but immediately after Zoom first made its allegations, Free Press *et al.* claimed that Zoom’s allegations should be considered in this docket. *See* Letter from Derek Turner, Research Director, Free Press, *et al.* to Julius Genachowski, Chairman, FCC, MB Docket No. 10-56 (Nov. 30, 2010). For the reasons cited herein, this claim is also without merit.

³ *See In the Matter of Zoom Telephonics, Inc. v. Comcast Cable Communications, LLC*, Answer of Comcast Cable Communications, LLC, File No. CSR. __ (Dec. 20, 2010).

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Please do not hesitate to contact me with any questions.

Respectfully submitted,

Michael H. Hammer

Michael H. Hammer

Counsel for Comcast Corporation

CERTIFICATE OF SERVICE

I, Michael D. Hurwitz, hereby certify that, on December 27, 2010, a copy of the attached letter was sent to the following counsel for Zoom by U.S. Mail, First Class:

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