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Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Petition of CRC Communications of Maine, Inc. and Time Warner Cable Inc. for Preemption Pursuant to Section 253 of the Communications Act, as Amended*
WC Docket No. 10-143

Dear Ms. Dortch:

Comcast Corporation (Comcast) submits this letter in support of the Petition filed by Time Warner Cable Inc. (Time Warner Cable) and CRC Communications of Maine, Inc. (CRC) in the above-referenced proceeding.¹

Time Warner Cable and CRC have asked the Commission to preempt a decision by the Maine Public Utilities Commission (PUC), based on an erroneous interpretation of section 251 of the Communications Act of 1934 (Act), as amended, that denied their request for interconnection with several rural incumbent local exchange carriers (LECs) pursuant to Sections 251(a) and (b) of the Act. Comcast urges the Commission to grant the Petition expeditiously because the issues raised by Time Warner Cable and CRC's request have important implications for local voice competition that extend beyond Maine.² Left undisturbed, the decision of the

¹*Petition of CRC Communications of Maine, Inc. and Time Warner Cable Inc. for Preemption Pursuant to Section 253 of the Communications Act, as Amended*, WC Docket No. 10-143, Petition for Preemption (July 15, 2010) (Petition).

²Contrary to the characterization of competition as "ruinous," the benefits to consumers of competitive entry by alternative voice providers are well-documented. *See* Opposition of Maine Public Advocate and NASUCA, WC Docket No. 10-143, at 3 (Aug. 30, 2010) (discussing the need to "prevent ruinous competition"). Those benefits include substantial savings on consumer's monthly phone bills. *See, e.g.*, Reply Comments of the National Cable & Telecommunications Association (NCTA), WC Docket No. 07-102, at 1-2 (June 15, 2007) (citing J.D. Power report discussing cost savings realized by cable voice customers); Testimony of Kyle McSarrow, President & CEO, NCTA, before the United States Senate Committee on

Maine PUC will hamper the ability of Comcast and other competitive providers to serve consumers in rural areas in other states who currently have no alternative to their incumbent LEC.

In fact, the pendency of this proceeding already has delayed Comcast's attempts to negotiate an interconnection agreement in Vermont, a state where the Public Service Board has demonstrated repeatedly its unequivocal support for local voice competition.³ Specifically, Comcast wishes to offer a competitive voice service to consumers in an area in Vermont that is served by a rural incumbent LEC. Comcast has even received unsolicited inquiries from consumers in that area who are interested in subscribing to Comcast's voice service. The rural incumbent LEC, however, has refused Comcast's request to commence interconnection negotiations pursuant to Sections 251(a) and (b) of the Act and has relied on the pendency of this proceeding to support its refusal. Consequently, Comcast's efforts to reach an agreement with this rural incumbent LEC are likely to continue to be frustrated until the FCC grants CRC and Time Warner Cable the relief they seek. Until the Commission makes clear that rural incumbent LECs have an obligation to negotiate and state commissions have the authority to arbitrate interconnection agreements with requesting carriers, Comcast and other competitive providers may be foreclosed from entering rural areas in other states to offer the competitive voice services that consumers seek.

Accordingly, Comcast asks that the Commission act promptly to grant the relief requested by CRC and Time Warner Cable.

Respectfully submitted,

/s/ Mary McManus

Mary McManus

Commerce, Science, and Transportation, at 3 (June 24, 2010) (noting that "cable's entry into the voice market has produced billions of dollars in consumer benefits and promises even greater benefits in the future"). Further, as the Commission has long recognized, the benefits of competition are especially pronounced in rural areas, such as those served by the five incumbent LECs that have refused to enter into interconnection agreements with CRC. *Time Warner Cable Request for Declaratory Ruling that Competitive Local Exchange Carriers May Obtain Interconnection Under Section 251 of the Communications Act of 1934, as Amended, to Provide Wholesale Telecommunications Services to VoIP Providers*, Memorandum Opinion and Order, 22 FCC Rcd 3513, ¶ 13 (2007) (noting that increased competition "holds particular promise for consumers in rural areas").

³See, e.g., *Petitions of Vermont Telephone Company, Inc. ("VTel"), and Comcast Phone of Vermont, LLC, d/b/a Comcast Digital Phone ("Comcast"), for Arbitration of an Interconnection Agreement Between VTel and Comcast, Pursuant to Section 252 of the Telecommunications Act of 1996, and Applicable State Laws*, Vt. PSB Docket No. 7469, Order, 2009 Vt. PUC LEXIS 37 (Feb. 2, 2009).