

June 2, 2011

**VIA ELECTRONIC FILING**

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

**Re: In re Leased Commercial Access; Development of Competition and Diversity in Video Programming Distribution and Carriage, MB Docket No. 07-42**

Dear Ms. Dortch:

On June 1, 2011, Jim Coltharp, Chief Policy Advisor for FCC & Regulatory Policy at Comcast Corporation (“Comcast”), and David Murray, Ryan Wallach, and the undersigned of Willkie Farr & Gallagher LLP, representing Comcast, had a telephone call with Rosemary Harold, Media Legal Advisor to Commissioner Robert McDowell. We discussed issues related to the Commission’s notice of proposed rulemaking on program carriage.

Specifically, we urged that the Commission consider allowing defendant multichannel video programming distributors (“MVPDs”) 60 days to answer program carriage complaints in order to permit a fuller response and more probing analysis of the evidence and data proffered by the complainant, which may promote more efficient and expeditious prima facie determinations by the Media Bureau. We also reiterated our concerns that expansion of the program carriage rules – for example, by mandating carriage before the Commission has determined a violation has occurred, or by broadening the attribution standard for an MVPD’s programming interests beyond the statutory scope and purpose – would raise significant legal issues, including First Amendment concerns, cause uncertainty and delay, and increase the costs and burdens of disputes.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Michael D. Hurwitz

Michael D. Hurwitz

Counsel for Comcast Corporation

cc: Rosemary Harold