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Washington, DC 20001

July 22, 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 July 20, 2011, the undersigned had a telephone call with Edward P. Lazarus, Chief of Staff to Chairman Genachowski. We discussed several policy reasons why the Commission should not issue a final rule on a program carriage “standstill” requirement in the above-captioned proceeding.

I explained that a standstill requirement could have serious unintended consequences and could frustrate the Commission’s goals in this proceeding. Among other things, the standstill could undermine good-faith business negotiations, chill MVPDs’ willingness to test new networks, and drive up programming costs for consumers. Furthermore, I noted that the Commission’s approach here, including the lack of notice and the deferral of key issues to a later proceeding, is out of step with its general interest in engaging in predictable and orderly rulemaking.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

/s/ Kathryn A. Zachem

Kathryn A. Zachem

Senior Vice President

Regulatory and State Legislative Affairs

cc: Edward P. Lazarus