



Comcast Corporation
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Washington, DC 20001

August 4, 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; Revision of the Commission's Program Carriage Rules, MB Docket No. 11-131*

Dear Ms. Dortch:

On August 2, 2011, Neil Smit, President, Comcast Cable Communications, had a telephone call with Chairman Julius Genachowski. They discussed the implications of the Commission's program carriage "standstill" rule in the Second Report and Order and the proposal in the Notice of Proposed Rulemaking to expand the scope of the discrimination provision of the program carriage rules in the above-captioned proceedings.¹

Mr. Smit explained that the new standstill rule could have unintended consequences, including undermining good-faith business negotiations. Mr. Smit also noted that it would be unwarranted and unprecedented to expand the scope of the program carriage rules further to, for example, cover claims that vertically integrated MVPDs favor not only their own affiliated programming vendors but also programming vendors affiliated with other MVPDs

Kindly direct any questions regarding this matter to my attention.

Sincerely,
/s/ Lynn Charytan
Lynn Charytan
Vice President, Legal Regulatory Affairs
Comcast Corporation

cc: Hon. Julius Genachowski

¹ *In re Revision of the Commission's Program Carriage Rules*, Second Report and Order and Notice of Proposed Rulemaking, FCC 11-119 (Aug. 8, 2011).