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January 11, 2012

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *In the Matter of Closed Captioning of Internet Protocol-Delivered Video Programming: Implementation of the Twenty-First Century Communications and Video Accessibility Act of 2010*, MB Docket No. 11-154

Dear Ms. Dortch:

On January 10, 2012, I spoke separately by telephone regarding the above-captioned proceeding with (1) Erin McGrath, Acting Legal Advisor, Media, to Commissioner McDowell, and (2) Mary Beth Murphy of the Media Bureau. During both calls, I expressed concerns Comcast has about the application of online captioning requirements to content that is already being distributed online without captions. In particular, I explained that, in the event that any such rules are adopted, video programming distributors (“VPDs”) should be afforded an adequate amount of time to complete the process of replacing an archived asset with a newly captioned version of the asset.

I emphasized that, as more and more content is being distributed online, VPDs can often face situations where they must process significant “bursts” of new content that they receive from programmers. Indeed, VPDs are constantly receiving new assets, some of which must be processed on a priority basis due to contractual obligations. Comcast continually assesses its processing capacity and the deployment of its resources based on reasonable assumptions about the volume of content that will need to be processed. Despite those efforts, Comcast has faced situations where the amount of content it has received from programmers has exceeded its processing capacity. In one particular instance, we received from a programmer an amount of content that was double the capacity of our systems. As a result of that unexpected “burst” of content, it took us approximately 60 days to finish processing the content and make it available online.

We fully expect that the volume of new, compelling content will only increase, and we are, of course, planning to meet that demand as efficiently as possible. However, because other instances can be expected to occur with particularly large “bursts” of content, there will be occasions when processing demand will exceed processing capacity. If additional burdens

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relating to archived online assets were added to existing demands, the likelihood of instances where demand exceeds capacity would significantly increase. As noted, it took Comcast approximately two months to process a particular instance of a “burst” of new content. If archived content were covered by the captioning rules, Comcast expects that it would need additional time to complete the swap-out process in such situations.

Please contact me should you have any questions regarding this matter.

Respectfully submitted,

/s/ James R. Coltharp

James R. Coltharp

Chief Policy Advisor for FCC & Regulatory Policy

Comcast Corporation

cc: Erin McGrath  
Mary Beth Murphy