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FILED/ACCEPTED

January 30, 2012

JAN 30 2012

Federal Communications Commission
Office of the Secretary

VIA ELECTRONIC FILING

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

Re: *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal Inc. for Consent to Assign Licenses and Transfer Control of Licenses, MB Docket No. 10-56*

Dear Ms. Dortch:

In accordance with the Memorandum Opinion and Order adopted in the above-referenced proceeding,¹ Comcast Corporation, for itself and on behalf of NBCUniversal Media, LLC, hereby files the following reports:

- a. Semiannual progress report on NBCUniversal's cooperative arrangements with locally focused non-profit news organizations ("Non-Profit News Partnerships"). See Attachment A. The report is required by Section XI.5.f of Appendix A to the Comcast-NBCUniversal Order. A copy of this report will be available today on the homepage of each NBC Owned Television Station.
- b. Semiannual progress report on Comcast's development of the platform to host PEG [Public, Educational and Governmental] content on Video On Demand and Online ("PEG Pilot Program"). See Attachment B. The report is required by Section XIV.4.c.vii of Appendix A to the Comcast-NBCUniversal Order. A copy of this report will be available today on www.comcast.com/peg.

¹ *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. For Consent to Assign Licenses and Transfer Control of Licenses, Memorandum Opinion and Order, 26 FCC Rcd 4238 (2011) ("Comcast-NBCUniversal Order").*

File of Copies rec'd 0

Ms. Marlene H. Dortch
January 30, 2012
Page 2

Please do not hesitate to contact me should you have any questions.

Sincerely yours,

Lynn R. Charytan

Lynn R. Charytan
Vice President, Legal Regulatory Affairs,
Senior Deputy General Counsel,
Comcast Corporation

Enclosures

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ATTACHMENT A



NON-PROFIT

NEWS ORGANIZATION

LOCAL

possible arrangement focus
reporting issues of concern
to the community of our ne
for more information pleas
website to check out

community

JAN. 2012

**PROGRESS
REPORT**

JANUARY 2012

NON-PROFIT NEWS PARTNERS PROGRESS REPORT

This report summarizes the steps NBCUniversal has taken during the reporting period of **July 28, 2011 to January 28, 2012** to satisfy the obligation under Appendix A, Section XI.5 of the Comcast-NBCUniversal Order.¹ That condition requires that at least four of the 10 NBC Owned Television Stations enter into cooperative arrangements with locally focused non-profit news organizations. These arrangements are to be modeled after the successful partnership already in place between the NBCUniversal-owned television station in San Diego, California and the VoiceofSanDiego.org.

As announced this past December, four stations, plus the San Diego operation, have established partnerships with non-profit news entities.

CULMINATION OF THE NEWS PARTNERS SELECTION PROCESS

The first report on the progress of the news partner selection process described the steps taken by NBCUniversal to ensure the broadest dissemination of its request for proposals and application intake process, both of which concluded on July 22, 2011.² NBCUniversal's efforts since then have been focused on evaluating proposals representing 30 independent news organizations from across the country. The high volume of applications came as little surprise considering the extensive outreach effort undertaken by the NBCUniversal-owned stations in their markets. To recap, the outreach consisted of:

- Airing promotional announcements on all of the NBC Owned Television Stations other than NBC 7 San Diego (KNSD). By the close of the application period, the NBC Owned Television Stations had aired more than 1,800 promotional announcements inviting interested parties to visit each station's website and submit an application.

¹ Memorandum, Opinion and Order in the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses and Transfer Control of Licensees, MB Docket No. 10-56 (Jan. 18, 2011), as amended by the Erratum released on March 9, 2011 ("Comcast-NBCUniversal Order").

² See Letter from Lynn R. Charytan, Vice President, Legal Regulatory Affairs, Comcast Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, MB Docket No. 10-56 (Jul. 28, 2011) at Attachment A ("July 28 Report").



- Placing advertisements on each NBC Owned Television Station's website, generating over 13 million ad impressions across the sites.
- Creating a vanity URL on each station's website (.com/nonprofit) that contained the application form and information on the application process.
- Issuing a press release that described the project and included links to the relevant section of the stations' websites.³
- Communicating directly with any organizations that had proactively contacted NBCUniversal based on press reports describing the local news partnership condition in the Comcast-NBCUniversal order.
- Sending e-mails describing the project to the heads of six diverse journalism organizations to encourage these organizations to make their members aware of the potential opportunity. These organizations are National Association of Black Journalists, National Association of Hispanic Journalists, Native American Journalists Association, Asian American Journalists Association, South Asian Journalists Association and National Lesbian and Gay Journalists Association.

Organizations interested in applying were required to demonstrate robust news gathering capabilities and a track record of accuracy, fairness and independence in their journalistic efforts. To further the goal of enhancing diversity, the application materials required each applicant to describe the manner in which the applicant's governance and leadership reflected the diversity of communities in the station's service area. The applicant's ability to help the NBC Owned Television Stations enhance diversity of viewpoints and programming was also a factor in the review process.

Each qualifying application was reviewed in full by four people —the in-market news director, the station's finance director, a second news leader randomly assigned, and a member of the law department. The pool of applicants was narrowed through this paper review. Finalists were then subjected to a second review, including a site visit, discussion of business terms, follow-up questions, reference checking and background checking.

³ See Press Release: NBC Local Media Announces Multi-City Search for Locally-Focused, Non-Profit News Organizations, <http://www.nbcuni.com/corporate/newsroom/nbc-local-media-announces-multi-city-search-for-locally-focused-non-profit-news-organizations-1> (May 23, 2011).

SELECTED PARTNERS

On December 6, 2011, NBC Owned Television Stations announced the four selected partners at the close of its careful and detailed selection process.⁴ Each selected partner has a distinguished history of providing locally-focused news through traditional and non-traditional media alike.

News Partner	Station
	

ProPublica (www.propublica.org) is a Pulitzer Prize-winning independent newsroom that produces investigative journalism that serves the public interest, focusing on important stories with great impact with a goal of generating positive reform in the larger community. Since its launch in 2008, ProPublica has partnered with leading news organizations across the nation to publish or broadcast their stories, distributing more than 100 stories in 2010 with more than 40 different partners.

ProPublica has partnered with NBC 4 New York (WNBC), but will also provide the results of its investigations to all 10 NBC Owned Television Stations. Richard Tofel, ProPublica's general manager, expressed that the partnership with the NBC Owned Television Stations "will extend the reach and impact of ProPublica's groundbreaking news applications and result in great local stories for NBC viewers across the country. Beyond that, we're very grateful for NBCUniversal's commitment to supporting innovative non-profit journalism in the public interest."⁵

News Partner	Station
	

⁴ See Press Release: NBC Owned Stations Selects Four Non-Profit News Partners, <http://www.nbcuni.com/corporate/newsroom/nbc-owned-stations-selects-four-non-profit-news-partners> (Dec. 6, 2011) and related blog post at <http://www.nbcudirect.com/nbcownedstations120611/> (Dec. 6, 2011).

⁵ M. Cho, NBC Selects ProPublica as New Non-Profit Partner, <http://www.propublica.org/atpropublica/item/nbc-selects-propublica-as-new-nonprofit-partner> (Dec. 6, 2011).

The Chicago Reporter (www.chicagoreporter.com) is an investigative news organization that publishes a website, blog and bi-monthly magazine. The staff of *The Reporter* is widely-recognized for its reports and analysis on the social, economic and political issues of metropolitan Chicago with a focus on race and poverty. *The Reporter* serves a wide, diverse and influential audience of policy makers and government officials, traditional and new media, social service providers and members of the general public.

The Chicago Reporter will work with NBC 5 Chicago (WMAQ). Kimbriell Kelly, editor and interim publisher of *The Reporter*, was quoted on her organization's website as saying that "[t]he Chicago Reporter is looking forward to combining our 40 years of investigative reporting and analysis around race and poverty with the heft of the investigative staff at NBC. As newsrooms cut back on resources, it's refreshing that NBC/Comcast has remained committed to expanding its capacity through strategic community partnerships."⁶

News Partner

Station



WHYY (www.whyy.org) is a leading public media provider in the Greater Philadelphia area, serving Southeastern Pennsylvania, Southern New Jersey and all of Delaware and reaching more than one million television viewers, over 400,000 radio listeners and nearly 100,000 unique website visitors at www.newsworks.org each week. Their coverage focuses on news, education, arts and culture.

WHYY will work with NBC 10 Philadelphia (WCAU). WHYY Executive Vice President and Chief Operation Officer Kyra McGrath praised the initiative by stating, "NBC 10 has a tremendous reach in this region beyond our reach. So we think each partner can bring something to the other."⁷

⁶ M. Zamudio, *The Chicago Reporter* partners with NBC 5, <http://www.chicagoreporter.com/news/2011/12/chicago-reporter-partners-nbc-5> (Dec. 6, 2011).

⁷ C. Mimidis, NBC10 Announces New Partnership with WHYY, <http://www.nbcphiladelphia.com/news/local/NBC10-Announces-New-Partnership-With-WHYY-135103868.html> (Dec. 6, 2011).





KPCC (www.kpcc.org) is Southern California Public Radio's flagship station, reaching more than 650,000 listeners every week in the Los Angeles area and Orange County with award-winning local news and public radio's signature programs. KPCC has garnered over 200 journalistic honors including three Distinguished Radio Journalist awards from the Greater LA Chapter of the Society of Professional Journalists and the 2008 top honor for Breaking News from the LA Press Club. KPCC also features signature public radio programs from American Public Media, the BBC and Public Radio International.

KPCC will work with NBC4 LA (KNBC). KPCC's News Director Paul Glickman said of NBC4 LA, "It's their goal to improve their local news coverage. That's what this is about for them. And they look to us as a logical place to turn because of our reputation for the high quality of our news coverage."⁸

CURRENT STATUS

These four agreements, plus the existing one in San Diego, mean that the NBC Owned Stations division is engaged in local news partnerships in 50 percent of its markets.

The new partnerships started immediately following the announcement. The partnerships will feature a variety of elements, including developing stories, conducting research and investigations, sharing footage and other content across multiple platforms, providing promotional assistance and cross-linking websites.

All four new stations participating in the partnerships kicked off the new arrangements by holding joint editorial planning meetings with the non-profit partners. Although these collaborations are still in the early planning stages, the efforts by the NBC stations and their partners are already producing results. For example, *The Chicago Reporter* and NBC 5 Chicago recently joined forces in an investigation concerning the business dealings of Dr. Leon Finney Jr., a high-profile Chicago minister and community organizer who controls tens of millions of dollars in government grants for subsidized housing and community programs. Following an investigative piece which appeared in *The*

⁸ See Press Release: KPCC plans investigative/enterprise news partnership with NBC LA, <http://www.scpr.org/news/2011/12/06/30219/kpcc-plans-investigativeenterprise-news-199/> (Dec. 6, 2011).

Reporter's bi-monthly magazine,⁹ *The Reporter* and NBC 5 Chicago assembled a joint team to conduct a deeper investigation into additional non-profit projects controlled by Dr. Finney and his wife in addition to those covered in *The Reporter's* story. The results of the investigation aired in a segment featured on the NBC 5 Chicago news during the week of January 16, 2012,¹⁰ and articles were posted on the NBC 5 Chicago website.¹¹ *The Reporter* and NBC 5 Chicago will continue collaborating on this story and its developments.

In New York, ProPublica recently provided NBC 4 New York a briefing on a new interactive news application. As a result, NBC 4 New York is working on a story that will air in February. Additionally, the station has shared the details with the other NBC Owned Television Stations so they can determine if they want to do their own local stories.



⁹ See A. Caputo, *The Chicago Reporter: Following Finney* (Jan.-Feb. 2012), reprinted online at <http://www.chicagoreporter.com/news/2012/01/following-finney> (Jan. 2, 2012).

¹⁰ Video of broadcast available at: <http://www.nbcchicago.com/video/#!/news/local/video-override/Questions-of-Financial-Impropriety-Dog-Woodlawn-Organization/137734768> (Jan. 19, 2012).

¹¹ See, e.g., A. Caputo, *Reporter Investigation: Landlord, Daley Ally Makes 'Slumlord' List*, <http://www.nbcchicago.com/news/local/Politically-Connected-Landlord-Makes-Slumlord-List-136833258.html> (Jan. 6, 2012)



JAN. 2012

**PROGRESS
REPORT**

 **comcast. NBCUniversal**

ATTACHMENT B

PEIG

Pilot Program

**Progress report on the
PEG Video On Demand and
Online platforms**

January 2012

project
open
voice

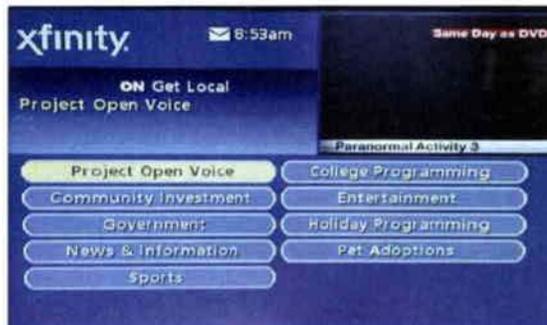
comcast

PEG VOD Folder Structure

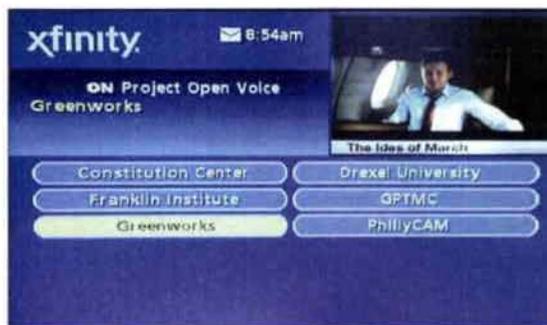
Comcast video subscribers can access the PEG VOD programming for their community by pressing the "On Demand" button in their remote control and navigating to the "Project Open Voice" folder. For example, the steps below illustrate how to reach the "Greenworks" PEG VOD content available in the Philadelphia market.



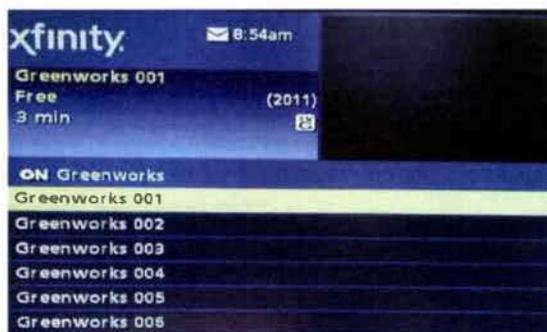
Select the "Get Local" folder from the folder list on the VOD home menu.



Select "Project Open Voice". Note: other local content choices may be listed in this menu.



The next menu displays the folder names of all the PEG VOD content designated by the pilot community. Select "Greenworks" to display a list of available PEG VOD content.



All "Greenworks" PEG VOD content chosen by the Philadelphia Office of the Mayor is available in this folder. Users can playback content from here.



Other Philadelphia PEG VOD content is located in folders titled “PhillyCAM” and “Drexel University.” The Get Local – Project Open Voice navigation structure is the same in all of the pilot VOD systems.

Managing PEG Content on VOD

In anticipation of the October 28, 2011 launch, Comcast met with PEG programmers specifically designated by the communities to participate in the VOD project and officials in each pilot community to introduce them to local Comcast VOD professionals. These meetings were also used to train PEG providers on the technical requirements for VOD content submission.

Project Open Voice teams also designed a straightforward submission process for PEG VOD content. Designated PEG programmers simply contact their local Comcast VOD team to request a folder management change or update. Soon after the PEG content is delivered by the PEG Programmer, the local Comcast VOD team converts it to VOD server-compatible format (if necessary), creates the relevant folder location and on-screen menu listing as per the PEG programmer’s instructions. The content is then ready for viewing by Comcast video subscribers within that pilot community.⁴ Programming placed in the PEG VOD folders can be refreshed as often as the PEG provider wants, content folders can be added or deleted, or the city can decide to allocate server space to another PEG provider.

Local Comcast VOD teams will continue to work closely with designated PEG content managers to support each city’s VOD folder management needs.

Placement of PEG Content Online

By January 28, 2012 (*i.e.*, within one year of the closing of the Comcast-NBCUniversal Transaction as required by Section XIV.4.iii), Comcast had successfully initiated placement of community-designated PEG content on a new, custom-designed online platform. Assisted by third-party developers, Comcast created six distinct websites to distribute local PEG content online and accessible to anyone on the public Internet.

Custom-built Websites for Each Pilot Community

The names and web addresses chosen by each of the communities for their online platforms are:



www.gottalovefresno.com



www.madeinmedford.com



⁴ It bears emphasizing that Comcast exerts no editorial control over the content selected by each community for PEG VOD placement.



Each community led the design of the branding, visual identity, theme and messaging focus of its Online portal. The result is six unique websites, each with a look and feel specifically tailored to local online media distribution needs. Additional details on the theme chosen by each community are featured on the revamped Project Open Voice website (www.projectopenvoice.com), a copy of which is attached hereto as Exhibit A.

All sites were launched in beta form and are now generally available to all Internet users. Our web developers and local PEG consultants will continue working with the communities to optimize the design, technical characteristics and viewing experience of each site. This soft launch will be followed by increased promotional and marketing support, including press events and official community launch events, in the near future.

Streaming PEG and Local Content

Each community was tasked with choosing qualified content providers to run "streaming channels" within the sites. Selected content providers then received user rights to manage the online content associated with their accounts, including new content uploads, designating "featured" videos, and other tools they can use to attract more viewers to their channels. Comcast provided common functions on the back-end of each website through a content provider dashboard to make managing content as simple as possible for the providers. The content provider dashboard lets the provider review all of the video, comments, social media and analytics functions all in one place. Video uploads are supported in a range of popular container formats, including .AVI, .MOV, .MP4, and .FLV and in a range of quality levels, including high definition (HD).

All sites were specifically designed to host and stream online PEG content with a format, function and appearance that is instantly familiar to any user of the Internet's popular online video streaming sites. Users can browse and search for videos by typing a keyword, neighborhoods, subject, category, community activity ranking or channel name. Playback is controlled through the characteristic play/pause button with a volume and progress bar.



In addition, Comcast has provided each community with automated tools and suggested guidelines to minimize abuse of the site's features, such as the comments section.⁵

At launch, the sites featured nearly 400 videos of PEG and other local content. Since the Online platform has more capacity than a VOD server provides, communities have the ability to include more programming choices, including programming from traditional PEG providers, and also from other local interest media that the community may wish to share on its website.

Online access has the potential to broaden the accessibility and availability of local PEG and public-interest programming through electronic media on a scale previously unavailable. To support that new reach, Comcast is also providing the content providers with data and analytics to measure the web, social media and video viewership impact of their content in a wide variety of ways.

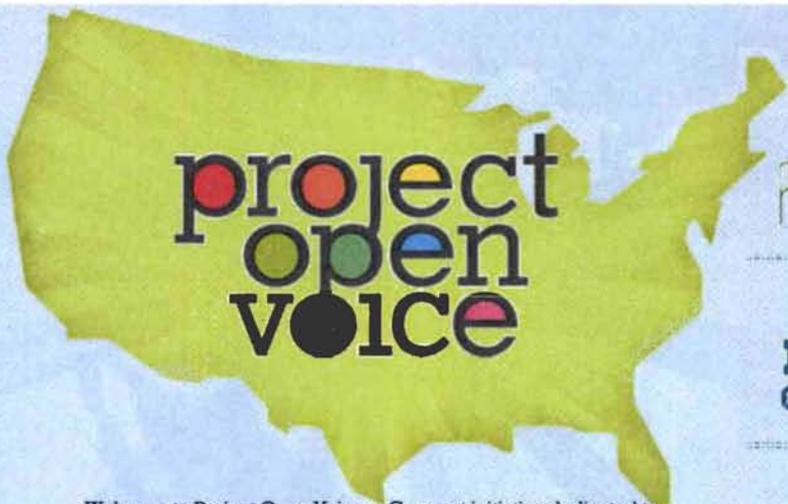


⁵ Each community is responsible for monitoring and managing its Online portal and Comcast exerts no editorial control over the posted content.

EXHIBIT A

project
open
voice

comcast.



Welcome to Project Open Voice, a Comcast initiative dedicated to the discovery of local content, including public, educational, governmental (PEG) programming. Through Online and OnDemand services in 6 markets, we explore innovative ways to showcase the vibrancy, spirit, and diversity of local communities



ABOUT PROJECT OPEN VOICE

SEE PROJECT OPEN VOICE IN ACTION
Learn more about our six pilot locations.



ABOUT PROJECT OPEN VOICE

Project Open Voice is a commitment to broaden the discovery of local content, including public, educational and government (PEG) programming. We seek to address the questions of diverse demand for local content in different communities and the variety of ways to deliver it. Comcast is working in six trial markets to find answers: Peterborough, NH; Medford, MA; Philadelphia, PA; Hialeah, FL; Houston, TX; and Fresno, CA.

Because of Comcast's commitment to PEG in local communities, they became a focal point for the project. Working with those providers, along with community leaders, non-profits and independent producers, we developed online and OnDemand platforms for all partners to use freely. We will continue to learn & adapt, and encourage you to explore Project Open Voice regularly.

WATCH AND LEARN

Watch these videos to learn more about Project Open Voice.

Share Facebook Share

OUR MISSION & MORE...



Understand our dedication to supporting local voices, including public, educational and government programmers

WATCH VIDEO



Hear how POV enjoys close partnerships in our pilot markets with a diverse set of local leaders, groups, and content providers

WATCH VIDEO



Learn how we will provide our partners with deep data about the consumption of local content across web, social, mobile and OnDemand outlets.

WATCH VIDEO

LOCAL LOOK PETERBOROUGH
fresno
Houston's
project open voice
made in medford
PHILLY FOCUS
No Soy! Hialeah



Follow The Local Look →
 



While you may not have heard of it, you have undoubtedly read a book, watched a play or admired a painting that is connected in some way to Peterborough's world-famous artist colony. Expect to be surprised.

VISIT THE LOCAL LOOK
CONTRIBUTE CONTENT

PEG CONTENT

1 - 2 of 2



Town of Peterborough
Ask Us About...Assessing



ConVal School District
conval chronicle

Site Activity



33

Videos Uploaded

1

Registered Member





0

No Comments Posted

LOCAL CONTRIBUTORS

1 - 3 of 31 [NEXT](#) ▶



InHaus Media
Local Look Peterborough
Welcome



Canning Peppers



Yankee Publishing
Lobster Pie

Share

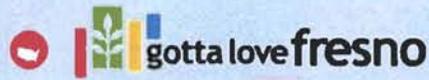
 Facebook

 Share

Comcast © 2012 Comcast Copyright Legal Policies
Follow Project Open Voice →



CONTACT US



Follow Gotta Love Fresno →

Fresno is a city in transition and it has food to thank for it. Nested in a largely agricultural region, the city's thriving restaurant scene, vibrant arts community and large state university make it uniquely Californian.

[VISIT GOTTA LOVE FRESNO](#)

[CONTRIBUTE CONTENT](#)

Site Activity

79 Videos Uploaded

2 Registered Members

2 Comments Posted

Share Facebook Share 0

PEG CONTENT

1 - 3 of 11 [NEXT](#)



First 5 Fresno County Know The Signs Be Their Voice



Fresno State Million Service Hours



Fresno State First Generation Voice

LOCAL CONTRIBUTORS

1 - 3 of 67 [NEXT](#)



KFSR Evening Eclectic



Street Scene with Ryan Jones



Heavy Young Heathens Music Video

LOCAL LOCAL
fresno
Houston's
project open voice
made in medford
PHILLY OFOCUS
No Spill Hialeah


Follow Houston's View   

The nation's fourth largest city, Houston is the definition of melting pot. A tremendous mix of diverse cultures and faiths translates to tons of incredibly original local programming and modern media consumption.

VISIT HOUSTON'S VIEW
CONTRIBUTE CONTENT

Site Activity



85

Videos Uploaded

2

Registered Members





18

Comments Posted

Share 0

PEG CONTENT

1 - 3 of 29 NEXT ▶



Houston Community College System TV
Max Your Business



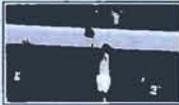
Houston Television
Spotlight Houston: Joe Sample



Houston Media Source TV
Via Color

LOCAL CONTRIBUTORS

1 - 3 of 56 NEXT ▶



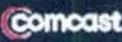
Positive Image Productions
Brianna Turner



Houston's Voice Welcome



VISION Production Group
Opportunity Houston - Platos Cave

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Follow Project Open Voice  
CONTACT US



Follow Made In Medford

Like neighboring Boston, Medford is a blue collar town with a passion for community. The city is on the cutting edge when it comes to PEG programming, community development and environmentally-friendly practices.

[VISIT MADE IN MEDFORD](#)

[CONTRIBUTE CONTENT](#)

Site Activity

60
Videos Uploaded

14
Registered Members

9
Comments Posted

Share Facebook Share

PEG CONTENT

1 - 3 of 42 [NEXT](#)



Medford Update 8.16.11 - algoild 0 2's library x 2 64 001



Medford Update 10.31.11 - algoild 0 2's library2 x 2 64



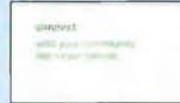
Fiorello 3rd place Auerbach Meet 1210 - algoild 0 2's library x 2 64

LOCAL CONTRIBUTORS

1 - 3 of 18 [NEXT](#)



Made in Medford Intro Slideshow



made in medford loop FP.mov (video quicktime Object)_x 2 64



Fit for Life 5K



PHILLY IN FOCUS

Follow Philly In Focus

Our beloved home, Philadelphia represents another major metropolitan market. The city's arts and food scenes, educational institutions and active PEG community prove that it is not just a historical landmark, but a modern American city.

[VISIT PHILLY IN FOCUS](#) [CONTRIBUTE CONTENT](#)

Site Activity

90
Videos Uploaded

4
Registered Members

3
Comments Posted

Share Facebook Share 0

PEG CONTENT

1 - 3 of 9 [NEXT](#)



What Is PhillyCAM699



Pushouts PhillyCAM



Temple University Interstitial - Five and Fit

LOCAL CONTRIBUTORS

1 - 3 of 81 [NEXT](#)



nb rosenbach



nb mattalgeo

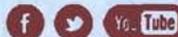


Three Legged Fox - Let You Down



iYo Soy! Hialeah

Follow Yo Soy Hialeah



Despite being just outside of Miami, Hialeah is anything but palm trees and beaches. A rich cultural heritage, landmark racetrack and tremendous Cuban food and coffee make this city one of our most unique partners.

[VISIT YO SOY HIALEAH](#)

[CONTRIBUTE CONTENT](#)

Site Activity



33

Videos Uploaded

4

Registered Members



1

Comment Posted

Share

Facebook

Share 0

PEG CONTENT

1 - 3 of 4 [NEXT](#)



YMCA - Because We Need Each Other



YMCA - Making a Difference



South Florida Autism Charter Schools

LOCAL CONTRIBUTORS

1 - 3 of 29 [NEXT](#)



NUESTRAS TRADICIONES



NUESTRAS TRADICIONES



NUESTRAS TRADICIONES



WWW.COMCAST.COM/PEG
WWW.PROJECTOPENVOICE.COM

project
open
voice

Comcast®