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July 30, 2012

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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 *Transaction 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 Public, Educational, and Governmental ("PEG") 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 *Transaction 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), as amended by the Erratum released on March 9, 2011 ("Transaction Order").*

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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,
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Enclosures

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Attachment A

NBCUniversal Non-Profit News Partnerships

Progress Report

July 30, 2012



NON-PROFIT

NEWS ORGANIZATION

LOCAL



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

community

JULY 2012

**PROGRESS
REPORT**

JULY 2012

NON-PROFIT NEWS PARTNERS PROGRESS REPORT

This report summarizes the steps NBCUniversal has taken during the reporting period of **January 28, 2012 to July 28, 2012** to satisfy its obligations under Appendix A, Condition XI.5 (the “Condition”) of the Comcast-NBCUniversal Order.¹

Per Condition XI.5(f), this report describes the status of the non-profit news partnership arrangements, including a description of the support provided by NBCUniversal to each news partner organization, and information about the news and other programming produced by the arrangement, including the overall quantification by market of local content segments or items generated, as well as their nature (including but not limited to videos, articles, blog posts, and photos), and whether the station’s primary channel, multicast channel(s), website, or other platforms exhibited such segments or items.² A copy of this report has been posted on the websites maintained by the NBC-owned television stations.

As the January 2012 progress report described,³ NBCUniversal satisfied the Condition’s requirement that at least four of the 10 stations in its NBC Owned Television Stations division enter into cooperative arrangements with locally-focused, non-profit news organizations: NBC 4 New York partnered with ProPublica (www.propublica.org); NBC 5 Chicago partnered with *The Chicago Reporter* (www.chicagoreporter.com); NBC 10 Philadelphia partnered with WHYH (www.whyh.org); and NBC 4 Los Angeles partnered with KPCC Southern California Public Radio (www.scpr.org).

In the first months of these partnerships, the collaborations have resulted in at least seven major investigations, including two with nation-wide implications. These investigations have generated dozens of news reports on the NBC-owned stations and websites, as well as on the partners’ radio stations, publications, and websites, supported by the data, research, and in-depth investigative efforts of their news partners. In fact, a May 2012 article by TVNewsCheck.com reported that the

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 Unless otherwise indicated, all of the referenced news stories were telecast on the stations’ primary channels.

³ See Letter from Lynn R. Charytan, Vice President, Legal Regulatory Affairs, Senior Deputy General Counsel, Comcast Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, MB Docket No. 10-56 (Jan. 30, 2012) at Attachment A (“January 2012 Report”).



partnerships have already resulted in “an uptick in investigative reports on local newscasts.”⁴

The NBC-owned stations also added a dedicated investigative reporting section to each of their websites that will feature videos and other resources related to stories produced by the news partnerships, such as investigative reports resulting from the collaboration between several NBC-owned stations and ProPublica.⁵

Beyond this reciprocal investigative and content production support, NBCUniversal also has provided financial assistance to each of its five news partners.

UPDATE ON THE NEWS PARTNERSHIPS



Collaboration and Support

NBC 4 New York and ProPublica conduct regular conference calls to ensure that NBC 4 New York and the other NBC-owned stations always have an up-to-date understanding of the research and investigative data that ProPublica has available. Where NBC 4 New York sees an appropriate opportunity to use the ProPublica investigative data, producers “transform” the data into special investigative segments for NBC 4 New York’s newscasts.

NBCUniversal support for ProPublica includes participation of ProPublica’s investigators during news segments, online references and links to ProPublica to build name recognition and support for the organization, and financial assistance to help support the ongoing mission. ProPublica will also provide the results of its data-based journalism—what it calls “news applications”⁶—to all 10 stations that compose the NBC Owned Television Stations division.

⁴ See Diana Marsalek, *NBC O&Os, Nonprofits Make News Deal Work*, TVNewsCheck.com, <http://www.tvnewscheck.com/article/59742/nbc-oos-nonprofits-make-news-deal-work> (May 29, 2012).

⁵ See, e.g., Press Release: NBCUniversal, NBC Owned Stations Launch New Platforms to Feature Investigative Stories, <http://www.nbcuniversal.presscentre.com/Press-Releases/nbc-owned-stations-launch-new-platforms-to-feature-investigative-stories-2853.aspx> (May 1, 2012).

⁶ See ProPublica’s Report to Stakeholders (January-April 2012), available online at http://s3.amazonaws.com/propublica/assets/about/PP_Report_to_Stakeholders_January-April_2012.pdf.

Key Projects

In the last six months, NBC 4 New York has aired stories based on two major joint investigations with ProPublica. The stories also ran on NBC 4 New York's multicast "Nonstop" channel during the 7:00 p.m. newscast on the dates indicated below.

■ Federal Stimulus Money

- Based on federal stimulus tracking data collected, sorted and presented in an interactive database developed by ProPublica, NBC 4 New York's "I-Team" (the news department's investigative unit) found more than 200 approved stimulus-funded projects totaling more than \$200 million in New York, New Jersey, and Connecticut are still listed as "not started," despite the fact that many of these projects had been touted as "shovel ready."
- The story, which also featured a ProPublica investigative journalist, aired on February 14, 2012 on NBC 4 New York during the 5:00 pm and 7:00 p.m. newscasts.⁷ NBC 4 New York also provided an accompanying online story that included a link to the tracking database on the ProPublica website (<http://projects.propublica.org/recovery/>) for viewers who wish to chart the progress of stimulus projects in their areas.

■ Kidney Dialysis Centers

- Based on data collected by ProPublica, NBC 4 New York reported that patients at certain Tri-State area dialysis centers located in low-income areas were less likely to get transplants than patients at other dialysis centers.
- The story aired on NBC 4 New York on April 26, 2012 at 11:00 p.m.⁸ and received at least one full day of on-air promotion. The results of the investigation were also posted on the NBC 4 New York website, where the story remained popular for several days.⁹ The data collected by ProPublica were shared with other NBC-owned stations and resulted in locally focused newscasts and companion website articles in those markets.¹⁰

⁷ See Tom Burke and Chris Glorioso, *I-Team: Millions of Stimulus Dollars Still Unused in Tri-State*, <http://www.nbcnewyork.com/investigations/I-Team-Millions-of-Stimulus-Dollars-Still-Unused-139315393.html> (Feb. 14, 2012).

⁸ See Chris Glorioso, *I-Team: Patients at Some Dialysis Centers Get Fewer Kidney Transplants*, <http://www.nbcnewyork.com/news/local/Kidney-Transplant-Disparity-Dialysis-ProPublica-I-Team-149269465.html> (Apr. 26, 2012).

⁹ *Id.*

¹⁰ See, e.g., Nesita Kwan, *Dialysis Danger: Why Location Matters for Some Kidney Patients*, <http://www.nbcchicago.com/investigations/Dialysis-Danger-Why-Location-Matters-for-Some-Kidney-Patients-148017845.html#ixzz20Eqa9xRH> (Mar. 18, 2012); Tisha Thompson, *Dialysis Center Ratings*, <http://www.nbcwashington.com/investigations/Dialysis-Center-Ratings-147820675.html> (Apr. 27, 2012).

THE CHICAGO REPORTER



Collaboration and Support

The NBC 5 Chicago news team holds regular meetings with *The Chicago Reporter's* staff with the goal of increasing the coordination between the two news organizations. One of the primary goals is to synchronize the airdates of stories airing on NBC 5 Chicago to coincide with *The Chicago Reporter's* publication dates for companion or related pieces. This collaborative approach helps each party benefit from the public interest in the stories they are producing and capitalize on the ability to reach consumers on multiple platforms. NBCChicago.com editors also provide a link-back to the associated *The Chicago Reporter* publication for each piece that was produced in partnership. In addition, NBCChicago.com provides social media support by posting each partnership-generated story on NBC 5's Twitter and Facebook feeds. *The Chicago Reporter* also provides a reporter as a resource for NBC 5 Chicago on-air stories.

Key Projects

The partnership produced a number of investigative reports that have aired on NBC 5 Chicago and on Telemundo Chicago:

- **Financial Practices of Rev. Leon Finney and Entry House**
 - The first collaboration between NBC 5 Chicago and *The Chicago Reporter* focused on Dr. Leon Finney, Jr., a high-profile Chicago minister and community organizer who received hundreds of millions of dollars in federal grants to provide services to people on Chicago's South Side. A report in *The Chicago Reporter's* January-February 2012 issue questioned how Dr. Finney and his organizations spent much of this money.
 - NBC 5 Chicago's "Unit 5" investigative team expanded on *The Chicago Reporter's* investigation by profiling one of Dr. Finney's organizations — a drug and alcohol rehabilitation center called Entry House. Entry House had received tens of millions of dollars in government grants, yet failed to pay its employees on time. Following these investigations, the Illinois Department of Human Services and the Office of the Illinois Attorney General began looking into the financial practices of Entry House and Dr. Finney's organizations.
 - The initial story aired on January 19, 2012 during NBC 5 Chicago's 10:00 p.m. newscast.¹¹ A follow-up story aired on March 2, 2012 on the 6:00 p.m. edition

¹¹ See Katy Symser, *State Agencies Looking Into Entry House's Books*, <http://www.nbcchicago.com/news/local/chicago-reporter-unit-5-woodlawn-corporation-entry-house-leon-finney-jr-137734013.html> (Jan. 19, 2012).

of the NBC 5 Chicago news.¹² The story re-aired on the 10:00 p.m. news on March 2, 2012 and the next day's early news shows. Both the original and follow-up stories were posted on the NBC 5 Chicago website.

▪ **Wage Theft**

- Following up on a story in the March-April 2012 issue of *The Chicago Reporter*, Unit 5 profiled a low-wage worker who had tried unsuccessfully to recoup thousands of dollars in back pay from his employer by filing a claim before the Illinois Department of Labor ("IDOL"). *The Chicago Reporter* analyzed hundreds of IDOL claims and found that the agency failed to recover the majority of the unpaid earnings owed to low-wage workers.
- Unit 5's report aired on March 8, 2012 during the 5:00 p.m. edition of NBC 5 Chicago's newscast.¹³ An abridged version of the story aired on the 10:00 p.m. news on the same day.
- Because many of the workers profiled in *The Chicago Reporter's* story were Latino, NBC 5 Chicago referred the profiled worker to Telemundo Chicago, an NBCUniversal-owned television station, which was then able to do a separate interview with the worker for a companion piece. Telemundo Chicago aired its story on March 8, 2012 on the 5:00 p.m. and 10:00 p.m. newscasts.¹⁴

▪ **Police Brutality**

- In conjunction with the May-June 2012 issue of *The Chicago Reporter*, NBC 5 Chicago aired a story on Chicago policemen who remain on the force after having been repeatedly accused of brutality and misconduct. Unit 5 profiled a man who had allegedly been beaten by one of these policemen.
- The NBC 5 Chicago story aired on May 1, 2012 on the 10:00 p.m. newscast, the same day that *The Chicago Reporter's* issue first hit the stand. NBC 5 Chicago's website posted video of the story, along with a complete print version of the story and several original documents featured in the report, including court documents, police complaints, and direct links to the various databases maintained by the City of Chicago.¹⁵

¹² See NBC 5 Chicago, *Employees Say "Entry House" Closure is Retribution*, <http://www.nbcchicago.com/news/local/chicago-reporter-unit-5-woodlawn-corporation-entry-house-leon-finney-jr-141271103.html> (Mar. 2, 2012).

¹³ See Lisa Capitanini and Marion Brooks, *Workers Say Company Shut Doors, Never Paid Them*, <http://www.nbcchicago.com/investigations/unit-5-chicago-reporter-wage-theft-142001553.html> (Mar. 8, 2012).

¹⁴ See Telemundo Chicago, *Video: Esperando en vano*, <http://www.telemundochicago.com/content-center/Esperando-en-vano-141964573.html> (Mar. 8, 2012).

¹⁵ See Rob Stafford and Katy Smyser, *Millions Paid to Settle Police Misconduct Suits*, <http://www.nbcchicago.com/investigations/unit-5-chicago-reporter-chicago-police-ipra--149771045.html> (May 1, 2012).