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January 18, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Modernizing the FCC Form 477 Data Program, WC Docket 11-10; Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, WC Docket 07-38; Service Quality, Customer Satisfaction, Infrastructure and Operating Data Gathering, WC Docket 08-190; Review of Wireline Competition Bureau Data Practices, WC Docket 10-132*

Dear Ms. Dortch:

On January 16, 2013, Duane Amendola, Richard Chapkis, Beth Choroser, Gina Mingioni, Michael Ruger, and the undersigned of Comcast Corporation (“Comcast”) spoke by telephone with Lisa Gelb, Steve Rosenberg, Travis Litman, Rodger Woock, Ken Lynch, Carol Simpson, and Chelsea Fallon of the Wireline Competition Bureau and Susan Singer, Nese Guendelsberger, and Mitali Shah of the Wireless Telecommunications Bureau. The purpose of the call was to provide the staff the opportunity to brief Comcast on potential changes to the FCC Form 477 as well as the process for submitting it.

The staff explained that the Commission’s goal in updating the form is to improve the usefulness of the data obtained from the industry while minimizing as much as possible the increased burden on filers. The staff described a “client-side application” or “web portal” that would be used by filers to upload their Form 477 data according to service address record. The staff indicated that the FCC would geocode the address records by census block, but that filers would not be required to geocode the data.

In response, Comcast explained that the company currently collects and organizes its Form 477 data for submission to the FCC on the basis of census tracts, drawing on multiple internal data systems to produce the information. Each submission requires the compilation of over 200 million records that are associated with more than 19 million Comcast customers. As part of its preparation, Comcast carefully reviews the data to make sure they are complete and accurate and certifies their accuracy. If the company were required to provide the data for its

entire 19 million customers in a single filing through the new FCC portal, the sheer volume of the data submission would preclude Comcast from being able to certify the accuracy of the information. Alternatively, requiring Comcast to submit the data on a census block basis would increase enormously the compliance burden on Comcast. For example, it would require Comcast to submit millions of new lines of data to the FCC, approximately 56 times more lines than are currently contained in Comcast's Form 477 submissions.

The staff also indicated that the Commission is considering modifying the speed tiers currently used on the Form 477. Comcast pointed out that the FCC's current Form 477 speed tiers do not align with those used by Comcast in marketing its broadband service and, consequently, Comcast was forced to develop new code to map its speed tiers to those listed on the form. Comcast further noted that any change in the speed tiers likewise would require new code development by Comcast to map its tiers to the new FCC tiers for each customer.

Finally, the staff asked whether submission of Comcast's data for the National Broadband Map would be less burdensome if Comcast could make a single submission to the FCC for its entire footprint, rather than individual submissions to each of the relevant state mapping entities. Comcast agreed that a single submission could be more efficient as a matter of process. However, Comcast noted that it performs a thorough accuracy check before submitting data to each state mapping entity as well and that a massive single submission could not be meaningfully reviewed to allow for certification as to its accuracy.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above referenced proceeding.

Respectfully submitted,

/s/ Mary McManus
Mary McManus

cc: Lisa Gelb
Steve Rosenberg
Travis Litman
Rodger Woock
Ken Lynch
Carol Simpson
Chelsea Fallon
Susan Singer
Nese Guendelsberger
Mitali Shah