BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Comcast Cable Communications, LLC On behalf of its subsidiaries and affiliates	))	
	)	
For a Determination of Effective Competition in:	)	
Beachwood, NJ-Area Franchise Areas	))	CSR 8650-E MB Docket No.12-159
	)	
East Windsor, NJ-Area Franchise Areas,	))	CSR-8651-E MB Docket No. 12-160
	)	
Hazlet, NJ (NJ0405),	))	CSR-8652-E MB Docket No. 12-161
	)	
Chatham, NJ-Area Franchise Areas,	))	CSR 8657-E MB Docket No. 12-166
	)	
Buena, NJ-Area Franchise Areas,	))	CSR-8656-E MB Docket No. 12-165
	)	
Delaware, NJ-Area Franchise Areas,	))	CSR-8668-E MB Docket No. 12-180
	)	
Berkeley Heights, NJ-Area Franchise Areas,	))	CSR-8671-E MB Docket No. 12-183
	)	
Bellmawr, NJ-Area Franchise Areas,	))	CSR-8675-E MB Docket No. 12-190
	)	
North Arlington, NJ (NJ0298) & Rutherford, NJ (NJ0294),	))	CSR-8649-E MB Docket No. 12-152
	)	
Bordentown (City), NJ (NJ0511) & Bordentown (Township), NJ (NJ0461),	))	CSR-8655-E MB Docket No. 12-164
	)	
In the Matter of Docket Established for Monitoring Recent Verizon Wireless Transactions	)	WC Docket 12-234

To: Secretary, FCC
Chief, Media Bureau
Chief, Wireline Competition Bureau

OPPOSITION TO MOTION TO DISMISS

Comcast Cable Communications, LLC, on behalf of its affiliates and subsidiaries ("Comcast"), opposes the Motion to Dismiss ("Motion") filed by the New Jersey Division of Rate Counsel ("Rate Counsel") in the above-referenced proceedings. Rate Counsel's Motion is wholly without merit. Accordingly, Comcast respectfully requests that the Commission proceed without further delay to an analysis of the underlying Petitions for a Determination of Effective Competition ("Petitions").

I. INTRODUCTION AND SUMMARY.

In June 2012, Comcast filed the above-captioned petitions seeking a Commission determination that its cable systems face "effective competition" in certain New Jersey franchise areas (the "Franchise Areas"). On February 8, 2013, Rate Counsel filed its Motion.

Rate Counsel now argues that these Petitions should be summarily dismissed because they rely upon franchise-specific subscriber numbers provided by Verizon Communications. Rate Counsel claims that such subscriber numbers constitute "competitively sensitive data" in violation of both the Commission's decision authorizing the transfer of spectrum from SpectrumCo LLC, which included Comcast, to Verizon Wireless, as well as the Justice Department's related Consent Decree.[1] Rate Counsel contends that "the subject Petitions must be refiled without Verizon's competitively sensitive data."[2] Rate Counsel also asserts that

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[1] *See Applications of Cellco Partnership d/b/a Verizon Wireless and SpectrumCo LLC and Cox TMI, LLC for Consent to Assign AWS-1 Licenses*, Memorandum Opinion & Order, 27 FCC Rcd. 10698 (2012) ("*Spectrum Decision*"); *United States v. Verizon Commc'ns Inc.*, No. 1:12-cv-01354-RMC, [Proposed] Final Judgment, ECF No. 2-1 (D.D.C. filed Aug. 16, 2012) ("Consent Decree").

[2] Motion at 2; *see also id.* at 5-7.

Comcast should be required to refile its petitions with updated subscriber data and household data because Hurricane Sandy "resulted in substantial losses of homes which directly impact both subscriber data and the number of household [sic] used in the application of the Competing Provider Test."[3]

Rate Counsel's effort to suggest that the Consent Decree is intended to deny Comcast the right to demonstrate effective competition by use of Verizon subscriber numbers, or to trump Verizon's obligation to disclose its subscriber numbers to Comcast for that limited purpose,[4] is wholly unfounded for a variety of reasons. Chief among those is that the Motion wholly ignores the fact that the Consent Decree clearly defines the categories of "competitively sensitive" Verizon information that are subject to its prohibitions, and the raw subscriber numbers for Verizon's multichannel video programming service do not meet that definition. Moreover, as is typical in these situations, Comcast has agreed to limit the disclosure of this information to outside counsel and inside counsel involved in this proceeding, thereby ensuring that this information could not have any effect on Comcast's conduct in the marketplace.

Rate Counsel's challenge to Comcast's Petitions based on Hurricane Sandy is similarly without support. The Motion references Hurricane Sandy's devastation, but fails to provide any explanation (let alone franchise-specific details) as to why the storm's impact compels the Commission to summarily dismiss Comcast's Petitions.

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[3] *Id.* at 2; *see also id.* at 7-8.

[4] *Id.* at 3-7.

II. VERIZON'S PROVISION OF AGGREGATE SUBSCRIBER DATA FOR PURPOSES OF THE COMMISSION'S EFFECTIVE COMPETITION RULES DID NOT VIOLATE THE CONSENT DECREE.

The Consent Decree prohibits Verizon from "disclos[ing] competitively sensitive VZT information to any Cable Defendant," including Comcast.[5] The Consent Decree, however, clearly defines "Competitively Sensitive VZT Information" as "*any non-public information relating to the price, terms, availability, or marketing plans of VZT services*."[6] Subscriber numbers are conspicuously absent from – and do not fit within – this list of information that is deemed "competitively sensitive" for purposes of the Consent Decree. And notably, Rate Counsel's Motion fails in any way to grapple with the actual language to show how Verizon's sharing of subscriber numbers in any way relates to the "price, terms, availability, or marketing plans of VZT services." That is hardly surprising. The subscriber data at issue here is aggregated on a franchise-wide basis – without any additional detail.[7] And the fact that Verizon operates in those franchise areas is not "non-public" information, given that Verizon operates pursuant to publicly-available franchise agreements, or in some states such as New Jersey, in communities that are listed on its publicly available state franchise applications, and given that its presence within a Franchise Area is readily apparent to the public.

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[5] Consent Decree at 15.

[6] *Id.* at 4 (emphasis added).

[7] Although the Commission's Competing Provider Test does require a showing of availability of MVPD services in a franchise area, Comcast does not use Verizon's subscriber data for such a purpose. Instead, Comcast relies on the pervasive presence of DirecTV and Dish to demonstrate the "availability" of competing MVPD service. Comcast uses the Verizon subscriber tally only to show that the cumulative penetration of competing MPVDs exceeds the 15 percent requirement under the second prong of the Competing Provider Test. The Competing Provider Test distinguishes between evidence of "availability" under the first prong and numerical evidence of actual subscribers under the second prong. *See* 47 U.S.C. § 543(*l*)(1)(B)(i) and (ii); 47 C.F.R. § 76.905(b)(2)(i) and (ii).

Moreover, the notion that the Consent Decree was intended to preclude Comcast from relying on, or Verizon from complying with, the Commission's effective competition rules, is unsupportable.[8] Leaving everything else aside, Verizon's disclosure of aggregate subscriber numbers to Comcast for use in a petition for determination of effective competition in no way implicates the concerns the Consent Decree was intended to address. The Justice Department's Competitive Impact Statement accompanying the Consent Decree explains that the disclosure restrictions:

> ensure[] that no competitively sensitive information passes between the Cable Defendants and Verizon's consumer wireline business, in order to prevent collusion or other lessening of the intensity of the competitive rivalry between FiOS and Cable Defendants.[9]

Verizon's disclosure of its subscriber numbers to Comcast, as required by the Commission rules, was for use exclusively in Comcast's petition for a determination of effective competition. Indeed, as is typical in these situations, Comcast expressly agreed that the information would only be disclosed to outside counsel and inside counsel involved in this matter – no business people with responsibility for competitive decision-making have received or will receive this information.[10] Accordingly, there is no plausible way in which the sharing of this information

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[8] *See* 47 C.F.R. § 76.907(c) ("If the evidence establishing effective competition is not otherwise available, cable operators may request from a competitor information regarding the competitor's reach and number of subscribers. A competitor must respond to such request within 15 days. Such responses maybe limited to numerical totals.").

[9] *United States v. Verizon Commc'ns Inc.*, No. 1:12-cv-01354-RMC, Competitive Impact Statement, ECF No. 3 (D.D.C. filed Aug. 16, 2012).

[10] Verizon's disclosure of its subscriber data was expressly conditioned on use of the data solely for purposes of demonstrating effective competition. In particular, a condition of obtaining that subscriber data was that: "Comcast agrees that the information will be used by this law firm [*i.e.*, Davis Wright Tremaine ("DWT")] solely for the purposes of preparing, filing and prosecuting petitions for effective competition at the FCC for Comcast's system(s) serving the Communities and will not be disclosed by DWT except to in-house Comcast personnel who are

could facilitate "collusion" or otherwise "lessen" the intensity of competitive rivalry between Comcast and Verizon. To the contrary, such sharing may actually facilitate *more* competition between the companies by removing regulatory impediments in the marketplace. In short, the Commission should reject Rate Counsel's argument on this score out of hand.[11]

III. RATE COUNSEL HAS FAILED TO DEMONSTRATE WHY HURRICANE SANDY'S IMPACT COMPELS DISMISSAL OF COMCAST'S PETITIONS.

Rate Counsel contends that the Commission should now dismiss the Petitions for failing to account for the intervening impact of Hurricane Sandy.[12] Rate Counsel fails, however, to provide the Commission with any legal or factual basis for this unusual request. In fact, the two paragraphs the Rate Counsel dedicates to this argument contain no evidence whatsoever as to how competitor penetration figures were impacted by Hurricane Sandy. The Motion simply questions the "reliability of both the household and the satellite penetration data,"[13] without offering any actual evidence – or even an argument – that the data Comcast submitted is no longer reliable.

The Commission's procedural rules entitle Rate Counsel to submit a substantive opposition to Comcast's Petitions. If Rate Counsel has specific evidence demonstrating the data

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actively engaged in the evaluation, preparation or prosecution of an effective competition petition and who are not involved in competitive decision-making." Attachment A.

[11] Beyond all of this, the Consent Decree was entered into on August 16, 2012, while Comcast's Petitions were filed in June 2012, and thus was not even in effect as of the date Comcast filed its Petitions. In fact, Verizon actually provided the subscriber data at issue to Comcast in late 2011 – even before any of the transactions leading to the Consent Decree occurred. However, to avoid delays in future effective competition proceedings where Verizon data is used, the Commission should address and reject Rate Counsel's Consent Decree argument.

[12] Motion at 2, 7-8.

[13] *Id.* at 8.

Comcast has submitted is no longer reliable in specific franchise areas, it should submit that evidence in a timely opposition and allow Comcast to file rebuttal evidence. The Commission should not, however, summarily dismiss Comcast's long-pending Petitions (thereby further delaying a substantive resolution) based solely on Rate Counsel's unsupported questioning of the "reliability" of Comcast's submissions.

CONCLUSION

For the foregoing reasons, Comcast respectfully requests that the Commission promptly deny both Rate Counsel's Motion to Dismiss and its request that "the comment period be stayed pending Media Bureau action."[14] Rate Counsel has already delayed this proceeding for many months based on earlier challenges and extensions. Given the time that has transpired since Comcast submitted its Petitions in June 2012, it is incumbent on Rate Counsel to submit any substantive opposition to the Petitions without further delay.

Respectfully submitted,

Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates

By: _____

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February 19, 2013

Its Attorneys

[14] *See id.* at 3, 8 n.15.

Attachment A

From: Edgington, M Eric (Eric) <eric.edgington@verizon.com>
Sent: Wednesday, November 02, 2011 5:27 PM
To: Giroux, Fred
Subject: RE: Request for Verizon Subscriber Figures For Certain New Jersey Communities
Attachments: Community & Sub #s.pdf

Fred,

Subject to the below terms, attached is the Verizon subscriber information for those NJ communities listed in the attachment to your original e-mail in which Verizon currently has subscribers.

As we discussed, you will notify me should you making any filing under note number 3 below.

Eric Edgington

Associate General Counsel

Ofc. 813.483.2618

Fax. 813.204.8870

From: Giroux, Fred [mailto:FredGiroux@dwt.com]
Sent: Friday, October 07, 2011 8:58 AM
To: Edgington, M Eric (Eric)
Subject: Request for Verizon Subscriber Figures For Certain New Jersey Communities

Eric:

As we discussed yesterday, Comcast is seeking to demonstrated the presence of "effective competition" in certain New Jersey communities. A list of the relevant communities (the "Communities") is included in the attached spreadsheet. We hereby request pursuant to Section 76.907(c) of the FCC's Rules that Verizon provide us with the number of video subscribers that it serves in each of the Communities as soon as possible, but in no event later than 15 days from the date of this request.

In counting subscribers, each separately billed household should be counted as a subscriber. In accordance with FCC Rule Section 76.905(c), however, where multiple dwelling units ("MDUs") are billed as a single customer, each individual unit in that MDU should be counted as a separate household subscriber.

Based on our prior discussions Comcast is agreeable to the following:

1. Verizon will provide undersigned counsel at DWT the information regarding Verizon's cable television subscribers in the Communities.

2. Comcast agrees that the information will be used by this law firm solely for the purposes of preparing, filing and prosecuting petitions for effective competition at the FCC for Comcast's system(s) serving the Communities and will not be disclosed by DWT except to in-house Comcast personnel who are actively engaged in the evaluation, preparation or prosecution of an effective competition petition and who are not involved in competitive decision-making.

3. Comcast agrees that if it submits any of the subscriber information provided by Verizon with respect to the Communities, Comcast will request confidential treatment of such information from the FCC.

Please feel free to contact me if you have any questions regarding this request.

Thank you for your prompt attention to this matter.

Regards,

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CERTIFICATE OF SERVICE

I, Paulette Humphries, do hereby certify on this 19th day of February, 2013 that a true and correct copy of the foregoing "OPPOSITION TO MOTION TO DISMISS" has been sent via U.S. mail, postage prepaid to the following:

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