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February 7, 2014

Electronically Filed
Steven Broeckaert
Senior Deputy Division Chief
FCC Policy Division
Media Bureau

Re: I/M/O Comcast Cable Communications, LLC
For a Determination of Effective Competition in 7 Washington Franchise Areas
Docket No. CSR-8854-E; MB 13-286

Dear Mr. Broeckaert:

Enclosed for filing is an Opposition to Petition for Special Relief on Behalf of the City of Burien, Washington in the above referenced matter.

This brief was electronically filed through the Commission's Electronic Filing system.

Sincerely,

OGDEN MURPHY WALLACE, P.L.L.C.

Elana Zana

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FEB 14 2014

FCC Mail Room

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of:	)	
Comcast Cable Communications, LLC On behalf of its subsidiaries and affiliates	)	
For a Determination of Effective Competition in 7 Washington Franchise Areas	)	**CSR No. 8854-E** **MB Docket No. 13-286**

To: Office of The Secretary
Attn: Chief, Media Bureau

OPPOSITION TO PETITION FOR SPECIAL RELIEF ON BEHALF OF THE CITY OF BURIEN, WASHINGTON

Pursuant to 47 CFR § 76.7, the City of Burien, Washington (the "City") opposes the Petition for Special Relief ("Petition") submitted by Comcast Cable Communications, LLC ("Comcast") on November 15, 2013, for a determination of "effective competition" in the City and supplemented on January 16, 2014. The City opposes Comcast's Petition because it fails to rebut the presumption that effective competition does not exist within the City. Accordingly, the Petition should be denied.

LEGAL ARGUMENT

I. COMCAST FAILS TO MEET THE BURDEN OF PROOF

Pursuant to 47 CFR §76.907(b), "the cable operator bears the burden of rebutting the presumption that effective competition does not exist with evidence that effective competition, as defined in 47 CFR §76.905, exists in the franchise area."[1] Comcast has failed to meet this burden with respect to the City of Burien. In order to rebut this presumption, Comcast must

[1] 47 CFR §76.907(b)

satisfy one of four conditions found in 47 CFR §76.905(b). Comcast's Petition relies upon the second condition (47 CFR §76.905(b)(2)) which requires that (1) there be at least two unaffiliated multichannel video programming distributors ("MVPD") which offer comparable programming to at least 50% of the households in the franchise area and (2) the number of households subscribing to the MVPDs exceeds 15% of the households in the franchise area. The burden of proof falls on Comcast, which Comcast has failed to satisfy.

II. DISH AND DIRECTV DO NOT MEET THE COMPARABLE PROGRAMMING REQUIREMENT

Comcast asserts that it meets the first part of the competing provider test because Dish Network Corporation ("Dish") and DirecTV, Inc. ("DirecTV"), both direct broadcast satellite ("DBS") providers, offer comparable programming to more than 50% of the households in the City. Though both Dish and DirecTV operate in the City, neither of them offer comparable programming to Comcast. Despite the narrow definition of comparable programming found in 47 CFR §76.905(g), the common sense definition equates to a comparable channel line-up, not just twelve channels. Dish and DirecTV are missing a core element of the basic service provided by Comcast – the public, education and government ("PEG") access channels. These PEG channels are offered as a part of Comcast's basic service to the City. It is a mechanism by which local government can showcase and inform citizens of important government and educational activities occurring in the City and other nearby localities. Dish and DirecTV do not offer these channels and therefore do not offer comparable programming. Accordingly, Comcast does not satisfy the first prong of the competing provider test.

III. DBS PROVIDERS DO NOT ACTUALLY CREATE EFFECTIVE COMPETITION

1. DBS Providers Insufficiently Affect the Rates of Wireline Providers

Even if Comcast technically satisfies the effective competition test, the FCC may still use its discretion to protect the consumers in the City from an increase in cable prices. Congress created the effective competition requirements because it assumed, based on basic economic theories, that market pressures would dictate rates and protect subscribers, therefore making rate regulation unnecessary.[2] Since 1993 the FCC has included DBS providers in the definition of MVPDs even though at the time the FCC issued the 1993 order DBS competition did not exist.[3] The FCC expected that with the advent of the DBS services, DBS would create competition to cable services and therefore act as a market competitor.[4] In fact, this is not the case. In 2002, the FCC noted that "effective competition due to DBS overbuild status has no significant effect on cable rates."[5] In 2007, when issuing its order imposing new requirements on the entrance of new cable providers, the FCC noted a need for wireline competition to incumbent cable providers: "[t]he record demonstrates that new cable competition reduces rates far more than competition from DBS."[6] In addition, the most recent price survey issued by the FCC indicates that the average prices for expanded basic service are higher in communities in which effective competition has been granted.[7]

With the bundling and triple play trends used by wireline cable providers, DBS will likely create less competition to Comcast. In fact, in 2012, DirecTV opined that due to the bundling trend and alternative forms of delivering video programming, the video only market is

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[2] *See, e.g.,* S. Rep. 102-92 at 11-12, *reprinted at* 1992 U.S.C.C.A.N. 1133, 1144 (1991).

[3] *In the Matter of Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992 Rate Regulation,* 8 FCC Rcd 5631, 5660 (1993).

[4] *Id.*

[5] *In re Implementation of Section 3 of Cable Television Consumer Protection and Competition Act of 1992,* 17 FCC Rcd 6301, 6318 ¶45 (2002).

[6] *In The Matter of Implementation of Section 621(A)(1) of The Cable Communications Policy Act of 1984 as Amended By The Cable Television Consumer Protection and Competition Act of 1992,* Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 5101 at 50. (March 5, 2007).

[7] *See Report on Cable Industry Prices,* MM Docket No. 92-266 at 7-8, Table 2 (June 7, 2013).

decreasing as a viable competitor, rather broadband internet is becoming the cornerstone product of the wireline providers, making it even more difficult for DBS providers to compete.[8] Determining that effective competition exists based on the presence of DBS providers alone is inaccurate, as their presence has not shown a decrease in rates.

2. Effective Competition is Not Actually Present in The City

The City does not currently impose rate regulation; Comcast is free to set its own rates as it deems necessary for the market. Here, Comcast is requesting the declaration of effective competition presumably because there is sufficient market presence by the DBS providers to not warrant rate regulation. If this was truly the case then the basic service rate in the City would be lower than the basic service rate for cities in which effective competition does not exist. However, the basic service rate in the City is in fact higher. For example, the basic service rate for the City of Seattle is $16.35,[9] compared with $17.25 in the City.[10] Similarly, Auburn, Des Moines and Maple Valley, three cities in which the FCC has declared effective competition,[11] have basic service rates of $19.32 – nearly $3.00 more than the City of Seattle. Analogously to the City, the FCC determined that effective competition existed in Auburn, Des Moines and Maple Valley based solely on the presence of DBS providers.[12] Actual effective competition to Comcast does not truly exist in these cities because the market forces are not driving Comcast to reduce its rates. If effective competition actually existed in the City then arguably the opposite result would occur– the City would have lower basic service rates. As evidenced by the FCC's

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[8] *In the Matter of Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, MB Docket No. 12-203, DirecTV Comments (filed September 10, 2012) at 15-18.

[9] As of the date of this filing, effective competition has not been found in the City of Seattle.

[10] *See* Xfinity Services and Pricing, King, Pierce and Snohomish Counties, January 1, 2013, Exhibit 1.

[11] *In the Matter of Comcast Cable Communications, LLC, Petitions for Determination of Effective Competition in Ten Communities in Washington*, MB Docket No. 13-2284, CSR 7757-E, 7856-E, 8028-E (released December 2, 2013).

[12] *Id.* at ¶5 and ¶18.

own reports, and the current basic service rate in the City as compared to the City of Seattle, effective competition does not equate to lower costs for consumers.

The City encourages the FCC to determine that DBS no longer satisfies the effective competition test, because it does not in fact create actual competition for wireline providers like Comcast. The City urges the FCC to either deny this Petition or in the alternative defer acting on the Petition until the FCC can reexamine its current policies related to whether DBS providers create effective competition.

IV GRANTING OF THIS PETITION IS NOT IN THE PUBLIC INTEREST

1. Comcast Proffers No Evidence Supporting that the Granting of Comcast's Petition Would Serve the Public Interest.

Petitions for Special Relief require a showing "to support a determination that a grant of such relief would serve the public interest."[13] Nowhere in its Petition does Comcast assert that granting effective competition would serve the public interest. Comcast does not proffer any evidence to support that its request would serve the public interest or that the existence of DBS providers affords adequate rate protection for the citizens of the City. In fact, in cities where the FCC has granted effective competition the cable rates for expanded basic cable have gone up.[14] Based on Comcast's Petition alone it is unclear how the FCC can determine "that a grant of such relief would serve the public interest."[15]

2. Granting of Effective Competition Will Cause Additional Undesirable Consequences.

As the FCC is aware, granting of effective competition can cause additional consequences beyond an increase in the basic service rates. The grant of this Petition will

[13] 47 CFR 76.7(a)(4)(i).

[14] *See Report on Cable Industry Prices, MM Docket No. 92-266 at 7-8, Table 2 (June 7, 2013).*

[15] 47 CFR 76.7(a)(4)(i).

eliminate the buy-through protections afforded by 47 CFR § 76.921(a), and will permit Comcast to require citizens to subscribe to a tier as a condition of subscribing to programming on a per channel or per program basis. Similarly, with the grant of effective competition, Comcast will no longer be subject to a geographically uniform rate structure within the City.[16] Comcast will be allowed to significantly change and raise its rate structure within the City without actually being subject to real competition.

Most troubling is that if effective competition is granted, Comcast will no longer be required to maintain a low cost basic service tier.[17] Subscribers to the low cost basic service tier may suddenly see their cable prices significantly increase. In addition, Comcast can arguably move the PEG channels off of the basic service tier.[18] Considering that DBS providers do not broadcast these PEG channels, citizens of the City may be faced with a significant increase in their cable costs in order to view the PEG channels.

It is questionable how the grant of this Petition by the FCC can be considered in the public interest. The impact of granting effective competition will have a far reaching effect beyond merely curbing the City's rate regulation authority (which it does not currently exercise). Instead, the public may be deprived of inexpensive access to PEG channels, a more variant rate structure and the elimination of buy-through protections.

CONCLUSION

For the reasons described above, the City hereby requests that the FCC deny Comcast's Petition for Special Relief. Comcast has failed to rebut the presumption that effective

[16] 47 CFR 76.984.
[17] 47 USC 543(b).
[18] 47 USC543(b)(7).

competition does not exist. Comcast's evidence to support its Petition is inadequate and unverified and therefore should be rejected outright.

Respectfully submitted,

Elana R. Zana
Ogden Murphy Wallace, PLLC
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
Telephone: (206) 442-1308
Counsel for the City of Burien

Dated: February 7, 2014

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of:	)	
Comcast Cable Communications, LLC On behalf of its subsidiaries and affiliates	)	
For a Determination of Effective Competition in 7 Washington Franchise Areas	)	**CSR No. 8854-E** **MB Docket No. 13-286**

To: Office of The Secretary
Attn: Chief, Media Bureau

Certification in Support of Opposition on Behalf of The City of Burien

I, Elana Rachel Zana, of full age, certify as follows:

1. I am a duly licensed attorney in good standing in the State of Washington.
2. I am employed at Ogden Murphy Wallace, PLLC, and serve as an outside counsel to the City of Burien. This certification is submitted in support of arguments made by the City of Burien in opposition to the Petition for Special Relief Submitted by Comcast Cable Communications, LLC, filed on November 15, 2013 and supplemented on January 16, 2014.
3. Information related to Xfinity's (Comcast) cable rates in King, Pierce, and Snohomish Counties was retrieved from the City of Seattle's cable website, located at: http://www.seattle.gov/cable/documents/ComcastServicesandPricingList_KingCounty_publishedJanuary2013_000.pdf on February 6, 2014.
4. I have read the foregoing Opposition to Petition for Special Relief on Behalf of the City of Burien, Washington, and, to the best of my knowledge, information and belief formed

after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and that it is not interposed for any improper purpose.

Respectfully submitted,

Elana R. Zana
Ogden Murphy Wallace, PLLC
901 Fifth Avenue, Suite 3500
Seattle, WA 98164
Telephone: (206) 442-1308
Counsel for the City of Burien

Dated: February 7, 2014

Exhibit 1

TRIPLE PLAY PACKAGES

XF TRIPLE PLAY PACKAGES*

Starter XF Triple Play Bundle
Includes Digital Starter for primary outlet, Performance Internet and XFINITY Voice Unlimited

Rate	$144.95
Bundle	$119.99

Preferred XF Triple Play Bundle
Includes Digital Preferred for primary outlet, Performance Internet and XFINITY Voice Unlimited

Rate	$154.95
Bundle	$129.99

HD Preferred XF Triple Play Bundle
Includes Digital Preferred for primary outlet, HD Technology Fee, Starz®, Performance Internet and XFINITY Voice Unlimited

Rate	$164.85
Bundle	$139.99

HD Preferred Plus XF Triple Play Bundle
Includes Digital Preferred for primary outlet, HD Technology Fee, HBO®, Starz®, Blast!® Internet and XFINITY Voice Unlimited

Rate	$184.95
Bundle	$159.99

HD Premier XF Triple Play Bundle
Includes Digital Premier with HD DVR Service or AnyRoom® DVR Service for primary outlet, HD Technology Fee, Blast!® Internet and XFINITY Voice Unlimited

Rate	$214.95
Bundle	$179.99

HD Complete XF Triple Play Bundle
Includes Digital Premier, The Movie Channel®, with AnyRoom® DVR Service for primary outlet, three Digital Additional Outlets with HD digital converters and remotes, HD Technology Fee, Blast!® Internet, Wireless Gateway, XFINITY Signature Support Wireless Network Support and XFINITY Voice Unlimited

Rate	$244.95
Bundle	$219.99

MULTILATINO PAQUETE TRIPLE*

MultiLatino Max Paquete Triple
Includes MultiLatino Max for primary outlet, Performance Internet and XFINITY Voice Unlimited

Rate	$139.95
Bundle	$119.99

MultiLatino Ultra Paquete Triple
Includes MultiLatino Ultra for primary outlet, Performance Internet and XFINITY Voice Unlimited

Rate	$149.95
Bundle	$129.99

MultiLatino Ultra HD Paquete Triple
Includes MultiLatino Ultra for primary outlet, HD Technology Fee, Starz®, Performance Internet and XFINITY Voice Unlimited

Rate	$159.95
Bundle	$139.99

MultiLatino Ultra HD Plus Paquete Triple
Includes MultiLatino Ultra for primary outlet, HD Technology Fee, HBO®, Starz®, Blast!® Internet and XFINITY Voice Unlimited

Rate	$179.95
Bundle	$159.99

MultiLatino Total HD Paquete Triple
Includes MultiLatino Ultra and HD DVR Service or AnyRoom® DVR Service for primary outlet, HD Technology Fee, HBO®, Showtime®, Starz®, Cinemax®, Sports Entertainment Package, Blast!® Internet and XFINITY Voice Unlimited

Rate	$209.95
Bundle	$179.99

XF TRIPLE PLAY PACKAGE REWARDS / MULTILATINO PAQUETE TRIPLE REWARDS	Regular Price	HD Preferred XF and MultiLatino Ultra HD	HD Preferred Plus XF and MultiLatino Ultra HD Plus	HD Premier XF and MultiLatino Total HD	HD Complete XF
HBO®	$19.99	$15.00	Included	Included	Included
Showtime®	$19.99	$10.00	$10.00	Included	Included
Starz®	$19.99	Included	Included	Included	Included
Cinemax®	$19.99	$10.00	$10.00	Included	Included
The Movie Channel®	$19.99	$10.00	$10.00	$10.00	Included
HD DVR Service[1]	$19.95	$9.95	$9.95	Included	N/A
AnyRoom® DVR Service®	$19.95	$13.95	$13.95	Included	Included
Digital Additional Outlet Service[2]	$8.75	$8.75	$8.75	$8.75	$8.75
with HD[3]	$8.75	$8.75	$8.75	$8.75	$8.75
with HD DVR Service[1]	$16.95	$16.95	$16.95	$16.95	$16.95
with AnyRoom® DVR Service	$8.75	$8.75	$8.75	$8.75	$8.75[4]
HD Technology Fee[1]	$10.00	Included	Included	Included	Included
3D Technology Fee[1]	$0.00	$0.00	$0.00	$0.00	$0.00
Blast!® Speed Upgrade	$10.00	$10.00	Included	Included	Included
Extreme 50 Upgrade®[5]	$54.00	$50.00	$40.00	$40.00	$40.00
Extreme 105 Upgrade®[5]	$157.00	$157.00	$147.00	$147.00	$147.00

Refer to the last page for additional information.
For information about XFINITY policies and terms of service, go to www.comcast.com/policies.

TRIPLE PLAY AND DOUBLE PLAY PACKAGES*

Economy Triple Play XF
Includes Digital Economy for primary outlet, Economy Plus Internet and XFINITY Voice Local With More®

Rate	$84.85

MultiLatino Plus Paquete Triple
Includes MultiLatino Plus for primary outlet, Economy Plus Internet and XFINITY Voice Local with More®

Rate	$94.85

MultiLatino Extra Paquete Triple
Includes MultiLatino Extra for primary outlet, Economy Plus Internet and XFINITY Voice Local with More®

Rate	$94.85

Blast Plus®
Includes Digital Economy and Streampix™ for primary outlet and Blast!® Internet

Rate	$79.95

Preferred XF Double Play
Includes Digital Preferred for primary outlet and Performance Internet

Rate	$134.95
Bundle	$119.99

XFINITY® TV

BASIC SERVICES

Limited Cable

Brier	$13.70
Bill Creek	$13.88
Mercer Island	$14.25
Edgewood, Fort Lewis, Milton, Puyallup, Steilacoom	$15.07
Bellevue	$14.75
Redmond	$14.80
Vashon Island	$16.00
Seattle	$15.35
Renton	$15.20
Sammamish, areas of Unincorporated King County	$16.41
Des Moines	$15.70
Kent	$16.50
Auburn	$16.58
Areas of Lake Forest Park	$16.51
Marysville, areas of Unincorporated King County	$18.10
Areas of Lake Forest Park	$16.58
Newcastle, areas of Unincorporated King County	$18.37
Burien, Federal Way	$17.25
Mukilteo	$19.20
Lake Stevens, Marysville, areas of Unincorporated Snohomish County	$18.77
Tukwila	$17.28
Auburn, Covington, Maple Valley, areas of Unincorporated King County	$19.32
Monroe, Sultan	$19.51
Bonney Lake, Dupont, South Prairie, Sumner areas of Unincorporated Pierce County	$19.81
Areas of Edmonds, Lynnwood, Mountlake Terrace, areas of Unincorporated Snohomish County, areas of Unincorporated King County	$18.15
Kirkland	$16.09
Bothell, Brier, Mill Creek, Mountlake Terrace, areas of Unincorporated Snohomish County	$20.73
Cascade, Eastside, Big Harbor, McChord AFB, Roy	$21.38
Arlington and areas of Unincorporated Snohomish County	$22.09
Everett, Everett Naval Station, Gold Bar, Granite Falls, Snohomish, Startup, Woodinville, areas of Unincorporated Snohomish County	$23.06
Areas of Edmonds, Shoreline, Woodway and areas of Unincorporated Snohomish County	$23.90
Algona, Black Diamond, Enumclaw, Normandy Park, Pacific, Sumner	$23.37
Carnation	$23.65
North Bend, Snoqualmie	$24.41

DIGITAL SERVICES

Digital Economy Includes Limited Cable, additional digital channels and a standard definition digital converter and remote for the primary outlet, access to Pay-Per-View programming and Music Choice — $34.95

Digital Starter Includes Digital Economy, additional digital channels and access to On Demand programming — $67.49

Digital Preferred Includes Digital Starter and additional digital channels — $85.49

Digital Preferred Plus Includes Digital Preferred, HBO® and Starz® — $119.99

Digital Premier Includes Digital Preferred, HBO®, Showtime®, Starz®, Cinemax® and Sports Entertainment Package — $135.99

MultiLatino Plus Includes Limited Cable, MultiLatino, standard definition digital converter and remote for primary outlet, access to Pay-Per-View and On Demand programming — $75.95

MultiLatino Extra Includes Digital Economy and MultiLatino — $39.95

MultiLatino Max Includes MultiLatino Extra, additional digital channels and access to On Demand programming — $55.95

MultiLatino Ultra Includes MultiLatino Max and Digital Preferred — $75.90

BASIC AND DIGITAL ANCILLARY SERVICES

HBO®	$10.99
Showtime®	$10.99
Starz®	$10.99
Cinemax®	$10.99
The Movie Channel®	$10.99
Playboy®	$10.99

Digital Preferred® Includes over 60 digital channels including National Geographic Channel, Science Channel, DIY Network, OWN, WE, Encore®, TCM, The Hub, Hub Jr., ESPN2, AFL Network and Fox Soccer Channel — $15.00

MultiLatino® Includes over 40 digital channels of Spanish language programming — $16.95

Family Tier® Includes 12 channels including C-SPAN, The Hub, Food Network, HGTV, PBS Kids Sprout, National Geographic Channel and The Weather Channel — $14.99

Sports Entertainment Package® Includes 17 channels including Big Ten Network, CBS Sports Network, FCS Atlantic, FCS Central, FCS Pacific and Fox Movie Channel — $9.99

AnyPlay®*	$13.00
HD Technology Fee[1]	$10.00
3D Technology Fee[1]	$0.00
HD DVR Service[1]	$16.95
AnyRoom® DVR Service®	$13.95
Digital Additional Outlet Service[2]	$8.75
with HD[3]	$8.75
with HD DVR Service[1]	$16.95
with AnyRoom® DVR Service	$8.75
Digital Adapter Additional Outlet Service®	$1.99

INTERNATIONAL SELECTIONS*

GMA Pinoy TV (Filipino)	$11.99
GMA Life TV (Filipino)	$8.99
GMA Pinoy & GMA Life TV (Filipino)	$10.99
TFC & GMA Pinoy TV (Filipino)	$19.99
Filipino Elite Pack (Filipino) Includes GMA Pinoy TV, GMA Life TV and TFC	$22.99
TV5 MONDE (French)	$9.99
TV Japan (Japanese)	$24.99
SBTN (Vietnamese)	$14.99
TFC (Filipino)	$11.99
RTN (Russian)	$14.99
KBS Cricket	$14.99
Zee TV (South Asian)	$14.99
KO-AM (Korean)	$14.99

PAY-PER-VIEW AND ON DEMAND SUBSCRIPTION SERVICES*

Bollywood Hits On Demand	$12.99
Bollywood Hits On Demand w/o South Asian premium network	$3.99
Howard Stern On Demand per show	$9.99
Howard Stern On Demand*	$10.99
Howard Stern On Demand® one year subscription	$119.99
WWE Classics On Demand	$7.99
Sarai TV On Demand	$7.99
Filipino On Demand	$7.99
Filipino On Demand w/o Filipino premium network	$0.99
Sao Mach for TV On Demand	$14.99
Disney Family Movies On Demand	$3.99
Pay-Per-View and On Demand Movies and Events® (per title or event)	Prices vary
Streampix™®	$4.99

SPORTS PACKAGES*

MLB Extra Innings	Call 1-800-XFINITY for pricing
MLS Direct Kick	Call 1-800-XFINITY for pricing
NHL Center Ice	Call 1-800-XFINITY for pricing
NBA League Pass	Call 1-800-XFINITY for pricing
ESPN Game Plan	Call 1-800-XFINITY for pricing
ESPN Full Court	Call 1-800-XFINITY for pricing

VIDEO EQUIPMENT

Limited Cable Only Converter	$1.80
Digital Converter	$2.50
Remote Control	$0.70
HD Digital Converter (Limited Cable Only)	$2.50
Digital Adapter (Limited Cable Only – Primary Outlet)	$0.00
Digital Adapter (Limited Cable Only – 1st and 2nd Additional Outlet)	$0.00
Digital Adapter (Limited Cable Only – 3rd Additional Outlet and above)	$ 0.50
CableCARD (first card in device)	$0.00
CableCARD (second card in same device)	$1.10
Customer-Owned Video Equipment Credit	
See www.comcast.com/equipment policy for additional information	$2.50

INSTALLATION FEES

	Initial Installation of Service	After-the-fact Installation of Service
Unwired Home[3,4,5] (Standard Installation)	$42.00	N/A
Wired Home[5,6] (Standard Installation)	$39.00	N/A
Hourly Service Charge® (Custom Installation)	$33.50	$33.50
Additional Outlet (new)	$13.50	$32.50
Activate Pre-existing Additional Outlet	$6.25	$20.00
Relocate Additional Outlet	$15.00	$30.50
Connect VCR/DVD	$18.50	$20.50
XFINITY TV Upgrade/Downgrade of Service no in-home visit required		$1.99
XFINITY TV Upgrade of Service in-home visit required		$35.00
XFINITY TV Downgrade of Service in-home visit required		$12.50
XFINITY TV In-Home Service Visit		$30.50
Reconnection of Service in-home visit required		$20.00

REACTIVATION FEES

Video Only	$1.99
Internet or Voice Only	$5.00
Video and Voice or Video and Internet	$8.99
Voice and Internet	$10.00
Video, Voice and Internet	$11.99

MISCELLANEOUS FEES

Service Protection Plan® (per month) Inside home wiring protection for your cable TV, high-speed Internet and phone services	$3.99
Computer Protection Plus® (per month) Protection for computers, laptops and tablets. Includes Service Protection Plan	$9.95
TV Protection Plus® (per month) Protection for flat panel television. Includes Service Protection Plan	$14.95
Complete Protection® (per month) Protection for computers, laptops, tablets, flat panel televisions and home phones. Includes Service Protection Plan	$19.95
Computer Performance Tool® (per month) Automated computer diagnostic tool for improved speed, performance and security	$4.95
Wireless Networking Support (per month) 24/7 technical support for wireless home network	$5.95

Wireless Networking & Computer Performance Support (per month) 24/7 technical support for wireless home network plus PC optimization for improved speed and performance	$5.95
Help Desk® (per month) 24/7 technical support for computers, networks, WiFi, printers and more	$14.95
Help Desk Plus® (per month) 24/7 technical support for computers, networks, WiFi, printers, virus removal and more	$19.95
Wireless Networking Support Enrollment Fee (per occurrence)	$39.00
Wireless Networking & Computer Performance Enrollment Fee (per occurrence)	$29.00
Help Desk Enrollment Fee (per occurrence)	$39.00
Help Desk Plus Enrollment Fee (per occurrence)	$79.00
Field Collection Charge Visit to customer's residence required to collect past due balance or unreturned equipment	$15.00
Returned Payment Item (each)	$25.00
Late Fee	$2.99
Transaction Fee—Agent Fee payment made by phone with a Customer Care Representative	$5.95
Unreturned or Damaged Equipment Fee[20] (per piece)	Replacement Cost
Signal Amplifier	$49.40
Self Install Kit[20] (Single Product)	$10.00
Self Install Kit[20] (Multi-Product)	$30.00
Self Install Kit Shipping and Handling	$15.00
Self Install Kit Shipping and Handling (Priority)	$30.00
Cable Guide Magazine (per month)	$3.50

XFINITY® VOICE[14]

XFINITY Voice—Unlimited[7]	$44.95
With TV and Internet Service $39.95	
XFINITY Voice—Local With More[7]	$34.95
With TV or Internet Service $24.95	

CAREFREE MINUTES INTERNATIONAL CALLING PLANS

Carefree Minutes International Calling Plans are additional call plans in specific countries or international regions

Carefree Minutes Asia 100	$4.95
Carefree Minutes Latin America 300	$9.95
Carefree Minutes Mexico 300	$9.95
Carefree Minutes Mexico 100	$4.95
Carefree Minutes Western Europe 100	$4.95
Carefree Minutes Worldwide 300	$14.95

OTHER CHARGES (PER MONTH UNLESS OTHERWISE INDICATED)

Text Messaging For Local with More[7]	$2.95
Voicemail	$3.95
Additional Line with Calling Features	$21.95
Additional Line without Calling Features	$11.95
Voice/Data Modem	$7.00

Refer to the last page for additional information.
For information about XFINITY policies and terms of service, go to www.comcast.com/policies.

Voice/Data Modem DOCSIS 2.0 Kit (for purchase, one-time charge)	$99.00
Voice/Data Modem DOCSIS 3.0 Kit (for purchase, one-time charge)	$149.00
New Activation Fee (per occurrence)	$29.95
Standard Installation (per occurrence)	$50.00
Upgrade/Downgrade at Service In-home visit required (per occurrence)	$50.00
Upgrade/Downgrade of Service No In-home visit required (per occurrence)	$5.00
In-Home Repair Charge (per occurrence)	$50.00
Unreturned or Damaged Equipment Fees[20] (per occurrence)	Replacement Cost

XFINITY® INTERNET[15]

	XFINITY Internet Service Only	with XFINITY Voice Service
Economy Plus[6]	$39.95	$29.95
Performance Starter[6,24]	$49.95	$40.95
Performance	$64.95	$45.95
Blast!®	$74.95	$59.95
Extreme 50[26]	$114.95	$99.95
Extreme 105[26]	$159.95	$139.95
Slingbox® on XFINITY	$9.95	
Voice/Data Modem (monthly)	$7.00	
Wireless Gateway (monthly)	$7.00	
Additional IP Address (first, monthly)	$4.95	
Additional IP Address (each monthly, up to 4 additional)	$9.95	
Voice/Data Modem DOCSIS 2.0 Kit (for purchase, one-time charge)	$79.00	
Voice/Data Modem DOCSIS 3.0 Kit (for purchase, one-time charge)	$99.00	
Comcast Certified Wireless Home Networking Gateway (for purchase, one-time charge)	$179.00	
Ethernet Cord (each, one-time charge)	$30.00	
Wireless-N Adapter (PCMCIA) (for purchase, one-time charge)	$60.00	
Wireless-N Adapter (USB) (for purchase, one-time charge)	$80.00	
Professional Internet Installation (per occurrence)	$90.00	
New Activation Fee (per occurrence)	$29.95	
Upgrade/Downgrade of service in-home visit required (per occurrence)	$40.00	
Upgrade/Downgrade of service No in-home visit required (per occurrence)	$5.00	
Wireless Networking On-Site Professional Set-Up (with installation of XFINITY TV, XFINITY Voice or XFINITY Internet, per occurrence)	$49.95	
Wireless Networking On-Site Professional Set-Up (Separate Trip, per occurrence)	$99.95	
Wireless Networking On-Site Professional Set-Up (Additional Device, per occurrence)	$29.95	

Refer to the last page for additional information.
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Extreme 105 Professional Internet Installation (one time charge, per occurrence)	$249.00
Upgrade Home Networking Equipment requiring separate trip (per occurrence)	$40.00
Installation of PC Cards, Separate Trip No Card (per occurrence)	$74.99
In-Home Service Visit (per occurrence)	$50.00
Unreturned or Damaged Equipment Fees[20] (per occurrence)	Replacement Cost

TRIAL PACKAGES

MyTV CHOICE

MyTV Choice Bundle	
Includes Get Started, XFINITY Performance Internet and XFINITY Voice Unlimited	$92.95
MyTV Choice Plus Bundle	
Includes Get Started Plus, XFINITY Performance Internet and XFINITY Voice Unlimited	$129.95
MyTV Choice Theme Packs	
News & Info includes 10 news and information channels including CNN, Fox News, MSNBC, History Channel, HGTV, Travel Channel	$19.99
Entertainment & Lifestyle includes 21 entertainment and lifestyle-oriented channels including USA, TNT, Syfy, MTV, VH1, Bravo	$10.00
Movies includes 16 movie channels including Encore®, IFC, Sundance, TCM	$10.00
Kids includes 11 kid and family-friendly channels including ABC Family, Cartoon Network, Disney Channel, Nickelodeon, PBS Sprout	$10.00

MyTV CHOICE : ADDITIONAL SERVICES

MultiLation®	$14.95
Sports & Entertainment[19]	$7.95
HD Technology Fee[8]	$10.00
HD DVR Service[8]	$15.95
Blast!® Speed Upgrade[6]	$10.00
Digital Additional Outlet Service[5]	$8.00

Refer to the last page for additional information.
For information about XFINITY policies and terms of service, go to www.comcast.com/policies.

Certain services available separately or as a part of other levels of service. Comcast terms & subject to Comcast's standard terms and conditions of service. Unless otherwise specified, prices shown are the monthly charge for the corresponding service, equipment or package. Prices shown do not include applicable taxes, franchise fees, FCC fees, Regulatory Recovery Fee, Public Access fees, other state or local fees or other applicable charges (e.g., per call tell or international charges). Taxes, surcharges and features are subject to change. If you are a video service customer and you own a compatible digital converter or CableCARD device, please call 1-800-XFINITY for pricing information or visit www.comcast.com/buydigitalcable.

- Requires a Voice/Data Modem except for HD Channels Value Pack.
- Bundles only available for 12 months to XF Triple Play or Month-Month Triple Play Customers after 12 month promotional package.
- Blast!® DVR Service is included with HD Premier Triple Play, Blast!® Total HD Premier Triple and HD Complete XF Triple Play & Blast!® DVR Service is included on primary outlet.
- Includes HD converter and remote. Requires standard definition converter and remote.
- Sold only with one or more Digital Optimized Cable Service with HD Converter. Maximum 3 per household. Requires professional install.
- Price shown is for any additional outlet after first 3.
- Not available in Limited Cable only customers. Digital service fee on additional outlet corresponds to digital service fee on primary outlet.
- Requires HD Technology Fee.
- HD converter replaces standard definition converter on primary outlet. Not available to customers with Limited Cable only.
- Not available in all areas. May require installation and non-refundable installation charge.
- Does not include PowerBoost®.
- Bundles are available for 12 months to Preferred XF Triple Play customers after 12 month promotional package.
- Requires digital converter or CableCARD and Limited Cable.
- Requires Digital Starter.
- Requires digital converter and purchase of Limited Cable, Family Tier programming included in Digital Six rates except for Multi-Jump.
- Requires Digital Starter and Performance Internet.
- Includes digital adapter and remote. Requires Digital Starter.
- Requires digital converter and Limited Cable.
- If cancelled in the first month, you will be charged $100.00.
- Automatically converted annually to the then-current price. If cancelled in the first month, you will be charged $100.00. If cancelled between the 2nd and 6th month your account will be credited $25.00. If cancelled after the 6th month, no credit will be issued.
- Price of Pay-Per-View and On Demand titles or Event is quoted prior to the completion of the Pay-Per View or On Demand ordering process.
- Requires digital converter and Limited Cable to receive Showtime®, an exclusive Showtime® included with the following tiers of service: Basic Plus®, HD Premier Plus, XF Triple Play, HD Premier XF Triple Play, HD Complete XF Triple Play. HD content requires subscription to HD Technology/HD Service fee. Streaming to XFI devices requires XFINITY TV rate, Internet service with bandwidth of at least 600 Kbps and a subscription to Limited Cable. Streaming to laptop/desktop requires equipment meeting minimum requirements posted at http://support.comcast.com/help-and-support/internet/streaming-on-xfi-devices-requirements-and-troubleshooting. Internet service with bandwidth of at least 600Kbps and a subscription to Limited Cable.
- Does not include Extreme 105 Internet Service Installation charge, wireless networking, professional Internet installation, Triple installation fees or activation fees.
- Standard installations includes installations up to 125 feet from nearest Comcast point, primary outlet only. Custom installations include installations which require in-wall wiring or installations in exterior drop cables, basements, or crawl spaces.
- See http://www.comcast.com/xfi/ for information on Service Protection Plan.
- See http://support.comcast.com/xfi/core/ for information on Computer Protection Plus.
- See http://support.comcast.com/xfi/core/ for information on TV Protection Plus.
- See http://support.comcast.com/xfi/core/ for information on Computer Protection.
- See http://support.comcast.com/xfi/core/ for information on Computer Performance Tool.
- See http://support.comcast.com/xfi/core/ for information on help Desk.
- See http://support.comcast.com/xfi/core/ for information on Help Desk Plus.
- Please contact 1-800-XFINITY for questions regarding equipment compatibility.
- Does not apply to the CableCARD Set Top Box.
- Requires a Voice/Data Modem. Unlimited Local and Long Distance package pricing applies only to direct dialed calls from home to locations in U.S., Canada, Puerto Rico and certain other U.S. territories. Price do not include other international calls. For more information regarding XFINITY voice policy go to http://www.comcast.com/xfinitysupport/internet/voice/voice.html. Also, go to http://www.comcast.com/xfinitysupport/internet/voice/voice.html.
- Voice/Data modem required. For more information regarding XFINITY Internet go to http://www.comcast.com/xfinitysupport/internet.
- Download speed up to 6 Mbps and upload speed up to 1 Mbps. Does not include Performance®. Many factors affect speed, actual speeds may vary and are not guaranteed.
- MyTV Choice® is available as a retail basis only and may be discontinued by Comcast at any time. MyTV Choice® requires purchase of Get Started or Get Started Plus, XFINITY Performance Internet Service and XFINITY Digital Voice Unlimited. MyTV Choice® customers downgrading or disconnecting XFINITY Performance Internet and/or XFINITY Digital Voice will not be eligible for MyTV Choice Bundles, activating MyTV Choice Theme Packs and receive Limited Basic either service. Get Started includes Limited Basic, additional digital channels, standard definition converter and remote for primary outlet. Get Started Plus includes Get Started and additional digital channels. Get Started or the MyTV Choice Bundle is $29.95 per month before discounts or $15.00 with no theme packs, $15.95 with 1 theme pack, $21.11 with 2 theme packs, $27.23 with 3 theme packs, $32.65 with 4 theme packs. Get Started Plus or the MyTV Choice Bundle is $44.95 per month before discounts or $25.00 with no theme packs, $27.45 with 1 theme pack, $35.36 with 2 theme packs, $42.58 with 3 theme packs. For more information on MyTV Choice® go to www.xfinity.com/tvchoicebundle.
- Requires purchase of Get Started or Get Started Plus.
- Requires purchase of XFINITY Performance Internet.

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Services & Pricing

Effective January 1, 2013

King, Pierce and Snohomish Counties

1-800-XFINITY | xfinity.com

Comcast

CERTIFICATE OF SERVICE

I, Madeline C. Olanie, do hereby certify on this 7th day of February, 2014 that a true and correct copy of the foregoing "Opposition to Petition for Special Relief on behalf of The City of Burien, Washington" has been sent via U.S. Mail, E-Mail or Electronic File to the following:

Steven Broeckaert
Senior Deputy Division Chief
FCC Policy Division
Media Bureau
Via Electronic File

Mr. Frederick Giroux
Davis Wright Tremaine LLP
Attorney for Comcast Cable Communications, LLC
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William Lake, Chief
Media Bureau
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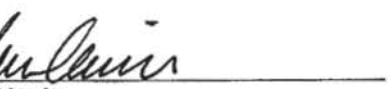

Madeline C. Olanie