June 12, 2014

VIA ELECTRONIC FILING

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

Re:  In the Matter of Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Transfer Control of Licenses and Authorizations, MB Docket No. 14-57

Dear Ms. Dortch:

On June 10, 2014, John Schanz, Kevin McElearney, Barry Tishgart, Lynn Charytan, David Don, and I met with Commission staff listed below. During the meeting, we discussed the numerous backbone services Comcast offers to third parties, and we explained how these products had been developed to meet the varying needs of our customers. We explained that customers decide which products they want to purchase and discussed the profiles of potential users for each service, as well as the general contract terms for each service. We noted that each service was designed to allow customers to take advantage of various economies of scale that they bring to the table, and we explained that the marketplace for each of these services is highly competitive, noting that the price for transit (which has declined over 99% in the last fifteen years) serves as a price ceiling for many of these services.

Below are the services we discussed and their relevant terms (the year noted represents the year we began offering the service on a commercial basis):

- Peering (2006): Over 40 settlement free peering partners that meet our peering policy published at www.comcast.com/peering. Most edge providers reach Comcast’s network indirectly, through these peering links.
• Full transit/Off-net transit (2007): Paid backbone interconnect that provides reach to Comcast’s network and the Internet (or partial transit to specific off-nets). This product is typically attractive to CDNs, Web Hosting Providers, Cloud Providers, large content providers that operate their own CDN, and regional ISPs.

• Paid peering/On-net transit (2007): Paid backbone interconnect that provides reach to every Comcast customer (but no off-net). Typical customers are similar to full transit customers noted above.

• Metro Interconnect (2012): Direct interconnect to Metro networks that provides reach to specific Comcast markets only. This would primarily be attractive to the few hyper-giants who own significant infrastructure and have very high capacity requirements.

• Wholesale CDN (2 beta trials) (Q4 2013): Content cached and delivered from Comcast caches to reach the entire Comcast footprint with limited off-net capability. Likely customers might include small & mid-tier content providers with limited scale & network expertise—e.g., live broadcasters and sports networks, premium on-demand video providers and studios, music streaming and Internet radio providers, game distributors, and providers of software and other download media. We discussed typical contract terms that would apply to this type of offering, including billing by the total traffic delivered or sustained volume, volume discounts, length of contracts, and pro-rated billing for partial use. Finally, we noted that numerous ISPs have deployed CDNs with varying degrees of success over the years.

While this discussion was not specifically focused on the above-captioned transaction, we are making this submission to ensure that the record is up-to-date on information provided to the Commission regarding all of Comcast’s broadband-related offerings.
Respectfully Submitted,

/s/ Kathryn A. Zachem

Senior Vice President,
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