

August 12, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MB Docket No. 14-57

Dear Chairman and Commissioners:

I submit this letter, in support of the Comcast-Time Warner Cable transaction. My support is based on the following observations.

For many years, Comcast has been a leader in cyber-technology and cyber-security. For the past few years, the University of Connecticut (UConn) and Comcast have collaborated on multiple projects and initiatives on hardware security, and developing holistic approaches to address evolving cybersecurity challenges. Comcast has been a strong partner to UConn and shares its commitment to utilizing leading-edge tools, strategies, and protocols for preventing, detecting, deterring, and responding to cybersecurity threats.

As part of this collaboration, Comcast is a founding member the Center for Hardware Assurance, Security and Engineering (CHASE) at UConn. Other sponsors include the U.S. Department of Defense, National Science Foundation, and industry leaders such as Honeywell, Samsung, and CISCO as sponsors. In addition, in partnership with Comcast, UConn has initiated several research projects aimed at reducing costly operations and offshore manufacturing risks.

Significantly, in April of this year, UConn expanded its longstanding relationship with Comcast to form the Comcast Center of Excellence for Security Innovation (CSI). CSI unites the expertise of renowned scholars and researchers from UCONN and Comcast’s leadership in Internet systems security to develop robust detection systems and analytical tools to ensure that the computer chips and other hardware components vital to Internet broadband systems are shielded from malicious attacks, unauthorized access, and faulty or counterfeit products. CSI’s primary functions include: conducting leading-edge security related R&D based on a holistic approach to the cybersecurity framework as defined by the National Institute for Standards and Technology (NIST) and industry best practices; delivering unprecedented security that grows the standard framework for industry and government; advancing continuous monitoring of attacks and vulnerabilities through a national database; and developing the next generation of cyber risk management professionals.

The Comcast Center of Excellence for Security Innovation is the first of its kind, with the best in class from both industry and academic institutions, when it comes to developing cutting edge security technologies, practices, and processes. To date, CSI is the only a dedicated security innovation lab at a university sponsored by a company. We are very proud of our joint effort, and are especially pleased to have had the opportunity to share it with your office firsthand when Mrs. Erika Olsen attended CSI's launch event this past Spring.

UConn's academic-industry partnership with Comcast is an important example of how to proactively advance science and create a new generation of highly-skilled workers prepared to resolve current and future technological challenges. Already, our PhD students have taken advantage of internship opportunities at Comcast. Earlier this month, our University awarded one of Comcast's leading experts a Professor of Practice which uniquely positions us to offer course work and certification based on NIST's cyber security framework. In October, we will be jointly hosting a security awareness/ challenge week at UConn called CyberSeed. Our goal is to have over 50 Universities competing in multiple challenges. Comcast is once again leading efforts to bring experts to UConn and broaden our academic-industry engagements during that week.

Our mission in advancement of knowledge needed to secure the cyber-space has taken a new momentum with Comcast's collaboration. Our current CSI research projects will have a transformative impact beyond the cable industry, and can translate to security solutions nationally and internationally. Comcast's size and scale has enabled it to invest and to differentiate itself from other broadband providers in rolling out the best technological advances to keep consumers safe. The national scale created by its proposed merger with Time Warner Cable will enable Comcast to continue to invest in research and development, and ultimately enhance network security for millions more residential and business customers.

Given all this, I firmly support the TWC transaction and look forward to supporting the growth and opportunities that this transaction will bring to our shared commitment to cybersecurity.

Respectfully,



Kazem Kazerounian
Dean & Professor