

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Bloomberg L.P.,	)	
Complainant	)	
	)	MB Docket No. 14-124
	)	CSR-8888-P
v.	)	
	)	
Comcast Cable Communications, LLC,	)	
Defendant	)	

**COMMENTS IN SUPPORT OF WAIVER**

Comcast Cable Communications, LLC (“Comcast”) files these Comments in support of the Petition for Waiver of the *Neighborhooding Order*<sup>1</sup> filed by Bloomberg, L.P. (“Bloomberg”).<sup>2</sup> As demonstrated in the Petition and these Comments, good cause exists for the Commission to grant a limited waiver of the *Neighborhooding Order*.<sup>3</sup>

Comcast has complied in its entirety with the *Neighborhooding Order*, which directed Comcast to carry BTV’s standard definition feed in a “news neighborhood” in Comcast’s most populous Designated Market Areas. Subsequently, in connection with a business agreement and settlement between the parties, Bloomberg requested that Comcast move BTV to a channel position proximate to CNBC, even when doing so requires placing BTV outside of a “news neighborhood” (i.e., because CNBC is not in a news neighborhood on several lineups). While Comcast has agreed that it is willing to proceed with those moves, it is unclear whether fulfilling Bloomberg’s request would be consistent with the *Neighborhooding Order*, because Comcast

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<sup>1</sup> *Bloomberg L.P. v. Comcast Cable Communications, LLC*, 28 FCC Rcd 14346 (2013) (“*Neighborhooding Order*”).

<sup>2</sup> Petition for Waiver (filed July 23, 2014) (“Petition”). See Public Notice, Special Relief and Show Cause Petitions, Report No. 0420 (MB July 31, 2014).

<sup>3</sup> See 47 C.F.R. § 1.3.

would have to move BTV out of a news neighborhood on a small number of lineups covered by the *Neighborhooding Order*.<sup>4</sup>

Grant of the limited waiver of the *Neighborhooding Order* Bloomberg seeks will thus allow Comcast to accommodate fully Bloomberg's requested channel placements and implement the parties' business arrangement, which would further the positive and productive relationship Comcast and Bloomberg have forged. Further, grant of the limited waiver will further the underlying purpose of the news neighborhooding condition and the *Neighborhooding Order*, and serve the public interest.

Accordingly, the Commission should grant the waiver requested by Bloomberg.

Respectfully submitted,

**COMCAST CABLE COMMUNICATIONS, LLC**

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August 20, 2014

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<sup>4</sup> Bloomberg filed the Petition for the avoidance of doubt; the Petition could be construed as a request for clarification of the *Neighborhooding Order*. See Petition at 2 n.6. While Bloomberg requested to be included in news neighborhoods at the outset of this proceeding, it is now requesting channel placement outside of news neighborhoods in a small number of lineups covered by the *Neighborhooding Order*, a change the *Neighborhooding Order* did not address.

**CERTIFICATE OF SERVICE**

I, Blake A. Zanardi, hereby certify that on this 20<sup>th</sup> day of August, 2014, I caused copies of the foregoing Comments to be served by electronic mail on the following:

Markham C. Erickson  
Andrew W. Guhr  
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/s/ *Blake A. Zanardi*

Blake A. Zanardi