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September 5, 2014

**VIA ELECTRONIC FILING**

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

**Re: *In the Matter of Protecting and Promoting the Open Internet, GN Docket No. 14-28;*  
*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 September 4, 2014, Lynn Charytan of Comcast and I met separately with Priscilla Delgado Argeris of Commissioner Rosenworcel's office and Amy Bender of Commissioner O'Rielly's office regarding the above-captioned proceedings. We explained that, in adopting new rules to protect and promote the open Internet, the Commission should follow the guidance of the D.C. Circuit in *Verizon v. FCC*<sup>1</sup> by relying on Section 706 of the Telecommunications Act of 1996 as legal authority, and we emphasized that Comcast agrees with the Commission's tentative conclusion to limit its rules to the provision of broadband Internet access services to end users. We also described Comcast's position regarding the benefits of the light-touch regulatory approach that has helped drive investment and dynamism in the Internet ecosystem, and the perils of and legal hurdles to Title II reclassification, which would threaten to slow or reverse these positive trends. Finally, we noted that the benefits of Comcast's open Internet commitment developed in connection with the NBCUniversal transaction will extend to millions of additional broadband customers through Comcast's proposed merger with Time Warner Cable.

Please direct any questions regarding this matter to the undersigned.

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<sup>1</sup> See *Verizon v. FCC*, 740 F.3d 623 (D.C. Cir. 2014).

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Respectfully submitted,

/s/ Kathryn A. Zachem

Senior Vice President,  
Regulatory and State Legislative Affairs  
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cc: Priscilla Delgado Argeris  
Amy Bender