



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001
202.379.7121

REDACTED – FOR PUBLIC INSPECTION

September 19, 2014

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20544

Re: *Applications of Comcast Corp., Time Warner Cable Inc., Charter Communications, Inc., and SpinCo for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-57*
REDACTED – FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Comcast Corporation hereby submits additional information to supplement its previously filed responses¹ to the Commission’s Information and Data Request.² Specifically, Comcast submits supplemental narrative answers responsive to Requests 26 and 89.

The information submitted herewith responds to the Request as clarified by previously disclosed discussions between representatives of Comcast and the Commission. Based on those discussions, Commission staff and Comcast agreed to certain modifications and understandings of the Request and accompanying Instructions, subject to the Commission’s ability to request additional information as it may deem necessary. The modifications and understandings are summarized in Comcast’s previously filed responses.³

Comcast herewith submits one copy of the redacted, public version of this filing. The {{ }} symbols denote where Highly Confidential Information has been redacted, and the [[]] symbols denote where Confidential Information has been redacted. A Highly Confidential version of this filing, which includes accompanying Highly Confidential exhibits, has been submitted to the Office of the Secretary

¹ See Letter from Kathryn A. Zachem, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 14-57 (Sept. 11, 2014).

² See Letter from William T. Lake, Chief, Media Bureau, to Kathryn A. Zachem, Comcast Corporation, MB Docket No. 14-57 (Aug. 21, 2014) (the “Request”).

³ See *supra* note 1.

Ms. Marlene H. Dortch

September 19, 2014

Page 2

pursuant to the terms of the Joint Protective Order in this proceeding.⁴ The Highly Confidential version of this filing will be made available for inspection pursuant to the terms of the Joint Protective Order.

If you have any questions or require further information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Kathryn A. Zachem

Senior Vice President,
Regulatory and State Legislative Affairs
Comcast Corporation

⁴ *Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-57, Joint Protective Order, 29 FCC Rcd. 3688 (2014) (“Joint Protective Order”).

SEPTEMBER 19, 2014 SUPPLEMENTAL RESPONSES OF COMCAST CORPORATION TO THE COMMISSION'S INFORMATION AND DATA REQUEST

26. Identify all sports teams, leagues, and other organizations with which the Company (or a network in which the Company has an attributable interest) has a contract granting distribution rights in the United States, and for each contract state:
- a. the official name of the team, league, or organization, the sport played, and its home venue;
 - b. the term of the contract that grants the right to distribute the sports programming in the United States and whether the Company has a right of first refusal;
 - c. the geographic area in which the Company has rights to distribute the sports programming;
 - d. the percentage of total game events entitled to be distributed live under the contract, and the percentage of total game events which the live distribution rights are exclusive to non-broadcast programming networks or cable systems in which the Company has an interest;
 - e. any plans to begin distributing game events in the United States; and
 - f. whether the Company is currently distributing this sports programming on an attributable or non-attributable sports programming network.

RESPONSE:

26(a)-(c):

Documents responsive to this request will be produced to the FCC. Comcast also incorporates its response to Request 27, which provides information on Comcast's sports rights counterparties dating back to 2009.

Information and data responsive to these subparts have been provided in machine-readable Excel spreadsheet format as Exhibit 26.1. Exhibit 26.1 provides information regarding Comcast's current sports rights agreements dating back to 2009 as well as the counterparties to those agreements. [[

]]

26(d):

Information and data responsive to this subpart have been provided in machine-readable Excel spreadsheet format as Exhibit 26.2, which provides information regarding the number of games of particular sports/teams that are exhibited on Comcast-owned networks. [[

]] Comcast is providing the number of games that were exhibited on Comcast-owned networks during the most recently completed regular season of the sports/teams referred to in Exhibit 26.2.

All of the networks referred to in Exhibit 26.2 are non-broadcast networks apart from NBC. Comcast networks that exhibit sports programming [[]] such programming may be carried by other programmers in other areas, and [[]] The networks referred to in Exhibit 26.2 are not exclusively distributed on Comcast cable systems.

26(e):

Comcast-owned networks distribute sporting events in the United States pursuant to each of the agreements referred to in Exhibit 26.1.

26(f):

[[]] Exact ownership interests in the networks referred to in Exhibits 26.1 and 26.2 are provided in response to Request 18.

89. Provide the Company’s data as specified in Attachment A, which seeks data relating: to active and potential business service addresses; internet traffic exchange and interconnection; subscriber and plan data; daily data on the capacity and use of IP points of presence; and, for Comcast, Charter and SpinCo after the consummation of the proposed divestiture transactions, monthly data for cable service on subscribers and locations served.

RESPONSE:

Comcast provides the following supplemental responses to this Request:

Update to “Interconnection Table – HB”

Updated information and data responsive to this Request have been provided in machine-readable Excel spreadsheet as Exhibit 89.5 (Revised) and Exhibit 89.6 (Revised). The updated version of Exhibit 89.5 contains a new worksheet, “Transit Node,” which provides data for transit customers by IP point of presence. The updated version of Exhibit 89.6 includes transit counterparties that use IPv6 with Comcast, in addition to the prior list of paid peers and settlement-free peers.

“TWC Subscriber Final”

Information and data responsive to this Request have been provided in machine-readable Excel spreadsheet and CSV format as Exhibit 89.7 through Exhibit 89.9.

Exhibits 89.7 and 89.8 provide data on Comcast’s subscriber plans, which have been provided by product (video, voice, and Internet) and by tier of service (e.g., Digital Preferred video, Blast Internet) for each zip code and separately for primary and bulk subscribers.¹ These exhibits contain data for the following fields requested: date, zip, plan_name, internet, myvpd, video_tier, voice, unlimited_voice, subs and disconnects overall and by tenure,² and arpsr overall and by tenure.³ [[

]]

For the fields requested on contracts and early termination fees associated with each service plan, Comcast has provided information and data in Exhibit 89.9. Exhibit 89.9 provides, for each zip code where data were available, the number of customers under a contract (i.e., a minimum term commitment) where the contract was entered into during

¹ Comcast incorporates by reference herein its description of bulk accounts in response to Request No. 4.

² As discussed with the FCC, [[
]] As such, Comcast has provided the data requested by the tenure of the customer with Comcast (i.e., account history).

³ As provided in response to other requests, Comcast has provided monthly recurring charge (“MRC”) by service plan. A description of MRC has been provided in response to Request No. 4(c) and is incorporated by reference herein.

or after November 2012 in the Northeast and Central Division and during or after January 2013 in the West Division, broken out by the term of the contract and the applicable initial early termination fee. {{

}}

For the other fields requested, [[
]] and provides the following narrative response:

Internet Tiers and Associated Speeds

As reflected in Exhibits 89.7 and 89.8, there are a number of residential and commercial Internet tiers available to Comcast subscribers. Comcast offers certain Internet speeds depending on the Internet tier.

Residential Internet Tiers: Between June 2013 to June 2014, Comcast offered the residential Internet tiers listed below. Customers received the following downstream and upstream speeds based on the tier to which they subscribed, listed as of June 2013 and as of June 2014. [[

⁴ [[

]]

⁵ [[

]]

⁶ [[

]]

]]

Business Class Internet Tiers: Between June 2013 to June 2014, Comcast offered the commercial Internet tiers listed below. Customers received the following downstream and upstream speeds based on the Internet tier to which they subscribed, listed as of June 2013 and as of June 2014. [[

⁷ [[

]]

]]

Video Tiers and Number of Programming Networks

As reflected in Exhibits 89.7 and 89.8, Comcast offered a number of video programming tiers to its residential and commercial subscribers. Comcast offers a range of video channels depending on the video programming tier provided.

Between June 2013 to June 2014, Comcast provided the video programming tiers listed below. The number of video channels provided for each video programming tier [[

]]. However, in general, customers received the following range of video channels based on the tier to which they subscribed as of June 2014.

| Residential Video Tier ⁸ | Number of Video Channels |
|--|--|
| Basic (B1; Broadcast Basic) | 25-30 |
| Digital Economy | 45-50 channels |
| Digital Starter (D0) | 44-55 (when combined with Basic Video: 70-85) |
| Digital Preferred (D1; Digital Classic) | 65-70 (when combined with Digital Starter: 145-155) |

Comcast offers commercial customers tiers within its Business Services Private View and Public View offerings, for which data have been provided in Exhibits 89.7 and 89.8. Those tiers vary in the number of video channels provided, but the following are approximate ranges of channels as of June 2014: []

]]

“CTWC Cable Services”

Information and data responsive to this exhibit request have been provided in machine-readable Excel spreadsheet as Exhibit 89.10 through Exhibit 89.13.

Exhibit 89.10 provides cable service location and subscription data for the Company (pre-transaction and post-transaction), Comcast Corp. (pre-transaction and post-transaction), and SpinCo (post-transaction only), as of December 31, 2013 and June 30,

⁸ []

]] {{ }}

⁹ []

]]

¹⁰ []

]]

REDACTED – FOR PUBLIC INSPECTION

2014. For each company and company-date combination, the exhibit provides the number of residential and other MVPD locations, the number of residential and other Internet access locations, and the number of residential and other telephone locations. In addition, the exhibit includes the number of residential and other MVPD subscribers, the number of residential and other Internet access subscribers, and the number of residential and other telephone subscribers.

The data provided in Exhibit 89.10 relate exclusively to Comcast: no data are provided for Time Warner Cable or Charter Communications Inc. and the data provided for SpinCo is based solely on Comcast data. The subscriber data included in this exhibit are reported on a units cabled basis.

Exhibit 89.11 provides MVPD service data by census block. For each census block in which Comcast offers MVPD services, the exhibit indicates which entity would offer MVPD services to the Company's subscribers were the transaction consummated as of June 30, 2014: Comcast Corp. (indicated with a "0" in column B) or SpinCo (indicated with a "2" in column B).

Exhibit 89.11 is based exclusively on Comcast data: no data are provided for Time Warner Cable or Charter Communications Inc. and the information provided for SpinCo is based solely on Comcast data. [[

]]

Exhibit 89.12 provides Internet access data by census block, as of June 30, 2014. For each census block, the exhibit indicates the entity or entities that would provide residential Internet access service if the transaction were consummated as of June 30, 2014 ("0" for Comcast Corp.; "1" for Charter Communications, Inc.; "2" for SpinCo) and the technology code of the Internet access service. It also provides the total number of residential locations in the corresponding census block group. [[

]] Also included in this exhibit are the number of residential customer locations for which the Company's Internet access service is available.

To enable Comcast to supply historical customer locations data (in Exhibit 89.13), the data provided are based on data previously gathered for purposes of reporting to the National Telecommunications and Information Administration ("NTIA"). The data that will be provided in Comcast's forthcoming Form 477 filing on October 1, 2014 will reflect newly established reporting requirements issued by the FCC. It is therefore possible that discrepancies will exist between the data provided in Exhibits 89.12 and 89.13.g and the data provided as part of the October 1 Form 477 filing. In the event that

REDACTED – FOR PUBLIC INSPECTION

material discrepancies arise, Comcast will submit revised versions of Exhibits 89.12 and 89.13.g.

Also provided in Exhibit 89.12 are the maximum download and upload speeds, the downstream and upstream bandwidth of the Internet access service, and the number of residential Comcast subscribers subscribing to Internet access service for each specified downstream and upstream bandwidth. [[

]] the maximum download and upload speeds included in this exhibit are maximum actual download and upload speeds received by at least one subscriber in the census block. Upload and download speeds and bandwidths in this exhibit are expressed in Mbps.

Exhibits 89.13.a through 89.13.g provide historical Internet access data, as of June 30, 2011 (Ex. 89.13.a), December 31, 2011 (Ex. 89.13.b), June 30, 2012 (Ex. 89.13.c), December 31, 2012 (Ex. 89.13.d), June 30, 2013 (Ex. 89.13.e), December 31, 2013 (Ex. 89.13.f), and June 30, 2014 (Ex. 89.13.g). Data of the type requested are not available on a census-block level for December 31, 2009, and for 2010. For each census block, the exhibits provide the technology code of the Internet access service. They also provide the total number of residential locations in the corresponding census block group. [[

]] For December 31, 2012 and later, the exhibits include the number of residential customer locations for which the Company's Internet access is available. These data are not available for 2011 and the first half of 2012. As discussed above, there may be differences between the number provided here for June 30, 2014 and the number that will be provided in Comcast's forthcoming Form 477 filing on October 1, 2014.

Also included in these exhibits are the maximum download and upload speeds, the downstream and upstream bandwidth of the Internet access service, and the number of residential Comcast subscribers subscribing to Internet access service for each specified downstream and upstream bandwidth. [[

]] the maximum download and upload speeds included in these exhibits are maximum actual download and upload speeds received by at least one subscriber in the census block. In Exhibit 89.13.g (June 30, 2014), upload and download speeds and bandwidths are expressed in Mbps. In Exhibits 89.13.a through 89.13.f (covering earlier dates), upload and download rates are expressed with rate codes that correspond to speed ranges, using the following convention: {{

}}

“Dedicated Services”

Information and data responsive to this exhibit request have been provided in machine-readable Excel spreadsheet as Exhibit 89.14 through Exhibit 89.16. The data provided in these exhibits relate exclusively to Comcast: no data are provided for customers of Time Warner Cable or Charter and the data provided for SpinCo are based solely on Comcast data.

Exhibit 89.14 provides the locations of current Comcast business customers in zip codes in which both Comcast and Time Warner Cable provide active business services. {{

}}

Exhibit 89.15 provides the locations of current Comcast business customers in zip codes in which both Comcast and Charter provide active business services, to the extent that, after consummation of the proposed divestiture transactions, these locations will continue to be supplied business services by Comcast, but not by Charter or SpinCo. {{
}}

Exhibit 89.16 provides the locations of current Comcast business customers in zip codes in which both Comcast and Charter provide active business services, to the extent that, after consummation of the proposed divestiture transactions, these locations will be supplied business services by SpinCo, but not by Comcast. {{

}}