

November 3, 2010

VIA ELECTRONIC FILING

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

Re: *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees*,
MB Docket No. 10-56

Dear Ms. Dortch:

On November 2, 2010, Kathy Zachem, Vice President, Regulatory and State Legislative Affairs, Comcast Corporation; Rick Cotton, Executive Vice President and General Counsel, NBC Universal, Inc.; Arthur Burke, Davis Polk & Wardwell LLP, counsel for Comcast; and the undersigned (collectively, "Applicants") met with the following Commission personnel: Edward Lazarus, Chief of Staff to the Chairman; John Flynn, Senior Counsel to the Chairman for Transactions; Rick Kaplan, Chief Counsel and Senior Legal Advisor to the Chairman; William Lake, Chief, Media Bureau; Jonathan Baker, Chief Economist; and Paul de Sa, Chief, Office of Strategic Planning and Policy Analysis.

Applicants disputed the need for any conditions in this proceeding related to the online distribution of video programming. Applicants pointed out that there is evidence in the record demonstrating that online video is complementary with MVPD services and that there is no reason to expect this to change in the foreseeable future. Applicants reiterated that, post-transaction, NBCU will own less than 15% of online content – a very modest amount and clearly insufficient to affect competition adversely. Consistent with these low shares, Applicants explained that there is no economic evidence or analysis in the record supporting a theory of anticompetitive effects in the online video marketplace or the need for any online video remedies. Applicants stated that, in the nascent and rapidly evolving online business, the Commission should move very carefully in order to avoid imposing remedies that may impede investment and innovation.

Applicants reviewed the relevant on-the-record commitments they have already offered in the online video space. Applicants also discussed program access and arbitration procedures and the substantial risks of applying those procedures to online video.

Ms. Marlene H. Dortch

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Kindly direct any questions regarding this matter to my attention.

Respectfully submitted,

Michael H. Hammer

Michael H. Hammer

Counsel for Comcast Corporation

cc: Edward Lazarus
John Flynn
Rick Kaplan
William Lake
Jonathan Baker
Paul de Sa