

November 22, 2010

VIA ELECTRONIC FILING

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

Comcast Corporation (“Comcast”) hereby responds to the ex parte report filed November 10 by counsel for WeatherNation TV, Inc. (“WeatherNation”).¹ WeatherNation’s 11th-hour intervention in this proceeding is an abuse of process and entirely without merit.

WeatherNation provides no excuse for its failure to raise its concerns on the date appointed by the Commission, a date that was more than four months ago. And WeatherNation provides no analysis to support its demand that “Comcast should be required to provide immediate and non-discriminatory access to competitive channels on its platform,” other than to assert that, but-for the transaction, under which NBCU’s non-controlling, non-managing, minority interest in The Weather Channel will be contributed to the joint venture, “Comcast would have an incentive to embrace a free, competitive national weather reporting TV service.”

Comcast has had no dealings with WeatherNation beyond a single introductory meeting nearly three weeks ago. At the time, according to WeatherNation, the network had no carriage agreements with any MVPDs and, with perhaps one exception, had not even begun efforts to try to obtain such agreements with any other MVPDs. In fact, insofar as Comcast is aware (and the WeatherNation website – <http://www.weathernation.net/> – does not suggest otherwise), WeatherNation is not even an

¹ WeatherNation’s filing has not yet appeared in the electronic docket of this proceeding. Counsel for WeatherNation provided a courtesy copy of its ex parte report to Comcast on November 11.

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operational network, much less one that has demonstrated its value in the marketplace. WeatherNation's assertion that it is a "competitive channel" cannot be sustained given these facts.

WeatherNation may prefer to obtain distribution through government mandates and manufactured grievances rather than by developing and marketing a valuable product for MVPDs and their customers – the hard work that scores of programming network developers have done. The Commission should not be a party to these efforts by WeatherNation or others attempting to misuse the transaction review in this way.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,

Michael H. Hammer
Michael H. Hammer
Counsel for Comcast Corporation