

October 12, 2010

Stephen Díaz Gavin
Direct: 202-457-6340
Direct Fax: 202-457-6482
sgavin@pattonboggs.com

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
TW-A325
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 Licenses,
MB Docket No. 10-56
Notice of Ex Parte Meeting*

Dear Ms. Dortch,

On Friday, October 8, 2010, Gregory Babyak, Director of Government Affairs of Bloomberg, L.P. (Bloomberg), Matthew Berry and Janet Moran of Patton Boggs, LLP and the undersigned met with Joshua Cinelli, Media Advisor to Commissioner Michael Copps. The subject of the meeting was the above-captioned application and the need to consider conditions to the proposed merger of Comcast and NBC-Universal (NBCU), in the event that the Commission grants the application. After a general overview of the competitive harms that Bloomberg has demonstrated will arise specifically out of the applications, if granted without conditions, there was a discussion of remedies in the form of conditions Bloomberg has recommended be imposed on the merger.

The conditions discussed included the reasonableness of requiring Comcast to “neighborhood” business news channels, specifically the placement of business news channels on channels contiguous and adjacent to CNBC on each tier where CNBC is carried. As a result of the transaction, Comcast would have the ability and incentive to favor its own programming, particularly as it relates to NBCU’s second most profitable channel, CNBC, and disadvantage rivals to its affiliated programming, such as Bloomberg® TV (BTV), the last independent video channel for news programming.

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Neighborhooding is an appropriate remedy because it heightens viewer choice by making channels in the same genre easier to find; it is easily implemented in light of the conversion of enhanced basic subscribers to digital and does not impose burdens on Comcast; and other video distribution platforms already neighborhood channels according to genre.

There was also a discussion why the program carriage complaint process would not be an effective remedy for a party such as Bloomberg, specifically noting the problems of the process, as well as the lengthy period of time needed to take a case to a final decision.

If there are any questions regarding this matter, please contact the undersigned at 202-457-6340 or Janet F. Moran at 202-457-5668.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen Díaz Gavin". The signature is fluid and cursive, with a large initial "S" and "D".

Stephen Díaz Gavin
Partner

cc: Joshua Cinelli