

Mr. Brian L. Roberts
Chairman and CEO
Comcast Corporation
1 Comcast Center
Philadelphia, PA 19103

February 19, 2010

Dear Mr. Roberts:

The undersigned groups submit this letter in response to your statements in recent congressional hearings on Comcast's proposed merger with NBC Universal. We take this opportunity to voice concerns regarding Comcast's commitment to abiding by the Federal Communications Commission's program access rules.

In litigation pending before the U.S. Court of Appeals for the District of Columbia Circuit, Comcast seeks to eliminate a key component of the program access regime: the ban on exclusive contracts between a cable operator and a satellite-delivered cable programming network in which a cable operator has an ownership interest. In light of Comcast's participation in this litigation, Sen. Al Franken questioned you on the subject of Comcast's commitment to abiding by the rules. In response to further questioning during the hearing, you promised that Comcast would adhere to FCC program access rules even if the court declares them to be invalid.

We share Senator Franken's concerns regarding your pledge. Your assurances are undercut by the fact that your company has a history of opposing the program access rules and is currently trying to dismantle critical parts of the program access regime.

Indeed, one of Comcast's proposed voluntary merger commitments involves applying FCC program access rules to retransmission consent negotiations with NBC owned-and-operated TV stations only "for as long as the FCC's *current* program access rules remain in place." Conspicuously absent from this promise is any acknowledgment that if Comcast is successful in eliminating the exclusive contract ban in litigation, the "current" program access rules would not apply, and Comcast's commitment will have vanished before the merger review is even concluded.

Moreover, it is highly unusual that Comcast would continue to spend shareholder dollars to overturn an FCC regulation that it has promised to follow regardless of the case's outcome. The fact that Comcast has not withdrawn from the litigation raises questions about whether your company will follow through on this commitment.

Withdrawing from the litigation would neither assuage all of our concerns about Comcast's past and present actions with regard to the program access rules, nor diminish the need for the Dept. of Justice and FCC to conduct a thorough review of your transaction. It would, however, be an important gesture to bolster the promises you made to Congress on February 4th.

Respectfully,

American Cable Association

Communications Workers of America

Consumer Federation of America

Consumers Union

Free Press

Media Access Project

National Telecommunications Cooperative Association

Organization for the Promotion and Advancement of Small
Telecommunications Companies

Public Knowledge

Rural Independent Competitive Alliance

Satellite Broadcasting and Communications Association

Sports Fans Coalition