

**Senator Klobuchar's QFRs**  
**"Examining the Comcast-Time Warner Cable Merger and the Impact on Consumers"**

**David Cohen, Comcast**

- 1. Set top boxes are consumers' gateway to content. As I said in the hearing, I am encouraged by Time Warner Cable's plan to make its content available without the use of a set top box rental. At the hearing, you said the X1 box will give Comcast consumers the "same experience" as a Time Warner Cable customer watching on a Roku. Does this mean that the X1 will be an "open" platform and Netflix, Hulu and others will be allowed onto the platform on the same terms they gain access to independent, third party platforms like Roku and Apple TV? Furthermore, will Comcast give full access to its content without requiring a set top box rental?**

**Response:** As I briefly stated during the hearing, the X1 platform enables our customers to deliver IP cable programming to a variety of devices in the home, much as TWC delivers its cable service to Roku and other devices. In Boston and other markets, we recently launched a live TV streaming feature that allows customers to access our full channel lineup in IP on smartphones, tablets, PCs, and Macs in the home without the need for a connected set-top box.

The live TV streaming feature of the X1 platform is the next step toward offering a pure IP cable service, which could in some cases even obviate the need for any set-top box in the home. This transition is complicated and expensive, requiring adaptations such as encoding all of the PEG and local broadcast channels to ensure Title VI compliance. It is further complicated by the FCC's legacy rules regarding set-top boxes. Nevertheless, if this transaction is approved, the combined company will be able to continue to invest in and advance this transition across our combined footprint.

We also enable a growing array of third-party Internet applications (*e.g.*, Facebook, Pandora, and others) on our X1 platform and are continuously exploring adding new apps. There is a diversity of approaches in the marketplace for applications on set-top devices, and each platform has its own specifications. Thus, applications on Roku must meet certain specifications for the Roku platform, Apple the same, and Comcast the same. This diversity of approaches offers multiple different choices to consumers, and is the hallmark of a competitive device marketplace.

Prior to completion of the proposed transaction, we cannot comment on future plans for the combined company, and particularly as it relates to TWC's plans regarding set-top boxes.

- 2. Competition from online video services and devices is an important to consumers. Roku and PlayStation 3 offer their users' access to HBO Go if they are paying HBO subscribers on any MVPD, but Comcast has refused to "authenticate" Roku users' HBO accounts since 2011. Why has Comcast refused to authenticate HBO Go on the Roku and PlayStation platforms? What assurances can you provide that**

**Comcast will not use authentication as a tool to deny content to competitive third-party, internet-connected set top boxes?**

**Response:** Comcast has not refused to authenticate Roku users. In fact, we announced over a month ago that we were testing authentication with certain programmers on both Apple TV and Roku platforms as part of our larger strategy to expand the ways in which consumers can access our TV Everywhere programming. We understand that customers want the ability to watch video programming where and when they want to, and on the equipment of their choice. As a result, we are strongly committed to meeting that demand, and this builds on the already robust menu of options we make available to consumers:

*HBO Go:* Comcast authenticates HBO Go for a wide array of devices: desktop/laptop computers, iPad, iPhone, Android smartphones, Kindle Fire, Android 7- and 10-inch tablets, Samsung Smart TVs, Xbox 360, and Apple TV. Comcast is exploring authentication for additional platforms, including Roku.

*Xfinity TV Go App:* The Xfinity TV Go app, which allows customers to stream live TV shows and movies over the Internet, is currently available on iPhone, the later generations of iPod touch, iPad, Kindle Fire, and some Android phones and tablets.

*PCs/Macs:* Comcast customers have the ability to access TV Everywhere content via the Xfinity.com website on their PCs, Macs, and other device platforms supporting an Internet browser.

Comcast also supports the ability of customers to access our cable services on various customer-owned devices:

*IP Cable Streaming:* Comcast customers can access our IP VOD services (without an additional cable set-top box) on both Xbox 360s and Samsung TVs. And Comcast is now enabling customers to experience our full IP cable service via an Xfinity app on PCs/Macs, iOS devices running 7.0 or higher, and Android devices running 4.4 or higher.

*CableCARD:* We have long supported TiVo and other CableCARD-enabled retail devices in our cable systems, and will continue to do so post-transaction. We have gone above and beyond the FCC's CableCARD requirements in this area by giving TiVo customers the ability to access our VOD services on TiVo devices using our "Cardio" solution throughout most of our footprint.

- 3. Comcast agreed to offer affordable broadband service to low income households as a condition of the NBC Universal merger. The program has enrolled about 10 percent of eligible households, that's roughly 300,000 homes. We have heard**

**concerns about how the program criteria can be difficult to meet. For example, a household must not have had a Comcast subscription in the past 3 months. Another requirement is to have a child eligible for the National School Lunch Program. What about households with small children not yet in school, households without children, or seniors? Is Comcast willing to reconsider these requirements? What is Comcast doing to get more than 10 percent of eligible households signed-up?**

**Response:** Comcast is fully committed to helping close the “digital divide” and has done more to do so and to encourage broadband adoption by low-income families than any other entity in the nation, private or governmental. *Internet Essentials* was designed to meet the needs of a specific population – low-income families with school-age children who are not currently connected to broadband Internet at home. This is the population with the greatest need for Internet connectivity for educational purposes.

Comcast has gone far beyond the requirements of the original voluntary commitment we made in the NBCUniversal transaction. We have expanded eligibility criteria for *Internet Essentials* twice – first by extending it to families with children eligible to receive reduced price (in addition to free) school lunches, and then by offering it to parochial, private, cyberschool, and homeschooled students. As a result, nearly 2.6 million families nationwide are now eligible for *Internet Essentials*, an increase of 30 percent from the original eligible base.

In addition, we have made numerous improvements to make it easier for eligible families to sign up. We developed an instant or auto-approval for all Provision 2 schools, which have the highest percentage of students eligible for the National School Lunch Program (the “NSLP”). We automatically approve enrollees from schools where 70 percent or more of the students are eligible to participate in the NSLP. We also created an online application tool on the program’s English- and Spanish-language websites to make applications easier and faster. And we updated the “transfer of service” process for *Internet Essentials* customers, which now allows customers to move their accounts to a new home address in Comcast’s service area without having to reapply for the program.

We have continuously made significant program enhancements that go well beyond our original voluntary commitment to the FCC, and we recently announced that we are extending *Internet Essentials* indefinitely. If this transaction is approved, the program will apply to communities in the TWC markets.

Experts agree that the success of this program has exceeded all reasonable expectations at launch. The unconnected population is difficult to reach – and given that issues of digital literacy (lack of understanding of the value or relevance of the Internet, fear of the Internet, lack of knowledge as to how to use computers, etc.) are the primary barriers to adoption, research confirms that closing the digital divide will be a very long-term project. When you consider that after more than a decade of aggressive marketing – spending hundreds of millions of dollars – we have connected to the Internet only about 40 percent of all the households we pass, the fact that we have connected over 10 percent

of the eligible low-income population to the Internet through *Internet Essentials* in only two and a half years is a remarkable accomplishment.

Comcast also regularly considers additional ways to reach less-connected populations. With respect to seniors, we have conducted pilot adoption initiatives through the AARP Foundation and a group called Project GOAL (Project to Get Older Adults Online). We are reviewing the results of these initiatives and exploring further opportunities to reach other unconnected populations.

- 4. At the hearing, you said that Comcast carries 160 independent networks. Can you please provide a list of these 160 independent networks?**

**Response:** As part of the independent network launch condition in the *Comcast-NBCUniversal Order*, the FCC defined “independent networks” as networks that are not owned by Comcast and not affiliated with either Comcast or a top 15 programming network owner, as measured by annual revenues. Using the FCC’s definition, Comcast carries over 160 independent networks, which are listed in Attachment A.

**ATTACHMENT A**  
**List of Independent Networks Carried By Comcast**

¡Sopresa!	Bandamax	RTP Int'l
AYM Sports	De Película	News 12 NJ
BridgesTV	De Película clasico	Three Angels Broadcasting
Cable Noticias	iON	Texas Cable News
Canal 24	Family Net	MAVTV
DMX Music	Outside Television (Satellite)	Portuguese Channel
El Garage TV	MYX	BYU International
ELLA (fka Casa Club TV)	Pentagon Channel	BlueHighways TV
GoTV	Total Living Network	Antena 3
Korean American TV	World Fishing Network	Playboy en Espanol
LaTele Novela	NESN	TYC Sports International
Mexico 22	MASN	Six News Now
Mexico TV	JUCE (fka JCTV)	Supercanal
Teleritmo	Boston Catholic	Youtoo TV (fka American Life)
World Today TV	PA Cable Network	Arizona Capitol TV
El Rey	iON qubo	Telemicro Int'l
Revolt	iON Life	Local Weather Station
HSN	NASA	HDNet Movies
QVC	CA Channel	GMA Pinoy
Jewelry TV	Northwest Cable News	EWTN Espanol
TV Guide Network	Impact Network (Local Detroit)	TV Globo
Univision	TBN Enlace	Filipino Channel
EWTN	Smile of A Child	Zee TV
BBC America	HRTV	RAI Italia
Bloomberg Television	TV Washington	TV 5
UP (fka GMC)	Church Channel	SET Asia
GSN	Altitude	News 12 WC
UniMas (fka Telefutura)	Catholic TV	Star Plus
WGN	Newschannel 8	TV Japan
Galavisión	Cine Latino	Jade Channel
Word Network	ViendoMovies	Cox Sports
INSP	VeneMovies	Channel One Russia
Azteca America	Cine Mexicano	RTN
NBA TV	WAPA-America	CCTV 4
Outdoor Channel	RFD TV	CTI Zhong Tian
TBN	Gran Cine	TV Asia
Fuse	Telehit	GMA Life
Al Jazeera (fka Current TV)	Once Mexico	Star Gold
Daystar	CentroAmerica TV	ABPNews (fka Star News)
BBC World News	TV Colombia	Willow Plus (fka Neo Cricket)

Reelz Channel  
Ovation TV  
ASPiRE  
Baby First TV Americas  
MGM HD  
TV Games  
NuvoTV (fka SiTV)  
Sportsman Channel  
Pivot (fka Halogen  
JLTV  
Africa Channel  
HITN-TV  
AXS TV (fka HDNet)  
Mnet (fka ImaginAsian TV)  
Tennis Channel  
Crossings TV  
BYU Television  
beIN – SP  
beIN – EN  
Ritmoson Latino

LAS  
MEXICANAL  
Pasiones  
V-Me Kids  
TV Chile  
TV Dominicana  
Sur (fka Canal Sur)  
Caracol TV  
Sur Peru  
TV Venezuela  
PCNC  
TeleFormula  
Video Rola  
TVE Internacional  
Ecuavisa  
Latinoamérica Televisión  
Telefe International  
MVS (Canal 52)  
Multimedios  
BMA (WRNB - Minneapolis)

ETTV  
TV Polonia  
Deutsche Welle  
SPT  
Mediaset  
RTVI  
Bandeirantes Int'l  
Israeli Network  
TV Record Int'l  
Washington Korean TV  
ART  
Vijay TV  
Premier Futbol Clube (fka TV Globo)  
Antena Satellite TV  
Russian Kino  
Impact TV  
Phoenix N.A. Chinese Channel  
Phoenix Infonews  
Milenio