

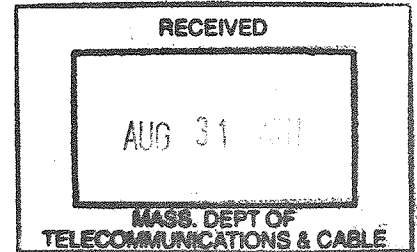


Comcast Cable
676 Island Pond Road
Manchester, NH 03109
www.comcast.com

Via United Parcel Service

August 30, 2011

Ms. Catrice Williams
Secretary of the Cable Television Division
Massachusetts Department of Telecommunications and Cable
Cable Television Division
1000 Washington Street, 8th Floor, Suite 820
Boston, MA 02118-6500



RE: Comcast Cable Communications, LLC
Docket No. D.T.C. 10-8
FCC Forms 1240 and 1205
Responses to Somerset Questions from August 3, 2011 Hearing

Dear Ms. Williams:

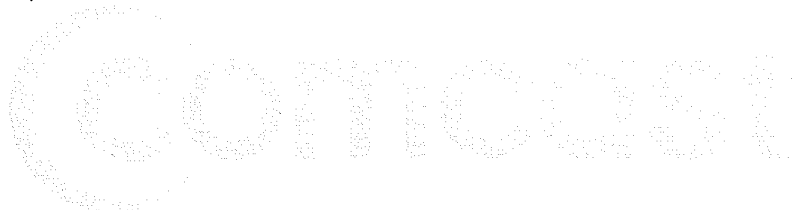
Enclosed are an original and three (3) copies of Comcast's responses to the questions brought by the Town of Somerset during the August 3, 2011 Hearing regarding Comcast Cable Communications, LLC's FCC Form 1205 and FCC Form 1240s submitted on February 1, 2011.

If you have any questions regarding this information, please contact me at 603-695-1468.

Sincerely,

Mark L. Renaud
Director of Regulatory Accounting
Comcast Cable Communications, LLC

/enclosures



DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 2: If it is interest, why should Somerset subscribers be subjected to a Comcast error and have to pay additional interest?

Response:

Please see the response to question 1. Contrary to the assumption underlying this question, the interest adjustment reduces current subscriber costs.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 3: Why did the base rate increase for Somerset in 2010 average 15% when most only jumped 3 – 5% according to Comcast?

Response:

The Basic Service Tier rate for customers in the Town of Somerset is \$20.70, which is *lower* than the maximum permitted rate of \$22.04 calculated in the FCC Form 1240 for the community. Comcast is under no obligation to increase Basic Service Tier rates by the same percentage across the state. Comcast is simply obligated to set its Basic Service rate in each community at a level not exceeding the Maximum Permitted Rate.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 4: Why is the base rate for Swansea only \$10 +/-, while Somerset's is \$20 +/- and hasn't changed for years?

Response:

Comcast is under no legal obligation to establish the same Basic Service Tier rate in Swansea and Somerset or any other communities. The Basic Service Tier rate for customers in the Town of Swansea is less than the Basic Service Tier rate for customers in the Town of Somerset due largely to differing Maximum Permitted Rates for the two communities. Under the governing FCC rate regulations and rate forms, the Maximum Permitted Rate for Swansea is considerably below the Maximum Permitted Rate for Somerset.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 5: Why is the Somerset base rate the third highest in Massachusetts, when the License runs from September 1, 2004 to August 31, 2014 and communities with new licenses have lower base rates and Somerset's keep going up?

Response:

The determination of the Basic Service Tier rate is not based on when a license is signed or the term of the license. The determination of the Basic Service Tier rate is based in large part on the Maximum Permitted Rate that is calculated in the FCC Form 1240 prepared for each community. For a variety of reasons, the FCC Form 1240 can produce significantly different Maximum Permitted Rates for different communities.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 6: Why were Swansea subscribers never charged a higher base rate to cover the \$250,000 one time “gift” for removing the I-Net. The Swansea rate has remained constant since early 2000, while Somerset’s has consistently gone up?

Response:

Comcast works with each town individually and sometimes forbears from collecting the full permissible Basic Service rate and the full permissible FRC for a variety of business reasons. The Swansea situation has no legal bearing on Somerset.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 7: After the 2010 rate hearing was ended, the rates for all of Massachusetts were distributed by the Commission and Somerset showed having the 3rd or 4th highest base rate and Maximum Permitted Rate. Why was this not submitted until after the rate hearing closed when Somerset was an intervener in that rate hearing?

Response:

Comcast properly served the City with its rate filing, showing a Maximum Permitted Rate and an Operator Selected Rate. The distribution of the final approved Maximum Permitted Rates and Operator Selected Rates (which happens to show all of Comcast's regulated rates across the state) is a Department of Telecommunications and Cable procedure. It is not required at any other point during the proceeding.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 8: Explain why Comcast can charge a HD Technology Fee, which is defined as a “Whole House Fee That Authorizes All HD capable outlets in the Home: for \$8.95 and an “additional outlet fee, described as “And Digital Additional Outlet Service : another \$8.95?

Response:

Comcast presumes that the question relates to the sample bill that Somerset’s counsel provided at the hearing. That bill does, in fact, show an “Additional Digital Outlet” charge and an “HD Technology Fee.” There is nothing improper with this assessment. The HD Technology Fee and the Digital Additional Outlet Service Charge are two separate fees.

Digital Additional Outlet Service is charged to digital subscribers who wish to receive the same unregulated digital tier programming that they subscribe to on their primary outlet on additional outlets in their home. This service charge applies to each additional outlet that receives unregulated digital service. For example, the subscriber at issue here has Digital Starter service on the primary outlet and 3 additional outlets. Accordingly, this subscriber has 3 Digital Additional Outlet Service charges on the account. The Digital Additional Outlet Service charges apply without regard to whether the reception at any particular additional outlet is on a high definition or standard definition television set.

Comcast chose to implement the supplemental HD Technology Fee to provide a sensible approach in the current business climate for the Company and its customers. Competing multichannel video providers have also chosen to apply an HD technology fee. Moving to a similar model simplifies comparison shopping by consumers, and permits Comcast to compete more effectively.

The HD Technology Fee is only charged *once* per household regardless of the number of outlets in the home. The HD Technology Fee is a “whole house” fee that enables customers with HD compatible equipment to receive HD services on all outlets in the home. Although the HD Technology Fee could have been included within each Digital Additional Outlet Service charge, Comcast has chosen instead to impose a single HD Technology Fee on a “whole house” basis.

HD has become considerably more prevalent in customers’ homes, and is increasingly subject to the rigors of the competitive marketplace. Moreover, the investments Comcast makes to deliver HD to consumers’ homes go far beyond the HD set-top box. Comcast makes substantial investments in network capacity and equipment that allow us to deliver more HD programming, including over 100 channels and over 3,000 HD OnDemand choices. We continue to add Video On-Demand technology to store and manage our expanding library of HD content, most of which is viewable for no additional charge. As such, the whole house HD Technology Fee serves the dual goals of (1) more accurately reflecting our investment in advanced and interactive HD technologies beyond just the set-top box; and (2) positioning the company to compete effectively in the market.

DTC Rate Hearing – August 3, 2011
Response to Somerset Questions

Somerset Question 9: Why is Comcast charging \$0.47 for Franchise Related Cost when by letter of September 1, 2004 from Comcast, by Lou Russo, indicated it would only be a total of \$0.38?

Response:

In the letter dated September 1, 2004 from Lou Russo, the total of \$0.38 actually represents only *new* franchise related costs. The letter actually states that the *total* franchise related costs would be \$0.88, which includes \$0.50 in “embedded” franchise related costs. In estimating the \$0.38 new FRC, the I-Net maintenance component is shown as \$0.02, which is an incremental figure – expressly representing the total I-Net Maintenance cost estimate of \$0.13 less the I-Net Maintenance cost that was previously embedded of \$0.11. In fact, as Comcast no longer embeds FRCs in the Basic Service rate and continues to have I-Net Maintenance responsibility under the renewed Somerset franchise, that entire I-Net Maintenance sum ($\$0.11 + \$0.02 = \$0.13$) cost should be included in the “new FRC” cost estimate / itemization. When the \$0.11 figure is added to the original \$0.38 tally, it produces a \$0.49 figure, – slightly more than the current \$0.47 itemized figure now being questioned by Somerset. The remaining portion of \$0.50 embedded franchise related cost is no longer applicable since the studio is now operated by an access corporation and funded by a separate 3% franchise fee.