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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554



In the Matter of Comcast Cable)
Communications, LLC, on behalf of its)
Subsidiaries and affiliates)
For Determination of Effective Competition in:)
8 Belvidere, New Jersey-Area Franchise Areas)

CSR-7868-E

To: Chief, Media Bureau

REPLY TO COMMENTS

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates (together "Comcast" or the "Company"), by its attorneys, hereby submits its Reply to the Comments in Opposition to Comcast Cable Communications' Petition for a Declaration of Effective Competition ("Opposition") submitted by the New Jersey Division of Rate Counsel ("Rate Counsel"), in the above-captioned proceeding (the "Petition"). The Opposition raises concerns regarding the data used by Comcast in calculating the competing provider penetrations in the franchise areas at issue in the Petition ("Franchise Areas"). These concerns, however, are without merit and fail to justify rejecting Comcast's Petition. Accordingly, the Commission should find that Comcast is subject to effective competition in each of the Franchise Areas.

I. COMCAST'S OCCUPIED HOUSING AND DBS SUBSCRIBERSHIP DATA FOR THE FRANCHISE AREAS ARE ACCURATE AND RELIABLE

The Opposition contends that the Petition fails to "show that effective competition was present at the time of filing" because the "DBS penetration data and household data ... are not reasonably contemporaneous in time to the filing date" of the Petition.¹ According to the

¹ Opposition at 4-5.