



Comcast Cable  
9605 SW Nimbus Avenue  
Beaverton, OR 97008

February 4, 2009

**VIA EMAIL (hard copy via mail)**

Honorable Commissioner Ted Wheeler  
Chair, Multnomah County Board of Commission  
501 SE Hawthorne Blvd.  
Portland, OR 97214

Re: Proposed Cable Franchise for Verizon

Dear Chair Wheeler:

Thank you for the opportunity to submit our preliminary comments on the proposed cable franchise between Multnomah County and Verizon Northwest Inc. Based on recent actions by the cities of Gresham, Fairview, Wood Village, and Troutdale, those cities have granted Verizon a cable franchise and the three latter jurisdictions have accepted the Gresham franchise by way of an addendum.

Our current cable franchise for the cities of Fairview, Gresham, Troutdale and Wood Village and Multnomah County ("Jurisdictions") provides for a level playing field when a competitor receives a cable franchise. Section 1.4 (B)(1) states:

If, after the effective date of this Franchise, a Jurisdiction enters into and authorizes a Cable Services franchise ... with any person other than Grantee to enter the Streets for the construction and operation of a Cable System providing Cable Services within any part Grantee's Franchise Area in which Grantee is actually providing Cable Services, the material provisions of such agreement shall be reasonably non-discriminatory and competitively neutral with respect to the material provisions of this Franchise, unless otherwise restricted by law.

Comcast looks forward to continuing to provide quality services at competitive rates to our customers within Multnomah County. As a company, we continue to face competition in the cable video market from satellite video providers who are not subject to regulation by the County. In the case of Verizon, we believe that fair competition in a regulated environment that ensures a level playing field (same rules at the same time) among franchised cable competitors benefits not only customers but the competitors as well.

While Verizon is proposing to provide cable video service as a new service, it has a significant presence within the County as the local exchange telephone provider as well as providing Internet service. Moreover, unlike Comcast cable service that provides digital and analog programming, we understand that Verizon will provide only digital programming where every television set will need a set top box. For Comcast's analog programming, a set top box is not necessary.

Honorable Commissioner Ted Wheeler

February 4, 2009

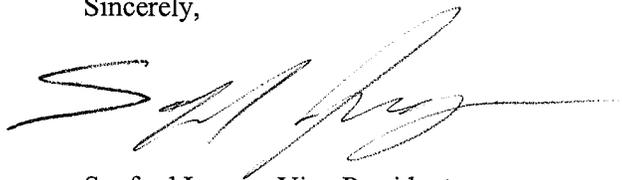
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As you may be aware, our franchise with the County is currently within the renewal window under federal law. There may be a concern that by granting Verizon the proposed franchise the County may set a precedent with respect to Comcast's franchise renewal. We believe that regulated competitors need to be subject to the same rules at the same time in order to ensure a level playing field. This is not only fair and equitable, but it is the right thing to do.

Accordingly, we respectfully request that in determining whether to approve and grant to Verizon the proposed franchise that the County adhere to the level playing field obligation under our current franchise. In order to ensure that Verizon is not given an unfair competitive advantage, our franchise requirements and obligations should be modified to be reasonably comparable to those for Verizon. Comcast reserves its rights to address all competitive issues and we look forward to discussions with the County regarding the modification of our franchise in a mutually cooperative manner.

Again, thank you for the opportunity to provide our comments. As always, please do not hesitate to contact me should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sanford Inouye', with a long horizontal flourish extending to the right.

Sanford Inouye, Vice-President  
Government Affairs

Cc: Multnomah County Commissioners Deborah Kafoury, Jeff Cogen, Judy Shiprack, and Diane McKeel  
Andrea Cano, Mt. Hood Cable Regulatory Commission  
David Olson, Mt. Hood Cable Regulatory Commission