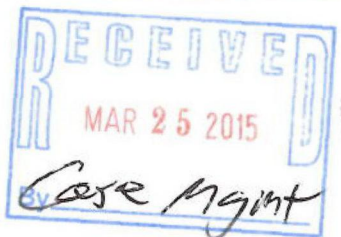


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MAR 25 2015

BOARD OF PUBLIC UTILITIES  
MAIL ROOM

March 23, 2015

Kenneth Sheehan, Acting Secretary  
Board of Public Utilities  
44 S. Clinton Avenue, 9<sup>th</sup> Floor  
Trenton, NJ 08625

CE15030379

Re: In the Matter of the Petition of Comcast of Garden State L.P., for a Renewal Certificate of Approval to Continue to Construct, Operate and Maintain a Cable Television System in and for the Borough of Haddonfield and the Borough of Tavistock, County of Camden, State of New Jersey  
Our File No. 41000.3000

Dear Mr. Sheehan:

Enclosed herewith please find the original and eleven (11) copies of the Verified Petition and Verification filed on behalf of Comcast of Garden State L.P. ("Comcast"), along with three (3) copies of Comcast's public Application for Renewal of a Certificate of Approval ("Application"), with respect to the above-referenced matter. Said copies of the Application have been redacted so as to protect certain confidential information contained therein. Confidential copies of the Application are being submitted simultaneously under separate cover, along with Comcast's request for confidential treatment, pursuant to N.J.A.C. 14:1-12 et seq.

Kindly file the Petition and please return the extra copy of this letter and Petition stamped "RECEIVED" in the self-addressed, stamped envelope provided herein.

Thank you for your kind consideration. Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

*Dennis Linken* /dp

Dennis C. Linken  
For the Firm

DCL:dp

cc:w/enc. Lawanda R. Gilbert, Acting Director (via first class mail)  
Christopher J. White, Deputy Public Advocate (via first class mail)  
Deanna Bennett, Borough Clerk (via first class mail)  
Fred J. DeAndrea, Director of Government and Regulatory Affairs (via first class mail)

CMS  
LEGAL  
DAG  
RPA  
CABLE(6)

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES  
OFFICE OF CABLE TELEVISION**

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Comcast of Garden State L.P.  
File No. 41000.3000

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BOARD OF PUBLIC UTILITIES  
MAIL ROOM

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IN THE MATTER OF THE PETITION OF )  
COMCAST OF GARDEN STATE L.P., FOR A )  
RENEWAL CERTIFICATE OF APPROVAL TO )  
CONTINUE TO CONSTRUCT, OPERATE AND )  
MAINTAIN A CABLE TELEVISION SYSTEM IN )  
AND FOR THE BOROUGH OF HADDONFIELD )  
AND THE BOROUGH OF TAVISTOCK, )  
COUNTY OF CAMDEN, STATE OF NEW )  
JERSEY )

---

**VERIFIED PETITION**

Docket No.

Comcast of Garden State L.P. (hereinafter “Comcast” or “Petitioner”), hereby petitions the Honorable Board of Public Utilities (the “Board”), pursuant to 47 U.S.C. §546(c), N.J.S.A. 48:5A-15, -16 and -17, N.J.A.C. 14:17-6.9 and N.J.A.C. 14:18-13.1 *et seq.*, for renewal of a Certificate of Approval. In support of its Petition, Petitioner states as follows:

COUNT ONE

1. Comcast, a limited liability company duly organized under the laws of the State of Delaware, is a cable television company subject to the jurisdiction of the Office of Cable Television (“OCTV”) and the Board, pursuant to N.J.S.A. 48:5A-1 *et seq.*

2. Comcast maintains its principal offices at 1250 Haddonfield-Berlin Road, Cherry Hill, New Jersey 08034.

3. On or about June 30, 1978, in Docket No. 781C-6350, pursuant to N.J.S.A. 48:5A-17(a) and (b) and N.J.S.A. 48:5A-28(c), the Board issued a Certificate of Approval to Cable Systems, Inc. (“Cable Systems”) to provide cable television service in the Borough of Haddonfield (“Haddonfield”). A copy of said Certificate is on file with the OCTV.

4. On November 6, 1980, in Docket No. 8010C-6722, the Board approved the transfer of the Certificate of Approval with respect to Haddonfield from Cable Systems to New York Times Cable Company of New Jersey (“NYT”).

5. On July 26, 1989, in Docket No. CM89030342, the Board approved the transfer of the Certificate of Approval with respect to Haddonfield from NYT to Garden State Cablevision, L.P. (“Garden State”).

6. On August 27, 1997, in Docket No. CE95080371, the Board issued to Garden State a Renewal Certificate of Approval to continue to provide cable television service in Haddonfield. In the same matter, the Board extended Garden State’s authorization to provide cable television service to the Borough of Tavistock (“Tavistock”, and together with Haddonfield, the “Boroughs”), a small private community located adjacent to Haddonfield. A copy of said Certificate is on file with the OCTV.

7. On or about January 5, 2000, in Docket No. CM99110855 the Board authorized the merger Lenfest Communications, Inc., which owned a 50% interest in Garden State, with and into a wholly-owned indirect subsidiary of Comcast Corporation, which owned the remaining 50% interest. As a result of said merger, Garden State, subsequently renamed Comcast of Garden State L.P., Petitioner herein, became indirectly wholly-owned by Comcast Corporation.

8. Pursuant to N.J.S.A. 48:5A-1 *et seq.* and N.J.A.C. 14:18-13.3(a)3, on or about November 23, 2011, Petitioner submitted an Application for Renewal of Municipal

Consent (hereinafter the "Municipal Application") to continue to construct, operate and maintain the System in Haddonfield.

9. On or about April 22, 2014, a public hearing was held by Haddonfield with respect to Petitioner's Municipal Application, during which all interested persons desiring to be heard were so heard.

10. On or about December 16, 2014, Haddonfield adopted Ordinance 2014-19 (the "Ordinance") granting to Petitioner renewal of its Municipal Consent ("Renewal of Municipal Consent") to continue to construct, operate and maintain the System in Haddonfield. A copy of the Ordinance is annexed hereto as Exhibit A.

11. On or about January 23, 2015, Comcast filed its formal acceptance of the terms and conditions of the Renewal of Municipal Consent granted by Haddonfield, pursuant to N.J.S.A. 48:5A-24. A copy of said letter of acceptance is annexed hereto as Exhibit B.

12. The information pertaining to Petitioner on file with the Office of Cable Television, together with the information contained in its Application for Renewal of a Certificate of Approval ("COA Application"), which applies to both Haddonfield and Tavistock, and which is simultaneously submitted herewith, all of which information is adopted by reference thereto, establishes the requisite criteria for the continued construction, ownership, operation and management of the System in the Boroughs by Comcast.

13. Comcast possesses the requisite character and suitability for the continued operation of the System. Further, as indicated in the COA Application and other information on file with the OCTV, Comcast possesses the necessary financial integrity and the ability to perform efficiently the proposed services and those services which may be required by the public convenience and necessity during the renewal period. The public convenience and necessity generally support the appropriateness of the issuance of a Renewal Certificate of Approval to Petitioner.

14. Petitioner has complied, and will continue to comply, with all rules, regulations and laws applicable to the construction, operation and maintenance of the System and will continue to provide safe, adequate and proper cable television service in the Borough of Haddonfield and the Borough of Tavistock and the other municipalities in which it serves.

#### COUNT TWO

15. Comcast repeats paragraphs 1 through 14 of COUNT ONE as if set forth fully hereinafter.

16. As set forth in the Municipal Application, the COA Application and other information on file at the OCTV, the System operated by Comcast in the Boroughs is part of larger regional Comcast and Comcast-affiliated cable television systems serving numerous other municipalities contiguous to and surrounding the Boroughs.

17. As also set forth in the Municipal Application, the COA Application and other information on file at the OCTV, the Boroughs represent an integral part of the Comcast and Comcast-affiliated regional cable television systems serving the counties of Atlantic, Burlington, Camden, Gloucester and Salem. In addition, the demographics of the Boroughs, as well as their location and other factors, mandate that cable television service be provided by Comcast as part of Comcast's and its affiliates' regional systems.

18. The Haddonfield and Tavistock portions of Comcast's and its affiliates' Atlantic, Burlington, Camden, Gloucester and Salem County regional cable systems are necessary for the continued provision of safe, adequate and economical cable television service to the citizens and residents of the Boroughs and the larger cable television systems generally. Further, continuation of Comcast's operating authority in the Boroughs will avoid an unreasonable duplication of services which would otherwise be detrimental to the development of adequate cable television service.

19. Comcast is entitled to a renewal of its Municipal Consent and Certificate of Approval, pursuant to the provisions of Section 17(b) of the New Jersey Cable Television Act, N.J.S.A. 48:5A-1 et seq.

20. Comcast believes that a Renewal Certificate of Approval for the Borough of Haddonfield and the Borough of Tavistock is necessary and proper for the public convenience and will serve the public interest for reasons which include, *inter alia*, the following:

(a) The grant of a Renewal Certificate of Approval to Comcast will ensure the continued provision of safe, adequate and proper cable television service to the residents of the Boroughs;

(b) The services provided and to be provided by Comcast as set forth in its Municipal Application and its COA Application are and will be of great benefit to the citizens and residents of the Boroughs;

(c) The financial strength and technical expertise of Comcast are more than adequate to continue to construct, operate and maintain its cable television system in the Borough of Haddonfield and the Borough of Tavistock; and


(d) Comcast, its officers and directors, have vast experience in all aspects of cable television. In particular, they possess and represent the highest degree of technical and engineering competence, significant administrative experience and a demonstrated responsiveness to community needs. In addition to Haddonfield and Tavistock, Comcast and its affiliates hold Certificates of Approval or other authorization to construct, operate and maintain cable television systems in more than 340 municipalities in New Jersey, as well as additional communities in 38 other states.

**WHEREFORE**, it is requested that this Honorable Board of Public Utilities issue to Comcast of Garden State L.P., a Renewal Certificate of Approval to continue to construct,

operate and maintain a cable television system in the Borough of Haddonfield and the Borough of Tavistock.

Respectfully submitted,

SCARINCI & HOLLENBECK, LLC  
Attorneys for Petitioner  
Comcast of Garden State L.P.

By:   
\_\_\_\_\_

Dennis C. Linken

Dated: March 23, 2015