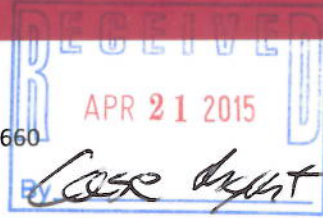


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Phone: 201-806-3426 | Direct Fax: 201-896-8660



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APR 21 2015

BOARD OF PUBLIC UTILITIES
MAIL ROOM

April 14, 2015

Via Regular Mail

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

CE15040483

Re: In the Matter of the Petition of Comcast of South Jersey, LLC, for a Renewal Certificate of Approval to Continue to Construct, Operate and Maintain a Cable Television System in and for the Township of Egg Harbor, County of Atlantic, 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 South Jersey, LLC ("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)
Eileen M. Tedesco, Township Clerk (via first class mail)
Fred J. DeAndrea, Director of Government and Regulatory Affairs (via first class mail)

CMS
LEGAL (2)
DAG
RPA
CABLE (6)

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

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BOARD OF PUBLIC UTILITIES
MAIL ROOM

SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Avenue
Lyndhurst, NJ 07071-0790
Phone: 201-896-4100
Attorneys for Petitioner
Comcast of South Jersey, LLC
File No. 41000.3000

)
IN THE MATTER OF THE PETITION OF)
COMCAST OF SOUTH JERSEY, LLC, FOR A)
RENEWAL CERTIFICATE OF APPROVAL)
TO CONTINUE TO CONSTRUCT, OPERATE)
AND MAINTAIN A CABLE TELEVISION)
SYSTEM IN AND FOR THE TOWNSHIP OF)
EGG HARBOR, COUNTY OF ATLANTIC,)
STATE OF NEW JERSEY)
_____)

VERIFIED PETITION

Docket No.

Comcast of South Jersey, LLC (hereinafter, "Comcast" or "Petitioner"), hereby petitions the Honorable Board of Public Utilities (the "Board"), pursuant to N.J.S.A. 48:5A-15, 16 and 17, and N.J.A.C. 14:18-13.6, for renewal of a Certificate of Approval to continue to construct, operate and maintain its cable television system ("System") in the Township of Egg Harbor, Atlantic County, New Jersey ("Township" or "Egg Harbor"). 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 1846 N.W. Boulevard, Vineland, New Jersey 08360.

3. On April 3, 1975, in Docket No. 752C-6078 pursuant to N.J.S.A. 48:5A-17(a) and (b), the Board issued a Certificate of Approval to Sammons Communications of New Jersey, Inc. ("Sammons"), to own, operate and maintain the System in the Township. A copy of said Order of Approval is on file at the OCTV.

4. On or about October 7, 1991, in Docket No. CE91010120, pursuant to N.J.S.A. 48:5A-16 and 17, the Board issued a Renewal Certificate of Approval to Sammons for the continued construction, operation and maintenance of the System in and for the Township. A copy of said Renewal Certificate of Approval is on file at the OCTV.

5. On March 1, 1996, pursuant to an Order of Approval issued by the Board on February 28, 1996, in Docket No. CM95080358, Lenfest Atlantic, Inc., d/b/a Suburban Cablevision ("Lenfest"), acquired Sammons' System, including the Certificate of Approval to operate in the Township. A copy of said Order of Approval is on file at the OCTV.

6. On January 18, 2000, pursuant to the Order of Approval issued by the Board in Docket No. CM99110855, Lenfest became an indirect, wholly-owned subsidiary of Comcast Corporation. Subsequently, on or about September 13, 2000, Lenfest's name was formally changed to Comcast Cablevision of South Jersey, Inc., which, effective May 13, 2004, was converted to Comcast of South Jersey, LLC, Petitioner herein.

7. On or about December 11, 2001, in Docket No. CE00110919, pursuant to N.J.S.A. 48:5A-16 and 17, the Board issued a Renewal Certificate of Approval to Petitioner (the "2001 Renewal Certificate of Approval") for the continued construction, operation and maintenance of the System in and for the Township. A copy of the 2001 Renewal Certificate of Approval is on file at the OCTV.

8. The 2001 Renewal Certificate of Approval, in accordance with its underlying municipal consent ordinance, reflected and included an automatic renewal provision, pursuant to

which the Egg Harbor franchise would be subject to automatic renewal for a period of five (5) years following its scheduled expiration date of April 3, 2015.

9. As set forth under N.J.A.C. 14:18-13.6, applicable to ordinances which provide for automatic renewal, in the absence of notice at least 60 days prior to expiration of the initial term of a franchise from either the cable television company or the municipality of its intention to not renew, a franchise will be deemed to automatically renew.

10. Neither the Township nor Comcast provided notice of its intention to not renew the Egg Harbor franchise pursuant to N.J.A.C. 14:18-13.6 prior to the deadline set forth therein for such action, as confirmed in Comcast's letter to the Township dated February 3, 2015, a copy of which is annexed hereto as Exhibit A. As set forth therein, Comcast further confirmed its intention to exercise its rights under the automatic renewal provision of the 2001 Renewal Certificate of Approval.

11. As a result of the foregoing, Comcast's franchise in Egg Harbor shall be deemed to automatically renew.

12. Accordingly, pursuant to N.J.A.C. 14:18-13.6, Comcast hereby requests approval and implementation of the automatic renewal provision of the 2001 Renewal Certificate of Approval granted in Docket No. CE00110919, to continue to construct, operate and maintain the System in the Township.

13. The information pertaining to Comcast on file with the OCTV, together with the information contained in its Application for Renewal of a Certificate of Approval ("COA Application") pertaining to the Township, simultaneously filed herewith, all of which is adopted by reference thereto, establishes the requisite criteria for the continued construction, operation and maintenance of the System in the Township by Comcast.

14. 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 responsibility and the ability to perform efficiently the proposed services and those services that 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 an Automatic Renewal Certificate of Approval for the Township to Comcast.

15. Comcast 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 Township and the other municipalities in which it serves.

COUNT TWO

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

17. As set forth in the COA Application and other information on file at the OCTV, the Systems operated by Comcast in the Township is part of larger regional cable television systems serving numerous other municipalities contiguous to and surrounding the Township.

18. As also set forth in the COA Application and other information on file at the OCTV, the Township represents an integral part of the Comcast regional cable television systems serving the counties of Atlantic, Burlington, Camden, Cape May, Gloucester and Salem. In addition, the demographics of the Township, as well as its location and other factors, mandate that cable television service be provided by Comcast as part of Comcast's regional systems.

19. The Township portion of Comcast's Atlantic, Burlington, Camden, Cape May, Gloucester and Salem County regional cable systems is necessary for the continued provision of

safe, adequate and economical cable television service to the citizens and residents of the Township and the larger cable television systems generally. Further, continuation of Comcast's operating authority in the Township will avoid an unreasonable duplication of services that would otherwise be detrimental to the development of adequate cable television service.

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

21. Comcast believes that an Automatic Renewal Certificate of Approval for the Township of Egg Harbor 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 an Automatic Renewal Certificate of Approval to Comcast will ensure the continued provision of cable television service to the residents of the Township;

b. The services provided by Comcast as set forth in its COA Application are of great benefit to the citizens and residents of the Township;


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 Township; and

d. Comcast, its officers and its 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 the Township, Comcast and other Comcast 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 and the District of Columbia.

WHEREFORE, Comcast hereby requests that the Honorable Board of Public Utilities issue to Petitioner an Automatic Renewal Certificate of Approval to continue to construct, operate and maintain a cable television system in and for the Township of Egg Harbor.

Respectfully submitted,

SCARINCI & HOLLENBECK, LLC
Attorneys for Petitioner
Comcast of South Jersey, LLC

By: 
Dennis C. Linken

Dated: April 14, 2015

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

SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Avenue
Lyndhurst, NJ 07071-0790
Phone: 201-896-4100
Attorneys for Petitioner
Comcast of South Jersey, LLC
File No. 41000.3000

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IN THE MATTER OF THE PETITION OF)
COMCAST OF SOUTH JERSEY, LLC, FOR A)
RENEWAL CERTIFICATE OF APPROVAL)
TO CONTINUE TO CONSTRUCT, OPERATE)
AND MAINTAIN A CABLE TELEVISION)
SYSTEM IN AND FOR THE TOWNSHIP OF)
EGG HARBOR, COUNTY OF ATLANTIC,)
STATE OF NEW JERSEY)
_____)

VERIFICATION

Docket No.

FRED DeANDREA hereby certifies as follows:

1. I am Director of Government and Regulatory Affairs of Comcast of South Jersey, LLC, Petitioner in the within matter.
2. I am familiar with the nature and contents of the Petition to which this Verification is annexed.
3. The allegations of the Petition are true and accurate to the best of my knowledge, information and belief.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I may be subject to punishment.



Fred DeAndrea

Dated: April 09, 2015