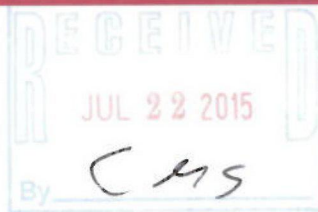


DENNIS C. LINKEN | Partner
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P: 201-806-3426 | F: 201-896-8660

July 15, 2015



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Via FedEx Overnight Mail

Lawanda R. Gilbert, Acting Director
Board of Public Utilities
44 South Clinton Avenue, 9th Floor
Trenton, NJ 08625

CO15070836

RE: In the Matter of the Alleged Failure of Certain Cable Television Subsidiaries or Affiliates of Comcast Cable Communications, LLC to Comply with Certain Provisions of the New Jersey Cable Television Act, N.J.S.A. 48:5A-1 et seq., the New Jersey Administrative Code, N.J.A.C. 14:17-1.1 et seq. and N.J.A.C. 14:18-1.1 et seq., and Certain Provisions of Board Orders
Our File No. 41000.2000

Dear Director Gilbert:

We write on behalf of the subsidiaries and affiliates of Comcast Cable Communications, LLC (collectively, "Comcast"), in connection with the above-captioned matter. Enclosed herewith please find an Offer of Settlement executed on behalf of Comcast, completing the recent review of the Office of Cable Television with respect to compliance matters.

We trust you will find all to be satisfactory but, needless to say, should you have any questions or require additional information, please do not hesitate to contact me.

I thank you for your kind attention.

Very truly yours,

D. Linken

Dennis C. Linken
For the Firm

DCL/dp
enc.

cc: William H. Furlong, Bureau Chief (william.furlong@bpu.state.nj.us)
Amy Drummond, Administrative Analyst 1 (amy.drummond@bpu.state.nj.us)

CMS
C. ARTALE
CABLE

Lawanda R. Gilbert, Acting Director

July 15, 2015

Page 2

bcc: Elizabeth Murray, Director of Regulatory Affairs
(Elizabeth_Murray@cable.comcast.com)
William J. Kettleson, Vice President, Government Affairs
(bill_kettleson@cable.comcast.com)

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

SCARINCI & HOLLENBECK, LLC
ATTORNEYS AT LAW
1100 Valley Brook Avenue, P.O. BOX 790
LYNDHURST, NEW JERSEY 07071-0790
Telephone: (201) 896-4100
Attorneys for Comcast Cable Communications, LLC and
the Comcast Subsidiaries

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IN THE MATTER OF THE ALLEGED)
FAILURE OF CERTAIN CABLE TELEVISION) OFFER OF SETTLEMENT
SUBSIDIARIES OR AFFILIATES OF)
COMCAST CABLE COMMUNICATIONS,)
LLC TO COMPLY WITH CERTAIN) Docket No. CO _____
PROVISIONS OF THE NEW JERSEY CABLE)
TELEVISION ACT, N.J.S.A. 48:5A-1 ET SEQ.,)
THE NEW JERSEY ADMINISTRATIVE)
CODE, N.J.A.C. 14:17-1.1 ET SEQ. AND)
N.J.A.C. 14:18-1.1 ET SEQ., AND CERTAIN)
PROVISIONS OF BOARD ORDERS)

WHEREAS, Comcast Cable Communications, LLC (“CCC”) owns the stock or equity interests of certain subsidiaries or affiliates which own and operate cable television systems in New Jersey¹ (referred to collectively hereinafter as the “Comcast Subsidiaries”); and

WHEREAS, the Comcast Subsidiaries are subject to the jurisdiction of the Board of Public Utilities (the “Board”) and the Office of Cable Television (“OCTV”), within the Board, pursuant to the New Jersey Cable Television Act, N.J.S.A. 48:5A-1 et seq. (the “Act”), and the New Jersey Administrative Code, N.J.A.C. 14:17-1.1 et seq. and N.J.A.C. 14:18-1.1 et seq. (the “Regulations”); and

¹ Comcast of New Jersey II, LLC; Comcast of South Jersey, LLC; Comcast of the Meadowlands, LLC; Comcast of Monmouth County, LLC; Comcast of Ocean County, LLC; Comcast of Northwest New Jersey, LLC; Comcast of Central New Jersey, LLC; Comcast of Central New Jersey II, LLC; Comcast of Mercer County, LLC; Comcast of Hopewell Valley, Inc.; Comcast of Lawrence, LLC; Comcast of Jersey City, LLC; Comcast of Burlington County, LLC; Comcast of Southeast Pennsylvania, LLC; Comcast of Gloucester County, LLC; Comcast of Plainfield, LLC; Comcast of Long Beach Island, LLC; Comcast of Avalon, LLC; Comcast of New Jersey, LLC; Comcast of Garden State L.P.; and Comcast of Wildwood, LLC.

WHEREAS, New Jersey cable television companies are required to comply with the provisions of the Act, the Regulations and Board Orders issued thereunder; and

WHEREAS, the OCTV has conducted an investigation with regard to the Comcast Subsidiaries' compliance with the Act, the Regulations and Board Orders; and

WHEREAS, as a result of said investigation, the OCTV has alleged that some or all of the Comcast Subsidiaries have failed to comply with certain provisions of the Act, the Regulations and/or Board Orders; and

WHEREAS, the Comcast Subsidiaries wish to amicably resolve the issues raised by the OCTV without the need for time-consuming and expensive litigation;

NOW, THEREFORE, the Comcast Subsidiaries submit this Offer of Settlement, as follows:

1. The OCTV has alleged that the Comcast Subsidiaries have failed to comply with, among other things:
 - a. Requirements pertaining to schedules of all rates, terms and conditions to be filed with the Board;
 - b. Requirements pertaining to rate application filings;
 - c. Requirements pertaining to construction obligations;
 - d. Requirements pertaining to bills for service; form of bill;
 - e. Requirements pertaining to the issuance of subscriber refunds;
 - f. Requirements pertaining to customer service standards;
 - g. Requirements pertaining to Board Orders, filings, notices and reports to be submitted to the Board and notices to be sent to subscribers; and
 - h. Requirements pertaining to notice of customer service office closures or relocations.
2. The Comcast Subsidiaries will pay to the State of New Jersey the sum of Three Hundred Thirty-Seven Thousand Dollars (\$337,000.00) in full settlement with the Board and the OCTV of any violations or potential violations up to March 31, 2015, of the Act, the Regulations or Board Orders, which violations or potential violations have been or could have been alleged by the Board or the OCTV against any or all of the Comcast Subsidiaries. Upon approval by the Board of this

Offer of Settlement and payment as required hereinabove, the Board and the OCTV release CCC and the Comcast Subsidiaries, their parents, affiliates, subsidiaries and successors, from any and all liability with respect to such violations or potential violations.

3. This Offer of Settlement does not relieve CCC, the Comcast Subsidiaries, or their parents, affiliates, subsidiaries or successors, from any liability for violations of the Act, the Regulations or Board Orders that occur after March 31, 2015.
4. This Offer of Settlement also does not include, and shall not have an impact upon, allegations or claims as they apply to alleged violations of New Jersey's Underground Facility Protection Act, N.J.S.A. 48:2-73 et seq. To the extent that there is a potential for liability on the part of CCC, the Comcast Subsidiaries, their parents, affiliates, subsidiaries, or successors, as a result of a violation of the Underground Facility Protection Act, that liability will remain subject to enforcement or other appropriate Board action.
5. The execution of this Offer of Settlement shall neither be deemed an admission by CCC or the Comcast Subsidiaries of any violation of the Act, the Regulations or Board Order, nor a determination by the Board or the OCTV that such a violation has occurred, nor shall Board approval of this Offer of Settlement be deemed a determination that a violation has occurred.
6. Any future repeated violation(s) of the Act, the Regulations or Board Orders by the Comcast Subsidiaries, their parents, affiliates, subsidiaries or successors that may now or in the future operate the cable television systems that are the subject of this Offer of Settlement, shall be deemed to be a second, third or subsequent violation, as appropriate, pursuant to the provisions of N.J.S.A. 48:5A-51(b), for the purpose of determining the amount of any applicable penalty.

7. Recognizing but notwithstanding the provisions of the foregoing paragraphs, the Comcast Subsidiaries agree to take the following actions: They will endeavor, going forward, to:

- a. submit to customers and/or the Board such notifications as may be required under pertinent Board Orders or Regulations.
- b. ensure all customers' bills for service conform to N.J.A.C. 14:18-3.7.
- c. issue refund checks promptly to customers no later than either the customer's next billing cycle following the resolution of the issue giving cause for the refund, or thirty (30) days, whichever is earlier, or the return of equipment supplied by the cable operator if service was terminated, as required by N.J.A.C. 14:18-3.25.
- d. achieve the Federal Communications Commission and State telephone customer service standards as set forth in 47 C.F.R. § 76.309(c) and N.J.A.C. 14:18-7.8(a) 2 and 3.
- e. submit to the Board such reports and applicable schedules of rates, terms and conditions as are required under pertinent Regulations.
- f. submit to the Board complete rate application filings as are required under pertinent Regulations.
- g. comply with applicable construction requirements, to the extent circumstances within their control permit.
- h. comply with all terms and conditions of Board Orders and directives issued by the Board and the Director as required by N.J.S.A. 48:5A-9.

8. The execution of this Offer of Settlement shall not be relied upon by CCC or the Comcast Subsidiaries, their parents, affiliates, subsidiaries or successors in an attempt to mitigate any future repeated violation of the Act, the Regulations or Board Orders.

Comcast of New Jersey II, LLC
Comcast of South Jersey, LLC
Comcast of the Meadowlands, LLC
Comcast of Monmouth County, LLC
Comcast of Ocean County, LLC
Comcast of Northwest New Jersey, LLC
Comcast of Burlington County, LLC

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Comcast of Central New Jersey, LLC
Comcast of Central New Jersey II, LLC
Comcast of Southeast Pennsylvania, LLC
Comcast of Mercer County, LLC
Comcast of Hopewell Valley, Inc.
Comcast of Lawrence, LLC
Comcast of Gloucester County, LLC
Comcast of Jersey City, LLC
Comcast of Plainfield, LLC
Comcast of Long Beach Island, LLC
Comcast of Avalon, LLC
Comcast of New Jersey, LLC
Comcast of Garden State L.P.
Comcast of Wildwood, LLC

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BY: 

Dennis C. Linken
Attorney for Comcast Cable Communications,
LLC and the
Comcast Subsidiaries

Dated: July 14, 2015