

**DENNIS C. LINKEN | Partner**  
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May 3, 2016

Irene Kim Asbury, Secretary  
NJ Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
Trenton, NJ 08625

RECEIVED

MAY 04 2016

BOARD OF PUBLIC UTILITIES  
MAIL ROOM

CE15030300

Re: In the Matter of the Petition of Comcast of Monmouth County, LLC, for a Renewal Certificate of Approval to Continue to Construct, Operate and Maintain a Cable Television System in and for the Borough of Freehold, County of Monmouth, State of New Jersey  
Our File No. 41000.3000

Dear Secretary Asbury:

Enclosed herewith please find the original and eleven (11) copies of the Amended Verified Petition and Verification filed on behalf of Comcast of Monmouth County, LLC ("Comcast"), with respect to the above-referenced matter.

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 ldp*

Dennis C. Linken  
For the Firm

DCL:dp

cc:w/enc. Lawanda R. Gilbert, Acting Director (via first class mail)  
Maria T. Novas-Ruiz, Esq., Assistant Deputy Rate Counsel (via first class mail)  
Traci L. DiBenedetto, RMC, Borough Clerk (via first class mail)  
Robert D. Clifton, Senior Director of Government and Regulatory Affairs (via first class mail)

CMS  
LEGAL  
DTG  
RPA  
CABLE(6)

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

SCARINCI & HOLLENBECK, LLC  
1100 Valley Brook Avenue  
P.O. Box 790  
Lyndhurst, New Jersey 07071-0790  
(201) 896-4100  
Attorneys for Petitioner  
Comcast of Monmouth County, LLC  
File No. 41000.3000

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\_\_\_\_\_)  
IN THE MATTER OF THE PETITION OF )  
COMCAST OF MONMOUTH COUNTY, LLC, )  
FOR A RENEWAL CERTIFICATE OF )  
APPROVAL TO CONTINUE TO CONSTRUCT, )  
OPERATE AND MAINTAIN A CABLE )  
TELEVISION SYSTEM IN AND FOR THE )  
BOROUGH OF FREEHOLD, COUNTY OF )  
MONMOUTH, STATE OF NEW JERSEY )  
\_\_\_\_\_)

**AMENDED VERIFIED PETITION**

Docket No. CE15030300

Comcast of Monmouth County, LLC (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 & Telecommunications (“OCTV&T”) and the Board, pursuant to N.J.S.A. 48:5A-1 *et seq.*

8. On or about March 6, 2002, in Docket No. CE02010014, 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 Renewal Certificate of Approval to CMCI to continue to construct, operate and maintain the System in the Borough. A copy of said Renewal Certificate of Approval is on file at the Board.

9. On January 30, 2003, CMCI notified the Board of its conversion to a limited liability company, to be known as Comcast Cablevision of Monmouth County, LLC, later changed to Comcast of Monmouth County, LLC.

10. 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 July 11, 2014, Petitioner submitted an Application for Renewal of Municipal Consent (hereinafter the "Municipal Application") to continue to construct, operate and maintain the System in the Borough.

11. On or about October 6, 2014, a public hearing was held by the Borough with respect to Petitioner's Municipal Application, during which all interested persons desiring to be heard were so heard.

12. On or about November 17, 2014, the Borough adopted Ordinance No. 2014/15 (the "Ordinance") granting to Petitioner renewal of its Municipal Consent ("Renewal of Municipal Consent") to continue to construct, operate and maintain the System in the Borough. A copy of said Ordinance is annexed hereto as Exhibit A.

13. On or about December 8, 2014, Comcast filed its formal acceptance of the terms and conditions of the Renewal of Municipal Consent granted by the Borough, pursuant to N.J.S.A. 48:5A-24. A copy of said letter of acceptance is annexed hereto as Exhibit B.

14. On or about March 3, 2015, Petitioner filed its Petition before the Board in this matter, seeking issuance of a Renewal Certificate of Approval with respect to the Borough ("Petition").

continue to provide safe, adequate and proper cable television service in the Borough of Freehold and the other municipalities in which it serves.

## COUNT TWO

21. Comcast repeats paragraphs 1 through 20 of COUNT ONE as if set forth fully hereinafter.

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

23. As also set forth in the Municipal Application, the COA Application and other information on file at the OCTV&T, the Borough represents an integral part of the Comcast and Comcast-affiliated regional cable television systems serving the counties of Mercer, Middlesex, Monmouth and Ocean. In addition, the demographics of the Borough, as well as its location and other factors, mandate that cable television service be provided by Comcast as part of Comcast's and its affiliates' regional systems.

24. The Borough portion of Comcast's and its affiliates' Mercer, Middlesex, Monmouth and Ocean 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 Borough and the larger cable television systems generally. Further, continuation of Comcast's operating authority in the Borough will avoid an unreasonable duplication of services which would otherwise be detrimental to the development of adequate cable television service.

25. 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.

26. Comcast believes that a Renewal Certificate of Approval for the Borough of Freehold 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 Borough;

(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 Borough;

(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 Freehold; 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 Freehold, 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 Monmouth County, LLC, a Renewal Certificate of Approval to continue to construct, operate and maintain a cable television system in the Borough of Freehold.

Respectfully submitted,

SCARINCI & HOLLENBECK, LLC  
Attorneys for Petitioner  
Comcast of Monmouth County, LLC

By: *Dennis Linken* /dp  
Dennis C. Linken

Dated: May 3, 2016

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES  
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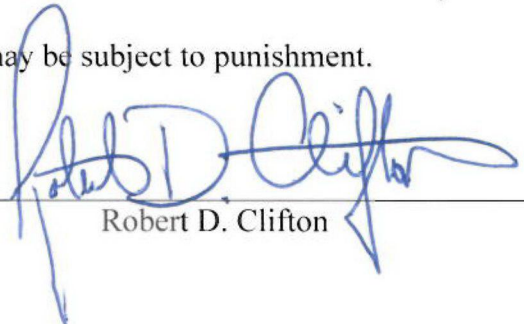
**VERIFICATION**

Docket No.

Robert D. Clifton, hereby certifies as follows:

1. I am Senior Director of Government Affairs of Comcast of Monmouth County, LLC, Petitioner in the within matter.
2. I am familiar with the nature and contents of the Amended Petition to which this Verification is annexed.
3. The allegations of the Amended 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 are willfully false, I may be subject to punishment.

  
\_\_\_\_\_  
Robert D. Clifton

Dated: April 27, 2016