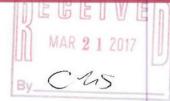
DENNIS C. LINKEN | Partner

dlinken@scarincihollenbeck.com Phone: 201-806-3426 | Direct Fax: 201-896-8660

March 17, 2017



MAR 2 1 2017

BOARD OF PUBLIC UTILITIES

MAIL ROOM

Irene Kim Asbury, Secretary Board of Public Utilities 44 South Clinton Avenue, 9th Floor Trenton, NJ 08625

CE17030275

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 Township of Haddon, County of Camden, State of New Jersey Our File No. 41000.3000

Dear Secretary Asbury:

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 seg.

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 C. Linken

Tinken Idx

For the Firm

DCL:dp

cc:w/enc. Lawanda R. Gilbert, Acting Director (via first class mail)

Maria T. Novas-Ruiz, Assistant Deputy Rate Counsel (via first class mail)

Ruth Dawson, Township Clerk (via first class mail

Fred J. DeAndrea, Director of Government and Regulatory Affairs (via first class mail)

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

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

RECEIVED

MAR 2 1 2017

BOARD OF PUBLIC UTILITIES
MAIL ROOM

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 TOWNSHIP OF HADDON, 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 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 a cable television system ("System") in the Township of Haddon, Camden County, New Jersey ("Township" or "Haddon"). In support of its Petition, Petitioner states as follows:

COUNT ONE

1. Comcast, a limited partnership 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.

- Comcast maintains its principal offices at 1250 Audubon Park-Berlin Road,
 Cherry Hill, New Jersey 08034.
- 3. On or about April 29, 1976, in Docket No. 762C-6129, 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 Township. A copy of said Certificate is on file with the OCTV&T.
- 4. On or about November 6, 1980, in Docket No. 8010C-6721, the Board approved the transfer of the System, including the Certificate of Approval with respect to Haddon, from Cable Systems to New York Times Cable Company of New Jersey ("NYT").
- 5. On or about July 26, 1989, in Docket No. CM89030342, the Board approved the transfer of the System, including the Certificate of Approval with respect to Haddon, from NYT to Garden State Cablevision, L.P. ("Garden State").
- 6. On or about January 26, 1993, in Docket No. CE91040838, the Board issued to Garden State a Renewal Certificate of Approval to continue to provide cable television service in Haddon. A copy of said Certificate is on file with the OCTV&T.
- 7. On or about January 5, 2000, in Docket No. CM99110855, the Board authorized the merger of 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, later renamed Comcast of Garden State L.P., Petitioner herein, became indirectly wholly-owned by Comcast Corporation.
- 8. On or about October 3, 2002, in Docket No. CE02010031, pursuant to N.J.S.A. 48:5A-16 and 17, the Board issued a Renewal Certificate of Approval to Petitioner for the

Application and other information on file with the OCTV&T, Comcast possesses the necessary financial responsibility and 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.

15. 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 Haddon 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 Municipal Application, the COA Application and other information on file at the OCTV&T, the System 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 Municipal Application, the COA Application and other information on file at the OCTV&T, the Township represents an integral part of the Comcast regional cable television systems serving the counties of Atlantic, Burlington, Camden, Cape May, Cumberland, 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 and its affiliates' regional systems.

- 19. The Township portion of Comcast's and its affiliates' Atlantic, Burlington, Camden, Cape May, Cumberland, 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 a Renewal Certificate of Approval for the Township of Haddon 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 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 a Renewal Certificate of Approval to continue to construct, operate and

maintain a cable television system in and for the Township of Haddon.

Respectfully submitted,

SCARINCI & HOLLENBECK, LLC

Attorneys for Petitioner

Comcast of Garden State L.P.

By: Dennis C. Linken /dp

Dated: Match 17, 2017

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STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES OFF ICE OF CABLE TELEVISION & TELECOMMUNICATIONS

SCARINCI & HOLLENBECK, LLC

1100 Valley Brook Avenue

Lyndhurst, NJ 07071-0790 Phone: 201-896-4100

Attorneys for Petitioner

Comcast of Garden State L.P.

File No. 41000.3000

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 TOWNSHIP OF HADDON, COUNTY OF CAMDEN, STATE OF NEW JERSEY

VERIFICATION

Docket No.

FRED DeANDREA hereby certifies as follows:

- I am Director of Government and Regulatory Affairs of Comcast of Garden State
 L.P., Petitioner in the within matter.
- I am familiar with the nature and contents of the Petition to which this
 Verification is annexed.
- 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 are willfully false, I may be subject to punishment.

Fred DeAndrea

Dated: March 17, 2017