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February 16, 2018

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CASE MANAGEMENT

FEB 20 2018

Via FedEx Overnight Mail

Board Secretary
Attn: Aida Camacho
Board of Public Utilities
44 South Clinton Avenue
3rd Floor, Suite 314
Trenton, NJ 08625

FEB 20 2018
BOARD OF PUBLIC UTILITIES
TRENTON, NJ

BOARD OF PUBLIC UTILITIES
TRENTON, NJ

CE18020175

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

Dear Ms. Camacho:

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 Federal Express)
Maria T. Novas-Ruiz, Assistant Deputy Rate Counsel (via first class mail)
Terry Shannon, Borough Clerk (via first class mail)
Fred J. DeAndrea, Senior Director of Government and Regulatory Affairs (via first class mail)

CMS
LEGAL
DAG
RPA
CABLE (b)

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

_____)
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)
BARRINGTON, 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 Borough of Barrington, Camden County, New Jersey ("Borough" or "Barrington"). 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.

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

3. On or about May 31, 1977, in Docket No. 773C-6255, 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. 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 Barrington, 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 Barrington, from NYT to Garden State Cablevision, L.P. (“Garden State”).

6. On or about March 12, 1993, in Docket No. CE92010034, the Board issued to Garden State a Renewal Certificate of Approval to continue to provide cable television service in Barrington. 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 September 23, 2004, in Docket No. CE03060482, pursuant to N.J.S.A. 48:5A-16 and 17, the Board issued a Renewal Certificate of Approval to Petitioner for

the continued construction, operation and maintenance of the System in and for the Borough. A copy of said Certificate of Approval is on file at the OCTV&T.

9. 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 December 7, 2016, 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.

10. On or about March 21, 2017, 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.

11. On or about October 10, 2017, the Borough adopted Ordinance 1081 (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.

12. On or about December 6, 2017, 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.

13. The information pertaining to Petitioner on file with the OCTV&T, together with the information contained in Petitioner’s Municipal Application and its Application for Renewal of a Certificate of Approval (“COA Application”), simultaneously filed herewith, all of which is adopted by reference thereto, establishes the requisite criteria for the continued construction, ownership, operation and management of the System in Barrington by Comcast.

14. Comcast possesses the requisite character and suitability for the continued operation of the System. Further, as indicated in the Municipal Application, the COA

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 Barrington 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 Borough is part of larger regional cable television systems serving numerous other municipalities contiguous to and surrounding the Borough.

18. 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 regional cable television systems serving the counties of Atlantic, Burlington, Camden, Cape May, Cumberland, Gloucester and Salem. 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.

19. The Borough 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 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 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 Borough, 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 Borough of Barrington 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 Borough;
- b. The services provided by Comcast as set forth in its COA Application are 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; 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 Borough, 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 Borough of Barrington.

Respectfully submitted,

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

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

Dated: February 16, 2018

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

SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Avenue
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BARRINGTON, COUNTY OF CAMDEN,)
STATE OF NEW JERSEY)
_____)


VERIFICATION

Docket No.

FRED DeANDREA hereby certifies as follows:

1. I am Senior Director of Government and Regulatory Affairs of Comcast of Garden State L.P., 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 are willfully false, I may be subject to punishment.


Fred DeAndrea

Dated: February 16, 2018