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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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September 12, 2019

Via FedEx Overnight Mail

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

RECEIVED
MAIL ROOM
SEP 13 2019
BOARD OF PUBLIC UTILITIES
TRENTON, NJ

CE 19091207

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 Lower Alloways Creek, County of Salem, State of New Jersey
Our File No. 41000.3000

Dear Secretary Camacho-Welch:

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 Application and please return the extra copy of this letter, Petition and documents 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,

Laura M. Miller
For the Firm

LMM/dp

cc/w/enc. Lawanda R. Gilbert, Director (via FedEx Overnight Mail)
Nancy J. Wolf, Administrative Analyst 4 (via FedEx Overnight Mail)
Stefanie A. Brand, Director (via first class mail)
Ronald L. Campbell, Sr., Township Clerk (via first class mail)
Fred J. DeAndrea, Senior Director of Government and Regulatory Affairs (via email)

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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

SCARINCI & HOLLENBECK, LLC
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Attorneys for Petitioner
Comcast of South Jersey, LLC
File No. 41000.3000

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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

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 LOWER)
ALLOWAYS CREEK, COUNTY OF SALEM,)
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 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.

2. Comcast maintains its principal offices at 1250 Haddonfield-Berlin Rd., Cherry Hill, NJ 08034.

3. On or about August 22, 1994, in Docket No. CE94040182, 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 Tri-County Cable Television Company ("Tri-County") to provide cable television service in the Township of Lower Alloways Creek, County of Salem, State of New Jersey ("Township" or "Lower Alloways Creek"). A copy of said Certificate is on file with the OCTV&T.

4. On May 1, 1996, in Docket No. CM95110598, the Board approved the transfer of the Certificate of Approval with respect to the Township from Tri-County to Lenfest Atlantic, Inc. ("Lenfest").

5. On January 18, 2000, pursuant to the Order of Approval issued January 6, 2000 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 of South Jersey, Inc., now known as Comcast of South Jersey, LLC, Petitioner herein. A copy of said Order of Approval is on file at the OCTV&T.

6. On August 1, 2005, in Docket No. CE05020152, the Board issued to Petitioner a Renewal Certificate of Approval (the "2005 COA") to continue to provide cable television service in the Township. A copy of said Renewal Certificate is on file with the OCTV&T.

7. The 2005 COA, in accordance with its underlying municipal consent ordinance, reflected and included an automatic renewal provision, pursuant to which the Lower Alloways Creek franchise would be subject to automatic renewal for a period of ten (10) years following its scheduled expiration date of August 22, 2019.

8. As set forth under N.J.A.C. 14:18-13.6(a)(1), applicable to ordinances which provide for automatic renewal, in the absence of notice at least sixty (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.

9. Neither the Township nor Comcast provided notice of its intention to not renew the Lower Alloways Creek franchise pursuant to N.J.A.C. 14:18-13.6(a)(1) prior to the deadline set forth therein for such action, as confirmed in Comcast's letter to the Township dated July 22, 2019, 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 2005 COA.

10. As a result of the foregoing, Comcast's franchise in Lower Alloways Creek shall be deemed to automatically renew.

11. The information pertaining to Petitioner on file with the OCTV&T, together with the information contained in its Application for Renewal of a Certificate of Approval ("COA Application"), simultaneously submitted herewith, all of which is adopted by reference thereto, establishes the requisite criteria for the continued construction, ownership, operation and management of a cable television system ("System") in Lower Alloways Creek by Comcast.

12. 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&T, Comcast possesses the necessary financial integrity and the 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.

13. 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 the Township of Lower Alloways Creek and the other municipalities in which it serves.

COUNT TWO

14. Comcast repeats paragraphs 1 through 13 of COUNT ONE as if set forth fully hereinafter.

15. As set forth in 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 Comcast and Comcast-affiliated cable television systems serving numerous other municipalities contiguous to and surrounding the Township.

16. As also set forth in the COA Application and other information on file at the OCTV&T, the Township represents an integral part of the Comcast and Comcast-affiliated regional cable television systems serving the counties of Camden, Burlington, Gloucester, Ocean 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.

17. The Township portion of Comcast's and its affiliates' Camden, Burlington, Gloucester, Ocean 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 which would otherwise be detrimental to the development of adequate cable television service.

18. 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.

19. Comcast believes that a Renewal Certificate of Approval for the Township of Lower Alloways Creek 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 Township;

(b) The services provided and to be provided by Comcast as set forth in its COA Application are and will be 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 of Lower Alloways Creek; 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 Lower Alloways Creek, 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 South Jersey, LLC, a Renewal Certificate of Approval to continue to construct, operate and maintain a cable television system in the Township of Lower Alloways Creek.

Respectfully submitted,

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

By: *Laura M. Miller*
Laura M. Miller

Dated: September 12, 2019

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

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 Lyndhurst, New Jersey 07071-0790
 (201) 896-4100
 Attorneys for Petitioner
 Comcast of South Jersey, LLC
 File No. 41000.3000

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 COMCAST OF SOUTH JERSEY, LLC, FOR A)
 RENEWAL CERTIFICATE OF APPROVAL TO)
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 ALLOWAYS CREEK, COUNTY OF SALEM,)
 STATE OF NEW JERSEY)

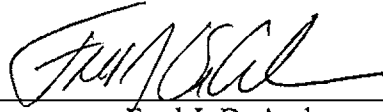
VERIFICATION

Docket No.

Fred J. DeAndrea, hereby certifies as follows:

1. I am Senior Director of Government & 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 are willfully false, I may be subject to punishment.



 Fred J. DeAndrea

Dated: September 6, 2019