COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

DEPARTMENT OF TELECOMMUNICATIONS & ENERGY
Cable Television Division

FORM 100
LICENSE APPLICATION

Applicant: Comcast of Boston, Inc.

Authorized Officer (Signature):

Municipality: City of Boston, Massachusetts

Date Submitted to Municipality: June 8, 2015

Type of Application: _____ **Initial License** __X__ **Renewal License**

Nature of Application: __X__ **Formal Proposal pursuant to 47 U.S.C. § 546(a)**

_____ **Informal Proposal pursuant to 47 U.S.C. § 546(h)**

Proposed License and/or Supporting Materials Attached: __X__ **Yes** _____ **No**

IDENTIFICATION OF APPLICANT

1. Name, corporate address, and corporate telephone number of applicant.

Comcast of Boston, Inc.
1701 John F. Kennedy Blvd.
Philadelphia, PA 19103
Tel: 215.665.1700

2. Name, title, business address, business telephone number, and email address of applicant's Authorized Officer. Attach as Exhibit _A_ evidence of Authorized Officer's authority.

Mark E. Reilly
Sr. Vice President of Government Affairs
Comcast Cable Communications, Inc.
676 Island Pond Road
Manchester, NH 03109
Tel: 603.695.1400
Email: mark_reilly@cable.comcast.com

3. Name, title, business address, business telephone number, and email address of individual to whom communications should be sent if different from Authorized Officer.

Timothy Murnane
Vice President of Government Affairs
Comcast Cable Communications, Inc.
330 Billerica Rd
Chelmsford, MA 01824
978-848-5142
Email: tim_murnane@cable.comcast.com

GENERAL LICENSE INFORMATION

4. Indicate number of years for which initial or renewal license is requested.

A 10-year license renewal from the expiration of the current license.

5. Indicate proposed start date of initial or renewal license.

Applicant proposes to commence the new renewal license the day following the current license expiration date.

6. **For initial license: State whether applicant currently holds licenses or has pending applications in any other Massachusetts municipality. If yes, provide detailed information as to the municipality and license status.**

   Not Applicable.

7. **State whether applicant has been a party to any fully adjudicated license-related legal action (e.g., breach of license, denial of license) in any jurisdiction. If yes, provide detailed information on each such legal action, including the disposition.**

   Applicant has not been a party to any fully adjudicated license-related legal action.

8. **State the amount of insurance applicant proposes to carry for the cable system in accordance with G.L. c.166A, 5(c). State whether applicant proposes to carry insurance in addition to that required by the statute, and if so, the purpose and amount.**

Property Damage:	$1,000,000 (per accident)
Personal Injury:	$3,000,000 (per person or accident)
Umbrella Policy:	$5,000,000
Workers' Compensation:	Statutory Limits

   Comcast currently carries insurance in these amounts listing the City of Boston as an additional insured.

9. **State the proposed amount of bonding that will be submitted in accordance with G.L.c. 166A, 5(k).**

   Comcast proposes a $1,000,000 performance bond throughout the term of the renewal license.

10. **State whether applicant's proposed subscriber privacy policy complies with federal and state law and regulation. If not, explain.**

    Yes.

11. **Describe applicant's proposed procedures for handling customer service inquiries during the term of the license, including but not limited to subscriber complaints. For renewal license, applicant may attach as Exhibit B its most recent copy of Billing & Termination Filing and Subscriber Privacy Notice.**

RATES AND SERVICES

12. For initial license: List broadcast television signals applicant proposes to carry. For renewal license: State whether applicant's proposed broadcast and cable offerings will differ significantly from offerings currently available in the municipality. Applicant may also attach as Exhibit _C_ current channel lineups for all service tiers, including broadcast and cable channels.

Comcast does not have any current plans for significant changes in broadcast and cable offerings from what is being offered today.

13. List separately those channels that are current must carry and those channels that are currently carried pursuant to retransmission consent. *Note: Channels that are must carry and retransmission consent may change throughout the license term beyond the cable operator's control.*

The following channels are current must carry within the Boston DMA.
WGBH-2 (PBS)
WBZ-4 (CBS)
WCVB-5 (ABC)
WHDH-7 (NBC)
WWDP-DT (EVINE Live)
WLVI-56 (WB)
WFXT-25 (FOX)
WSBK-38 (MyTV)
WBPX-68 (ION)
WGBX-44 (PBS)
WUNI-27 (UNI)
WNEU-60 (TELEMUNDO)
WMFP-62 (IND)
WUTF-66 (UNIMAS)

14. State whether applicant proposes to offer or continue to offer non-automated local origination programming. If yes, describe in detail the starting date that such programming will be available, the types of programming, the hours per week, the quantity of programming applicant expects to produce within the service area, how the programming will serve the specific needs of the municipality, and applicant's policy regarding making time available for discussion of controversial issues of public importance. Also, list the schedule of fees to access users for production costs and use of origination equipment.

Comcast proposes to provide financial support to the City of Boston or its designee, with such terms as indicated in Sections 6, 8 and 10 of the proposed Cable Television Renewal License.

15. State whether applicant plans to offer or continue to offer public, educational, and governmental access channel(s). If yes, provide the amount and type of financial support, the location of the facilities, the facilities and equipment available (including the cost of such equipment and facilities), the hours of operation, and whether there will be technical assistance available.

Comcast proposes to make available five (5) PEG Access channels for use by the City of Boston or its designee, with such terms as indicated in Section 6 of the proposed Cable Television Renewal License.

16. If applicant plans to offer or maintain an institutional network (I-Net), attach as Exhibit ___ a technical description of the system.

Please see Section 6.10 of the proposed Cable Television Renewal License.

FOR INFORMATIONAL PURPOSES ONLY:

17. Provide a complete listing of all proposed subscriber fees, including those for both regulated and non-regulated cable services, installation, and equipment. For renewal licenses, applicant may attach as Exhibit _D_ a current rate card.

18. State whether applicant proposes to offer or continue to offer any additional services in the municipality that are not subject to regulation as a cable service, and if so, provide description.

Comcast currently offers the following NON-cable related services in Boston:

1) *Modem Service* – An always on, high speed, cable modem based Internet access service to residential customers. In addition to offering speeds significantly faster than conventional phone line based services, Comcast's Internet service offers features such as exclusive broadband and local content; free support 24 hours a day, 7 days a week; multiple email accounts; professional in-home installation; and more.
2) *Digital Voice Service* – A single home connection to unlimited local calling, in-state and state-to-state direct-dialed long distance calls, packaged with preferred features combined with local and long distance calling.

TECHNICAL INFORMATION:

19. State whether the proposed service area is included in a regional cable system. If yes, list all of the other communities in the regional system served by the headend(s) that will be used for the proposed service area and the location of such headend(s). If no, state where the headend(s) will be located in the service area.

The area served is part of a regional cable system. Communities served by this regional cable system are: Boston, Back Bay/Beacon Hill, Charlestown, East Boston, Fenway/Kenmore, Financial District, North End, South Boston and South End. The system is currently served by a headend located in Boston.

20. If the proposed service area is not the entire municipality, specify the nature of the area (e.g., neighborhood) and explain why the entire municipality will not be served.

The area served is the entire municipality, subject to the limitations set forth in Section 3 of the proposed Cable Television Renewal License.

21. Describe in detail any problems applicant foresees in extending service to all parts of the proposed service area.

Please see Section 3 of the proposed Cable Television Renewal License.

22. Construction: *For initial license*, indicate the time period in which applicant proposes to begin and complete full-scale construction. *For renewal license*, state whether applicant plans significant upgrade or rebuild activity during the renewal term, and if so, file as Exhibit E a description of the proposed changes and projected dates for the commencement and completion of construction.

Comcast recently enhanced the cable system serving the Greater Boston Region including the City of Boston. In addition to other benefits, the enhancement provided digital picture and sound on all Limited Basic and Expanded Basic Service channels allowing for additional High-Definition content to be added to the channel lineup. There are no further plans to upgrade the cable system in Boston at this time. The current cable system has the capability to offer advanced services.

23. Attach as Exhibit E a technical description of the system, including a strand or street map showing the extent of cable plant in the municipality.

Comcast prides itself in being a leader in providing City of Boston subscribers with a modern cable system. Licensee currently complies with and exceeds the requirements set forth in the current Cable Television License. Licensee completed an upgrade of the current system to a minimum 860 MHz system, which exceeds the current channel

requirements of the current Cable Television License and has the capability to offer advanced digital television services. The current upstream and downstream digital and analog channel capacity in upstream is 5 to 42 MHz, downstream is 54 to 860 MHz.

24. Describe the equipment applicant proposes to offer or continue to offer at the subscriber terminal (e.g., remote control, analog converter, digital converter, high definition converter, digital video recorder).

Comcast does reserve its rights under Federal Laws and Regulations to require digital devices for all subscribers in the future. Comcast does make available, for a monthly charge, devices specific to the service tier requested by a subscriber, including digital video recorders and remote controls. Equipment available to Boston subscribers can be found in Exhibit D.

25. State whether applicant's proposed safety measures for the cable system comply with federal and state law and regulations.

Yes, Comcast complies with federal and state laws and regulations.

26. State whether applicant's Emergency Alert System (EAS) complies with federal and state law and regulations.

Yes, Comcast complies with federal and state laws and regulations.

OWNERSHIP AND FINANCIAL INFORMATION:

27. If applicant is a publicly-traded corporation or subsidiary of a publicly-traded corporation, attach as Exhibit __ a copy of the corporation's most recent annual report to stockholders. Otherwise, attach as Exhibit F an audited financial statement as of the most recent audit, showing applicant's financial position.

Comcast's most recent annual report can be found at http://www.cmcsa.com. Hard copies are available upon request.

If the status and composition of any assets or liabilities on the audited financial statement is not clearly defined by the respective titles, attach as Exhibit F schedules that provide a definition of such terms.

If recent financial information, i.e., an annual report or an audited financial statement, is not available, complete the Supplement to License Application.

28. Provide as Exhibit _F_ the following system information as of the last complete year for which the data is available:

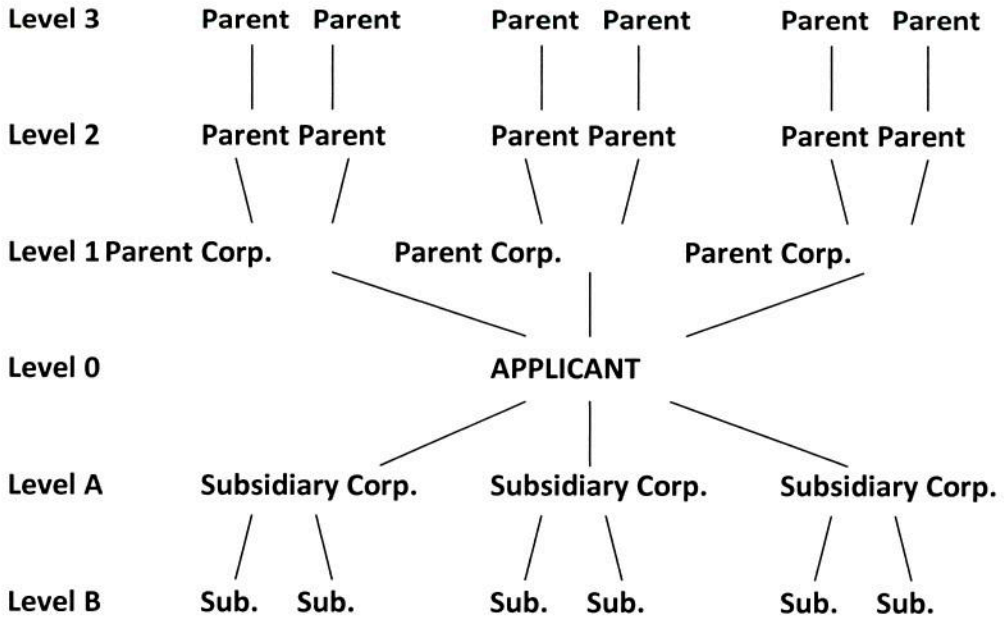
a. **Total Homes in Service Area (passed and not passed by cable system)**
b. **Homes Passed by Cable System**
c. **Cable Subscribers**
d. **Aerial Miles Constructed**
e. **Underground Miles Constructed**
f. **Total Cable Subscriber Revenues in Service Area**

29. Indicate appropriate business structure for applicant:

_____ Individually owned
_____ Corporation serving one community
___X___ Corporation operating cable systems in more than one community, but there operations are not separate corporation
_____ Partnership
_____ Other (specify)

30. Complete a "corporate family tree" for each of the corporations or other business entities listed in the following levels. For example, if there is one corporation named in Level 0, two in Level 1, one in Level 2, one in Level 3, two in Level A, and none in Level B, seven sets of responses must be filed, one for each of the seven corporations or other business entities identified in the "corporate family tree."

In simplified fashion, such a "tree" might look like this:



Level 0: Provide the name, city, and state of principal office.

Level 1: Provide the name, city, and state of principal office for any corporation or other business entity that owns 25% or more of the voting stock of the reporting cable system named in Level 0.

Level 2: Provide the name, city, and state of principal office for any corporation or other business entity that owns 25% or more of the voting stock of the entity or entities named in Level 1. In each case, indicate which entity in Level 1 is the subsidiary of the entity named in Level 2.

Level 3: Provide the name, city, and state of principal office for any corporation or other business entity that owns 25% or more of the voting stock of the entity or entities named in Level 2. In each case, indicate which entity in Level 2 is the subsidiary of the entity named in Level 3.

Level A: If applicant (Level 0) owns 25% or more of the voting stock of any corporation or other business entity, provide the name, city, and state of principal office.

Level B: If the entity or entities named in Level A owns 25% or more of the voting stock of a corporation or other business entity, provide the name, city, and state of principal office. In each case, indicate which entity in Level A is the parent of the entity named in Level B.

Please see as **Exhibit _G_.**

31. **For corporations, provide as Exhibit __ a list of all officers and directors (whether or not they own stock) and stockholders who own 1% or more of the voting stock of the corporation, as well as the city and state of residence and corporate position. If an ownership interest exists, record this to the nearest whole percent based on the total number of outstanding shares of voting stock in the corporation, exclusive of treasury stock. Where stock is held by a stockholder in a street name, this fact should be noted, but no further information concerning such stockholder need be furnished.**

OR

For partnership, list the name, city, and state of residence, and percent of interest in the partnership of each general or limited partner.

One hundred percent (100%) of the Applicant's common stock is wholly-owned by Comcast MO of Delaware, LLC. There is no designation for voting stock.

32. **Has any individual named in Question 31 been found guilty of any felony in any federal or state court within the past ten years? If yes, submit as Exhibit___ a statement disclosing the individual and matters involved and identifying the court and proceeding by date and file numbers.**

Not Applicable.

33. If any individuals listed in Question 31 are aliens, submit as Exhibit___ a list of their names, addresses, and nationalities.

34. If applicant is unable to supply all of the information requested herein for itself or any of the corporations or other business entities named, submit as Exhibit___ a list of those individuals or business entities for which any of the requested information is not being furnished, and include a detailed explanation of why the omitted material is unavailable.

SUPPLEMENT TO LICENSE APPLICATION

This Supplement to the License Application must be completed by any applicant that is not able to provide an annual report or an audited financial statement for its most recently completed fiscal year.

In completing Schedules A through E, provide pro forma information for each year in a ten-year projected period.

In completing Schedule F, appropriate documentation must be provided to ensure the applicant has secured the proper financial commitment.

SCHEDULE A: ASSETS

CURRENT ASSETS

- Cash and Equivalents
- Accounts Receivable, Less Allowances
- Inventory
- Prepaid Expenses
- Other Current Assets
- TOTAL CURRENT ASSETS

FIXED OPERATING ASSETS

- Land
- Buildings
- Headend Equipment
- Trunk and Distribution Equipment
- Subscriber Devices
- Other Fixed Operating Assets
- Construction Work in Progress
- TOTAL FIXED OPERATING ASSETS
- Accumulated Depreciation
- NET FIXED OPERATING ASSETS

OTHER OPERATING ASSETS

- Franchise Acquisition Costs
- Excess Fair Value
- Goodwill
- Other Intangible Assets
- TOTAL OTHER ASSETS
- Accumulated Amortization
- NET OTHER ASSETS

TOTAL NET ASSETS

SCHEDULE B. LIABILITIES

CURRENT LIABILITIES

- Accounts Payable
- Subscriber Advance Payments and Deposits
- Debt Due Within One Year
- Current Taxes Payable
- Other Current Liabilities
- TOTAL CURRENT LIABILITIES

NON-CURRENT LIABILITIES

- Long-Term Debt
- Notes Payable
- Bonds Payable
- Obligation on Capitalized Leases
- Deferred Taxes
- Other Non-Current Liabilities
- TOTAL NON-CURRENT LIABILITIES

OWNER'S EQUITY

- Net Assets Due From/To Parent Company
- Capital Stock
- Retained Earnings – Gross
- Accumulated Dividends
- Other Owner's Equity
- TOTAL OWNER'S EQUITY

TOTAL LIABILITIES AND EQUITY

SCHEDULE C: LOCAL CHARACTERISTICS

CONSTRUCTION AND SUBSCRIBERS

- Total Homes in Service Area
- Aerial Miles Constructed
- Underground Miles Constructed
- TOTAL Miles Constructed
- Homes Passed by Cable
- Subscribers at End of Year

SCHEDULE D: OPERATING INCOME

SUBSCRIBER REVENUE

- Installation Income
- Equipment Revenue
- Basic Service Tier Revenue
- Cable Programming Service Tier Revenue
- Premium Service Revenue
- Per Program or Per Channel Revenue
- Other Subscriber Revenue
- TOTAL SUBSCRIBER REVENUE

NON-SUBSCRIBER REVENUE

- Advertising Income
- Other Income
- TOTAL NON-SUBSCRIBER REVENUE

TOTAL OPERATING INCOME

SCHEDULE E: OPERATING EXPENSES

DIRECT OPERATING EXPENSES

- Programming Expenses
- Net Bad Debt and Collection Expenses
- Salaries and Benefits
- Repairs and Maintenance
- Light, Heat, and Power
- Pole and Duct Rental
- Administration - Office and Billing
- Marketing
- Local Origination
- Other
- TOTAL OPERATING EXPENSES

DEPRECIATION AND AMORTIZATION

- Depreciation
- Amortization
- TOTAL DEPRECIATION AND AMORTIZATION

TOTAL EXPENSES

SCHEDULE F: DEBT FINANCING

DEBT FINANCING PLAN

Provide the commencement date, interest rate, repayment terms, and outstanding amount for each loan held by the applicant.

Attach as Exhibit___ a description of each financial agreement to include the lender, terms, conditions and security.

If lender is a bank or financial institution, a letter of intent or commitment must be included. If lender is a corporation, individual, or partnership, a financial statement showing net worth equal to amount of commitment or a letter of commitment from a financial institution for the specific project must be included.