



Federal Communications Commission  
Washington, D.C. 20554

DA 03-566  
MB-ILR 03-1  
Released: February 26, 2003

Peter H. Feinberg, Esq.  
Dow, Lohnes & Albertson, PLLC  
1200 New Hampshire Avenue, Suite 800  
Washington, D.C. 20036-6802

Dear Mr. Feinberg:

On behalf of Comcast Cable Communications, you have asked for a response from the Media Bureau to a data calculation method Comcast proposes to use in preparing FCC Form 1205, which is the form used to determine regulated equipment and installation rates.

In your letter of January 31, 2003, you explain that, at the time of the Comcast acquisition of AT&T Broadband, Comcast merged over 4000 Comcast and AT&T Broadband general ledgers into approximately 400 ledgers. As a result, the financial data necessary to complete Form 1205 is not available for the former AT&T Broadband systems for the last two months of 2002. You propose to use the data that is available for the 10 months from January through October and "annualize" it by dividing by 10 and multiplying by 12. You state that the proposed methodology "will not adversely affect former AT&T customers or skew .... installation and equipment rates."

This is to advise you that, based upon your explanation and assurances, I am of the view that Comcast's proposed annualization of the Form 1205 data for the former AT&T systems is reasonable and not inconsistent with Commission rules and policies. Should this issue arise in the context of any specific rate appeal, the Commission would, of course, have to give consideration to whatever additional information might be adduced in the course of that proceeding.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Kenneth Ferree", written over a horizontal line.

W. Kenneth Ferree  
Chief, Media Bureau