

PETITION FOR REINSTATEMENT AND RENEWAL

Comcast Cable Communications Management, LLC (“Comcast”), pursuant to Section 25.163(a) of the Commission’s rules, hereby requests reinstatement and renewal of earth station license E950410 which expired on September 8, 2020.¹ Concurrently herewith, Comcast is filing an application for Special Temporary Authority to authorize continued operation of E950410 pending FCC action on this request. As set forth below, favorable action on this request would serve the public interest, convenience and necessity, and is therefore warranted.

Section 25.163 provides that a petition for reinstatement will be considered where: (1) the petition is filed within 30 days after the expiration date; (2) the petition explains the failure to timely file a renewal application, and; (3) sets forth with specificity the procedures that have been established to ensure timely filings in the future.² Comcast respectfully submits that each of these requirements is satisfied in this instance. First, the license for station E950410 expired on September 8, 2020, which is less than thirty days ago. Second, due to an accidental error, Comcast filed two license renewal applications for earth station E950412³ (which also expired on September 8, 2020), but did not file a renewal application for earth station E950410. Finally, Comcast has implemented procedures to help ensure timely renewal filings in the future. Specifically, Comcast has implemented a policy to reconfirm its upcoming license expiration dates at the beginning of each quarter and will prepare and circulate draft license renewal applications for internal review by its compliance team prior to filing.

Earth Station E950410 is located at Comcast’s national transmission center in Littleton, Colorado. Comcast uses this station to uplink programming to its owned and operated broadcast television stations. Failure to grant this request to reinstate and renew this license would create an immediate hardship potentially disrupting Comcast’s broadcast operations, and would further complicate efforts to transition Comcast’s operations in the C-band. Moreover, no party will be prejudiced by favorable FCC action on this request. Earth Station E950410, which authorizes transmit and receive operations in the C-band, is not an incumbent earth station for purposes of reimbursement.⁴ Comcast also has disavowed any right to reimbursement for this station.⁵ Accordingly, the Commission should reinstate and renew earth station E950410 pursuant to Section 25.163 of the Commission’s rules, and respectfully submits that good cause exists to grant this request.

¹ 47 C.F.R. § 25.163(a).

² *Id.*

³ See IBFS File Nos. SES-RWL-20200910-00983 and SES-RWL-20200910-00984.

⁴ *International Bureau Releases List of Incumbent Earth Stations in the 3.7-4.2 GHz Band in the Contiguous United States*, Public Notice, DA 20-823 (IB rel. Aug. 3, 2020).

⁵ See Comcast Corporation Waiver Request, GN Docket No. 20-305 (filed Sept. 25, 2020). While Comcast has requested interference protection for station E950410, granting this request will not add to the interference protection obligations of any party since E950410 is co-located with numerous other protected earth stations.