

LAURA M. MILLER | Counsel

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October 17, 2018

Via FedEx Overnight Mail

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

RECEIVED  
CASE MANAGEMENT

OCT 18 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

CE18101143

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OCT 18 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

Re: In the Matter of the Petition of Comcast of Burlington County, LLC, for a Renewal Certificate of Approval to Continue to Construct, Operate and Maintain a Cable Television System in and for the City of Bordentown, County of Burlington, 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 Burlington County, 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, the Petition and the Application 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 Miller ldp*

Laura M. Miller

For the Firm

LMM/dp

cc/w/enc. Lawanda R. Gilbert, Director (via Fedex Overnight Mail)

Stefanie A. Brand, Director (via first class mail)

Maria T. Novas-Ruiz, Assistant Deputy Rate Counsel (via first class mail)

Grace I. Archer, City Clerk (via first class mail)

Fred J. DeAndrea, Senior Director of Government and Regulatory Affairs (via email)

cms  
Legal  
DAG  
RPA  
CAGE

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

SCARINCI & HOLLENBECK, LLC  
1100 Valley Brook Avenue  
Lyndhurst, New Jersey 07071-0790  
(201) 896-4100  
Attorneys for Petitioner  
Comcast of Burlington County, LLC  
File No. 41000.3000

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TRENTON, NJ

IN THE MATTER OF THE PETITION OF )  
COMCAST OF BURLINGTON COUNTY, LLC, )  
FOR A RENEWAL CERTIFICATE OF )  
APPROVAL TO CONTINUE TO CONSTRUCT, )  
OPERATE AND MAINTAIN A CABLE )  
TELEVISION SYSTEM IN AND FOR THE )  
CITY OF BORDENTOWN, COUNTY OF )  
BURLINGTON, STATE OF NEW JERSEY )

VERIFIED PETITION

Docket No.

Comcast of Burlington County, LLC (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 its cable television system ("System") in the City of Bordentown, Burlington County, New Jersey ("City" or "Bordentown"). 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 Road, Cherry Hill, New Jersey 08034.

3. On or about November 9, 1981, in Docket No. 811C-6747, 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 Futurevision Cable Enterprises, Inc. ("Futurevision"), to construct, operate and maintain the System in the City. A copy of said Certificate of Approval is on file at the OCTV&T.

4. On or about July 1, 1988, pursuant to authorization granted by the Board in its Order of Approval in Docket No. CM86050542, Storer Cable Communications of Burlington County, Inc. ("Storer"), succeeded to the rights of Futurevision as part of an internal corporate reorganization. A copy of said Order of Approval is on file at the OCTV&T.

5. On or about October 8, 1993, in Docket No. CE91091478, 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 Renewal Certificate of Approval to Storer, now known as Comcast, to construct, operate and maintain the System in the City. A copy of said Renewal Certificate of Approval is on file at the OCTV&T.

6. On or about October 3, 2002, in Docket No. CE02030203, 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 Renewal Certificate of Approval to Comcast, to construct, operate and maintain the System in the City. A copy of said Renewal Certificate of Approval is on file at the OCTV&T.

7. 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 February 8, 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 City.

8. On or about July 11, 2016, a public hearing was held by the City with respect to Petitioner's Municipal Application, during which all interested persons desiring to be heard were so heard.

9. On or about June 11, 2018, the City adopted Ordinance 2018-06 (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 City. A copy of the Ordinance is annexed hereto as Exhibit A.

10. On or about September 10, 2018, Comcast filed its formal acceptance of the terms and conditions of the Renewal of Municipal Consent granted by the City, pursuant to N.J.S.A. 48:5A-24. A copy of said letter of acceptance is annexed hereto as Exhibit B.

11. The information pertaining to Petitioner on file with the OCTV&T, together with the information contained in Petitioner's Application for Renewal of a Certificate of Approval ("COA Application") pertaining to the City, simultaneously filed herewith, all of which is adopted by reference thereto, establish the requisite criteria for the continued construction, ownership, operation and management of the System in Bordentown 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 responsibility 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

- a. The grant of an Automatic Renewal Certificate of Approval to Comcast will ensure the continued provision of cable television service to the residents of the City;
- b. The services to be provided by Comcast set forth in its COA Application are of great benefit to the citizens and residents of the City;
- c. The financial strength and technical expertise of Comcast are more than adequate to continue to construct, operate and maintain its System in the City; 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 Bordentown, 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 and the District of Columbia.

WHEREFORE, Petitioner Comcast of Burlington County, LLC, 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 City of Bordentown.

Respectfully submitted,

SCARINCI & HOLLENBECK, LLC  
Attorneys for Petitioner  
Comcast of Burlington County, LLC

By: Laura M. Miller  
Laura M. Miller

Dated: October 17, 2018



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

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CITY OF BORDENTOWN, COUNTY OF )  
BURLINGTON, STATE OF NEW JERSEY )


VERIFICATION

Docket No.

Fred J. DeAndrea, hereby certifies as follows:

1. I am Senior Director of Government and Regulatory Affairs of Comcast Burlington County, 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: October \_\_\_\_, 2018p