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VIA E-MAIL

Public Utility Commission
201 High Street SE
Salem, Oregon 97302

Re: Docket No. AR 597 – SB 611 REPORTING REQUIREMENTS

Dear Commissioners:

I am writing on behalf of Comcast Corporation and Subsidiaries (“Comcast”) to encourage the Commission to adopt the proposed rules in this Docket without modification.

Comcast operates and maintains a “qualified project” as that term is defined in SB 611, codified at ORS 308.677 (“SB 611”). In Order No. 16-085, the Commission approved Comcast’s Application for Qualified Project Determination in Docket No. UM 1760, finding that Comcast’s project is a “qualified project” under the criteria specified in SB 611. The Commission’s determination requires that Comcast be granted the property tax exemption for a “qualified project” established in SB 611 (“the Ggigabit exemption”). As a recipient of the “gigabit exemption,” Comcast will be required under the proposed rules to provide the Commission information needed for the Commission’s annual report to the Legislature regarding all companies receiving the gigabit exemption.

Comcast, along with other stakeholders, participated in numerous workshops convened by Commission Staff to develop the proposed rules. The proposed rules reflect the good-faith efforts of Staff and the stakeholders to arrive at a set of requirements that provide the Commission the needed information while, at the same time, protecting highly sensitive and confidential information of the reporting entities.

For all of the foregoing reasons, Comcast urges the Commission to adopt the proposed rules “as is.”

Sincerely,

Davis Wright Tremaine LLP

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