



October 31, 2017

Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, Oregon 97301

**Re: OAR 860-200-0200, Qualified Project Report
Comcast Corporation & Subsidiaries**

Dear Commission Staff:

Comcast Corporation & Subsidiaries (collectively, “Comcast”) respectfully submits the enclosed Qualified Project Report (the “Report”) to the Public Utility Commission of Oregon (the “Commission”) pursuant to OAR 860-200-0200.

OAR 860-200-0200(1) requires a company that has received a qualified project determination under ORS 308.677(4) (“Qualified Project Determination”) to submit a report to the Commission on or before November 1 of each year. Comcast received a Qualified Project Determination from the Commission on March 1, 2016. Order No. 16-085, *In re Comcast Corp. & Subs.*, Docket No. UM-1760 (Or. Pub. Util. Comm’n Mar. 1, 2016), as corrected by Order No. 16-088, *In re Comcast Corp. & Subs.*, Docket No. UM-1760 (Or. Pub. Util. Comm’n Mar. 3, 2016).

As an overview, Comcast provides video, high-speed data and phone services in thirty-nine (39) states, including Oregon. Comcast provides communication services in ten Oregon counties: Benton, Clackamas, Columbia, Lane, Linn, Marion, Multnomah, Polk, Washington and Yamhill. Comcast offers a tier of internet access service delivering download and upload speeds of up to two (2) gigabits per second symmetrical (“Gigabit Pro”) in a number of markets in twenty-seven (27) states, including Oregon. Within Oregon, Comcast began offering Gigabit Pro service in and around Beaverton, Corvallis, Damascus, Eugene, Forest Grove, Gladstone, Gresham, Happy Valley, Hillsboro, Junction City, Lake Oswego, McMinnville, Milwaukie, Oregon City, Portland, Salem, Tigard, West Linn and Wilsonville prior to December 31, 2015.

The enclosed Report includes, in accordance with OAR 860-200-0200(2) & (3), a completed Oregon Form PUC FM050, *e-Filing Report Cover Sheet*, along with all of the documents and information required to be reported under OAR 860-200-0200 and 860-200-0250 for companies that offered the qualified service in Oregon during the preceding calendar year.

Additionally, pursuant to OAR 860-200-0200(5), Comcast will arrange for an on-site review by Commission Staff prior to December 31, 2017 of Comcast’s most recent Form 477

Oregon-specific broadband subscription data submitted to the Federal Communications Commission (“FCC”).

Portions of the Report are confidential and protected from public disclosure under federal and/or state law, including, but not limited to, ORS 192.502(8) and 192.501(2). As such, we have enclosed two separately bound sets of documents:

- The first bound set of documents is an unredacted copy of the Report in which all confidential information has been identified as such and printed on yellow paper pursuant to OAR 860-001-0070.
- The second bound set of documents is a copy of the Report in which all confidential information has been redacted.

Please note that the numbered tabs in the bound sets generally correspond to the appropriate section of OAR 860-200-0250. Additionally, we have enclosed two flash drives, the first of which is confidential and contains an electronic, unredacted copy of the Report, and the second of which contains an electronic, redacted copy of the Report. The flash drive containing the confidential, unredacted copy of the Report contains privileged and proprietary information, which is protected from any unauthorized divulgence under federal and/or state law.

* * * * *

If you have any questions or require additional information, please do not hesitate to contact me at the number provided above or by e-mail at pamela_willmoth@comcast.com.

Respectfully submitted,



Pamela Willmoth

Enclosures



e-FILING REPORT COVER SHEET

COMPANY NAME: Comcast Corporation & Subsidiaries

DOES REPORT CONTAIN CONFIDENTIAL INFORMATION? No Yes If yes, submit a redacted public version (or a cover letter) by email. Submit the confidential information as directed in OAR 860-001-0070 or the terms of an applicable protective order.

Select report type: RE (Electric) RG (Gas) RW (Water) RT (Telecommunications)
 RO (Other, for example, industry safety information)

Did you previously file a similar report? No Yes, report docket number: RO 10

Report is required by: OAR 860-200-0200
 Statute
 Order

Note: A one-time submission required by an order is a compliance filing and not a report (file compliance in the applicable docket)

Other
(For example, federal regulations, or requested by Staff)

Is this report associated with a specific docket/case? No Yes, docket number:

List Key Words for this report. We use these to improve search results.

Send the completed Cover Sheet and the Report in an email addressed to PUC.FilingCenter@state.or.us

Send confidential information, voluminous reports, or energy utility Results of Operations Reports to PUC Filing Center, PO Box 1088, Salem, OR 97308-1088 or by delivery service to 201 High Street SE Suite 100, Salem, OR 97301.

**COMCAST'S QUALIFIED PROJECT REPORT TO THE PUBLIC UTILITY
COMMISSION OF OREGON**

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Tab 1

COMMONWEALTH OF PENNSYLVANIA)
) ss:
COUNTY OF PHILADELPHIA)

CERTIFICATION PURSUANT TO OAR 860-200-0250(1)

Before me, the undersigned notary public, this day, personally appeared Pamela Willmoth to me known, who being duly sworn according to law, deposes the following:

I, Pamela Willmoth, Senior Director, Property Tax, for Comcast Corporation, affirm that Comcast Corporation & Subsidiaries, as described and set forth in the report accompanying this Certification, has met the requirements for service capacity and offering service to residential customers specified in Section 308.677(2) of the Oregon Revised Statutes.

I further affirm that all of the information in Comcast Corporation & Subsidiaries' report accompanying this Certification is accurate and complete.

I hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand it may be used for any purpose allowed under Oregon law, including as evidence in court, and is subject to penalty for perjury.

Dated: 10-30-17

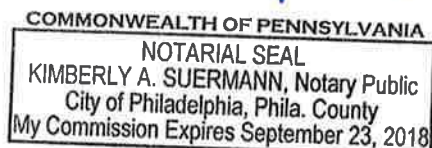


Pamela Willmoth

Subscribed and sworn to before me this 30th day
of October, 2017.

Kimberly A. Suermann
Notary Public

My Commission Expires: September 23, 2018



Comcast Corporation & Subsidiaries
Qualified Project Report

Tab 2

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(2)

The amount of capital investment made in the previous calendar year by the company in Oregon in newly constructed or installed real or tangible personal property constituting communication infrastructure that enables the company to offer the qualified service.

In 2016, after considering year-end adjustments, Comcast made capital investments of approximately \$114,846,634 in Oregon of newly constructed or installed real or tangible personal property constituting communication infrastructure that enables Comcast to offer its qualified service.

In 2017, as of the end of Comcast's third-quarter, September 30, 2017, Comcast has made an estimated capital investment of approximately \$59,374,427 in Oregon of such communication infrastructure.

Accordingly, Comcast has made an estimated aggregate capital investment of approximately \$174,221,061 within Oregon from 2016 up to September 30, 2017.

Tab 3

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(3)

A general description of how the company is providing the qualified service.

Comcast's qualified service, Gigabit Pro, provides broadband Internet access with speeds of up to two (2) gigabits per second symmetrical by utilizing Comcast's fiber optic network. The customer receives the Internet access over a fiber-to-the-home connection, consisting of a fiber optic connection between Comcast's fiber network and the customer's premise. Comcast continues to work on increasing its broadband offerings to meet consumer demand for higher speed and affordable Internet solutions.

Please refer to Tabs A, B, and C of the Report for detailed schematics and descriptions.

Tab A

Tab B

Tab C

Tab 4

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(4)

A map, including county and city designations, depicting the area where the company offers qualified service and identifying, using census blocks, where residential customers of the company subscribe to broadband services indicating the highest of the following download speed tiers for each census block in which it has customers:

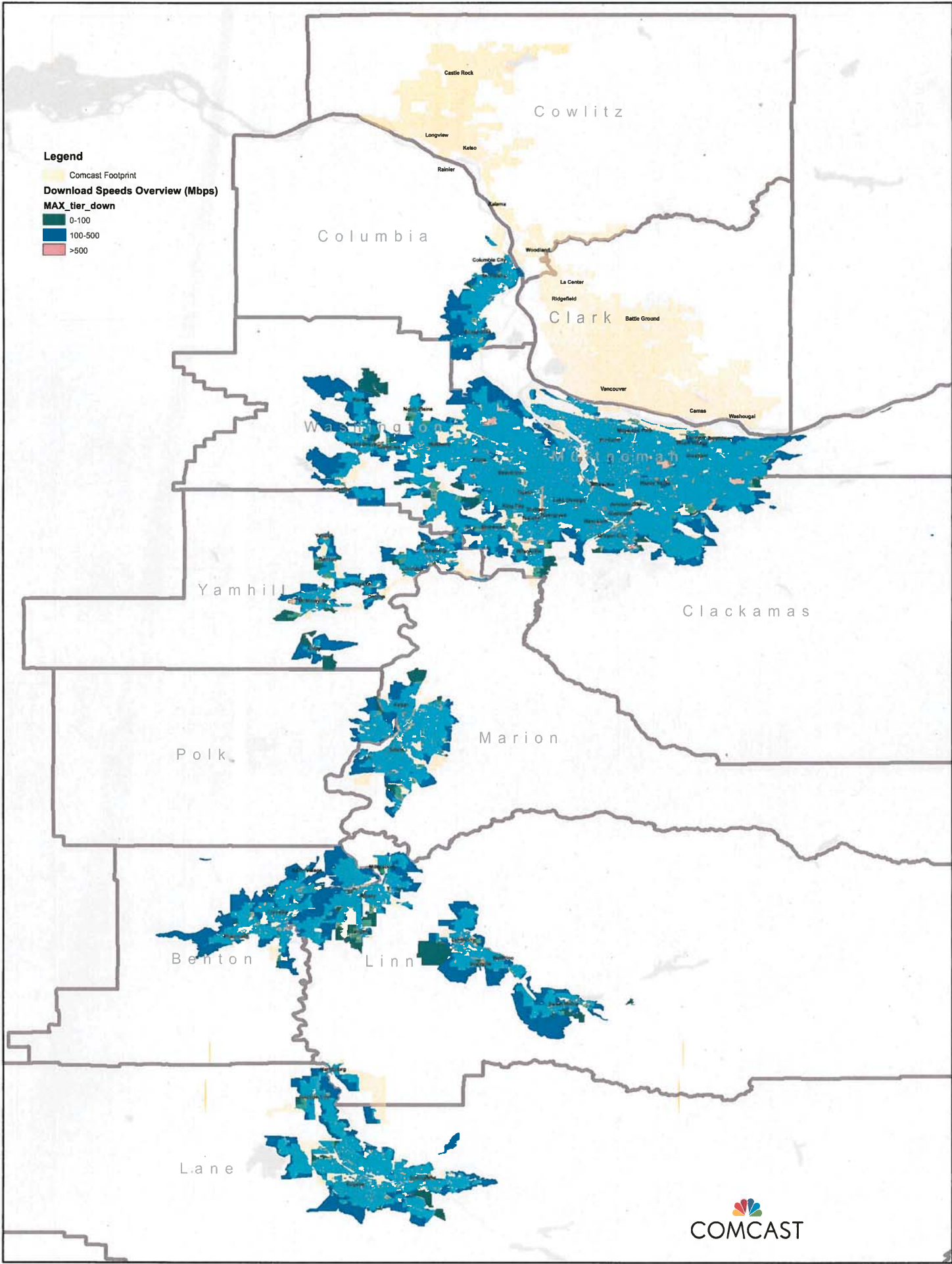
- (a) Up to and including 100 Megabits per second (Mbps);*
- (b) Greater than 100 Mbps up to and including 500 Mbps; and*
- (c) Greater than 500 Mbps.*
- (d) The company may submit information regarding speed tiers in addition to those shown above. As an example, a company may choose to also submit information regarding download speed of 1 gigabit per second (Gbps) or greater.*

Please refer to Tab A for the small-scale map depicting the area where Comcast offers qualified service, as well as the download speed tiers for its residential customers. An electronic copy of the map is also being filed with this Report, and may be found on the accompanying flash drives.

Comcast has attached seven additional confidential maps depicting a more-granular level for the Commission Staff's convenience. Please refer to Tabs B through H for the additional maps.

For the seven additional confidential maps in electronic form, please refer to the PDF files located on the "Confidential" flash drive submitted with Comcast's Report.

Tab A



Tab B

Tab C

Tab D

Tab E

Tab F

Tab G

Tab H

Tab 5

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(5)

The quartile containing the percentage of the company's residential broadband services customers in Oregon that have access to the company's at least, approximately one gigabit per second symmetrical service.

- (a) *Quartile 1 – 0 percent to 25 percent;*
- (b) *Quartile 2 – 26 percent to 50 percent;*
- (c) *Quartile 3 – 51 percent to 75 percent;*
- (d) *Quartile 4 – greater than 75 percent.*

Comcast qualifies under “Quartile 4” because approximately [CONFIDENTIAL – REDACTED **] of Comcast’s residential broadband services customers in Oregon have access to Comcast’s qualified service.**

Tab 6

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(6)

The percentage, rounded up to a whole percent, of the company's residential broadband services customers with access to the company's qualified service that subscribe to broadband service in the following download speed tiers:

- (a) Up to and including 100 Mbps;*
- (b) Greater than 100 Mbps up to and including 500 Mbps; and*
- (c) Greater than 500 Mbps.*
- (d) The company may submit information regarding speed tiers in addition to those shown above. As an example, a company may choose to also submit information regarding download speed of 1 gigabit per second (Gbps) or greater.*

The following percentages reflect Comcast's residential broadband service customers with access to Comcast's qualified service that subscribe to broadband service in the following download speed tiers:

- **60% subscribe to download speed tiers up to and including 100 Mbps.**
- **41% subscribe to download speed tiers greater than 100 Mbps up to and including 500 Mbps.**
- **1% subscribe to download speed tiers greater than 500 Mbps**

Tab 7

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(7)

The percentage, rounded up to a whole percent, of the company's residential broadband services customers in Oregon that subscribe to broadband service in the following download speed tiers:

- (a) Up to and including 100 Mbps;*
- (b) Greater than 100 Mbps up to and including 500 Mbps; and*
- (c) Greater than 500 Mbps.*
- (d) The company may also submit information regarding speed tiers in addition to those shown above. As an example, a company may choose to also submit information regarding download speed of 1 gigabit per second (Gbps) or greater.*

The following percentages reflect Comcast's residential broadband service customers in Oregon that subscribe to the following download speed tiers:

- **59% subscribe to download speed tiers up to and including 100 Mbps.**
- **41% subscribe to download speed tiers greater than 100 Mbps up to and including 500 Mbps.**
- **1% subscribe to download speed tiers greater than 500 Mbps**

Tab 8

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(8)

A product description and a copy of the company's customer service agreement form for each qualified service offering.

Comcast's Gigabit Pro is a tier of Internet access service delivering download and upload speeds of up to two (2) gigabits per second symmetrical to residential broadband customers over a fiber network.

Please refer to Tab A for more information on Comcast's Gigabit Pro service.

Please refer to Tab B for Gigabit Pro two-year Customer Service Agreement.

Tab A

MULTI-GIG INTERNET AVAILABILITY



Comcast Footprint



Multi-Gig Internet



Upcoming

California	Chico, Fresno, Marysville/Yuba City, Merced, Modesto, Monterey, Mountain View, Oakland, Palo Alto, Salinas, San Francisco Bay Area, San Jose, Santa Barbara County, Santa Clara, Stockton and Visalia metro areas, Sunnyvale
Colorado	Boulder, Denver
Connecticut	Hartford, New Haven
Delaware	New Castle, Wilmington
Florida	Ft. Lauderdale, Miami, West Palm Beach
Georgia	Atlanta
Illinois	Chicago
Indiana	Anderson, Bloomington, Columbus, Elkhart, Fort Wayne, Gary, Hammond, Indianapolis, Kokomo, Lafayette, South Bend
Maine	Brunswick
Maryland	Baltimore, Grantsville
Massachusetts	Boston, Lowell, Martha's Vineyard, Quincy, Springfield
Michigan	Detroit
Minnesota	Arden Hills, Blaine, Brooklyn Park, Burnsville, St. Paul, Minneapolis, Shakopee, Woodbury
New Hampshire	Lebanon, Manchester
New Jersey	Jersey City, Newark, Trenton
New York	Carmel
Oregon	Beaverton, Corvallis, Damascus, Eugene, Forest Grove, Gladstone, Gresham, Happy Valley, Hillsboro, Junction City, Lake Oswego, McMinnville, Milwaukie, Oregon City, Portland, Salem, Tigard, West Linn, Wilsonville
Pennsylvania	Bethlehem, Harrisburg, Hershey, Lebanon, Philadelphia, Pittsburgh, State College
Tennessee	Chattanooga, Knoxville, Nashville
Texas	Houston
Utah	Salt Lake City, West Valley
Vermont	Montpelier
Virginia	Charlottesville, Richmond
Washington	Battle Ground, Camas, Castle Rock, Columbia City, Kalama, Kelso, La Center, Longview, Ridgefield, Seattle, Vancouver, Washougal, Woodland
Washington, D.C.	Washington, D.C.
West Virginia	Martinsburg

Tab B

{OrderDate}

{CustomerFirstName} {CustomerLastName}
{CustomerBillingAddressStreet}
{CustomerBillingAddressLine2}
{CustomerBillingAddressCity}, {CustomerBillingAddressState}
{CustomerBillingAddressZip}

Account Number: {Account_Number}

Dear {CustomerFirstName} {CustomerLastName}

Thank you for requesting the following offer ("Offer"):

Offer:

XFINITY Gigabit Pro Internet Service ("Service") for 24 months at Comcast's
Regular rate, currently \$299.95 per month (pricing subject to change)

The Offer you selected requires a minimum term agreement and is subject to an early termination fee. A copy of the agreement will either be mailed or emailed depending on whether you have provided this to Comcast. If you had expected to receive this agreement via email, we apologize, but we were unable to deliver it through that method. Once you receive this letter via mail, no further action is required to accept the terms of this offer.

You have the option to cancel the agreement within 30 days of the date the services under the Offer are installed / activated. If you wish to cancel the agreement, you must contact Comcast by calling 1-800-XFINITY. If you do not cancel the agreement within the 30 day period, the terms of the agreement provided will automatically apply.

A copy of this agreement will be available, after your installation/activation, at www.xfinity.com. Once registered, click on My Account > Sign In> Billing & Payment. This agreement will be posted on the right side along with other Terms associated with Comcast.com.

Please feel free to contact us with any questions you may have by calling 1-800-XFINITY.

Thank you.

COMCAST

{OrderDate}

{CustomerServiceAddressStreet}
{CustomerServiceAddressLine2}
{CustomerServiceAddressCity}, {CustomerServiceAddressState}
{CustomerServiceAddressZip}

Account Number: {Account_Number}

Offer:

XFINITY Gigabit Pro Internet Service ("Service") for 24 months at Comcast's Regular rate, currently \$299.95 per month (pricing subject to change)

24 MONTH TERM CUSTOMER AGREEMENT

Dear {CustomerFirstName} {CustomerLastName},

Thank you for choosing Comcast!

A description of the Offer ("Offer") you have ordered is set forth above. The Offer is subject to the terms and conditions of this agreement ("Agreement"), including the minimum term and early termination provisions under Section 5 below, and Comcast's standard terms and conditions of service.

Term and Conditions

If you cancel this Agreement within 30 days of the date of Service installation/activation, you will be responsible for the prorated charges for Service up to the date the Agreement is cancelled, installation fee, currently \$500.00 for standard installation (non-standard installation charges are additional) and activation fee (currently \$500.00) (pricing subject to change). If you do not cancel this Agreement within 30 days of the date of Service installation/activation, as applicable, you will be billed for the Services at the rates specified under the Offer. If you wish to cancel this Agreement, you must call Comcast at 1-800-XFINITY. Upon cancellation you are required to return all equipment provided by Comcast.

If you cancel this Agreement within THIRTY (30) DAYS of the date Services are installed / activated, as applicable, the early termination fee specified in Section 5 shall not apply. The 30 day period referenced above begins on the date of installation.

The customer receiving this Offer named above ("you" or "your") will receive the Services under the Offer for the first 24 MONTHS from the date the Service is activated / installed, at the price specified above plus applicable taxes, activation, installation, and other fees such charges and fees subject to change during and after the term of this agreement. YOU AGREE THAT PRICING IS SUBJECT TO CHANGE DURING THE 24 MONTH OF SERVICE UNDER THIS AGREEMENT. You agree to maintain the Service for 24 MONTHS with your account in good standing. Comcast is not responsible for lost or misdirected agreements.

YOU AGREE THAT IF ANY SERVICE COMPRISING THE OFFER IS CANCELLED, DOWNGRADED OR DISCONNECTED FOR ANY REASON DURING THE 24 MONTH PERIOD AN EARLY TERMINATION FEE OF UP TO \$1,150.00 SHALL APPLY. DURING THE TERM OF THE AGREEMENT, THE EARLY TERMINATION FEE WILL BE REDUCED BY \$50.00 EVERY MONTH, BEGINNING WITH THE SECOND MONTH AFTER SERVICE ACTIVATION/INSTALLATION. IN ADDITION, IF SERVICE IS DOWNGRADED, COMCAST'S APPLICABLE CHARGES FOR SERVICE AND EQUIPMENT WITHOUT A 24 MONTH AGREEMENT WILL APPLY TO ANY REMAINING SERVICES. YOU ALSO AGREE THAT FOLLOWING THE 24 MONTH PERIOD, COMCAST'S APPLICABLE CHARGES FOR SERVICES AND EQUIPMENT WITHOUT A 24 MONTH TERM AGREEMENT SHALL APPLY UNLESS SERVICE IS CANCELLED BY CALLING 1-(800)-XFINITY.

If during the term of this Agreement you cancel Service because you move your residence to a location within a Comcast serviceable area and you reconnect to comparable Services offered by Comcast (as determined by Comcast), within 30 days of disconnection, the amount of the early termination fee will be credited upon proof of installation. If Comcast does not offer comparable Services and you activate XFINITY Internet service within 30 days of your Service

disconnection, the amount of the early termination fee will be credited upon proof of installation. To receive the credit, you must contact Comcast by calling, 1-855-487-0252 within forty-five (45) days of Service disconnection.

Services under the Offer are for one outlet (except as may be specified under the above Offer). Comcast's applicable charges for installation, equipment, and other services not specifically included in the Offer described above (including without limitation, pay per view, and other non-recurring charges) are additional. The provisions of this Agreement supplement the terms and conditions of the Comcast agreement for residential services for Cable, High Speed Internet and Digital Voice services (as amended in accordance with its terms).

Comcast may rearrange, delete, add to or otherwise change programming or features or offerings contained in the Services.

Customer acknowledges that he or she has been provided with the minimum system requirements necessary for use of the service which are available at <http://customer.comcast.com/help-and-support/internet/requirements-to-run-xfinity-internet-service>.

Again, thank you for choosing Comcast. Please call us if you have any questions.

Sincerely,

Comcast Customer Service

SP_I_GigPro_\$299.95x24_Q215_2Y

Tab 9

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(9)

The network speed test methods, data, and results from a sample of tests conducted within six months of the date of the report, using industry-standard testing methodology, for the company's broadband service that provides at least, approximately one gigabit per second symmetrical service.

Comcast, during its service activation of Gigabit Pro customers, tests the network connection using a JDSU/Viavi 5800 Meter. The Meter performs an industry standard RFC 2544 test in order to test heads located across the network.

The Internet Engineering Task Force RFC 2544 is a benchmarking methodology for network interconnect devices. RFC 2544 was created in 1999 as a methodology to benchmark network devices such as hubs, switches, and routers, as well as to provide accurate and comparable values for comparison and benchmarking. RFC 2544 provides engineers and network technicians with a common language and results format. RFC 2544 includes six subtests, three of which are used by Comcast in its speed tests. The subtests used by Comcast include:

- (1) **Throughput**: measures the maximum rate at which none of the offered frames are dropped by the device/system under test (DUT/SUT). This measurement translates into the available bandwidth of the Ethernet virtual connection;
- (2) **Frame loss**: defines the percentage of frames that should have been forwarded by a network device under steady state (constant) loads that were not forwarded due to lack of resources. This measurement can be used for reporting the performance of a network device in an overloaded state, as it can be a useful indication of how a device would perform under pathological network conditions such as broadcast storms; and
- (3) **Latency**: measures the round-trip time taken by a test frame to travel through a network device or across the network and back to the test port. Latency is the time interval that begins when the last bit of the input frame reaches the input port and ends when the first bit of the output frame is seen on the output port. It is the time taken by a bit to go through the network and back. Latency variability can be a problem.

Comcast's Gigabit Pro customers are tested using these standards as set forth in the RFC 2544. Comcast's speed tests on its qualified service were performed on new customer connections and its business centers within six months of the Report. In each instance, the speed tests reflected broadband service providing for speeds exceeding one gigabit per second symmetrical.

Please refer to Tabs A, B, C, D, and E for the network speed test methods, data, and results from a sample of tests conducted for Comcast's qualified service within six months of the Report. Any customer-related information has been redacted.

Tab A

Tab B

Tab C

Tab D

Tab E

Tab F

Tab 10

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(10)

In the previous calendar year, the percentage of households to whom the company offers its qualified service who properly placed an order requesting the equivalent of at least, approximately one gigabit per second symmetrical service and were denied that service by the company.

In the previous calendar year, Comcast has denied its qualified service to 0% of households to whom Comcast offers its qualified service who properly placed an order requesting such service.

Tab 11

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(11)

In the previous calendar year, the number of complaints the company received that the company had denied access to its qualified service to a group of residential customers because of the income level of the residential customers in the local service area in which the residential customers reside, and a description of how each complaint was resolved.

In the previous calendar year, Comcast received zero complaints that it had denied access to its qualified service to any group of residential customers based on the income level of the residential customers in the local service area in which the residential customers reside.

Tab 12

INFORMATION REQUESTED PURSUANT TO OAR 860-200-0250(12)

Any additional information the company wishes to report regarding benefits of any tax exemption granted to the company under ORS 308.677.

Comcast's qualified service offers Oregon consumers access to the latest technological breakthrough in Internet service. A growing number of Oregon consumers have been subscribing and experiencing the benefits of ultra-high-speed broadband service with Comcast's fiber-to-the-home solution. The capital investment made by Comcast in its Oregon system, which includes the system that provides the qualified service, in both the 2016 and 2017 years, far exceeds the property tax associated with its intangible value in Oregon.