

**ATTACHMENT C:**  
**COMCAST CORPORATION**  
**NETWORK MANAGEMENT TRANSITION COMPLIANCE**  
**PLAN**

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1. **New Network Management Practices.** Comcast is preparing to transition to new, protocol-agnostic practices for managing congestion on our High-Speed Internet (“HSI”) network (“congestion management”). We will complete that transition across our HSI network by December 31, 2008. We provide more details about these new practices, and detailed information about some of the hardware and software referenced in this document, in Attachment B.
2. **Trials.** Comcast is currently performing technical trials of the new congestion management practices in the following communities: Chambersburg, PA; Warrenton, VA; Lake City, FL; East Orange, FL; and Colorado Springs, CO. If Comcast management deems it necessary to conduct additional trials, they will be announced on Comcast’s Network Management Policy page, located at <http://www.comcast.net/networkmanagement/>.
3. **Benchmarks.** Comcast expects to meet the following benchmarks in our transition to the new protocol-agnostic congestion management practices:
  - a. **October 15, 2008.** Comcast will have completed installation of the PacketCable Multimedia and Internet Protocol Detail Record servers, and will have begun installation of the Congestion Management Fairshare servers. These servers, and other hardware used for the new congestion management practices, are described in detail in Attachment B.
  - b. **November 15, 2008.** Comcast will have begun commercial (i.e., not trial) “cut-overs” to the new congestion management practices on a market-by-market basis. Once the equipment is in place in a particular area, this involves Comcast installing a software update to our customers’ cable modems in that area, launching the software for the new protocol-agnostic congestion management practices in that area, and disabling the current congestion management techniques in that area.
  - c. **December 31, 2008.** Comcast will have completed the deployment of all hardware and software needed to implement our new congestion management practices, and will have completed the “cut-overs” to the new, protocol-agnostic congestion management practices. We will also have discontinued the protocol-specific congestion management practices throughout our network.
  - d. **January 5, 2009.** Comcast will report to the FCC that we have discontinued our protocol-specific congestion management practices throughout our network, and that we have completed transitioning to the new congestion management practices.
4. **Information Sharing.** Comcast will take the following steps to provide timely information to our customers about the transition to our new congestion management practices. We intend for our disclosures to be clear, concise, and useful to the average consumer.

- a. **Congestion Management Trials.** Comcast already provides information about the trials of our new congestion management practices on our Network Management Policy page. Information about any additional trials will be posted there.
  - b. **Revision of Acceptable Use Policy.** Comcast will take the following two steps with regard to revising our Acceptable Use Policy (“AUP”).
    - i. Comcast will revise our AUP to explain that our network congestion management practices may include temporarily lowering the priority of traffic for users who are the top contributors to current network congestion. This new AUP will be published on October 1, 2008.
    - ii. By January 1, 2009, Comcast will publish an amended AUP to reflect the discontinuation of the current protocol-specific congestion management practices, as well as any other necessary and appropriate updates.
  - c. **Customer Disclosures.** Comcast will take the following steps to inform our customers of the new congestion management practices.
    - i. Attachment B, detailing Comcast’s planned network management practices, as filed with the Commission on September 19, 2008, will be posted by midnight on that date to Comcast’s Network Management Policy web page.
    - ii. Comcast will, by midnight on September 19, 2008, provide new Frequently Asked Questions that explain these developments clearly, and will continue to post on our Network Management Policy web page updated information about the new congestion management practices.
    - iii. At least two weeks prior to the first commercial (i.e., not trial) deployment of the new congestion management practices, Comcast will send e-mail notifications to the primary Comcast.net e-mail address associated with each customer regarding the new congestion management practices, informing them of the AUP revisions, and directing them to Comcast’s Network Management Policy page for FAQs and other information. These developments will be further publicized through announcements at <http://www.comcast.net>.
  - d. **Customer Support.** Comcast will also answer customer questions on our Customer Support Forums page, located at <http://forums.comcast.net/>, which is available to all Comcast HSI customers. A link from the Network Management Policy page to the Customer Support Forums will also be provided.
5. **Management Responsibility.** The transition to these new practices and the discontinuation of the old practices is a high-priority effort. The project is being led and overseen at a senior executive level. The actual engineering and operations work is a joint project of the Office of the Chief Technology Officer and National Engineering & Technical Operations. In addition, regular customer communications and messaging are overseen by the company’s Online Services business unit representatives.

6. **Employee Training.** Educational materials about the new protocol-agnostic practices are being developed for broad distribution throughout the relevant business units in Comcast. All affected employees in those business units will receive appropriate training about Comcast's transition to the new protocol-agnostic congestion management practices. Detailed technical customer inquiries about the new practices will be directed to the representatives in the Online Services business unit who will be trained to deal with such questions.
7. **FCC Notification of Material Changes.** Comcast will make supplementary filings with the Commission as necessary to keep the FCC (and the public) informed of any material changes in our plans before the transition to protocol-agnostic congestion management is completed at year-end.