



July 5, 2006
BY ELECTRONIC FILING

Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Comments of RCN Corporation in MB Docket No. 05-192, Applications for Consent to the Assignment and/or Transfer of Control of Licenses, Adelphia Communications Corporation, Assignors, to Time Warner Cable Inc., Assignees; Adelphia Communications Corporation, Assignors and Transferors, to Comcast Corporation, Assignees and Transferees; Comcast Corporation, Transferor, to Time Warner Inc., Transferee; Time Warner Inc., Transferor, to Comcast Corporation, Transferee

Dear Commissioners Adelstein and Tate:

At Paula Kerger's request, I am writing to respond to requests that each of you made at our respective June 26, 2006, meetings¹ for further information concerning comments made in various ex parte submissions by RCN Corporation ("RCN") in the above-captioned matter. Specifically, RCN in its submissions contends that it "experienced a host of difficulties in accessing" the VOD programming services offered by PBS KIDS Sprout, including an alleged "delay in negotiating with RCN for carriage of this programming"² and difficulties accessing the content through Comcast Media Center.

As you may know, PBS KIDS Sprout ("Sprout") is a preschool children's programming service created and launched in 2005 by PBS, Sesame Workshop, HIT Entertainment PLC and Comcast Corporation. Although Sprout includes some programming previously broadcast by PBS member stations, our member stations continue to be the premier, first-run distributors of PBS KIDS programming, with exclusivity periods on new seasons of existing and original programming. By permitting subsequent use of the same programs on Sprout, PBS hopes to generate revenue for further investment in and strengthening of its commercial-free children's programming.

¹ See Letters dated June 27, 2006 from Lonna Thompson, Vice President and General Counsel, The Association of Public Television Stations, to Marlene Dortch, Secretary, Federal Communications Commission, re Ex Parte Presentation, CS Docket No. 98-120.

² See Comments of RCN Telecom Services, Inc., dated July 21, 2005, at 12-13; see also Letter dated May 19, 2006 from Richard Ramlall, Senior Vice President, RCN Corporation, to Chairman Martin and Commissioners Adelstein, Copps and Tate; Letter dated May 26, 2006 from Jean Kiddoo, Counsel for RCN Corporation, to Marlene Dortch, Secretary, Federal Communications Commission.

PBS takes seriously the concerns you expressed about the allegations made by RCN concerning the availability of Sprout's VOD services to other multichannel video distributors. Accordingly, we have inquired further about these concerns and have been assured by Sprout that it has dealt with RCN both responsibly and legally. From its inception, Sprout has made clear that its mission includes making its programming services available as broadly as possible to cable and satellite operators nationwide. Consistent with that mission, Sandy Wax, the President of Sprout, recently affirmed in her written response to RCN's allegations that Sprout consistently has been made available to all distributors wishing to carry it, including RCN.³ Ms. Wax also indicated that Sprout's recent decision to offer its content through Comcast Media Center rather than TVN Entertainment was "based on sound business reasons" and ultimately will serve to make additional resources available for the development of quality programming for children.

It was a pleasure seeing each of you. PBS appreciates your continued support of our mission to use the power of noncommercial television, the Internet and other media to enrich the lives of all Americans through quality programs and education services that inform, inspire and delight. Thank you.

Very truly yours,

/s/Paul Greco

Paul Greco

Vice President & Deputy General Counsel

Cc: MB Docket No. 05-192

Rudy N. Brioché, Legal Advisor, Office of Commissioner Jonathan Adelstein

John Grant, Special Advisor, Office of Commissioner Deborah Taylor Tate

Paula Kerger, President & Chief Executive Officer, PBS

Katherine Lauderdale, Senior Vice President & General Counsel, PBS

John Lawson, President & Chief Executive Officer, APTS

Lonna Thompson, Vice President & General Counsel, APTS

³ See Letter dated June 5, 2006, from Sandy Wax, President, PBS KIDS Sprout, to Marlene Dortch, Secretary, Federal Communications Commission.