

INFORMATION CONCERNING POLITICAL ADVERTISING POLICIES OF COMCAST SPOTLIGHT ATLANTA

The following describes the political advertising policies of Comcast Spotlight, adopted in compliance with requirements of the Communications Act of 1934, as amended, and the rules and regulations of the Federal Communications Commission. These policies apply to purchases of advertising time for “use” by legally-qualified political candidates. A political advertisement or program involves a “use” if it includes the recognizable voice or image of the candidate. Candidates may be asked to demonstrate that they are legally-qualified. All federal candidates must comply with the requirements of the Bipartisan Campaign Reform Act of 2002 (“Reform Act”).

Spot Announcements — Terms and Conditions

During the 45 day period before a primary election and the 60 day period before a general or special election (the “Pre-Election Window”), the cable system will sell spot announcement time to political candidates on the same terms and conditions, including discount and other privileges, as are available to its most favored commercial advertisers. Pursuant to the Reform Act, no federal candidate will be offered lowest unit charge unless the candidate provides the system with a Certification. This Certification must state that the candidate (and any authorized committee of the candidate) has not and will not make any direct reference to another candidate for the same office in any advertisement unless the advertisement complies with Section 315(b)(2)(C) of the Communications Act as amended by the Reform Act. A sample Certification is attached for use by federal candidates. This certification must be received before any purchase during a Pre-Election Window if the candidate intends to receive statutory lowest unit charge benefits and should be provided with the first order whenever possible.

The following classes of spot announcements, each of which has a separate rate structure and lowest unit charge, are available:

- A. **Comcast Spotlight** will sell spot announcement time to political candidates on the same terms and conditions, including discount and other privileges as are available to its most favored commercial advertisers. Candidates and their authorized representatives must submit a written request for times/rates.
- B. **Comcast Spotlight**, as part of ongoing policy, requires prepayment from inherently ephemeral businesses such as Entertainment (Concerts), Closeouts, and Political campaigns.
- C. **Comcast Spotlight’s** methods do not include guaranteed audience delivery, although Quantitative Audience Measurement Data is available by request.

Candidates may purchase time at the estimated lowest unit charge or at higher negotiated rates (subject to the issuance of rebates).

Sales of Time Outside the Pre-election Window

If candidates purchase time for cablecast outside the statutory Pre-Election Window, rates and conditions of sale will be comparable to those charged and applied to commercial advertisers.

Avails and rates will be provided to candidates for carriage during these periods on the same basis as to commercial advertisers. Candidates are not entitled to the lowest unit charge for time purchased for use outside the statutory Pre-Election Windows but will be sold time at rates comparable to those paid by commercial advertisers. Volume discounts and similar discount privileges are available to candidates only on the same basis they are available to commercial advertisers during those periods. Rebates will be available only if required by equal opportunities and comparable rate requirements. The cable system's policies concerning make-goods, the availability and pricing of package plans and other sales practices will be applied to political advertisers during non-window periods on the same basis as to commercial advertisers. Candidates purchasing time for carriage outside of pre-election windows should inquire if they have additional questions about the cable system's policies during these periods.

Spot Announcement Availabilities

Attached is a description of all programs, dayparts, rotations and packages available to political candidates on the cable system showing applicable rates.

1. In order to provide fair and reasonable access for all campaigns, **Comcast Spotlight** reserves the right to limit the amount of time purchased in all time classes by *political race*.
2. Geographic "Zone" and "Interconnect" rate cards with spot prices and programming networks are available upon request. Commercial time is limited to the following dayparts:
 - A. M-Su 5A-9A
 - B. M-Su 9A-4P
 - C. M-Su 4p-7P
 - D. M-Su 7P-12M
 - E. Sa-Su 11A-7P.
3. In addition to these five daypart offerings, the 2008 political rate card is divided into two distinct rate categories on each network and in each daypart. The first rate category is designated **Immediately Pre-Emptible** (IPE), meaning that spots entered at this rate are subject to pre-emption due to higher rates on competing, non-political orders as well as preemptions due to inventory constraints. The second rate category is designated as **Non Pre-Emptible** (NPE), meaning that spots entered at these rates are not subject to pre-emption and should run at this rate, as ordered (presuming the absence of unforeseen technical difficulties).

All sales of time for use by political candidates are subject to federal equal opportunities requirements.

Spot Announcement Make-Goods

The cable system will provide “make-goods” prior to the election for candidate spots purchased for airing during the Pre-Election Window which are preempted because of the nature of the time purchased, and will make every effort to provide a make-good in the same daypart or program purchased. However, it cannot guarantee any advertiser that make-goods will be provided in the time period originally ordered. If inventory constraints preclude identical scheduling, the cable system will offer make-goods in time period(s) of equal or greater value, or, if the candidate prefers, will issue credits or rebates.

Spot Announcement Rebates

The lowest unit charge is the lowest per-spot price paid for the same class and amount of time during the same time period. In calculating the lowest unit charge, the system will take account of rates for spots which are sold as part of packages.

Current estimates of the lowest unit charge and chances of preemptibility are attached. Because determination of the lowest unit charge cannot be made until after all time has aired in a particular week and because the rate levels at which time will clear vary with market demand, the cable system cannot guarantee its estimates of the LUC or of the preemptibility of various classes of or rates for time. All such estimates are subject to change in light of current market developments. Candidates should inquire at the time of order as to current estimates of the LUC and preemptibility.

On a weekly basis, the cable system will review purchases of advertising by commercial and political advertisers. If that review indicates that political candidates are entitled to rebates in order to comply with federal requirements, every effort will be made to issue rebates (or, at the candidate’s option, credits) within a reasonable time frame and, to the extent possible, prior to the election.

Spot Announcement Ordering Procedure

All political advertisers are asked to execute the attached “Acknowledgment of Political Cablecasting Policies of **Comcast Spotlight Atlanta.**”

Orders for political time will not be considered firm for cablecast clearance until the following have been provided:

1. Proof that the candidate is “legally qualified” as defined by the FCC, and the purchaser is authorized to buy time for the candidate must be provided prior to airing of any commercial time. The attached political candidate form must be completed.
2. Completed and signed Comcast Spotlight Advertising Contract or Schedule for Political Cablecast.

3. Net cash-in-advance payment for all services. **Comcast Spotlight** reserves the right to verify funds without notification. Refunds will be issued for any spots that do not air within “flighted” or approved candidate cable schedule.
4. Commercial tapes (BETA SP, Mini DV, DG, Vivix or Fastchannel format), along with written instructions for their use, should be submitted to Comcast Spotlight according to the insertion guidelines set forth in the commercial insertion and schedule section of this document. Changes to these instructions should be in writing to **Comcast Spotlight** (by mail, fax, or telegram) prior to the change being made. **Comcast Spotlight** does not provide any delivery service for any candidate materials.
5. All political commercials will be pre-screened to determine compliance with technical standards, including sponsorship requirements. Any commercial not meeting sponsorship requirements have to be modified to meet compliance standards.
6. Tapes should be received in sufficient time to permit confirmation of compliance with sponsorship identification and technical standards. If required sponsorship identifications are not included, pursuant to FCC regulations, candidates/qualified representative must add the necessary information. If a commercial arrives prior to the tape deadline without the necessary identification, the commercial may not run in that weekly rotation.

Payment in full is due at the time of the order or no more than one week before the schedule is to start, whichever is shorter. Exceptions may be made for candidates or agencies (which accept payment responsibility in writing) with an established credit history, consistent with the cable system’s policy with respect to similarly-situated commercial advertisers. No scheduled time will be considered firm until the system has confirmed and accepted the order and payment is received. All payments must be made by check, cash or money order. All political advertisers must provide complete information concerning the entity or individual who is paying for the advertisement, including the identity of its chief executive officers or members of its executive committee or board of directors. Candidates must provide the name of the treasurer of their authorized committees.

The cable system reserves the right to recapture spot time sold to a candidate to meet equal opportunities requirements of the Communications Act of 1934, as amended. If spot time is recaptured by the cable system, the candidate will be advised as soon as practicable and an appropriate refund will be issued.

All advertising contracts and production materials should arrive at the cable system 48 hours in advance of cablecast in order to ensure compliance with sponsorship identification requirements, cable system technical standards and the provisions of this policy. (Orders to begin during a weekend should be placed with payment no later than Wednesday, 10AM.

All advertisers have a 3 day cancellation period prior to start flight.

Spot Announcement Sponsorship Identification

System expects all federal candidates to comply with the requirements of the Reform Act. These requirements include new sponsorship identification requirements. It is the responsibility of the candidate, and not the system, to ensure that each candidate ad complies with applicable federal requirements. **At a minimum, all political announcements and programs must include a sponsorship identification announcement which fully and accurately identifies the organization or individual which has paid for the commercial, using the terms “paid for by” or “sponsored by.” Such sponsorship identification must be visual, must last at least four seconds, and must use letters which are all at least 4% of vertical picture height.** For a federal candidate to receive lowest unit charge, all advertisements that refer to opposing candidates must contain a printed statement that is displayed with a candidate picture. The printed statement must identify the candidate, state that the candidate approved the advertisement, and state that the candidate and/or the candidate’s authorized committee paid for the advertisement.

Disputes

The Communications Act of 1934, as amended (the “Act”), establishes certain requirements for the sale of cablecast advertising time for use by or on behalf of political candidates. The Federal Communications Commission (“FCC”) has adopted rules and policies to implement those requirements and asserted its exclusive jurisdiction to enforce the Act. Complaints concerning the sale of political advertising by the cable system should therefore be filed with the FCC, subject to judicial appeal as provided by the Act. In order to ensure that material necessary to resolution of disputes is maintained, political advertisers should file complaints with the FCC concerning the cable system’s political practices and policies promptly. The FCC’s resolution of such complaint(s), subject to such judicial review as is provided by the Act, provides the sole and exclusive remedy for such complaints.

VOD Showcase and Feature Terms and Conditions

The cable system will sell advertising time on its Video On Demand platform (“VOD”) to political candidates on the same terms and conditions as are available to its commercial advertisers purchasing VOD server time. Candidates may purchase time in accordance with the attached rate card and VOD Terms and Conditions.

Other Matters

The cable system maintains a public inspection file at Comcast office in Norcross, located at 2975 Courtyards Drive, Norcross, GA 30071 which includes certain required information concerning political advertising. This file is available for public inspection and copying during Weekdays, 9:00a-5:00p.

Please contact Rich Crone, 770-559-2488 if you have any questions concerning the political advertising policies or rates of the cable system.

This policy is subject to change.

Tapes and checks are due by 10 am every day for the following start schedule:

MONDAY	-	WEDNESDAY START
TUESDAY	-	THURSDAY START
WEDNESDAY	-	FRIDAY & SATURDAY START
THURSDAY	-	SUNDAY & MONDAY START
FRIDAY	-	TUESDAY START

** These deadlines are subject to change for special Holiday Deadlines.

** Tapes will not be returned unless otherwise indicated in writing.

Failure by a political advertiser to fulfill all requirements in advance of the deadlines may result in preemption of some or all announcements previously cleared.

**ACKNOWLEDGMENT OF POLITICAL CABLECASTING POLICIES
OF COMCAST SPOTLIGHT ATLANTA**

This will acknowledge receipt of "Information Concerning Political Advertising Policies of Comcast Spotlight (the "Political Policy").

I agree that all purchases of advertising time on the Comcast Spotlight Atlanta (the "System") which I make by or on behalf of legally-qualified political candidates will be made subject to this Acknowledgment and the Political Policy.

I acknowledge that I have been informed to my satisfaction concerning the classes of time which are available to advertisers, including without limitation every level of preemptibility; the chances of preemption for the various levels of preemptibility; the availability of discount packages and rotations, including the System's willingness to negotiate combinations of time suitable to the needs of particular candidates; the System's lowest unit charge and related privileges for each class of time; and the System policy with respect to make-goods.

I recognize that the Federal Communications Commission ("FCC") has asserted its exclusive jurisdiction under the Communications Act of 1934, as amended (the "Act"), with respect to all disputes concerning purchases of advertising time by or on behalf of legally-qualified political candidates, specifically including all disputes concerning charges for candidates' "uses" of System's facilities. I acknowledge that all such disputes will therefore be governed exclusively by the Act, and the rules and policies of the FCC, and must be resolved exclusively before the FCC, subject to such judicial review as is provided for by the Act. In order to ensure that material necessary to resolution of such disputes is maintained, any such complaint should be filed with the FCC promptly.

[To be completed by a candidate: I certify that all advertising purchased by me for cablecast on the System will include my recognizable voice or image. I agree to indemnify and hold the System harmless from and against any and all damages and liability, including reasonable attorneys' fees, which may be assessed against the System as the result of its cablecast of advertising purchased by me which does not involve a "use".]

If I am an agent acting on behalf of a candidate, I certify that I have made full disclosure to the candidate of the information provided to me by the System concerning its political advertising policies, and, if not, that I have been specifically authorized by the candidate to purchase advertising time on the System on his or her behalf without the need to make such full disclosure. I further represent that all advertising which I purchase on the candidate's behalf will include the candidate's recognizable voice or image. Unless I am acting on behalf of a candidate for federal elective office, I further represent that the candidate agrees to indemnify and hold the System harmless from and against any and all damages and liability, including reasonable attorneys' fees, which may be assessed against the System as the result of its cablecast of advertising not involving a "use" by the

candidate which I purchase on the candidate's behalf. I further represent that I am authorized by all candidates on whose behalf I purchase time to agree to the terms and conditions set forth herein.

By:

On behalf of: _____

Date:

