



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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March 7, 2025

Delivered electronically to Comcast/Xfinity at steve_lee@comast.net

Subject: PDC Case 164902 regarding Comcast/Xfinity

Steve Lee:

The Public Disclosure Commission (PDC) completed its review of the complaint filed by Conner Edwards on November 5, 2024. The complaint alleged violations of: RCW 42.17A.345 and WAC 390-18-050 by failing to provide inspection of commercial advertiser books of account.

Applicable Laws and Rules

[RCW 42.17A.345](#) and [WAC 390-18-050](#) require commercial advertisers to make their documents and books of account open for public inspection during normal business hours for five years following the election to which the records pertain. Pursuant to RCW 42.17A.345, the documents and books of account shall specify: 1) the names and addresses of persons from whom it accepted political advertising or electioneering communications; 2) the exact nature and extent of the services rendered; and 3) the total cost and the manner of payment for the services.

[WAC 390-18-050\(3\)](#) states that commercial advertisers can provide such information to the requester in person during normal business hours or by email or online publication.

Background and Findings

- Comcast/Xfinity is a commercial advertiser headquartered in Philadelphia, PA, that is listed in PDC expenditure records as providing advertising services.
- The Complainant requested Comcast's commercial advertiser books of account. He confirmed receipt of commercial advertising records on August 26, 2024. Upon review of the records and finding them incomplete, the Complainant sent a followup on Oct. 30, 2024, requesting that Comcast/Xfinity provide the missing commercial advertising. The request email was included as part of the evidence.
- In the response provided by Steve Lee, Deputy General Counsel, to PDC staff, he stated that due to the specific language used in the Complainant's request that "his desire to review these [political advertising] records" was "[b]ecause of the rapidly approaching 2024 general election," Comcast originally provided political advertising data from 2024 only. Lee explained that the

specific records cited as “missing” by the Complainant were omitted from the first production because they pertained to advertising provided prior to 2024.

- On March 6, 2025, PDC staff received confirmation from Mr. Lee that the remaining commercial advertising records had been provided via an FTP site per the Complainant’s request.

Summary and Resolution

It appears that, prior to the complaint, you were not fully aware of the requirement to make books of account available for public inspection. When initially providing the records, you included only those you believed the Complainant was requesting, specifically political advertisement done in calendar year 2024. After being informed about a requester’s right to inspect five years of records, however, you responded to the complainant’s request after some delay.

Based on our findings, staff has determined that, in this instance, failure to respond to a commercial advertiser inspection of the books of account does not amount to a finding of a violation that calls for further investigation.

Reminder

PDC staff is reminding you about the importance of the requirements under RCW 42.17A.345 and WAC 390-18-050 to respond to a request for inspection of books of account. Staff expects you, in the future, to respond to requests to review your books of account per requirements associated with commercial advertisers and political advertisements.

Based on this information, the PDC has dismissed this matter in accordance with [RCW 42.17A.755\(1\)](#).

If you have questions, you may contact Jennifer Hansen at 1-360-753-1111, toll-free at 1-877-601-2828 or by e-mail at pdc@pdc.wa.gov.

Sincerely,

Electronically signed by Jennifer Hansen

Jennifer Hansen
Compliance Officer

Endorsed by,

Electronically signed by Kim Bradford

Kim Bradford
Deputy Director
For Peter Frey Lavallee
Executive Director

cc: Conner Edwards