



Comcast Corporation
One Comcast Center
Philadelphia, PA 19103

February 6, 2025

Via Electronic Mail

Jennifer Hansen
Compliance Officer
Washington State Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

In Re: Public Disclosure Commission Case Number 164902

Dear Ms. Hansen:

Comcast Corporation (“Comcast”) writes in response to the complaint made by Conner Edwards (the “complainant”) to the Washington State Public Disclosure Commission (the “WA PDC”) in relation to an alleged violation of RCW 42.17A.345 for “failure to timely provide complete commercial advertiser books of account upon request.” RCW 42.17A.345 requires that commercial advertisers make available for review various types of information relating to political advertising, such as the identities of individuals from whom it accepted political advertising, the services rendered, and the cost of such services. As indicated below, Comcast, through its advertising sales division, Effectv, provided an extensive and thorough response to the complainant and did not violate RCW 42.17A.345 or any other statute, and respectfully requests the closure of this complaint.

Background and Discussion

On July 1, 2024, the complainant sent a request to “view Comcast’s commercial advertising books of account” under RCW 42.17A.345, to two Comcast executives in Philadelphia uninvolved in political advertising. Subsequently, under the advice of the WA PDC, on August 14, 2024, the complainant forwarded this same request to a Comcast government affairs professional. The complainant’s request did not identify any particular candidate or campaign for which he sought information and did not provide a date range for any records he was seeking.

Despite this, Comcast, through its advertising sales division, Effectv, went above and beyond to provide the complainant with all available advertising records, including advertiser details, records of request forms, order contracts, targeting information, impression counts, and ad copy from the entirety of 2024 up to the date of the request. This extensive set of records was provided directly to the complainant on August 26, 2024, so that he could access and review them personally and at his convenience. The records were so voluminous—over 900MB in size—that Comcast had to email to the complainant a link to an FTP site for personal access. These records included not only records relating to political advertising distributed via linear television, but also records relating to digital advertising.

Comcast’s decision to provide political advertising data from all of 2024 was entirely reasonable and in good faith in light of the complainant’s non-specific request. Typically, such requests focus on a specific candidate or campaign and the lack of specific information delayed Comcast in both discerning the focus of the complainant’s attention and locating and producing a large volume of relevant records. In fact, in his complaint to the WA PDC, he indicates that “his desire to review these [political advertising] records” was “[b]ecause of the rapidly approaching 2024 general election,” so we consider the production of political advertising data from all of 2024 to be consistent with what we believed the complainant’s focus was. Despite this, in his complaint, the complainant points out that certain records were “missing.” In fact, these records were not “missing,” but were records from prior years, 2022 and 2023, which the complainant did not specifically request and were not provided by Comcast since its production included only political advertising in 2024.

However, in an effort to resolve this matter in its entirety, Comcast is working to provide the complainant with a complete set of political advertising documents and information from 2019 to 2024 pursuant to RCW 42.17A.345. We expect that this production will be complete in the coming weeks, and we will provide an update on its completion to the WA PDC. Please direct any future inquiries, either from individuals or the WA PDC, to our primary point of contact on these matters, Erin Keltz, at email address erin_keltz@comcast.com. Accordingly, in light of the above, Comcast requests that this complaint be dismissed.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Lee", written in a cursive style.

Steve Lee
Deputy General Counsel
Comcast Cable