

**Comcast Averment**  
**Confidential Migration Plan**

**A. Identification of Document or Information**

The detailed migration plan, including plans for isolated migration testing, required by Condition 34 of the Case No. 19-4845 Certificate of Public Good (“CPG”) issued to Comcast of Connecticut/Georgia/ Massachusetts/New Hampshire/New York/North Carolina/ Virginia/Vermont, LLC (“Comcast”) on May 13, 2020.

**B. Degree of Confidential Information**

The detailed migration plan for Comcast’s integration of the Southern Vermont Cable Company (“SVCC”) system contains proprietary and commercially sensitive information, including the timeline for customer communications and the current schedule for migrating customers from SVCC products and services to Comcast products and services.

**C. Confidentiality Factors**

**i. Extent Information Known Outside Company**

Detailed information regarding the migration plan is not shared outside of Comcast. Further, Comcast limits distribution of this information to employees, management, agents and counsel who require access to such information for performance of their job or engagement. This information has not been shared with persons outside the company except for such agents and counsel who are under obligation to hold such information in confidence.

**ii. Extent Information Known by Employees and Independent Contractors**

The above information is not available to Comcast employees, counsel or authorized agents outside of those who require such information for the performance of their job. One measure of employee performance is their reliability in handling sensitive information or materials and in maintaining confidentiality.

**iii. Measures Taken to Guard Security**

Comcast limits access to this information to appropriate personnel, and it is not disseminated (hard copy or electronically) beyond those employees who require such information for their job. Comcast also monitors employee e-mail and computer usage, and there is a security pass for entry/exit of facilities, including for visitors. Computer firewalls and other arrangements at Comcast render data used by certain departments inaccessible to personnel outside those departments.

**iv. Value of Information to Company and Competitors**

Comcast operates in a very competitive environment in Vermont. Comcast's video competitors in Dummerston, Jamaica, Newfane, Putney, and Townshend ("former SVCC system") include two satellite dish providers and Consolidated Communications. Additionally, there are non-video competitors within Comcast's service area who are actively expanding and upgrading their networks. The detailed migration plan would be valuable to a competitor as it provides insight into Comcast's operations in the former SVCC system.

**v. Amount of Money or Effort to Develop Information**

Comcast has incurred costs in order to develop the detailed migration plan. Additionally, Comcast has expended significant funds and efforts to develop a secure system to ensure that such information remains secret in a business environment where competition occurs based on price and through the rapid, targeted deployment and introduction of new technologies, services and marketing strategies.

**vi. Cost/Difficulty in Acquiring/Duplicating Information**

A competitor would have to finance and/or conduct its own field analyses and other work activity to acquire the information in this report and could not be able to replicate this information readily.

**vii. Harm of Disclosure**

Disclosure of the detailed migration plan could be valuable to competitors in the marketplace for making decisions about their own system and service investments, pricing, and strategies. Disclosure of the detailed migration plan could provide competitors with information that could be used to target specific groups of consumers.

**D. Time Period**

This information should not be disclosed publicly until one month after all customer migrations are complete.

**E. Partial Disclosure or Redaction**

This information cannot be reasonably or meaningfully disclosed in partial or redacted form.

**F. Other Factors**