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September 24, 2001

BY HAND DELIVERY

Sheila Cross-Reid
Chair, DC Board of Zoning Adjustment
441 4th Street, NW, Suite 210
Washington, DC 20001

Re: BZA Application 16784
Comcast Facility at 6336 Piney Branch Road, NW

Dear Chairman Cross-Reid:

On behalf of Comcast Cablevision of the District, LLC, the Applicant in the referenced matter, please accept the following information and materials submitted in accordance with subsection 3316.6 of the Zoning Regulations:

1. Engineering Statement/Analysis of Human Exposure:

In response to several questions and concerns expressed about the nature of the facility and whether harmful emissions would be produced at the site, the Applicant submits a report prepared for it by Denny & Associates, P.C. This report is attached hereto and marked as Exhibit A.

2. Resume of Robert Denny:

Robert Denny is a consulting engineer and president-treasurer with Denny & Associates, P.C. He is a professional engineer registered in several jurisdictions, including the District of Columbia. Mr. Denny is considered an expert in the fields of radio frequency hazard analysis, and has been qualified as an expert witness in dozens of similar proceedings. We intend to ask Mr. Denny to speak at the hearing and ask that his testimony and report be considered expert testimony. Mr. Denny's resume is attached hereto and marked as Exhibit B.

147780_2.DOC

BZA
Case No. 16784
Exhibit No. 27

Board of Zoning Adjustment
District of Columbia
CASE NO.16784
EXHIBIT NO.27

3. Aerial Photograph of the Site and Surrounding Area:

Attached hereto is a reduced version of an aerial photograph that we intend to use at the hearing in full-size. The photo shows the facility near the center of the picture and several blocks in all directions. The photo is marked as Exhibit C.

4. System Map:

Exhibit D is a graphic showing the placement of the proposed seven (7) OTN sites throughout the District of Columbia. Please be advised that this exhibit is to be considered proprietary and confidential, and as such should not be photocopied or distributed. A copy is being provided to the Office of Planning, and we have asked this Office to also provide this map with confidential treatment.

5. Additional Exhibits:

We are developing a landscape plan to address concerns about the view of the facility as it now stands. The intention of the Applicant has been to provide a landscape screen to improve the present condition. It is expected that such a plan will be ready within the next week.

We are also developing a colorized version of the rendering of the facility. A black-line version was submitted at the initial filing. Current plans call for certain enhancements to the facility to include replacing the existing exterior with a brick veneer that more closely matches the exteriors of the neighborhood. It is expected that this exhibit will be ready within the next week as well. For both these exhibits, we anticipate that they will be presented to the Advisory Neighborhood Commission (ANC 4A) at the next meeting of the ANC on October 2nd, and filed with the Board at the same time.

Thank you. We look forward to our hearing in October.

Sincerely,

Edward L. Donohue

Edward L. Donohue

cc: Jennifer Steingasser (DC Office of Planning)

Exhibit 1

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

ENGINEERING STATEMENT
ANALYSIS OF HUMAN EXPOSURE
TO RADIOFREQUENCY EMISSIONS
COMCAST CABLEVISION
WASHINGTON, D,C.

INTRODUCTION

This engineering statement has been prepared on behalf of Comcast Cablevision (hereinafter Comcast), proponent for the construction of a new optical transition node (OTN) in Washington, D.C. The purpose of this statement is to address concerns pertaining to radiofrequency (RF) emissions from the proposed OTN. In preparing this report, the undersigned has familiarized himself with the OTN system plans and all related ancillary equipment associated with the OTN.

SUMMARY CONCLUSION

The proposed use of the OTN will not present any risk of public exposure even mildly approaching the maximum permitted levels as established by the federal government because associated electromagnetic energy remains inside the OTN and is not radiated into the air.

DISCUSSION

This firm has prepared a number of reports that analyze RF emissions from antennas and other sources of radiofrequency electromagnetic radiation. This report differs in a substantial way in that there will be no RF emissions from the proposed OTN.

Signals passing in and out of the OTN are carried on light waves rather than radio waves. While radio waves and light waves are closely related forms of electromagnetic energy, there is a major difference in the ways the two types of energy are used. Radio waves are emitted from an antenna, and the resultant RF electromagnetic wave travels through space. Light waves of the type used by the proposed Comcast OTN are emitted from an optical transmitter and the resultant light wave travels through a glass fiber often referred to as a fiber optic cable. While radio waves travel through space and may cause exposure of the public, light waves travel through a fiber optic cable which confines the light energy inside the cable so that there is no risk of exposure to the public. Accordingly, there is no emission of electromagnetic radiation into the air.

The Federal Communications Commission (FCC) regulates all radio communication services as well as the cable television service. There are FCC rules pertaining to human exposure to high levels of RF radiation, but, since there is no high-level radiation from cable television facilities, the FCC has not established equivalent rules for the cable television service. The Occupational Safety and Health Administration has established maximum permissible exposure (MPE) limits for human exposure to light waves, but, since access to the OTN will be restricted to authorized personnel only, these rules pertain only to workers. Because of the nature of the transmission (through encased fiber) and the secured nature of the facilities that contain the means of transmission there are no MPE limits for general population or uncontrolled exposures to light waves. Absent extraordinary and unforeseen circumstances, there is no exposure to light waves from cable television or the proposed OTN of the general population.

Also to be located at the site is other electronic equipment necessary to the operation of the OTN. Specifically, the OTN contains the following principal equipment: optical receivers, optical transmitters, control

modules, and power supplies. As with the fiber optic cable, there are no RF emissions from this equipment and, accordingly, there is no risk of public exposure. The OTN will be a secured facility, and access will be restricted to authorized personnel only. Accordingly, the proposed use poses no risk of exposure to the general population.

CONCLUSION

Radio waves and light waves are closely related forms of electromagnetic energy. Radio waves travel through space, and there exists the possibility of public exposure. In Comcast's proposed use, the light waves will travel through electronic equipment and fiber optic cable from which there is no radiation and consequently no risk of public exposure. There are no FCC rules for public exposures to light waves, and the pertinent OSHA regulations establish exposure limits for those who may be exposed to high levels of light electromagnetic waves while working. Consequently, operation of the Comcast OTN will not present any risk of public exposure to high levels of electromagnetic radiation.

CERTIFICATION

I certify under penalty of perjury that the foregoing is true and correct. Executed on September 24, 2001.

Robert W. Denny, Jr.

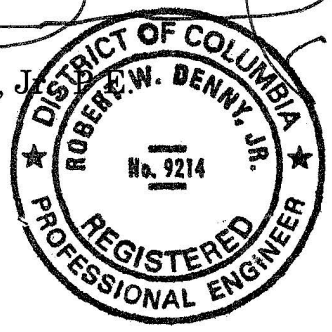


Exhibit 2

BIOGRAPHICAL SKETCH OF ROBERT W. DENNY, JR.

Robert W. Denny, Jr., is a consulting engineer and president-treasurer of the firm of Denny & Associates, P.C. He is a professional engineer registered in the District of Columbia, registration number 9214; Mississippi, registration number 10768; Maryland, registration number 17475; and North Carolina, registration number 13298.

Work performed includes propagation studies, frequency allocation surveys, interference studies, planning and placement of communications structures, field strength surveys, radio-frequency radiation hazard analyses, surveys and expert testimony, communication system planning, inspection and appraisal of broadcast technical facilities, and the preparation of engineering material to support FCC applications for FM, TV, and other services.

Prior to founding the firm, he served as president of Jules Cohen & Associates, P.C. from 1992 to 1994, and was a principal engineer with that firm from 1987. Before joining Jules Cohen & Associates, P.C., he was a senior engineer with McCracken and Lopez, P.A., Charlotte, North Carolina, specializing in the design and specification of power, lighting, process control, and communications systems for large commercial and public facilities. From 1980 to 1986, he was engineering manager of standard broadcast station WBT and FM broadcast station WBCY, both Charlotte, flagship radio stations of the Jefferson-Pilot Communications Company. During his tenure with Jefferson-Pilot, he participated in the design and supervision of reconstruction of the radio stations and group-owned television station WBTV, Charlotte. He has also

worked as a free-lance engineer in the production of live television sports programming for the Mizlou Television Network and the Entertainment and Sports Programming Network (ESPN).

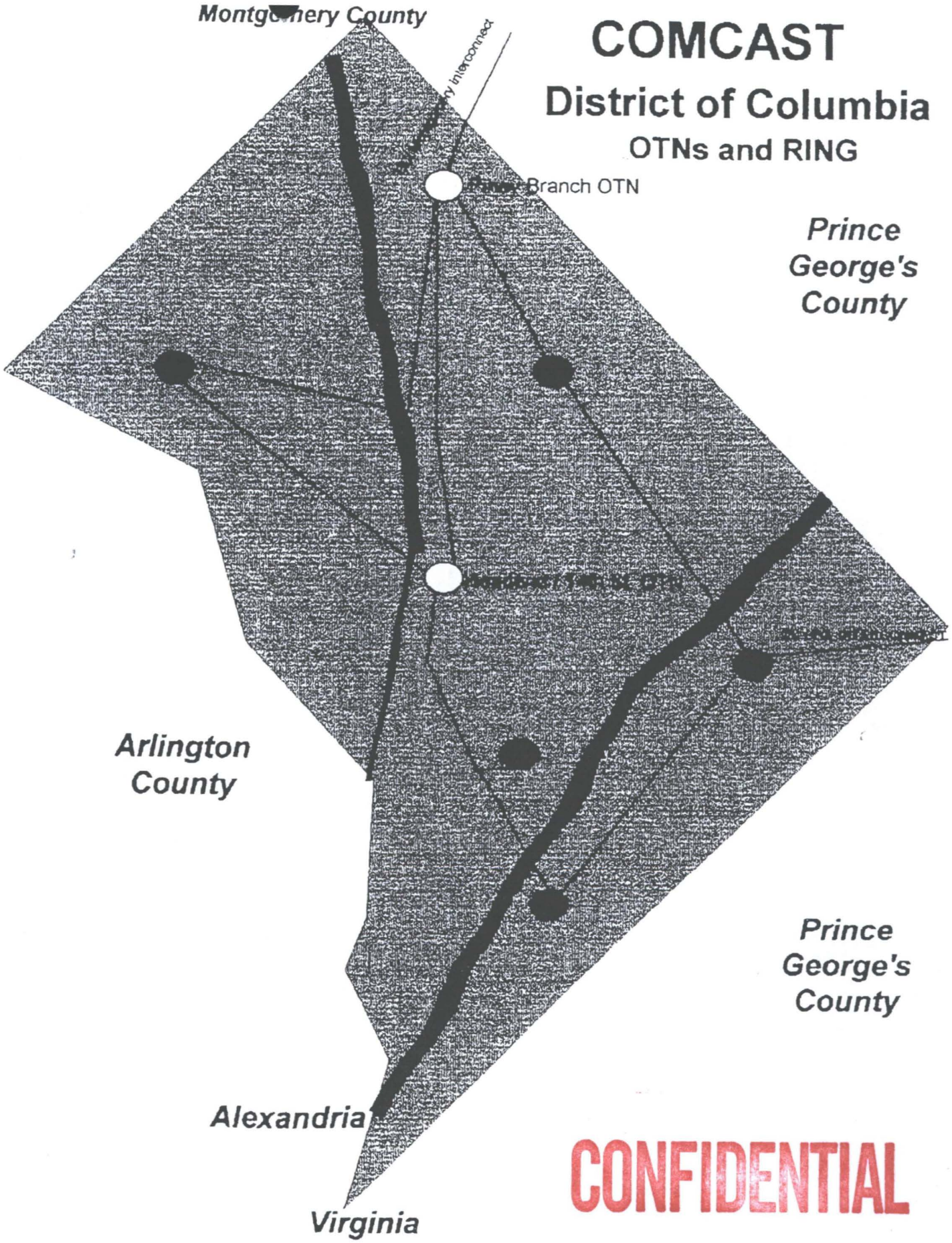
From 1978 to 1980, he was employed as chief engineer and vice president-engineering for the Lincoln Broadcasting Corp., a station group owner based in Syracuse, New York. Upon graduation from college, he joined the Harris Corporation, RF Communications Division in Rochester, New York, as a designer of high frequency communications systems for the military. In the course of his career, he has designed and supervised the construction of numerous broadcast and communications intensive facilities.

Mr. Denny received the degree of Bachelor of Science in Electrical Engineering from Drexel University, Philadelphia, Pennsylvania, in 1976. He is a member of the Institute of Electrical and Electronics Engineers (IEEE), a member of the Society of Motion Picture and Television Engineers (SMPTE), and a member and past officer of the Association of Federal Communications Consulting Engineers (AFCCE). He also is a member of the National Society of Professional Engineers (NSPE), the Society of Broadcast Engineers (SBE), the Electromagnetic Energy Association, and the Association of Public-Safety Communications Officials, an associate member of the International Association of Electrical Inspectors (IAEI), and a life member of the American Radio Relay League (ARRL).

Exhibit 3



Exhibit 4


Montgomery County
COMCAST
District of Columbia
OTNs and RING
Branch OTN
Prince George's County
Arlington County
Prince George's County
Alexandria
Virginia
CONFIDENTIAL