

Clerk of the House of Representatives  
Legislative Resource Center  
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Washington, DC 20515

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232 Hart Building  
Washington, DC 20510

SECRETARY OF THE SENATE

03 FEB 24 PM 3:30

**LOBBYING REPORT**

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required to Complete This Page

1. Registrant Name <b>Palmetto Group</b>			
2. Registrant Address <input type="checkbox"/> Check if different than previously reported Address <b>801 Pennsylvania Avenue, N.W.</b> Suite <b>730</b> City <b>Washington</b> State/Zip (or Country) <b>DC 20004</b>			
3. Principal Place of Business (if different from line 2) City _____ State/Zip (or Country) _____			
4. Contact Name <b>David Rudd</b>			5. Senate ID # <b>18570-1154</b>
Telephone <b>202-638-7780</b>			E-mail (optional)
7. Client Name <input type="checkbox"/> Self <b>Comcast Corporation</b>			6. House ID # <b>30874091</b>

**TYPE OF REPORT** 8. Year 2002 Midyear (January 1-June 30)  OR Year End (July 1-Dec)


9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report  >> Termination Date \_\_\_\_\_

11. No Lobbyi

**INCOME OR EXPENSES - Complete Either Line 12 OR Line 13**

12. Lobbying Firms	13. Organizations
<p><b>INCOME</b> relating to lobbying activities for this reporting period was:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input checked="" type="checkbox"/> &gt;&gt; \$ <u>\$90,000.00</u> Income (nearest \$20,000)</p> <p>Provide a good faith estimate, rounded to the nearest \$20,000 of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p><b>EXPENSES</b> relating to lobbying activities for this reporting period were:</p> <p>Less than \$10,000 <input type="checkbox"/></p> <p>\$10,000 or more <input type="checkbox"/> &gt;&gt; \$ _____ Expenses (nearest \$20,000)</p> <p><b>14. REPORTING METHOD.</b> Check box to indicate accounting method. See instructions for description of</p> <p><input type="checkbox"/> <b>Method A.</b> Reporting amounts using LDA definition</p> <p><input type="checkbox"/> <b>Method B.</b> Reporting amounts under section 6033 the Internal Revenue Code</p> <p><input type="checkbox"/> <b>Method C.</b> Reporting amounts under section 162(c) Internal Revenue Code</p>

Signature  Date 1/31/05

Printed Name and Title David Rudd - Pag

Registrant Name: Palmetto Group

Client Name: Comcast Corporation

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code COM (one per page)

16. Specific Lobbying issues

- H.R.1416, Broadband Expansion Grant Initiative of 2001,**
- H.R.2038, Rural Broadband Enhancement Act,**
- H.R.2139, Rural America Broadband Deployment Act,**
- H.R.267, Broadband Internet Access Act of 2001,**
- S.1126, Broadband Deployment and Competition Enhancement Act of 2001,**
- S.1127, Rural Broadband Deployment Act of 2001,**
- S.2048, Consumer Broadband and Digital Television Promotion Act,**
- S.2430, Broadband Regulatory Parity Act of 2002,**
- S.2582, National Broadband Strategy Act of 2002,**
- S.2863, Consumer Broadband Deregulation Act,**

17. House(s) of Congress and Federal agencies contacted  
**Federal Communications Commission**  
**House of Representatives**  
**Senate**

Check if None

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
<b>Rudd, David</b>	

19. Interest of each foreign entity in the specific issues listed on line 16 above

Check if None

Signature  Date -----

Printed Name and Title David Rudd - Pag

Registrant Name: Palmetto Group

Client Name: Comcast Corporation

**LOBBYING ACTIVITY.** Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code TEC (one per page)

16. Specific Lobbying issues  
**H.R.2669, Rural Telecommunications Enhancement Act,  
S.2448, Broadband Telecommunications Deployment Act of 2002,  
Anti-trust issues related to merger of Comcast and AT&T broadband**

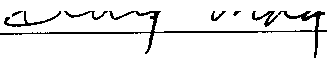
17. House(s) of Congress and Federal agencies contacted  Check if None  
**Federal Communications Commission  
House of Representatives  
Senate**

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)
<b>Rudd, David</b>	

19. Interest of each foreign entity in the specific issues listed on line 16 above  Check if None



Signature  Date 10/1/05

Printed Name and Title David Rudd - Pag