

**Comcast Cable Communications  
Transparency Report  
July 1, 2019 – December 31, 2019**

Comcast is committed to protecting the data of our customers, and we work hard to deliver secure services and products. We believe that our customers should understand how we manage and protect their personal data. This Transparency Report provides information on the types and volume of government requests for customer information received during the second half of 2019.

<b>Criminal Demands: July 1, 2019 – December 31, 2019</b>	
<b>Subpoenas</b>	9,460
<b>Court Orders</b>	
General Orders	1,586
Pen Register/Trap & Trace	48
Wiretaps	1
<b>Warrants:</b>	
Content Warrants	157
Non-Content Warrants	965
<b>Total</b>	12,217

<b>Emergency Requests: July 1, 2019 – December 31, 2019</b>	1251
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<b>National Security Demands: July 1, 2019 – December 31, 2019</b>	
<b>National Security Letters</b>	0-499
Number of Customer Accounts Impacted	500-999

<b>FISA Orders: January 1, 2019 – June 30, 2019</b>	
<b>Content</b>	0-499
Number of Customer Accounts Impacted	0-499
<b>Non-Content</b>	0-499
Number of Customer Accounts Impacted	0-499

**Types of Requests Received.** Comcast receives several forms of legal requests asking for information about our customers from federal, state and local government agencies throughout the United States. Government agencies request information in a variety of circumstances, such as (1) where law enforcement agencies are working on behalf of Comcast customers who have requested assistance regarding lost or stolen devices and services; (2) where customers suspect

their credit card has been used fraudulently; and (3) where a Comcast account is suspected to have been used unlawfully. These requests take many forms, including court orders, search warrants, pen register/trap and trace orders, wiretap orders, subpoenas, and requests made under the Foreign Intelligence Surveillance Act (“FISA”).

**How We Handle Legal Requests.** Comcast is legally obligated to respond to lawful government agency requests for customer-related information, we are also committed to protecting our customers’ privacy and rights. Accordingly, we carefully scrutinize each government request for data, and, before providing any customer information, we ensure the request has a valid legal basis and is appropriately tailored. If we determine that a request has a questionable legal basis, or if we consider it to be unclear, inappropriate, and/or overly broad, we seek clarification or reject it.

**How We Count Requests.** Comcast counts requests received from government agencies nationwide within the reporting period in which they are received. Consistent with federal law, we report national security requests that we receive in bands of 500. Requests for information made under the FISA are subject to a six-month delay, and, therefore, number of requests in that category cover the first half of 2019. We make this data available to the public in order to help enhance the transparency of government surveillance programs and to promote an open dialogue about the important privacy, law enforcement, and national security issues raised by those programs.

### **Definitions (as terms appear in the Report)**

**Subpoenas** don’t typically require the approval of a judge and are issued by an officer of the court such as a law enforcement officer or an attorney. They are used in both criminal and civil cases and typically request customer account information such as calling records and basic subscriber information such as the billing name and address.

**Court Orders** are signed by a judge. “General” court orders are all court order except those that contain a probable cause finding. For example, in a criminal case a judge may issue a court order without a finding of probable cause. In criminal cases, general court orders are also used to request pen register/“trap and trace” information, which provides phone numbers and other dialed information for calls as they are made or received from the device identified in the order. Similarly, in a civil case, a court order may be issued without a finding of probable cause and based on whether the information sought is relevant to the case.

**Search Warrants and Probable Cause Court Orders** are signed by a judge, and they are issued only upon a finding of “probable cause.” To be issued, the warrant or order must be supported by sworn testimony and sufficient evidence to believe the information demanded is evidence of a crime. Probable cause is viewed as the highest standard to demand evidence. Except in emergency circumstances, a search warrant or probable cause court order is required for real-time information such as content obtained through wiretaps. Stored content such as stored text and voice messages also generally requires a warrant.

**Emergency Requests** typically seek information on an expedited basis in an emergency involving danger of death or serious physical injury to any person. Our policy requires the

requesting law enforcement officer to provide a written certification describing the emergency, which Comcast uses to verify the emergency request. Some emergency requests seek information related to 911 telephone calls. In those cases, Comcast verifies that the request is coming from a legitimate Public Service Answering Point before responding.

**National Security Letters** are issued by the United States Government, often the Federal Bureau of Investigation, to gather information for national security purposes. National security letters typically request basic information such as customer account information.

**Foreign Intelligence Surveillance Act Orders and Warrants** are issued by the Foreign Intelligence Surveillance Court. These can be court orders or warrants and typically request both content and non-content information relating to national security matters.

**Customer Accounts Affected** means the number of unique Comcast subscriber accounts affected by a particular legal request. For example, one national security letter may seek information about two different subscriber accounts.

**Content** refers to the actual contents of a communication, such as the body of an e-mail or a telephone conversation.

**Non-Content** refers to information other than the contents of a communication, such as a list of phone numbers or e-mail addresses or header information (signaling, addressing, or routing information).