

June 21, 2010

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 10-56

Dear Chairman Genachowski:

On behalf of the National Urban League, and on the basis of our long standing relationship with both Comcast and NBC Universal, I write with regard to the proposed joint venture between Comcast and NBCUNI. For the reasons set forth below, we support the proposed joint venture transaction, subject to reasonable conditions which we urge be set in the public interest.

The National Urban League recognizes that any joint venture, such as the one contemplated here, necessarily raises concerns regarding the potential for decreased diversity, increased costs, fewer consumer choices and other harmful marketplace realities.

However, our experience with Comcast and NBCUNI is this: both Comcast and NBCUNI have had a positive record in promoting diversity and the other important interests of our constituents.

First, Comcast and NBCUNI have been committed to supplier diversity in a way that provides opportunities to minority-owned suppliers.

Second, Comcast and NBCUNI have made significant philanthropic investments in the community, supporting the work of institutions that serve the needs of communities of color.

Third, Comcast and NBCUNI have taken steps to increase the diversity of their workforce at all levels through recruitment and mentoring programs, and best practices in hiring.

Fourth, Comcast and NBCUNI have strongly indicated their support for the goal of closing the digital divide, a critical barrier to education, career and entrepreneurship opportunities for people of color.



Fifth, Comcast and NBCUNI have taken steps towards increasing the availability of minority-focused content within their programming line-ups.

These demonstrated commitments speak to the willingness of Comcast and NBCUNI to support the needs of urban communities, and communities of color across the nation. We have, and will continue to work closely with the leadership of Comcast and NBCUNI to develop a comprehensive plan to strengthen and expand the commitments to diversity which are paramount to the public interest.

As this process continues, we will continue our conversations with Comcast and NBCUNI toward developing a comprehensive plan to cover the following:

- Establishing, tracking and reporting benchmarks with regard to diversity in the areas of procurement, governance, philanthropy, employment, and content development;
- Committing that a substantive number of independent and minority-owned programmers are provided with carriage on a non-premium tier, especially in the early stages of the joint venture;
- Ensuring practices consistent with a commitment to a free and open internet, including fair treatment of programmers and internet video companies.

We look forward to the successful completion of this joint venture as well as working with Comcast and NBCUNI to assist them in building upon the platform of the diversity commitments they have made to date through the development of a comprehensive plan, and therefore ensuring that the joint venture establishes a progressive 21st Century model for all media companies.

Sincerely yours,

Marc H. Morial
President and Chief Executive Officer
National Urban League