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April 28, 2010

The Honorable Chaka Fattah
2301 Rayburn House Office Building
Washington, D.C. 20515

Re: Comcast Corporation / NBC Universal Joint Venture -- Diversity Initiatives

Dear Congressman Fattah:

We are writing to thank you for the time you have spent with us discussing the proposed joint venture between Comcast Corporation ("Comcast") and General Electric ("GE") with respect to NBC Universal ("NBCU"). We appreciate your advice and counsel on the proposed transaction, including your insights relating to our diversity efforts.

From your many years of experience with our company, you know that diversity is a core principle of the way in which Comcast conducts its business. It is a core principle of NBCU's business as well. You have seen first-hand our diversity efforts and achievements. Most importantly, you know that when we make a commitment, we honor that commitment.

Based on our conversations and your advice, Comcast and NBCU are prepared to make commitments to enhance diversity of African Americans in their respective businesses in a variety of ways, including with respect to key issues such as workforce recruitment and retention, procurement, programming, and community investment. Many of these initiatives are underway in each of the companies, but the commitment to work together on these priorities can take effect only after the close of the transaction.

To facilitate open communication and assist in the development, monitoring, and evaluation of diversity initiatives among Comcast, NBCU, and African American leadership organizations, we are planning to establish an external National African American Diversity Council (the "African American Council") after the transaction closes. We would anticipate that the African American Council will provide advice to the senior executive teams at Comcast and NBCU regarding the companies' development and implementation of a strategic plan to improve diversity practices in the areas identified above.

The African American Council would meet at least two times per year, along with the internal Diversity Councils already operating within Comcast and NBCU, as well as with other external diversity councils advising the companies. These meetings would include the senior executives of Comcast and NBCU responsible for diversity, and Comcast's Chairman and Chief Executive Officer will attend one of those meetings. We believe the creation of a national,

external African American Council to provide advice on diversity issues affecting our organizations is a significant landmark in our approach to corporate diversity.

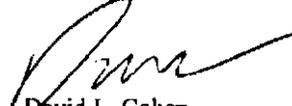
In the key areas identified above, Comcast and NBCU are committed to maintaining their current diversity initiatives and to enhancing these achievements with new and expanded approaches to diversity. For example, in the area of workforce recruitment and retention, we are committed to enhancing diversity, including African American representation, within our executive ranks and across all levels of employment. With respect to procurement, Comcast Cable and NBCU will continue to partner with African American organizations to enhance utilization of minority-owned enterprises and will commit to continuing and enhancing diversity in our procurement of goods and services and increasing the amount spent with diverse business partners, including African American-owned enterprises. In the programming area, we are committed to maintaining and improving our track record in bringing diverse programming to subscribers and to increasing and improving the presence of diverse groups, including African Americans, throughout all programming areas, including entertainment, news, sports, and public affairs programming, both in front of and behind the camera. In addition, Comcast and NBCU recognize the importance of investing in minority-led organizations, including African American organizations, and are committed to providing no less than the current levels of community investment to organizations serving the African American community currently being made by both organizations in the aggregate.

We also want you to know that Comcast and NBCU have begun an outreach process to African American creative communities to ensure that they know our doors are open to creating opportunities and discussing issues of concern.

We anticipate that these commitments will cover all major operating units of both Comcast and NBCU. As a legal matter, of course, we cannot formally commit to undertake these initiatives covering Comcast and NBCU until the transaction has closed. However, we are actively working with African American leadership organizations now to lay the groundwork for these initiatives, including the formation of the African American Council.

Thank you again for your continued counsel. We look forward to a constructive and ongoing dialogue with you and your colleagues on these matters.

Sincerely,



David L. Cohen

cc: Brian L. Roberts
Jeff Zucker
Payne Brown
Paula Madison

APPENDIX R



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July 19, 2010

Honorable Gregory W. Meeks
2342 Rayburn House Office Bldg.
Washington, D.C. 20515-3206

Re: Comcast/NBCU

Dear Congressman Meeks:

I am writing on behalf of Messrs. Roberts, Zucker, and Immelt to respond to your letter dated June 30, 2010, and which we received on July 8, 2010, in connection with the proposed joint venture between Comcast Corporation (Comcast) and General Electric (GE) relating to NBC Universal (NBCU). Thank you for your encouragement and willingness to undertake this important dialogue about diversity and the minority community.

Diversity Commitments

In your letter, you refer to the Summary of Diversity Commitments prepared by Comcast and NBCU highlighting the public interest commitments we have made. To ensure you have the most current information, we are enclosing a copy of the latest version of the Summary, which was submitted for the record of the Chicago hearing on July 8, 2010, before the House Subcommittee on Communication, Technology and the Internet. This Summary includes the commitments developed in the course of our dialogue with various national diversity leaders and reflects those commitments that are the joint focus of Comcast and NBCU on the critically important issues of diversity in the operation of our companies.

Diversity Advisory Council

We are gratified to have your support for our plans to form external Diversity Advisory Councils. The Advisory Councils will exist to facilitate open communication with Comcast and NBCU in the development, monitoring, and evaluation of diversity initiatives; and to provide advice to the senior executive teams at Comcast and NBCU regarding the companies' development and implementation of a strategic plan to improve diversity practices with emphasis on five focus areas: work force recruitment and career development, supplier diversity, programming, community investment and partnerships, and governance. This will be accomplished through meetings with senior Comcast and NBCU officials. Comcast will appoint the members of the Advisory Councils, but it will consider the input of various leading diversity groups when making the appointments.

We have committed that the Diversity Advisory Councils will have the resources they require to perform their functions. The members of the Advisory Councils will have the

opportunity to interact with the existing Comcast and NBCU Diversity Councils in between formal meetings of the Joint Advisory Council, including additional meetings on an as-needed basis to offer advice on the strategic plan and to discuss progress under the plan. Also, the chief diversity officers of Comcast and NBCU will designate appropriate staff members to serve as liaisons to the Advisory Councils to, among other things, facilitate communication between the Advisory Councils, Comcast, and NBCU concerning our activities in the focus areas outlined above, as well as to address administrative issues.

With these resources and the opportunity for interaction with senior Comcast and NBCU executives, we believe the Advisory Councils will be able to provide effective advice that will improve our diversity achievements.

Workforce and Career

In your letter, you ask Comcast to establish numerical goals to increase Comcast and NBCU's diverse workforce. As you note, we did not set numerical goals in our diversity commitments. Both companies comply with affirmative action laws, which require the analysis of underutilization of minorities and the establishment of goals and action plans to remedy any such underutilization. While existing law does not allow employers to set quotas, Comcast and NBCU have elected to take a series of meaningful steps to increase workforce diversity. Comcast requires a diverse pool of candidates for all senior-level hires and at least one person of color on every slate for all positions at the vice president level and above. NBCU also is committed to increasing diversity within its executive ranks and across all levels of employment, including the creation of diverse pools of candidates for all senior-level hires.

Moreover, both Comcast and NBCU support the Emma Bowen Foundation for Minority Interests in Media, and we do and will support similar diversity-oriented internship and training programs. Comcast and NBCU are the two largest supporters of Emma Bowen, which offers a unique five-year internship program for minority students with the opportunity to work for partner companies during summers and school breaks. Comcast and NBCU also sponsor leadership and pipeline programs to develop diverse talent in their workforces. These programs, both internal and external to the companies, help Comcast and NBCU attract and retain qualified diverse employees.

Supplier Diversity

Comcast and NBCU currently spend significant amounts on minority-owned and minority-led suppliers and vendors. Comcast spent more than one billion dollars with minority-owned vendors between 2006 and 2008. Since our formal supplier diversity program began in 2003, the percentage of company-wide spend attributed to diverse suppliers has grown from 7.4% to 11.9% in 2009. In dollar terms, Comcast increased its overall annual spending with diverse suppliers during this period from \$322 million to \$627 million, representing a 95% increase. Since 2006, NBCU increased its diverse spend by 78%. From 2006 to 2009, NBCU spent over \$650 million with diverse suppliers. Both companies have programs to encourage their suppliers to use minority-owned businesses and are committed to strive to increase the percentage of business conducted with minority firms to mirror the percentages in the communities Comcast and NBCU serve.

This commitment to diverse suppliers can also be seen in the recently completed Comcast Center in Philadelphia. Comcast awarded \$100 million worth of vendor contracts to 73 businesses owned by minorities, women, and disabled Americans, representing 45% of the vendors who built the Comcast Center. Minority, women, and disabled owned businesses received 30% of the qualified construction contracts and 60% of the furniture, fixtures and equipment contracts.

Comcast and NBCU will work with the Diversity Advisory Councils to identify additional opportunities for spending with minority-owned suppliers and to provide annual procurement-related data. Moreover, Comcast has committed to continue to evaluate its second tier procurement program and will work to find ways to expand it to create additional opportunities and an even greater impact, including expansion of second tier reporting to encompass more suppliers and automation of the reporting process.

Media Ownership

We believe that the proposed joint venture offers substantial ownership opportunities for diverse entrepreneurs.

We have now committed to add ten independently owned and operated cable networks to our cable systems over the next eight years after the close of the transaction with NBCU. This represents an expansion of the commitment appearing in the Federal Communication Commission (FCC) Public Interest Statement of January 28, 2010, and referenced in your letter. Comcast has committed that at least eight of the ten networks to be added pursuant to this commitment will be networks in which minorities have a majority ownership interest -- at least four of these networks will be networks in which African Americans have a majority ownership interest and at least four will be networks in which Hispanics have a majority ownership interest.

Comcast has also made a substantial new commitment to foster minority media ownership as an outgrowth of this transaction. Comcast has announced that it will establish a venture capital fund to create opportunities for minority entrepreneurs to develop new media content and applications. Comcast will commit at least \$20 million in funding to this new venture upon closing of the transaction with NBCU. The fund will facilitate early stage financing of minority business, including African American businesses.

The only media divestiture that is contemplated in connection with the merger is the sale of KWHY-TV in Los Angeles. As part of this sale, NBCU has established a process to identify potential buyers and has selected the Minority Media and Telecommunications Council (MMTC) as co-advisor for this transaction. MMTC has had demonstrable success in identifying qualified minority buyers in similar divestitures. This process presents a key opportunity for minority ownership in one of the nation's top two largest media markets. In the event of future divestitures of broadcast stations, cable systems, or cable channels, Comcast is committed to aggressively facilitate and to pursue opportunities for minority ownership groups to purchase those assets and will use commercially reasonable efforts to provide first priority to minority ownership groups.

Programming

We appreciate your supportive comments on the many initiatives that the companies are undertaking and will expand upon to promote opportunities within NBCU for diverse programmers and creative talent. For example, NBCU's diverse writers program is a long-term program which does not expire after three years. Each writer spends three years in the program, after which a show is expected to pick up the writer on its staff. New slots are added as writers rotate out of the program and into individual show budgets. We will take your additional suggestions into account as we implement and expand these programs.

We would also bring to your attention the agreement with the Independent Film and Television Alliance (IFTA), made public on July 12, in which we commit to additional actions to open opportunities for independent producers on our broadcast, cable, and new technology distribution platforms. We have enclosed a summary of the Comcast, NBCU, and IFTA Agreement.

Community Investment and Partnerships

We are pleased that you are aware of Comcast and NBCU's deep commitment to community investments and partnerships with the diverse non-profit community. We are intrigued by your ideas on how we might encourage investment and partnerships with for-profit minority companies. We plan to bring your ideas to our Diversity Advisory Councils for further discussion and to seek their help in identifying best practices on the part of other companies.

* * *

Thank you again for your willingness to participate in this important dialogue on diversity issues. We look forward to continuing our productive discussions and relationship. As always, please do not hesitate to contact me if you have any questions or feedback.

Sincerely,



David L. Cohen
Executive Vice President

Enclosures



COMCAST AND NBCU'S SUMMARY OF DIVERSITY COMMITMENTS

Comcast Corporation ("Comcast") and NBC Universal ("NBCU") have made a series of commitments to diverse communities in connection with the joint venture between Comcast and General Electric ("GE") relating to NBCU. Except as otherwise indicated, all of these commitments are new or expand upon current commitments by the companies. These commitments span the organizations' business practices with respect to governance, workforce recruitment and career development, supplier diversity, media ownership, programming, and community and partnership investment.

1. Existing Initiatives and Commitments

Comcast and NBCU will honor their respective existing diversity commitments, including those contained in the diversity memorandum of understanding between NBC and a coalition representing the interests of various minority organizations reached in the year 2000, to the extent the commitments remain relevant. Those commitments will be extended to the programming assets that Comcast will contribute to the newly formed Comcast Entertainment Group upon closing of the joint venture.

2. Governance

Comcast and NBCU: New External Diversity Advisory Councils. Comcast and NBCU will establish four external Diversity Advisory Councils (collectively called the "Joint Council") representative of African American, Latino, Asian Pacific Islander, and other diverse communities, to facilitate open communication on the development, monitoring, and evaluation of the companies' diversity initiatives. Comcast will appoint up to nine (9) members to each Diversity Advisory Council with input from national minority leadership organizations. The Joint Council and each Advisory Council will meet at least two times per year with Comcast's and NBCU's internal Diversity Councils, including an annual meeting with Comcast's Chairman and Chief Executive Officer. In addition, the Diversity Councils will interact throughout the year on diversity issues with representatives of Comcast and NBCU.

The Advisory Councils will provide advice to the senior executive teams at Comcast and NBCU regarding the companies' development and implementation of a strategic plan to improve diversity practices. Comcast will develop a strategic plan, with advice from the Joint Council, to address five critical "Focus Areas" related to diversity – governance, workforce recruitment and career development, supplier diversity, programming, and community investment and partnerships.

Comcast: Benchmarking and Ongoing Reporting. Comcast will conduct a benchmark study of the diversity initiatives in these Focus Areas which it will update annually to facilitate input and recommendations from the Joint Council for strategies to improve performance in the five Focus Areas. Annually, Comcast will provide diversity data to the Advisory Councils related to the five



Focus Areas, subject to a non-disclosure agreement and the understanding that the data will be used only for internal discussions and development of progress reports by the Joint Council.

NBCU: Coalition Reporting. NBCU will continue to report annually on its corporate diversity efforts, with particular emphasis on programming/content, procurement, and pipeline programs, to a Coalition consisting of the following four organizations ("NBCU Coalition"):

National Association for the Advancement of Colored People, Inc. ("NAACP");
American Indians in Film and Television;
National Asian-Pacific American Media Coalition; and
National Latino Media Council.

NBCU's Chief Diversity Officer will consult quarterly with each of these NBCU Coalition members on diversity issues.

Comcast and NBCU: Diversity Oversight. Comcast and NBCU each will continue to support their respective internal Diversity Councils. Each organization also will provide annual reports to the Joint Council analyzing success in achieving diversity objectives and offering recommendations for improvement.

3. Workforce Recruitment & Career Development

Comcast and NBCU: Increased Minority Representation: Comcast and NBCU are committed to be industry leaders in the arena of workforce diversity. Both organizations commit that they will increase minority representation at all levels of their respective organizations and will recruit and retain more minorities so that their workforces more accurately reflect the communities they serve.

Comcast and NBCU: Joint Council Input on Recruitment and Leadership Development. Comcast and NBCU will seek the advice of the Joint Council in reviewing and selecting executive leadership development programs, recommendations for minority-owned executive search firms that may be helpful in finding and retaining diverse talent, and assistance in the development of internship programs aimed at exposing college and university-level students to career opportunities.

Comcast and NBCU: Career Path Programs. Comcast and NBCU will continue to develop career-path programs, including mentoring programs, designed to enhance the promotion potential of identified diverse talent, moving individuals from entry-level, to mid-level, to senior management.

Comcast and NBCU: Minority Internship and Scholarship Programs. Comcast and NBCU will increase support for programs focusing on the growth and development of minorities, such as the Emma L. Bowen Foundation for Minority Interests in Media ("Emma Bowen Foundation") and similar internship and scholarship programs focusing on diverse communities (see further discussion of Emma Bowen Foundation under Programming and Community Investment and Partnerships below). As part of these initiatives, Comcast will design and establish programs in partnership with local institutions for minority secondary education students a curriculum that will equip them with advertising, sales and marketing, and technical skills and experience to help facilitate their entry into the cable industry in positions such as technicians, engineers, and advertising/marketing.



Comcast: Workforce Diversity Initiatives. In addition, Comcast will implement the following workforce diversity initiatives:

- **Diversity Forum.** Develop a diversity forum and action plan to increase director-level representation of minorities;
- **Focus Groups.** Create minority focus groups with the objectives of gaining insight, creating opportunities, and identifying high potential employees;
- **Boot Camp.** Implement a boot camp program for mid-level vice president candidates which will include not less than 80% diverse candidates; and
- **Search Firms.** With the cooperation of the Advisory Councils, identify search firms with track records of successfully recruiting diverse pools of talent to partner with the company in identifying diverse leaders.

Comcast: Senior Position Candidate Pools. Comcast will enhance minority representation in the leadership ranks of the organization by requiring a diverse pool of candidates for all hires at the vice president level and above, including the commitment to have at least one person of color on every slate for all such hires.

NBCU: Diverse Senior Level Executives. NBCU will focus on hiring opportunities for diverse senior level executives in development, production, casting, marketing, legal/business affairs, and distribution.

Comcast and NBCU: Workplace Diversity Training Programs. Both Comcast and NBCU have active workplace diversity programs that include training on diversity issues. Both organizations are committed to exploring ways in which to expand their respective programs, including, for example, in the case of NBCU, by offering a new online diversity training module for its regular employee base.

4. Supplier Diversity

Comcast and NBCU: Increased Spend on Diverse Suppliers. Comcast and NBCU will enhance diversity in their procurement of goods and services and company-wide supplier diversity activities, increasing the amount spent on diverse business partners, including minority-owned enterprises. On a nationwide basis, Comcast and NBCU will strive to increase the percentage of business conducted with minority-owned vendors to be on par with the percentage of minority-owned businesses in the communities they serve.

Comcast and NBCU: Increased Partnerships with Diverse Organizations. Comcast and NBCU will partner with diverse organizations to enhance the utilization of minority-owned enterprises, specifically minority-led chambers of commerce and/or other minority-led business organizations, at the national, regional, and local levels.



Comcast and NBCU: Joint Council Input on Minority Suppliers. Comcast and NBCU will seek advice from the Joint Council to identify opportunities for spending with minority-owned suppliers in agreed-upon categories.

Comcast and NBCU: Second Tier Procurement Programs. Comcast and NBCU have "second tier" procurement programs designed to encourage their top suppliers to purchase goods and services from minority-owned vendors. As part of these programs, Comcast and NBCU encourage their largest vendors to report quarterly on their spending with minority-owned vendors. Comcast and NBCU will expand their programs to create additional opportunities and an even greater impact, including expanding of second tier reporting to encompass more suppliers as well as automation of the reporting process.

Comcast and NBCU: Banking. Comcast will grow the diversity of its investment banking and banking partners through its minority banking program and through the development and expansion of relationships with minority investment firms. After the closing, NBCU will participate in Comcast's minority banking initiative. Comcast has established banking relationships with numerous minority-owned financial institutions and has included them in the creation and syndication of numerous credit facilities. Where practicable, NBCU will be a depositor in these institutions.

Comcast and NBCU: Advertising Spend. In 2011, following the close of the transaction, Comcast and NBCU jointly will commit at least an additional \$7 million in spending on advertising with minority-owned media.

Comcast and NBCU: Law Firms. In 2010, Comcast became a founding partner in the Inclusion Initiative, a collaborative effort among several publicly held corporations designed to increase significantly business opportunities for law firms owned by diverse individuals. The overall goal for this initiative is \$30 million, of which Comcast has committed \$1 million. As part of the Inclusion Initiative, Comcast will use its best efforts to retain minority-owned law firms that participate in the Initiative. Further, NBCU commits post-close to expand its business with minority-owned law firms. NBCU will establish a working relationship with one or more minority firms in at least three cities where it has headquarters operations – New York City, Los Angeles, and Washington, D.C. In addition, NBCU will commit to have its General Counsel meet annually with the executive director of the National Association of Minority and Women Owned Law Firms ("NAMWOLF") and the senior executive of the National Bar Association to review NBCU's outreach efforts to minority-owned law firms and review its efforts to expand the amount of business that NBCU does with minority-owned firms.

5. Media Ownership

Comcast: New Independently-Owned and -Operated Cable Networks. It is Comcast's intention to ensure that there are substantial opportunities for diverse programmers to benefit from its commitment to add ten new independently-owned and -operated cable networks to its systems over the next eight years after the close of the transaction with NBCU. This represents an expansion of the commitment appearing in the Federal Communication Commission ("FCC") Public Interest Statement of January 28, 2010. To that end, Comcast commits that at least eight of the ten networks



to be added to its systems pursuant to this eight-year pledge will be networks in which minorities have a majority ownership interest. Comcast commits that at least four of these networks will be networks in which African Americans have a majority ownership interest and at least four of these networks will be networks in which Hispanics have a majority ownership interest.

Comcast: Venture Capital Fund. Comcast will establish a venture capital fund intended to expand opportunities for minority entrepreneurs to develop new media content and applications. Comcast is prepared to commit at least \$20 million in funding to this new venture upon closing of the transaction with NBCU. The fund will be housed within Comcast Interactive Capital, the company's venture capital arm, and will facilitate early stage financing of minority businesses (including African American businesses). Investment discretion will rest with the manager of the Fund. Further details on the Fund will be released this Fall.

NBCU: LA. Station Divestiture. NBCU has agreed to divest its ownership interest in KWHY-TV, an independent Spanish-language broadcast station in Los Angeles. This process presents a key opportunity for minority ownership in one of the nation's top two largest media markets. NBCU has committed to use its best efforts to ensure that this station is sold to a minority-controlled ownership group. To facilitate this opportunity, NBCU has established a process to identify potential buyers and has selected the Minority Media and Telecommunications Council ("MMTC") as co-advisor for this transaction. MMTC has had demonstrable success in identifying qualified minority buyers in similar divestitures.

In the event these efforts do not result in the sale of KWHY-TV, the station license and assets will be placed in a divestiture trust at the closing of the proposed transaction. If this becomes necessary, MMTC will work with the trustee to effectuate the sale to a qualified third party. On May 17, 2010, an application was filed seeking FCC consent for the assignment of KWHY-TV to a divestiture trust. NBCU and MMTC will remain actively engaged in efforts to sell KWHY-TV while the application for assignment to the divestiture trust is pending.

Comcast and NBCU: Minority Buyers for Media Assets. Although no additional divestiture of media assets is contemplated in connection with the NBCU transaction, Comcast is committed to having an appropriate sensitivity to minority ownership issues in the event media assets are divested in the future, including involvement of specialists to identify minority buyers for any future asset sales. In the event of future divestitures of broadcast stations, cable systems, or cable channels, Comcast is committed to aggressively facilitate and pursue opportunities for minority ownership groups to purchase those assets and will use commercially reasonable efforts to provide first priority to minority ownership groups.

6. Programming

Comcast and NBCU: Expansion of Minority Programming. Comcast Cable and NBCU are committed to expanding minority-focused programming and will have discussions with the external Diversity Advisory Councils representing each minority community about measures that can be taken to achieve this objective for their respective communities.



Comcast and NBCU: Enhancing Diversity in Programming. Comcast and NBCU are committed to expanding the presence of minorities both in front of and behind the cameras. In furtherance of this commitment, Comcast and NBCU commit to build on previous and current efforts to increase and improve the presence of minorities throughout all its programming, including entertainment, news, sports, and public affairs programming.

Comcast: Expanded Services and Competitive Pricing. Comcast Cable is committed to maintain and improve its track record in bringing diverse programming to its subscribers. Moreover, Comcast Cable remains committed to providing competitive and affordable video services to its customers, including its minority customers. As part of its regular meetings with the external Advisory Councils, Comcast will review the pricing and packaging of its minority-oriented programming.

For example, Comcast currently carries African American-controlled and -operated programming and also non-African American-owned entities that target the African American community with programming services. Working with programmers, Comcast will extend carriage of this type of programming in key market systems, including key African American market systems, within six months of closing of the transaction.

Comcast: Expansion of Diverse Video On Demand ("VOD") Content. On Demand and On Demand Online are dynamic and innovative platforms, and Comcast intends to help opportunities for owners of diverse content to utilize them. On Demand affords independent and minority owners of content with an unparalleled opportunity to reach niche audiences in a direct way and with scheduling directed by the viewers' time preference. As Comcast expands On Demand and On Demand Online, it will focus on ways to ensure that independent and minority owners of content can take advantage of these next-generation platforms. Comcast Cable also will continue to work with content providers to deliver minority-oriented content on its online Fancast Xfinity platform.

- **African American Content.** Comcast Cable recently launched Black Cinema On Demand, a VOD channel that celebrates black films, filmmakers, and actors past, present and future, focusing on the wide range of experiences, accomplishments, and points-of-view of black people as expressed through the artistic medium of film. In addition, Comcast Cable features On Demand programming that delivers a variety of television, entertainment, and music choices from various networks and programs that target African American audiences, including Black Entertainment Television (BET), H2O (Hip Hop On Demand), and recently acquired Soul Train content.
- **Asian Content.** This fall, Comcast Cable will launch Asian Cinema On Demand that will feature films from across the Asian Pacific Islander diaspora that highlight the experiences, accomplishments, and points-of-view of this community as expressed through the artistic medium of film. This permanent platform will allow Comcast Cable to work with Asian Pacific Islander English-language content developers and will be programmed by experts in the Asian Pacific Islander film space. This channel will be available 24 hours a day, 365 days a year; contain 20 hours of content; be refreshed up to 100% a month but no less than 50%; and will include a specific marketing plan developed to promote the offering.



- **Latino Content.** Within twelve months of the transaction closing, Comcast Cable plans to launch Hispanic Cinema On Demand featuring Latino-themed movies. In addition, Comcast Cable will use its On Demand and On Demand Online platforms to feature Telemundo programming and to continue expanding the availability of NBCU's mun2 (MunDos). Comcast Cable will use these platforms to increase programming choices available to children and families, as well as to audiences for Spanish-language programming. Within three years of closing the transaction, Comcast Cable has committed to add 1,500 additional programming choices appealing to children and families and 300 additional programming choices from Telemundo and mun2 to its On Demand platform.

Comcast: Continued Reliance on Unaffiliated Content. There is no prospect that the proposed transaction with GE and NBCU will diminish Comcast's reliance on unaffiliated content. Following consummation of the proposed transaction, Comcast will continue to rely on other content providers to provide the vast majority of its video content. Comcast will not rely exclusively or even primarily on NBCU content.

NBCU: Entertainment Programming. With respect to entertainment programming, NBCU makes the following commitments:

- **Building Diverse Relationships.** NBCU commits to double (from two to four) the number of formal networking events hosted each year to provide information on employment opportunities for diverse directors, writers, and directors of photography with its senior executives (at the president, executive vice president, senior vice president, and vice president levels) in the feature, broadcast, cable, and digital divisions of NBCU.
- **Diverse Writers Program.** To promote diversity among its writers, NBCU commits to continue to fund diversity writer positions for three years, selected by the show-runner/producer, for each of its scripted series on the NBC broadcast network and for each of NBC's three late night programs. In addition, NBCU commits to expand this program to fund a diverse writer position on each scripted series on NBCU's cable networks.
- **Directors Fellowship Program.** NBCU will continue to sponsor this important shadowing program, which offers diverse participants a developmental opportunity with a DGA director, as well as exposure to other aspects of NBCU Television Studios production.
- **Casting (TV and Film).** NBCU will commit to use its influence to encourage diversity among the freelance casting directors hired in connection with the production of NBCU programming. In addition, NBCU will create a casting associates program for TV and film with an emphasis on diversity in what would be a model for the industry.
- **Professional Development Programs.** NBCU will continue to support the following four pipeline development programs offering hands-on experience in programming development and management, and other areas of NBCU's business: Entertainment Associates, NBCU/Canada Fellowships, the Universal Pictures Leadership Program, and multiple NBCU Internship Programs.



- **Benchmarking and Reporting.** NBCU commits to report annually to the Joint Council on the diversity of: (i) on-camera talent in regular, recurring, and guest roles in both scripted and reality TV programming, as well as to continue annual reporting in those areas to the members of the NBCU Coalition; and (ii) production executives (directors, writers) in primetime TV programming. NBCU will expand this annual report by including the diversity of the producers and executive producers of primetime TV series. NBC also commits to continue quarterly meetings with each NBCU Coalition member to seek input on ways for NBC to increase diverse participation in each category.

NBCU: News Programming. With respect to news programming, NBCU makes the following commitments:

- **News Associate Program:** NBC's News Associate Program is a highly competitive program that identifies outstanding aspiring journalists who bring diverse backgrounds to news production and news coverage. NBCU will expand this program beyond NBC News to also include the NBC-owned and -operated stations' news departments. This means an expansion annually from six to twelve News Associates.
- **Diversity Leadership Program.** NBCU will explore ways to expand its Diversity Leadership Program, through which NBC News operates a mid-career program designed to train diverse producers and associate producers for executive producer roles. The program lasts for 18 months and involves monthly workshops, business, and finance seminars, "shadowing" days with key senior executives, individual mentoring, and presentation skills training. The program enrolls eight to ten high potential journalists every 18 months.
- **Recruitment Outreach to Minority Journalists.** NBC recruits every year at the annual conventions of the National Association of Black Journalists ("NABJ"), National Association of Hispanic Journalists ("NAHJ"), Asian-American Journalists Association ("AAJA"), National Lesbian & Gay Journalists Association, Native American Journalists Association ("NAJA"), and South Asian Journalists Association. Representatives of NBC News, NBC Sports, Local Media, and Telemundo contribute on all levels to seminars, career fairs, and student networking events, resulting in the tracking and hiring of diverse candidates. NBCU will explore ways in which this recruitment outreach can be expanded.
- **Meetings with Congressional Caucuses.** NBCU commits to annual meetings between the President of NBC News and the NBC News D.C. Bureau Chief with the Congressional Black Caucus, the Congressional Hispanic Caucus, and the Asian-American Caucus, to discuss diversity practices as they affect the News Division.
- **NBC News Summer Fellowship Program.** NBCU will explore ways to expand its News Summer Fellowship Program, under which NBC sponsors two (2) paid internships every summer for nominees from each of three organizations: NABJ, NAHJ, and AAJA. These six (6) paid interns are selected jointly every year by the individual organizations and NBC News. NBCU will expand its news internships and increase to a minimum of nine paid internships annually with NABJ, NAHJ, and AAJA (three each year per organization), while



also seeking to extend the program to NAJA, to foster the careers of aspiring diverse journalists.

NBCU: Programming Leadership Diversity. NBCU commits that it will continue to take steps to increase the diversity of its executives in each of the following areas: development (television and film); production (television and film); and marketing (television and film). NBCU will work diligently to ensure that key slates for executive openings include diverse candidates identified either through leveraging internal succession plans or using external sources, such as recruiting firms that have strong expertise and track records in identifying diverse candidates within these fields, as needed or appropriate.

NBCU: Telemundo Newscasts. Telemundo just introduced a comprehensive news strategy to enhance and expand its news content across multiple platforms, including an increased investment in local newscasts at the Telemundo stations. This will include the launch of a weekly public affairs show in the first half of 2010. Comcast Cable and NBCU are committed to the production of local newscasts in the communities where stations are located. Further, as a result of the joint venture, NBCU will not reduce the number of current local Telemundo newscasts and will consider expanding local Telemundo newscasts. NBCU will continue to expand local content in Telemundo station newscasts.

NBCU: Emma Bowen Foundation. NBCU is one of the largest supporters of the Emma Bowen Foundation, a preeminent organization dedicated to preparing minority youth for careers in the media industry. NBCU has sponsored more than 100 students, a significant number of whom have taken positions at NBCU and elsewhere in the industry. NBCU commits to continuing as an industry leader in this program and will expand its participation in and support of the program by sponsoring at least 50 students annually for the next five years, as well as continuing to house the Foundation in its Washington, D.C. offices and providing administrative support to the organization on a *pro bono* basis.

7. Community Investment & Partnerships

Comcast and NBCU: Ten Percent Increase in Community Investment. Comcast and NBCU commit to increase their philanthropic efforts to support minority-led and minority-serving institutions and to establish more specific benchmarks for their investment activities in minority communities in consultation with the Joint Council. Upon closing of the transaction, Comcast is prepared to increase its community investment spend on minority-led and minority-serving institutions by 10% per year for each of the next three years. Similarly, NBCU will increase its funding by 10% per year for each of the next three years in the areas of community-based philanthropic focused organizations that serve youth and family in under-served communities and community engagement organizations with broad missions of serving diverse communities.

Comcast: Community Investment and Partnership Programs. Comcast will enhance its investment in diverse communities and its partnerships with diverse organizations by taking the following steps.



- **Comcast Leaders and Achievers Scholarship Program.** Comcast will increase outreach to diverse students and schools for The Comcast Leaders and Achievers Scholarship program.
- **Internship and Scholarship Programs.** Comcast remains the largest supporter of the Emma Bowen Foundation internships. Comcast will increase its support for this program and similar internship and scholarship programs and will seek to enhance participation of minority students in these programs. In addition, Comcast will work with its Human Resources Department to ensure that graduates of these programs are being considered for entry level positions.
- **Beyond School Walls Program.** Through the Big Brothers Big Sisters Beyond School Walls program, Comcast will ensure that school assignments are in diverse communities.
- **Comcast Cares Day.** Comcast will expand its Comcast Cares Day focus to add organizations being served in diverse communities and to increase the number of organizations that are serving diverse beneficiaries.
- **Comcast Digital Connectors Program.** Comcast will ensure that locations of its programs through the Comcast Digital Connectors program (in partnership with One Economy) are in diverse communities.
- **Promotion of Diverse Partnerships.** Comcast will promote and communicate the positive work and impact of its diverse partners, including increases in public service announcements, social media communications, advertising, and media placement, both locally and nationally.

Summary of Agreement among Comcast Corporation ("Comcast"), NBC Universal, Inc. ("NBCU"), and the Independent Film & Television Alliance ("IFTA")

Overview: Comcast, NBCU, and IFTA have agreed to take certain actions to provide enhanced opportunities for programming produced by independent producers to be considered for Comcast and NBCU platforms (the "Agreement"). The Agreement covers scripted entertainment programming as well as unscripted ("reality") entertainment programming on the NBC Network during primetime, on the NBCU cable entertainment networks, and on Comcast's video-on-demand ("VOD") and online platforms. The commitments in the Agreement are generally applicable for a period of four years beginning on June 1 following the closing of the Comcast/NBCU joint venture.

- Development Meetings. NBCU will schedule each year a presentation outlining for Independent Producers its upcoming scripted and reality programming needs. The term "Independent Producer" includes both IFTA and non-IFTA producers/production companies, and is generally defined as a producer/production company that: (i) is not part of a vertically-integrated company; (ii) is either an IFTA member, or is among those non-IFTA member companies that would not be considered a "major" independent supplier; (iii) is financially able to deficit finance network-quality scripted series or longform programming or appropriately finance reality programming; and (iv) has had at least three projects in development at (or has produced at least one project that has been exhibited by) a broadcast network or a basic or pay cable entertainment network within five years preceding the date of the applicable Development Meeting. IFTA will provide an invitation list of up to 200 Independent Producers, working with its members and with other independent producers and organizations.
- Pitch Meetings. NBCU will set up annual meetings with creative executives from NBCU's entertainment networks to take series pitches from Independent Producers.
 - The Independent Producers will be referred by IFTA based upon NBCU's stated needs with the goal of having presentations by a diverse group of producers. NBCU may submit Independent Producers to IFTA for inclusion in the process.
 - Independent Producers who are not members of IFTA will not be unreasonably excluded from the process by IFTA, and Independent Producers may be selected for pitches even if they did not attend the Development Meeting.
 - In the six-month period following each Development Meeting, NBCU's cable group will take at least 15 pitches and its broadcast group will take at least 20 pitches as part of this process. NBCU may also take pitches from Independent Producers in addition to those taken as part of this process.
 - NBCU's Digital Studio executives may also participate in the pitch meetings in order to evaluate the presentations for potential digital platform opportunities.
- Allocated Development Funds. Each year, the NBC Network will allocate \$1 million in development funds and, separately, the NBCU cable entertainment networks will allocate \$500,000 in development funds (collectively, the "Allocated Development Funds").

- o The Allocated Development Funds will be exclusively dedicated to supporting early development of new projects from Independent Producers as part of this process, and will be disbursed by NBCU directly to such Independent Producers in such amounts and allocations as NBCU determines is appropriate but seeking to provide funds to multiple projects/Independent Producers.
 - o NBCU will provide IFTA an annual report setting forth the projects and Independent Producers to which the Allocated Development Funds were allocated.
- Advertiser-Sponsored Movies of the Week (“MOWs”). The NBC Network will facilitate formal introductions of Independent Producers of MOWs to advertisers looking to produce fully-sponsored MOWs that will be supplied to the NBC Network on a time-buy basis as the company’s sales and programming needs dictate.
- Acquisition of Feature Films and Other Programming. To the extent the NBCU cable networks license MOWs or mini-series or seek to acquire feature films, their executives or employees will take submissions of professionally produced, completed MOWs, miniseries or films from Independent Producers at agreed upon times and locations including the American Film Market in a good faith effort to consider independent programming for such slots. The definition of “Independent Producer” for purposes of this provision includes only parts (i) and (ii) of the general definition set forth above.
- New Media Distribution. Comcast commits to meet with IFTA to develop a plan to simplify the method by which Independent Producers license their content to Comcast for distribution on New Media platforms.
 - o Comcast and IFTA will work toward the goal of developing a process within three (3) months of the Agreement for Comcast Cable to evaluate content for its New Media platforms from Independent Producers.
 - o The definition of “Independent Producer” for purposes of this provision includes only parts (i) and (ii) of the general definition set forth above.

APPENDIX S



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August 6, 2010

The Honorable Michael M. Honda
Chair, CAPAC
1713 Longworth HOB
Washington, DC 20515

The Honorable Judy Chu
Chair, CAPAC Economic Development Task Force
2421 Rayburn HOB
Washington, DC 20515

Re: Comcast/NBCU

Dear Representatives Honda and Chu:

I am writing in response to your July 15, 2010, letter to Brian L. Roberts, CEO and Chairman of Comcast Corporation, and me, regarding the proposed joint venture between Comcast and General Electric relating to NBC Universal (NBCU). Thank you for giving us the opportunity to discuss how this transaction and our diversity-related commitments will benefit the Asian American and Pacific Islander (AAPI) community and provide meaningful opportunities to strengthen our growing partnership for many years to come. I especially want to thank you for the thoughtful discussion during our meeting on July 28, 2010. I appreciate your candor and look forward to continuing our work together. We are pleased to work with your offices, the Congressional Asian Pacific American Caucus (CAPAC), and leading AAPI organizations moving forward.

Well before we announced this transaction, we recognized the value of diversity in many areas of our business and engaged the AAPI community, its organizations, and its leadership in a variety of mutually beneficial respects. Comcast values its relationship with all diverse communities, including the AAPI community, because we believe that maintaining a strong connection to the people we serve is integral to our long-term success. As a result, we have announced significant measures to assure all diverse communities, including the AAPI community, that the Comcast/NBCU transaction is good for diversity and that diversity will be a priority for the new company.

In your letter, you refer to the Summary of Diversity Commitments prepared by Comcast and NBCU highlighting the commitments we have made. To ensure you have updated information, we are enclosing a copy of the latest version of the Summary which was submitted for the record at the July 8, 2010, hearing of the House Subcommittee on Communication, Technology, and the Internet in Chicago. This Summary includes the commitments made in the course of our dialogue with various national diversity leaders, representing the rich tapestry of American society. We also are enclosing a document which summarizes Comcast's achievements and commitments with respect to the AAPI community, in particular.

As you correctly note, Comcast has stated publicly its commitment to be an industry leader in the arena of diversity. We are confident that the complete set of the commitments we have made is the most significant advancement of diversity in the history of modern communications. In programming, ownership, and other areas, the Comcast/NBCU commitments are a model for others in the media, entertainment, and communications industry to follow.

Workforce Diversity and Corporate Governance

Comcast has made significant progress in retaining diverse and talented AAPI employees in important segments of our business. We employ 3,400 members of the AAPI community. This represents a 61 percent increase over the past seven years. Over 600 members of Comcast's leadership and management teams are from the AAPI community, representing 43 percent of our minority managers. Members of the AAPI community hold various executive and other leadership positions within Comcast, including key roles in Comcast Interactive Media, Finance and Accounting, Government Affairs, Strategy and Development, Marketing, Technical Research and Development, and Comcast SportsNet, among others.

Despite these positive trends, Comcast recognizes that our commitment to diversity is a continuing effort. Hence, we are determined to increase minority representation at all levels of our company by recruiting and retaining more minorities so that our workforce more accurately reflects the communities we serve. For example, with respect to diversity in our leadership ranks, Comcast has committed that at least one person of color will be on every slate for all positions at the vice president level and above, including the company's executive and business leadership position.

As for recruitment pipeline programs, Comcast and NBCU provide substantial support for diversity-oriented internship and training programs, including, for example, the Emma Bowen Foundation for Minority Interests in Media. Comcast and NBCU are the two primary supporters of the Emma Bowen Foundation, which offers unique five-year internships that allow minority students to work for partner companies each summer and on school breaks. This program has opened doors for many minority candidates, and 15 percent of Comcast's Emma Bowen Foundation interns this year are from the AAPI community. Today, Comcast employs six former Emma Bowen Foundation interns, NBCU employs 10, and many others have gone to work in the media industry. Comcast also sponsors leadership and pipeline programs to develop diverse talent in its workforce and has outreach programs with the Leadership Education for Asian Pacific Americans and the National Association of Asian American Professionals. Moving forward, we believe the establishment of the AAPI Diversity Advisory Council, discussed below, will play an important role in further enhancing diversity within our company's leadership.

Regarding the Comcast Board of Directors, it is important to understand that we have a relatively small Board with limited opportunity to add directors. The stability within the Board has guided Comcast from a small market cable operator to a successful national company. Nominees to the Comcast Board are determined by the Governance and Directors Nominating Committee, which consists entirely of independent directors. As we discussed, diversity is an important criterion considered by the Committee, along with a variety of other factors, including professional knowledge; business, financial, and management expertise; industry knowledge; and entrepreneurial background and experience. As I explained during the meeting, while Comcast cannot commit to adding an AAPI director within any specific time frame, we recognize that this issue is important. The Governance and Directors Nominating Committee will continue to make diversity a critical consideration in future board nominations. Simply put, diversity is a priority for us, and the AAPI community is an important part of that priority. Moreover, as discussed below, we have taken steps to ensure that the views, perspectives, and concerns of all diverse communities are considered in our business planning and decision-making processes.

Diversity Advisory Councils

We are very pleased that you support the creation of the external Diversity Advisory Councils, including a Council composed of representatives of the AAPI community. The Advisory Councils will facilitate open communication with Comcast and NBCU in the development, monitoring, and evaluation of diversity initiatives. They also will provide advice to the senior executive teams at Comcast and

NBCU regarding the companies' development and implementation of a strategic plan to improve diversity practices, with emphasis on the five focus areas referenced in our diversity-related commitments and your letter: (1) workforce recruitment and career development; (2) supplier diversity; (3) programming; (4) community investment and partnerships; and (5) governance. This will be accomplished through meetings with senior Comcast and NBCU executives.

We have committed that the Diversity Advisory Councils will have the resources they require to perform their functions. The members of the Advisory Councils will have the opportunity to interact with the existing internal Comcast and NBCU Diversity Councils between formal meetings of the Joint Advisory Council, including additional meetings on an as-needed basis to offer advice on the strategic plan and to discuss progress under the plan. Also, the chief diversity officers of Comcast and NBCU will designate appropriate staff members to serve as liaisons to the Advisory Councils to, among other things, facilitate communication between the Advisory Councils, Comcast, and NBCU concerning our activities in the focus areas.

In addition, Comcast will conduct a benchmark study of the diversity initiatives in all five focus areas, which will be updated annually to facilitate input and recommendations from the Joint Advisory Council for strategies to improve performance in these areas. Annually, Comcast will provide diversity data to the Joint Advisory Council related to the five focus areas. This data will help the Joint Advisory Council monitor and evaluate Comcast and NBCU's diversity efforts. We will work out the nature of the data to be presented, and the confidentiality of that data, with the Joint Advisory Council.

With these resources and regular interaction with senior Comcast and NBCU executives, we are confident the Joint Advisory Council will have the opportunity to provide meaningful advice that will improve our diversity goals and achievements.

On-Demand Channel Featuring AAPI Content and Original AAPI Media Content

We understand your disappointment with the closing of the AZN Television Network in 2008. Comcast operated AZN for almost four years and invested approximately \$25 million in the network. Despite our best efforts, AZN was unsustainable for three principal reasons: (1) it was never widely distributed by other multichannel video programming distributors (satellite, phone, and cable); (2) it did not attract audiences in substantial numbers; and (3) advertisers did not support AZN as a means of reaching the AAPI audience. While our experience with AZN was disappointing, it demonstrates that Comcast's interest in serving our customers with rich and authentic AAPI content predates this transaction.

Today, Comcast continues to offer a robust variety of programming featuring the AAPI community or aimed at AAPI viewership. Comcast carries more 30 cable networks geared toward this community, including content from AAPI providers, such as KOAM TV, TV Asia, Washington Korean TV, World Today TV, STAR India PLUS, Zee TV, STAR One, VIJAY, GMA Pinoy TV, Phoenix North America, CTI-Zhong Tian, and Saigon Broadcasting Television Network (SBTN). As part of its subscription Video On Demand (VOD) services, Comcast offers Filipino On Demand, which has up to 40 choices of movies and celebrity concerts from the Philippines; and Bollywood Hits On Demand, which features 100 choices of content from India.

In addition, Comcast launched MYX, an Asian-owned English-language network carried broadly in California, which delivers programming targeted at the younger AAPI audience. Comcast also is a significant investor in SBTN and tvK24, two channels focused on Vietnamese Americans and Korean Americans, respectively. Additionally, Comcast has partnered with the Center for Asian American Media

(CAAM) for the creation of new programming, with the goal of creating On Demand programming that advances our goal to provide a library of content that viewers can tailor to their lifestyles.

Our support of CAAM has been quite significant over the years. Comcast has partnered with CAAM in sponsoring the San Francisco International Asian American Film Festival, the largest festival featuring AAPI films. Comcast has funded this film festival for the past three years, and supported the creation of originally produced programming, some of which has been featured in Comcast's AAPI Heritage Month offering. This year we provided substantial resources to CAAM, in the form of public service announcements, local Newsmakers spots, direct mailings, and banner advertisements, to market and promote this content-rich offering. In addition to movies, we offered music videos, children's programming, and special programming, such as documentary-style programs.

We are pleased you share our enthusiasm for Asia Cinema On Demand (ACOD). This service will be launched this fall in major AAPI markets, with more markets to follow. ACOD will be part of Comcast's standard digital package, so it will be available to over 18 million subscribers. It will be a permanent service through which Comcast can work with AAPI English-language content developers, and it will be programmed by an AAPI curator who has expertise in AAPI arts and culture. ACOD will be available 24 hours a day, 365 days a year. At the outset, it will contain 20 hours of content, and 50 to 100 percent of its content will be refreshed monthly. To ensure that this offering is successful, Comcast is in the process of developing a multiplatform marketing campaign, which includes an On Demand "barker" (a 20-minute F! Network-produced looped promotional reel which highlights select On Demand content offerings), a placement in "Top Picks," e-mails to over nine million Comcast customers, and promotions on Comcast's ground-breaking online site, XFINITY TV. And to maximize the likelihood of ACOD's success, Comcast will work with marketing firms familiar with the AAPI community.

NBCU is proud to feature AAPI community members both in front of and behind the camera. In particular, AAPI actors and actresses appear in strong, positive roles in popular NBCU cable shows such as Bravo's *Top Chef*, *Top Chef Masters*, *Work of Art*, and *Double Exposure*, USA Network's *Covert Affairs* and *Royal Pains*, and Syfy Network's *Ghost Hunters International*, *Beast Legends*, *Ghost Hunters Academy*, *Sanctuary*, and *Stargate: Universe*. Members of the AAPI community also can be seen in NBC's 2010-2011 primetime season in several returning series, including *The Office*, *Chuck*, *Parks and Recreation*, *Community*, and *Law and Order: SVU*, as well as in new series debuting this season, including *Perfect Couples*, *Love Bites*, *The Event*, and *Outsourced*, which features five East Indian actors. In addition, MSNBC has recently announced that two highly regarded AAPI journalists, Martin Bashir and Richard Lui, will join its news team. Mr. Bashir will anchor a 4:00 pm news show beginning in the fall, and Mr. Lui will become a key anchor on MSNBC *Jayside* beginning on August 30, 2010.

To promote diversity among its writers, NBCU has committed to continue funding a diversity writer position (selected by the showrunner/producer) for each of its scripted series on the NBC broadcast network and for each of NBC's three late-night programs. In addition, NBCU has committed to expand this program to fund a diverse writer position on each scripted series on NBCU's cable networks. NBCU will continue to sponsor programs that give minorities, including members of the AAPI community, the opportunity to work with NBCU professionals, including its Director's Fellowship program, casting initiatives, and other professional development programs.

Beyond NBCU's strong record on the small screen, NBCU's film subsidiaries, Universal Studios and Focus Features, also share a history of working with diverse talent on the big screen. For example, Focus Features has worked with one of today's leading directors -- Ang Lee -- and is proud that Focus produced and distributed Mr. Lee's award-winning film, "Brokeback Mountain." After this transaction, we will continue to seek opportunities to work with AAPI directors, such as Mr. Lee and others. This is an important part of NBCU's past, and Comcast is committed to supporting its continuation.

AAPI Media Ownership

Comcast's commitment to minority ownership spans numerous media platforms. NBCU has agreed to divest its ownership interest in KWHY-TV, an independent Spanish-language broadcast station in Los Angeles. As part of this sale, NBCU has established a process to identify potential buyers and has selected the Minority Media and Telecommunications Council (MMTC) as co-advisor for this transaction. MMTC has had demonstrable success in identifying qualified minority buyers in similar divestitures. This process presents a key opportunity for minority ownership in the second largest media market. While no additional divestitures of media assets are contemplated in connection with the NBCU venture, in the event of future divestitures of broadcast stations, cable systems, or cable channels, Comcast is committed to aggressively facilitate and pursue opportunities for minority ownership groups to purchase those assets and will use commercially reasonable efforts to provide first priority to minority ownership groups. Also, as Comcast expands On Demand and On Demand Online, we will focus on ways to ensure that independent and minority owners of content can take advantage of these next-generation platforms.

You may also be aware that Comcast made a substantial new commitment to foster minority media ownership as an outgrowth of this transaction by establishing a venture capital fund to create opportunities for minority entrepreneurs, including those in the AAPI community, to develop new media content and applications. Comcast will commit at least \$20 million in funding to this new venture upon the closing of the NBCU transaction.

As we noted earlier, Comcast Cable carries more than 30 channels geared toward the AAPI community. We also carry AAPI broadcast channels where they are available in markets with significant AAPI populations. For example, in the San Francisco Bay Area, we carry KTSF and KCNS on our basic level of service. Also, based on the needs of that market, we carry three (and soon to be four) multicast channels (KBS, NHK, and KEMS) with AAPI programming. Each of these channels reaches well over a million of our subscribers in the Bay Area. Similarly, in Seattle, we carry a multicast channel (KPST) that has programming geared to the AAPI audience. On our VOD platform, Comcast will provide 85 hours of content for the AAPI community this fall after the launch of ACOD. Comcast Cable's carriage of AAPI-targeted networks and programming (the overwhelming majority of which are owned and operated by members of AAPI community) is significant. Nevertheless, in order to continue making strides in this area, we are willing to discuss with AAPI organizations the prospect of a new AAPI-owned channel.

Commitment to Increasing Supplier Diversity

Comcast has committed to increase its use of diverse suppliers. On a nationwide basis, we will strive to increase the percentage of business conducted with minority-owned vendors to be on par with the percentage of minority-owned businesses in the communities we serve.

Comcast spent more than \$1 billion with minority-owned vendors between 2006 and 2009, including vendors in the AAPI community. Since our formal supplier diversity program began in 2003, the percentage of company-wide spend attributed to diverse suppliers has grown from 7.4 percent to 11.9

percent in 2009. In dollar terms, Comcast increased its overall annual spending with diverse suppliers during this period from \$322 million to \$627 million, representing a 95 percent increase. In 2009 alone, Comcast increased its spending with AAPI-owned businesses by almost 60 percent compared to 2008, spending \$84 million with 100 AAPI vendors.

Comcast works with a number of AAPI organizations to enhance supplier diversity. For example, Comcast partners with the United States Pan Asian American Chamber of Commerce to provide support for its events and services geared to AAPI business owners. In addition, Comcast attends trade shows and business expos and collaborates with organizations that promote diversity in business, including local Asian Pacific American Chambers of Commerce and the National Federation of Filipino Americans. As you know, Comcast is a founding member and platinum sponsor of the California Asian Pacific Chamber of Commerce (CAPCC), an organization formed in 2009, and is now scheduled to begin operations in 2010. Comcast holds a board seat on CAPCC's executive committee.

In addition, as part of its second tier procurement program, Comcast encourages its top suppliers to purchase goods and services from diverse vendors. This program encourages the organization's largest vendors to report quarterly on their spending with diverse vendors. The impact of this effort indirectly generates a significant number of business opportunities for minority and woman-owned suppliers, including AAPIs. In 2010, Comcast plans to expand this program to encompass more suppliers and to automate the reporting processes.

Commitment to Forming a Memorandum of Understanding

As we discussed during our meeting, we are open to discussions with national AAPI organizations, such as the Asian American Justice Center, regarding a Memorandum of Understanding to memorialize these various commitments. We look forward to the next steps on this effort.

* * *

Thank you again for engaging with us in this important dialogue on diversity issues. Our relationship with the AAPI community and its leadership, including CAPAC, is important to us. We look forward to continuing our productive discussions and enhancing our already important and sustained relationship. As always, please do not hesitate to contact me if you have any questions or feedback.

Sincerely,



David L. Cohen
Executive Vice President

Enclosures