



Comcast Corporation  
300 New Jersey Avenue, NW  
Suite 700  
Washington, DC 20001

December 16, 2010

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street S.W.  
Washington, D.C. 20554

Re: *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees*, MB Docket No. 10-56

Dear Ms. Dortch:

On December 15, 2010, the undersigned met with Commissioner Mignon Clyburn and Dave Grimaldi, Chief of Staff and Media Legal Advisor, Angie Kronenberg, Wireline Legal Advisor, and Louis Peraertz, Legal Advisor for Wireless, International, and Public Safety, all from Commissioner Clyburn's office.

At the meeting, I reviewed Comcast's plans for reporting on corporate diversity initiatives at Comcast and the new NBCU. As previously discussed on the record, Comcast and NBC Universal have made a series of commitments to diverse communities, including plans to establish four external Diversity Advisory Councils (collectively, the "Joint Council"), and the companies will measure and report on their corporate diversity initiatives through the Joint Council. As discussed in the attached document, Comcast now commits to publish an annual Diversity Progress Report, which will be made available to the public on Comcast's investor relations and consumer websites. The Progress Report will include tracking and percentage metrics for both supplier and employment diversity.

I also reiterated the significance of Applicants' commitment to add 10 independent networks over the next 8 years. I emphasized the considerable carriage that Comcast already provides to independent networks and explained that the timeframe for the independent programming commitment is appropriate because of the significant amount of time it takes to identify a network, develop its programming, negotiate a carriage contract, and launch the network.

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Please contact me should you have any questions regarding this matter.

Respectfully submitted,

/s/ Kathy Zachem  
Kathy Zachem  
Vice President  
Regulatory and State Legislative Affairs

cc: Commissioner Clyburn  
Dave Grimaldi  
Angie Kronenberg  
Louis Peraertz

## Diversity Progress Reports

Comcast and NBC Universal have made a series of commitments to diverse communities in connection with the joint venture between Comcast and GE with respect to NBC Universal. These include a commitment to establish four external Diversity Advisory Councils with representatives of leaders from diverse communities, including African Americans, Hispanics, Asian Americans, and others. These councils will work closely with each company's internal Diversity Council, providing advice on diversity issues, and collectively will comprise a new Joint Council. The companies will measure and report on their corporate diversity initiatives through the Joint Council.

In addition to reporting to the new Joint Council, Comcast commits to enhancing our Corporate Responsibility Report to include an annual "Diversity Progress Report", and making it available on our public website. The Corporate Responsibility Report will appear both on the Comcast Investor Relations website and on Comcast.com, our consumer website, to enhance its accessibility. This Progress Report will include tracking metrics as well as updates for supplier diversity:

1. Diversity spending as a percentage of total available dollars
2. Outreach related activities and events
3. Capacity building – participation on boards or programs that assist with Minority/Women Business Enterprise growth
4. Subcontractor diversity participation (Tier II spending).

The report will also include percentage metrics and updates for employment diversity, including:

1. Total women in the workforce
2. Total people of color<sup>1</sup> in the workforce
3. Management employees who are women
4. Management employees who are people of color
5. New Hires who are women and people of color
6. Annual retention rate<sup>2</sup> for women and people of color.

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<sup>1</sup> We report metrics to show white (non-Hispanic), African American, Hispanic, Asian Pacific Islander, Native American, and other.

<sup>2</sup> Retention rate is defined as the reverse of turnover rate.