



WASHINGTON BUREAU  
NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE  
1156 15<sup>TH</sup> STREET, N.W. • SUITE 915 • WASHINGTON, D.C. 20005 • Phone (202) 463-2940  
Fax (202) 463-2953 • E-Mail: [washingtonbureau@naacpnet.org](mailto:washingtonbureau@naacpnet.org) • Web Address: [www.naacp.org](http://www.naacp.org)

August 25, 2014

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: MB Docket No. 14-57

Dear Chairman and Commissioners:

As the Director of the NAACP Washington Bureau and Senior Vice President for Policy and Advocacy, I am reaching out to emphasize the urgent need to upgrade our nation's communications networks to world-class standards, recommendations that the Federal Communications Commission (FCC) give the highest priority to investment and job creation. A point well worth reiterating here, after most recently stating this point in our comments filed in the *Open Internet* proceeding.

The substantial investment in these networks over the last decade or more has led to the creation of more living-wage jobs, which is particularly encouraging as new residential and office construction in major cities has meant new buildings which need to be wired and serviced.

If the merger between Comcast and Time Warner Cable is approved, Comcast has openly stated that it will make new capital investments to upgrade existing Time Warner Cable systems to meet Comcast's faster speeds and more robust all-digital video technologies. In the process, we expect that it will expand and create opportunities for vendors, contractors and corporate employees to perform these upgrades. Comcast's demonstrated record in diverse hiring practices makes me confident that the result will be positive for our members and for communities of color throughout the country.

Comcast has played a large, positive role in African American hiring in the networking space. After the merger with NBCUniversal in 2011, Comcast implemented a variety of programs and policies to increase diversity and inclusion throughout the company, particularly at the higher-level positions. As a member of the company's Joint Diversity Council of external advisors tasked with overseeing the company's progress on these commitments, I can report that much progress has been made in the last three years.

A recent Comcast report shows a 32% increase in the number of people of color in Vice President or higher positions. Last year, people of color accounted for approximately 40% of the company's staff and about 48% of new hires. Comcast has also adopted new approaches for recruitment, leadership training programs and innovative engagement initiatives as a way to invest in and develop a diverse talent pipeline. After close review we learned that Comcast offers more than 100 recruitment and training programs to people of color as well as numerous internship and scholarship programs for younger members of the community. Comcast's efforts have been recognized with many awards, including the "2013 Industry Diversity Champion Award" from The National Association for Multi-Ethnicity in Communications, which also named Comcast as a "2013 Top Company for People of Color."

If the transaction with Time Warner Cable is approved, then Comcast has promised to expand the programs they have implemented to additional markets. Similarly, Comcast's increased investments in minority-led and minority-serving institutions, which are up 10 percent annually, would have even greater reach if extended to Time Warner Cable markets.

Comcast has not only increased diversity in the workplace, but also invested in future generations of African Americans so that they can have the same qualifications and opportunities as others when starting their careers. The NAACP has supported Comcast's Internet Essentials program since its inception, and we have urged our local units as well as like-minded organizations to share information about the program with those individuals who could most benefit from enrolling. Closing the digital divide is essential to increasing diversity in the workplace and improving academic achievement among our Nation's youth, and I believe the Internet Essentials model is one that should continue to be emulated nationally. Comcast will expand the program to new markets through this transaction, and that is a significant public interest benefit of the transaction.

While these are not the only factors the Commission needs to consider, the work that Comcast has already done and its continued appreciation for the importance of creating opportunities for contractors and vendors, as well as employees of color should be considered when weighing the benefits of a successful transaction with Time Warner Cable. Thank you in advance for your time and consideration of these issues.

If there is anything else I can do to further elaborate or clarify our position in support of this transaction, I can also be reached by telephone at (202) 463-2940.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hilary O. Shelton", written over a light blue horizontal line.

Hilary O. Shelton  
Director,  
NAACP Washington Bureau and  
Senior Vice President for Policy and Advocacy