



December 15, 2010

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: MB Docket No. 10-56

Dear Mr. Chairman:

I write today on behalf of the Asian American Justice Center, Organization of Chinese Americans, Japanese American Citizens League, East West Players, and Media Action Network for Asian Americans – organizations representing the interests of the Asian American community – to urge your approval of the Comcast and General Electric's (GE) proposed NBC Universal (NBCU) joint venture.

Since the public announcement of this joint venture, Comcast initiated meetings with us to outline their commitments to diversity in the context of the new joint venture. We began the discussions with serious concerns since although we had been working with NBCU for many years on the issue of diversity, Comcast had terminated one of the few Asian American channels after an earlier acquisition. However, these unprecedented commitments, set forth in a Memorandum of Understanding (MOU) between our organizations and Comcast/NBCU, will significantly enhance diversity in media, programming, procurement, and employment.

First and foremost, Comcast has committed to expanding its distribution of Asian American owned, operated, and targeted programming either through expanding the distribution of an existing channel or the launching of an additional new channel. By these means, more Asian American programming will be available in the major Asian American media markets.

In addition, Comcast has committed to invest substantial funds to develop new talent pipelines for Asian American-themed content for linear television, video-on-demand, online, and other media, and to help increase the availability of diverse and high quality content. To realize this goal, Comcast/NBCU will expand a partnership with the Center for Asian American Media and Visual Communications and others. Comcast/NBCU will also build on its work with the Asian American Media Coalition to help advance the goal of increasing Asian American representation both in front of, and behind, the cameras for television and film. In short, these commitments mean that the joint venture will increase production opportunities for Asian Americans, and will increase news, information and entertainment choices for Asian American viewers.

Comcast has also launched a new, groundbreaking On Demand offering – Cinema Asian America - featuring Asian American content that reflects the diversity and depth of Asian American culture and its cinema. The new offering, available to 18 million subscribers, gives Comcast digital video customers access to classics, award-winning movies featured on the film festival circuit, and short- and feature-length works with genres ranging from documentary to experimental. Comcast has also agreed to promote Cinema Asian America through a significant marketing and communications plan.

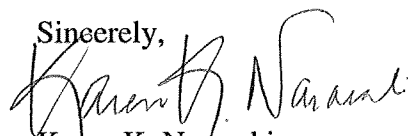
In the area of corporate governance, Comcast recognizes the importance of diversity in its senior executive leadership and on its board. To that end, Comcast has committed to begin identifying potential candidates for consideration for the Board of Directors and will make its best efforts to fill a future board opening with an Asian American candidate. Comcast will also designate a “senior-level” member of its external affairs and public policy staff as a community liaison to the Asian American community. Moreover, Comcast will appoint nine members to its new Asian American Advisory Council, four of whom will come from organizations that signed the MOU. The companies have made other important commitments in the areas of employment, supplier diversity and philanthropy, as well.

Significantly, Comcast plans to monitor these diversity commitments through the formation of a Joint Diversity Council that will include the senior executive leadership of Comcast and the leaders of civil rights and diversity organizations working together to realize the goals stated in the MOU and in Comcast’s Summary of Diversity Commitments.

Finally, Comcast has promised to build on its philanthropic efforts to meet educational, digital literacy, and other needs of diverse communities. As part of this commitment, Comcast will expand its various minority scholarship and internship programs.

Comcast has demonstrated that it recognizes the importance of diversity not just as a societal value but also as a business philosophy. We thus believe that the approval of this joint venture will mark a significant advance for the cause of diversity in media and entertainment.

Therefore, we hope that the FCC will approve the license transfers necessary to consummate this transaction.

Sincerely,

Karen K. Narasaki
President and Executive Director

cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker