

July 23, 2015

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Ex Parte Communication with FCC Commissioners Relating to Proposed AT&T Acquisition of DirecTV (**MB Docket No. 14-90**), Proposed Charter/Time Warner Merger (**MB Docket No. 15-149**), Frontier/Verizon Transfer of Control and Assets (**WC Docket No. 15-44**)

Dear Ms. Dortch:

On Tuesday, July 21, 2015, representatives of the National Diversity Coalition (NDC) met in Washington D.C. with FCC Commissioner Mignon Clyburn, Chief of Staff Chanelle Hardy, and Law Clerk Misha Guttentag. The following individuals participated in the meeting:

Faith Bautista, President and CEO of the National Asian American Coalition  
Charles Dorsey, Christ Our Redeemer Church  
Jesse Rubel Miranda, founder, Jesse Miranda Center for Hispanic Leadership  
Eleazar de Leon, President, Templo Calvario  
Maria Yanet Gonzalez, Templo Calvario  
Robert Gnaizda, General Counsel, National Diversity Coalition  
Richard Rey Ramos, President, Latino Coalition for Community Leadership  
Theresa Martinez, CEO, Los Angeles Latino Chamber of Commerce  
Jin Sung, Founder, Oasis Center International  
Tuongngerntra Luke Tharasri, Founder, Tharasri Foundation  
George McDaniel, Founder, African Americans for Economic Justice  
Lionel Savage, Founder, Lionheart Consulting  
Anthony Suarez, Executive Vice President, National Hispanic Christian Leadership Conference

The subjects discussed related to the pending AT&T/DirectTV merger, the proposed Charter/TimeWarner Cable/Brigh house merger, the proposed transfer of assets from Verizon to Frontier Communications, and future potential mergers.

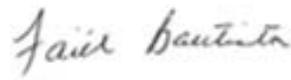
We discussed five primary issues:

1. The AT&T/DirecTV proposed merger: We discussed the importance in this very large merger for AT&T to use its enormous financial resources to fundamentally change broadband and the way it serves the poor at affordable prices. We noted that the Internet Essentials service developed by Comcast was a start, but inadequate for the vast majority of those who need it the most. We also discussed the importance of AT&T/DirecTV developing outside-the-box public interest commitments, and that no major merger should occur in the absence of substantial innovative public interest provisions designed to benefit underserved communities. (Please note: this meeting occurred from 11:30am-12:30pm, and only after the meeting did we learn about Chairman Wheeler's proposal on AT&T/DirecTV).
2. We discussed, partially in the context of the recent jettisoned Comcast/Time Warner merger, the importance of Charter, in its acquisitions of Time Warner and Bright House, developing substantial outside-the-box public interest provisions that effectively benefit underserved communities. We also informed the Commission that we had an initial conference call with the leadership from Charter/Time Warner/Bright House on the importance of progressive public interest benefits as a condition for the merger, and indicated that Comcast's proposed merger would have been more warmly and possibly positively perceived by the minority community and other underserved communities if they had developed robust public interest provisions when they initiated the proposed merger. We also informed the Commission that we will keep all of the Commissioners informed of our efforts, but believed that the Commission should itself set forth clear objectives that are innovative in terms of public interest provisions.
3. We discussed with the Commissioner the Frontier proposed acquisition of Verizon landlines. We stated that over 90% of underserved communities, including minorities, preferred a more robust wireless future. However, we were working with Frontier to develop creative public interest provisions, but were unclear as to whether such would be made.
4. Fourth, in the context of all future mergers including those presently pending, we discussed how the cable and telecommunications industry has directly and indirectly promoted large Black and Latino networks that have failed to portray the minority community in a positive light. Therefore we urged including public interest provisions that required merging parties to develop with community groups, independent stations, and smaller minority networks, mechanisms for enhancing the role of the Black, Latino, and Southeast Asian community. Many examples were raised as to the failure of, for example, Telemundo and Univision networks to portray the Latino community accurately and fairly and/or to effectively reach out to major elements of the minority communities such as third-generation Latinos whose primary language is English. Other examples include the lack of effort from the cable industry to work with small Latino networks such as Entravision, and the failure of any major companies seeking mergers to interface with the largest Latino Christian network, TBN.
5. We discussed our strong support for Chairman Wheeler's efforts to establish lifeline benefits for broadband service in underserved low-income communities. We also stressed the importance of such occurring without additional costs being imposed on low-income communities. We suggested that all industry participants should join the FCC in aiming to reach difficult target communities, that is, to "aim high."

We have endeavored to report our ex parte communication in a descriptive and informative manner, in support of the policy and intention behind the FCC ex parte rule 1.1206(b)(1), as well as to encourage transparency and comprehensive ex parte reporting from all parties in proceedings before regulatory bodies.

In accordance with the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Respectfully submitted,



Faith Bautista  
President & CEO  
National Asian American Coalition, on  
behalf of the National Diversity Coalition



Bob Gnaizda  
General Counsel  
National Diversity Coalition