

July 27, 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 Thursday, July 23, 2015, representatives of the National Diversity Coalition (NDC) met in Washington D.C. with FCC Commissioner Michael O’Rielly. The following members of the NDC participated in the meeting:

Faith Bautista, President and CEO of the National Asian American Coalition (NAAC)  
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

The subjects discussed related to the proposed Charter/Time Warner/Bright House merger, future potential mergers and the importance of lifeline broadband. We informed Commissioner O’Rielly that we had met on July 21 with Commissioner Mignon Clyburn on these subjects and would be meeting later that morning with Assistant Attorney General in charge of Antitrust, William Baer, on many of these issues.

We discussed five primary issues:

1. As to the AT&T/DirecTV proposed merger, we expressed our hope that the merger would contain robust and innovative public interest provisions that would affect other mergers and reference Chairman Wheeler’s proposed decision.

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 Commissioner that we had an initial conference call with the leadership from Charter/Time Warner/Bright House on the importance of innovative outside-the-box 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 Commissioner 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 outside-the-box in terms of public interest provisions.

3. We briefly discussed with the Commissioner Frontier's 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 outside-the-box public interest provisions but were unclear as to whether such would be made.
4. We discussed, in the context of all future mergers, including those presently pending, that the cable industry and the telecommunications industry, directly or indirectly, had helped existing large Black and Latino networks that have failed to portray the minority community in a positive light. Therefore we urged that public interest provisions include, in each proposed merger, that the merging parties develop with community groups and independent stations and smaller minority networks mechanisms for enhancing the role of the Black community, the Latino community, and Southeast Asian community.
5. We discussed our strong support for Chairman Wheeler's efforts at establishing lifeline benefits to broadband for 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 a bipartisan effort to reach difficult target communities.

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 us if you have any questions or wish to know the scope of our discussions later that day with Assistant Attorney General for the Antitrust Division William Baer.

Respectfully submitted,



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



Robert Gnaizda  
General Counsel  
National Diversity Coalition