



Urban League of Greater Hartford, Inc.

James E. Willingham, Sr.
President and Chief Executive Officer

July 15, 2005

Chairman Kevin Martin
Commissioner Kathleen Q. Abernathy
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: MB Docket Number 05-192

Dear Chairman Martin, Commissioners Abernathy, Copps, and Adelstein:

I write to you regarding the pending acquisition by Time Warner, Inc. and the Comcast Corporation of Adelphia cable systems. On behalf of the Urban League of Greater Hartford, I support this transaction and urge the Commission to take the appropriate steps to approve the acquisition.

One of the central missions of the Urban League of Hartford is to ensure equal opportunity, including equal opportunity in the digital marketplace. High-speed digital networks, if deployed widely and into traditionally underserved communities, can serve as the bridge over the digital divide. Indeed, as advanced networks have been increasingly deployed in the past several years, there has been a corresponding decline in the digital divide. Whereas only 30% of African Americans were online in 2000 – less than half the national average – more than 50% are today, representing the fastest growing demographic of on-line users.

It is in this context that the Adelphia merger becomes so important. As has been widely reported, Adelphia has been plagued by a host of financial and other problems, significantly hampering its ability to invest in local communities. With the plummeting of the company into bankruptcy, these problems have worsened. In a real sense then, the willingness of Comcast and Time Warner to acquire the company and invest in badly needed network upgrades represents the cavalry to the rescue. Indeed, as you know, there is a long tradition in antitrust and competition law that encourages the acquisition of a failing company by a successful, well-

established company. (See, e.g. the Newspaper Preservation Act, Pub. L. 91-353 [1970])

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In this instance, Comcast and Time Warner jointly agreed to allocate \$800 million to transform Adelphia cable systems thus creating job security and opportunities for local businesses. These upgrades will also be critical to ensuring that all consumers in the local communities are served by the latest advanced networks. Remember, federal and state franchise legal requirements – a critical touchstone of civil rights law in the telecommunications field which we strongly support – require that cable providers serve the entire community in their franchise area. Comcast and Time Warner have both said that they support these anti-redlining provisions, thereby ensuring that all residents in their franchise areas will be the beneficiaries of their new investments.

As of 2004, Comcast has provided free cable service to almost 17,000 schools, and free high-speed internet access to roughly 8,500 schools, libraries, and community centers. Time Warner continues to expand access to advanced communications through partnerships with respected organizations like the Boys and Girls Clubs of America. These are shining examples of corporate responsibility, and should reflect positively as regulators consider the effects of the acquisition on local communities.

It is again our hope that the FCC will approve this merger. We see it as a win-win for local communities.

Sincerely,

A handwritten signature in cursive script that reads "James E. Willingham, Sr.".

James E. Willingham, Sr.
President & Chief Executive Officer