

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Application Filed for the Acquisition of)	WC Docket No. 09-183
Certain Customer and Assets of CIMCO)	
Communications, Inc. to Comcast Phone,)	
LLC, Comcast Phone of Michigan, LLC,)	
And Comcast Business Communications,)	
LLC)	

**COMMENTS OF MABUHAY ALLIANCE
ASIAN AMERICAN PROTEST OF COMCAST ACQUISITION OF
CIMCO COMMUNICATIONS: SHOULD BE PART OF
COMCAST/NBC UNIVERSAL APPLICATION**

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December 16, 2009

**COMMENTS OF MABUHAY ALLIANCE
ASIAN AMERICAN PROTEST OF COMCAST ACQUISITION OF
CIMCO COMMUNICATIONS: SHOULD BE PART OF
COMCAST/NBC UNIVERSAL APPLICATION**

On behalf of 15 million Asian Americans, including more than 200,000 in the Greater Chicago area, we respectfully request that the acquisition of CIMCO Communications, Inc. (CIMCO) by Comcast be part of a larger decision by the Federal Communications Commission regarding the Comcast acquisition of NBC Universal.¹

National Survey of Asian American Groups

Preliminarily, Mabuhay Alliance will be discussing with Asian American groups across the nation their position regarding the public interest issues, including corporate responsibility, presented by Comcast's acquisition of NBC Universal. We believe, based upon preliminary information we have received, that many of the Asian American groups across the nation share for a variety of reasons some of the conclusion reached by Free Press, Consumers Union and the Consumer Federation of America. Should this be the case, we would be filing an opposition to the acquisition in its present form.

Survey of CIMCO in Chicago

Based upon our December 5th conference in Chicago attended by 275 Asian Americans, we intend to undertake a survey of CIMCO's corporate responsibility and public interest efforts in the Greater Chicago area. This survey will relate to underserved communities with a particular focus on Asian Americans.

¹ See Mabuhay Alliance filed comments before the FCC:

- December 3, 2009, "Comments of Mabuhay Alliance (NBP Public Notice #18): FCC Should Help Underserved Communities Gather Requested Data on Broadband"
- December 1, 2009, "Comments of Mabuhay Alliance (NBP Public Notice #16) on Behalf of 15 Million Asian Americans Regarding Broadband Adoption: Pockets of Asian Americans at Third World Levels of Broadband Access, Adoption and Usage"
- November 20, 2009, "Comments of Mabuhay Alliance on Behalf of 15 Million Asian Americans Regarding the 2010 Media Ownership Review Proceeding and the Importance of Greater Asian American Participation"
- October 14, 2009, "Public Interest Requires Comprehensive Public Involvement and Public Hearing Regarding Broadband Industry Practice (Docket No. 07-52)"

Incorporate CIMCO into NBC Universal Decision

Because Comcast's acquisition of NBC Universal is part of a larger and more comprehensive effort (and perhaps a quasi-monopolistic effort) by Comcast, we believe that the CIMCO acquisition should not be viewed in isolation. That is, without prejudging the matter, it should be part of an evaluation of Comcast's growing influence and its consequences on competition, lower prices, the public interest and corporate responsibility to underserved communities and minorities.

Failure of Comcast's December 3rd FCC Letter to Mention Asian Americans

In the interim, besides our national survey of Asian American organizations regarding Comcast's acquisition of NBC Universal, we will be conducting a survey on CIMCO and its public interest efforts in Chicago. Further, we have requested a meeting with Brian Roberts, the CEO of Comcast, to discuss Asian American concerns since Comcast's prior letter of December 3rd to the FCC made no mention of our nation's 15 million Asian Americans.

We will keep the FCC advised of our findings.

Respectfully submitted,

/s/ Faith Bautista
Faith Bautista
President and CEO

/s/ Mia Martinez
Mia Martinez
Deputy Director

/s/ Robert Gnaizda
Robert Gnaizda
Of Counsel

Dated: December 16, 2009