



**ECONOMIC BUSINESS DEVELOPMENT, INC.**

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March 29, 2010

Chairman Julius Genachowski  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

***Two Million Vietnamese-Americans Oppose Comcast/NBCU Acquisition and Seek Extension of Time for Other Asian Americans***

Dear Chairman Genachowski and Commissioners Baker, Clyburn, Copps, and McDowell,

The Vietnamese-American community and a number of other Asian American communities rarely participate in FCC proceedings, yet our two million community is deeply affected by giant media actions, particularly in mergers.

NBC Universal ("NBCU") has historically ignored our community which first began to immigrate to the United States in significant numbers 35 years ago. Similarly, Comcast has ignored our community.

On behalf of two million Vietnamese-Americans, we concur, in general, with the opposition to the Comcast/NBCU merger as expressed by Mabuhay Alliance and the Greenlining Institute in their earlier filings.

We are prepared to document the scarcity of resources and lack of outreach by both corporations towards the Vietnamese-American community. This includes: (a) lack of employment opportunities onscreen and off-screen; (b) lack of business opportunities, including virtually no contracts to Vietnamese-American owned businesses; (c) a virtual absence of philanthropy; and (d) a virtual absence of customer outreach at affordable prices.

As a result of the concerns we have expressed, we urge the FCC to:

- Hold public hearings, including one in Orange County, the home of the largest number of Vietnamese-Americans in the United States;
- Complete, with our assistance, a survey of Vietnamese-Americans in California (the state that has almost half of all Asian-Americans in the nation), that will demonstrate the concerns of the Vietnamese-American community toward both Comcast and NBCU;

- Require Comcast and NBCU to provide to the FCC and the public its employment data, including number and percentage of Vietnamese-Americans onscreen and off-screen and in senior management positions; and
- Require Comcast and NBCU to provide a full accounting of its contracts to Vietnamese-American owned businesses and its philanthropy to Vietnamese-American led nonprofits.

#### Support MAP's Extension

In this filing, we also note Media Access Project's request for an additional 45 days to oppose Comcast/NBCU's acquisition. We support this particularly because knowledge of the significance of this acquisition has still not spread to the Vietnamese-American community and the FCC does not appear to be equipped with the resources to adequately inform the Vietnamese-American community of the significance and implications of this acquisition.

#### DOJ or FTC Action

We have met with commissioners Copps and Clyburn, and with aides to Commissioner Baker on this issue during the week beginning March 15<sup>th</sup>. We will also be joining the Mabuhay Alliance in its efforts to request that the Department of Justice and/or the Federal Trade Commission oppose this acquisition because it is against the public interest. It is also our intention to contact all members of the Asian Pacific American Congressional caucus to ensure that there is greater Asian American, including Vietnamese-American, input in this proceeding.

Our organization, Economic Business Development, Inc. (EBD), is the leading Vietnamese-American business incubator in the United States. Incorporated in 2000, this nonprofit organization has a strong determination to make a difference in the community. Our business incubator center is a very important catalyst for young companies and business start-ups. The center provides to small businesses a state-of-the-art technology conference room and meeting place, consulting, and sophisticated 10-week entrepreneurship training from its education partner, the USC Business Expansion Network (USC BEN) at very little or no cost. EBD is also producing a weekly entrepreneurship television show, Entrepreneur S.O.S., to be broadcast on Saigon TV, in English, to further assist multi-ethnic entrepreneurs with business tips and to provide an entrepreneurship hotline and education. The show reaches 6 million households in California.

Sincerely,



Lynn Dangtu, M.B.A.  
Founder, President and CEO  
Economic Business Development, Inc.