



1918 UNIVERSITY AVENUE, 2ND FLOOR BERKELEY, CA 94704  
PHONE: (510) 926-4000 FAX: (510) 926-4010 <http://www.greenlining.org>

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Chris Vaeth, Director of Special Projects

April 21, 2010

Mr. Thomas Reed  
Director  
Office of Communications Business Opportunities  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Comcast's Murky History on Supplier Diversity**

Dear Mr. Reed,

At the suggestion of Mark Lloyd, we are reaching out to share some information that we believe will be of interest to you regarding Comcast's supplier diversity program.

**About Greenlining**

As a multi-ethnic public policy research and advocacy institute, Greenlining's efforts include protecting consumer interests while partnering with some of the largest companies in America to better serve this country's multi-ethnic and underserved communities. We have nearly two decades of experience intervening in major corporate mergers to leverage viable opportunities for consumers, particularly disadvantaged communities.

**GO 156: Supplier Diversity Goals for California's Regulated Utilities**

In 1988, the California Public Utilities Commission adopted General Order 156, pursuant to legislation authored by the Honorable Assemblywoman Gwen Moore. GO 156 sets voluntary supplier diversity goals for the energy, telecommunications, and water utilities under its regulatory purview, and establishes an annual reporting requirement.

GO 156 includes no enforcement mechanisms or penalties, only transparency and voluntary benchmarks. Yet since its adoption, many of California's largest energy and telecom utilities have surpassed 20% or even 30% in their procurement from women-, minority-, and disabled veteran-owned businesses. Each year, Greenlining publishes a report card analyzing each large utility's successes and shortcomings in the area of minority procurement. A copy of last year's report is enclosed, and we anticipate releasing this year's report in May.



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## Comcast's Supplier Diversity Falls Well Short of Its Peers

Enclosed, you will find Comcast's most recent GO 156 filing. As you will see, the filing is deliberately incomplete, which Comcast explains at the beginning of its letter. However, the letter then goes on to state, without any factual support, a dollar figure and corresponding percentage for its diverse spend in California in 2009.

We believe that Comcast, as an unregulated provider of essential information and communications services, only indicates what is yet to come among its peers with respect to supplier diversity. Traditional telecommunications companies such as AT&T and Verizon are radically expanding their business plans in order to remain competitive against bundled service packages offered by cable companies. They have also increased their diverse spend in the process of so doing. This kind of community commitment and involvement stems not only from the long history these companies enjoy, but also from regulatory guidance.

### Opportunity for More Detailed Discussion

I will be in Washington DC on May 14<sup>th</sup>, and would appreciate the opportunity to meet with you and discuss in greater detail the perception of Comcast's diversity policies and programs among California's communities of color. I will follow up with your office to find a mutually agreeable time to meet. Should you have any questions, please feel free to call me at 510-926-4004 or email me at [samuelk@greenlining.org](mailto:samuelk@greenlining.org).

Sincerely,

/s/ Samuel S. Kang  
Samuel Kang  
Managing Attorney