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May 11, 2010

Commissioner Mignon Clyburn
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

California Commends You for Calling for Public Hearings on the Comcast-NBC Merger

Dear Commissioner Clyburn,

The Greenlining Institute commends you for your leadership in advancing awareness of the proposed Comcast-NBC merger and for promoting greater transparency and public participation. The FCC has repeatedly expressed its commitment to increased public participation in agency matters, and your call for public hearings on the proposed merger is a true demonstration of this commitment.

Thousands of Americans have voiced their concerns about this merger, as demonstrated by the tremendous volume of filings submitted in the FCC docket for this proceeding. The airwaves belong to the public, and Comcast is the dominant cable and Internet service provider in several major locations throughout the US. As such, people and various stakeholders seek answers from Comcast and NBC about their concerns of a potential media monopoly that could result from the merger.

This merger is of particular consternation for communities of color because of its potentially adverse impact on minority media ownership and ethnic media programming. Currently, the number of minority-owned media outlets does not even come close to representing the number of minorities in the US.¹ Further, in its testimony before Congress, NBC admitted that it has problems with diverse content and that it does not have any African-American programming. Despite this, NBC announced last week that it will sell its independent Spanish-language station in Los Angeles before closing its joint venture with Comcast. Unfortunately, it appears that issues of diversity will not improve after the merger as Comcast simply dedicated approximately 3 pages from its 135 page application to diversity issues.²

Your call for public hearings highlights the importance of having diverse and unique perspectives. Public hearings are one valuable component of hearing from communities of color. Also, public hearings will provide the Commission with opportunities to hear from multiple and varied viewpoints, and this is crucial to the Commission's ability to have a complete and exhaustive review of the merger.

¹ For example, nearly 12% of the nation's African-American homes are in the NY city and LA markets, where there are no African American-owned stations. Nor do African Americans own stations in cities with large black populations like Detroit, Atlanta and New Orleans. African American owned stations reach just 5.3% of the African American TV households in the US.

² Comcast's commitments merely involve moving Telemundo re-runs to a cable platform.

Greenlining Coalition:

Allen Temple Baptist Church
American G.I. Forum
Asian Business Association
Black Business Association
Black Economic Council
California Black Chamber
California Hispanic Chamber
California Journal
California Rural Legal Assistance
CHARO
Chicana/Latina Foundation
Chicano Federation, San Diego
Community Resource Project, Inc.
Council of Asian American
Business Associations
Economic Business Development
El Concilio of San Mateo County
First AME Church, Los Angeles
Greater Phoenix Urban League
Hermandad Mexicana Latinoamericana
Hispanic Chamber, Orange County
Hmong-American Political Association
KHEIR Center
Latino Business Chamber of Greater L.A.
La Maestra Family Clinic
Mabuhay Alliance
Mexican American Grocers Association
Mexican American Political Association
Mission Language & Vocational School
NaFFAA
OCCUR
Our Weekly
San Francisco African American Chamber
San Francisco Housing Development Corp.
Search to Involve Pilipino-Americans
Southeast Asian Community Center
TELACU
Ward Economic Development Corp.
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Your Leadership: The FCC's Voice of Conscience

Your leadership demonstrates that the FCC can give Americans a greater voice. The FCC can provide parties and individuals a forum outside of an electronic docket to address concerns about this merger and its inevitable impacts on the production and distribution of media, consumer choice, and rates.

Greenlining lauds your recognition that the Commission must "interact and see up close how Americans feel." Nothing can replace a face-to-face interaction where the FCC can see the impact of media consolidation first hand. Indeed, public hearings will provide the Commission with a better understanding of how this merger will impact consumers across the nation and the media industry.

You also stated that the "[FCC has] the resources to hold more than one hearing in places where people are affected..." The Commission held multiple forums for public discussions in other important proceedings,³ and Greenlining applauds your initiative to apply this same commitment for public participation to its review of the Comcast-NBC merger.

Again, Greenlining commends your leadership. We look forward to continuing our dialogue and meeting with you again soon. Please contact Samuel Kang at (510) 926-4004 should you have any questions or would like to discuss anything concerning this matter.

Sincerely,



Samuel Kang
Managing Attorney



Stephanie Chen
Legal Counsel



Jean Chung
Legal Fellow

Cc: Chairman Julius Genachowski
Commissioner Meredith Attwell Baker
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Congresswoman Maxine Waters (CA-35)
California Assembly Speaker John Perez
California Assemblymember Steve Bradford
California Public Utilities Commission President Michael Peevey
CPUC Commissioner John Bohn
CPUC Commissioner Dian Grueneich

³ In recent months, the FCC held workshops network neutrality, media ownership, the future of media and information needs of communities, the development of consolidated licensing system, etc. At the very least, the FCC should provide the same public interest commitments on a merger that involves the nation's largest cable system and one of the nation's oldest networks, because of its far-reaching and potentially adverse implications for consumers and the public.

CPUC Commissioner Nancy Ryan
CPUC Commissioner Timothy Simon
William T. Lake, Media Bureau Chief
Brian Roberts, Comcast CEO
Jeff Zucker, NBC CEO