

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of)
)
Application of Comcast Corporation,) MB Docket No. 10-56
General Electric Company)
And NBC Universal Inc.)
)
For Consent to Assign Licenses or)
Transfer Control of Licensees)

OPENING COMMENTS
ASIAN AMERICAN DIVERSITY, ECONOMIC INTEGRATION, AND IMAGE ADVERSELY AFFECTED BY
COMCAST/NBC UNIVERSAL MERGER

Faith Bautista
Mia Martinez
MABUHAY ALLIANCE
1801 K Street, N.W.
Suite 200-K
Washington, D.C. 2006
Telephone: (202) 530 1444
Facsimile: (202) 204 5843
Email: mia@mabuhayalliance.org

June 17, 2010

OPENING COMMENTS
ASIAN AMERICAN DIVERSITY, ECONOMIC INTEGRATION, AND IMAGE ADVERSELY AFFECTED BY
COMCAST/NBC UNIVERSAL MERGER

“A special thanks from the Asian American community to two of our heroines, Commissioner Mignon Clyburn and Congresswoman Maxine Waters.” - Faith Bautista, President and CEO, Mabuhay Alliance

On March 15th, Mabuhay Alliance filed preliminary remarks relating to the concern of our nation’s 18.5 million Asian Americans in the context of the Comcast/NBC Universal merger.

At the time of the preliminary comments, we requested a wide range of data and urged Public Hearings. Since the date of our initial filing more than 90 days ago, the FCC has determined to hold its first public hearing on July 13th despite strong opposition by Comcast to any Public Hearings. Further, 68 congresspersons have written to the FCC and Comcast requesting much of the information we have sought and held a public hearing on these issues in Los Angeles on June 7th.

In addition, a number of other groups have now made their voices clear regarding opposition to this merger.

Present Position of Mabuhay Alliance

Since our preliminary filing more than 90 days ago, the evidence has further demonstrated the need for more Public Hearings, more public participation and growing concerns relating to the impact of this merger on the Asian American community and on what the Wall Street Journal calls the new “majority minority.”

The failure of Comcast to respond to our request and similar ones by the Black Economic Council and the Latino Business Chamber of Greater Los Angeles (filed on behalf of the Black and Latino communities) should be considered as evidence that the merger will not benefit the “majority minority” markets and could be harmful to these markets.

The failure to respond to community request for legitimate data is compounded by Comcast’s refusal to provide transparent data to Congresswoman Maxine Waters and the 67 other congresspersons who have sought such data.

We have reviewed all significant comments filed in this merger, both in favor and in opposition, as well as all information made publicly available by Comcast as a result of the June 7th hearing in Los Angeles. In our opinion, there is little reason to assume that this merger is in the public interest. If it were, Comcast and NBC Universal would have eagerly provided the specific information requested by the critics of this merger, including congressional critics.

We therefore urge the FCC to attempt to gather the data sought by Congress and the critics of this merger prior to the July 13th public hearing in Chicago and make such available at the hearing, if not before.

Further, as requested by Black Economic Council, the Latino Business Chamber of Greater Los Angeles and Mabuhay Alliance, far more Public Hearings should be conducted by the FCC. We strongly concur with Commissioner Mignon Clyburn's statement on May 11th at a FreePress conference that this Commission must go outside the Beltway and secure significant input from the Main Streets of America. We urge these Main Street hearings to include hearings in every major community where a significant percentage of its population consists of the new "majority minority" population. This should include a hearing in California, New York, Georgia and Texas.

Where is Brian Roberts?

Frequently, when CEOs believe their merger is in the public interest, they are very public about it in terms of their appearances and meetings, including meetings with community groups. See, for example, relatively recent community meetings by the CEOs of Bank of America and JP Morgan Chase on their public interest efforts and the public relations disaster that has befallen CEO Lloyd Blankfein at Goldman Sachs due to the absence of public transparency. As far as the Asian American community is concerned, CEO Brian Roberts appears to be "Missing In Action" from the playing field in terms of convincing the public that this acquisition is in the public interest.

Data Requested

The most important data that this Commission should have is a comprehensive data, by race and ethnicity, on the content of all programming by Comcast and NBC Universal and its future impact on the "majority minority" markets. Related to this is data as to future programming and opportunities that will enable the "majority minority" marketplace to prosper from this acquisition. Other data that should be routinely required, as set forth in our preliminary remarks filed on March 15th, is diversity data on who runs the companies, who they do business with, and what communities they invest in.

The Asian American community looks forward to testifying at the July 13th Chicago public hearing and to future Public Hearings in other parts of this nation.

Respectfully submitted,

/s/ Faith Bautista
Faith Bautista
President and CEO

/s/ Mia Martinez
Mia Martinez
Deputy Director

June 17, 2010