

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)

**INITIAL COMMENTS
ON BEHALF OF THE BLACK COMMUNITY IN OPPOSITION TO
COMCAST/NBC UNIVERSAL ACQUISITION**

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The Independent Black Community is at Risk by the Comcast/NBC Merger.

Human progress is neither automatic nor inevitable... Every step toward the goal of justice requires sacrifice, suffering, and struggle; the tireless exertions and passionate concern of dedicated individuals. –Dr. Martin Luther King, Jr.

Preliminary remarks by the Black Economic Council (BEC) on behalf of our nation's 40 million Blacks were filed with the FCC on the Comcast merger on March 29th.

Since the date of our preliminary filing on March 29 and since our filing, Commissioner Clyburn, embracing the Martin Luther King Jr. philosophy expressed above, urged public hearings and this Commission has embraced her suggestion. The FCC has announced a public hearing, which we supported in our preliminary remarks and Congress, led by Congresspersons John Conyers and Maxine Waters, have held their own public hearing in Los Angeles on June 7th. Since the date of our filing (we were the first Black groups to oppose the merger), other Black groups have expressed their concerns.

But certain facts still loom large in evaluating whether the Comcast/ NBC merger is in the public interest. First, Comcast/NBC has failed to provide any compelling data to either the 68 Congresspersons who sought diversity data or to the Black community, including the BEC. Ordinarily, if the CEO believes that her merger is in the company's interest, she will make many public appearances, meet with the public and be fully forthcoming as to why the acquisition is in the public interest. As the record demonstrates, this has not been the case regarding CEO Brian Roberts or even his most senior management. And we still have little useful information provided by Comcast relating to content and other diversity issues despite many requests for this information, including from the BEC, and Congress.

We fully support the FCC's hearing in Chicago and urge additional hearings in other states with significant Black and other minority populations, including California, Texas and Florida.

We also urge this Commission, as requested in our preliminary remarks, to appoint a Special Master to

specifically gather diversity information requested by Congress and in large measure, by the Black Economic Council in its preliminary filing. Alternatively, Comcast should be required under oath to supply such data. To date, Comcast has refused all efforts to meet or provide any data to our organization. Upon information and belief, we contend that no organization that is independent of Comcast/NBC¹ has received the type of information that would convince the Black community or Congress that this merger is in the public interest. We would urge the FCC in evaluating comments filed by the public to take this matter into consideration.

Respectfully submitted,

/s/ Len Canty
Len Canty
President and CEO

/s/ Yolanda Lewis
Yolanda Lewis
Director of Technology

June 22, 2010

¹ Please note that Congresswoman Maxine Waters' statement at the June 7th Congressional hearing in LA that Comcast/NBC appears to be trying to buy off or otherwise influence community groups through extremely modest philanthropic contributions.