



*The Revolution will not be televised. You have to demand it!*

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: MB Docket No. 10-56

Dear Mr. Chairman:

I appreciate the opportunity to once again address the matter of media diversity in the context of the Comcast-NBC Universal joint venture.

As I told Congress at a field hearing this summer, the key problem facing minority-focused media today is that advertisers will not pay for every African-American viewer that makes up a show's audience. This is true of my own experience with Hip Hop OnDemand. Fortunately, we had lined up big-name sponsors right off the bat. But when global economic woes and other factors led many big companies to cut their ad budgets, in typical fashion our budgets were sacrificed first – despite the fact that we have experienced viewership growth in each and every quarter.

The proposed joint venture between NBC and Comcast has prompted a renewed discussion about the future of minority-owned media and, more broadly, program diversity. One organization has called for a mandate that Comcast set aside twenty-five channels for African-American media owners, defined as 100 percent African-American owned, before this deal can be approved.

I don't believe this proposal addresses the challenges we face. Defining African-American media ownership as nothing shy of 100 percent undercuts the long-standing policy of using public funds to invest in minority asset managers, who in turn invest in minority media firms like Radio One and Hip Hop OnDemand. Congress and the FCC have made a point of encouraging capital investment in minority media enterprises. But neither has ever required segregation – so that Black-owned radio stations, say, could only be funded by Black investors.

Thank goodness they didn't. Although my African-American partners and I control almost all of the equity in Hip Hop OnDemand, some media diversity advocates apparently do not consider us African-American owned because we had the foresight to

attract investments from outside the community. The same with Radio One, built by Cathy Hughes and Alfred Liggins, that reaches tens of millions of African-Americans each day, hosts great content from the likes of Tom Joyner and Roland Martin and employs thousands of African-Americans. This is a bizarre kind of racial purity. Our President is Black enough, and so are TV One and Hip Hop On Demand.

That's not say that there's no opportunity for the joint venture to produce meaningful steps toward more diversity in media ownership. But I believe that the commitments made by Comcast and NBC since the deal was first announced last December take strides never before taken by major media companies with respect to program diversity. Comcast stated its intent to add eight minority-owned cable channels to its lineup while expanding the amount of minority-focused content – including foreign language programs and Telemundo archival material – on its interactive OnDemand and online platforms. Further, upon completion of the deal Comcast will put up for sale the local NBC affiliate in Los Angeles to minority bidders. Lastly, the companies will create a \$20 million investment fund for minority-owned “new media” ventures.

Comcast appears willing to put its money where its mouth is, creating a diversity council of outside minority stakeholders to advise and monitor senior executives at Comcast as they implement these plans. Even this step is quite extraordinary for ventures of this type.

I have spent many years in media, so believe me when I say that these commitments will not only serve minority viewers and the overall discourse on diversity in American but will create new opportunities for minority entrepreneurs on a variety of media platforms. The FCC should not unnecessarily withhold these opportunities, thus I urge you to complete your review of the joint venture in a timely manner and approve it as soon as possible.

Sincerely,



William Griffin

cc: Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker