

RADIO ONE

THE URBAN MEDIA SPECIALIST



Lifestyle & Entertainment Television

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Chairman of the Board

August 18, 2010

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

Re: MB Docket No. 10-56

Dear Mr. Chairman:

I have been an active participant on Capitol Hill and at the Commission in the review of the joint venture proposal between General Electric and Comcast relating to NBC Universal. As the comment period comes to a close, I would like to formally submit for the FCC record some of the thoughts I have had occasion to share throughout this process.

There are some critics of the Comcast/NBCU deal. They generally argue that "big is bad" and insist that this combination can not possibly be good for those concerned about diversity or competition in media. I have an alternative view based on my own personal experience with Comcast at both the highest executive and operational levels. Based upon my relationship with Comcast, I can offer a personal testament to Comcast's commitment to diversity.

Eight years ago, I began to pitch the idea of a new cable television channel, now known as TV One, which would provide real entertainment and news to the African-American community – programming that would inspire, uplift and educate. Our idea was to promote programming that would not only allow the African-American community to see itself as it really is, but also would allow all of America to see us more truthfully with all the richness and complexity that characterizes every racial and ethnic group – from the success of people like the brilliant African-American neurosurgeon Ben Carson and the prolific and colorful playwright August Wilson to the harsh realities of life in underprivileged inner cities.

For the most part, television executives and cable television providers granted me polite audiences when I sought to get this new kind of programming carried on their cable systems. Nearly all of them smiled, spoke encouraging words about my "noble experiment" and then promptly refused to carry our network on their cable systems.

There was one exception. Brian Roberts, Steve Burke and David Cohen at Comcast not only expressed genuine interest in the idea but quickly agreed to give us significant exposure on its systems – the make-or-break moment for us.

However, the real turning point was when Comcast offered to actually help finance the network while allowing us to retain significant ownership, even in excess of Comcast's ownership stake, along with substantial management control.

The result is that today, as one of the nation's two major African-American-oriented channels (and the only one owned by African-Americans), our network now reaches more than 50 million homes via cable and satellite and has an audience with enormous race, gender and generational diversity.

In addition to supporting TV One, Comcast has a history of giving diverse voices a megaphone. The company assisted in launching African-American-owned channels like Hip Hop on Demand, the Africa Channel and Crossings and boasts an unrivaled package of 50 Spanish language channels and 150 titles available on-demand. The newly formed company plans to build on this track record in a number of exciting ways.

For starters, Comcast intends to add 10 independently-owned programming networks to its cable offerings at least eight of which will be minority-owned. In divesting one of its three Los Angeles broadcast Affiliates, NBC Universal has committed to use its best efforts to sell to a minority ownership group. Comcast has further pledged to invest \$20 million into a venture capital fund for new minority media entrepreneurs.

This joint venture extends the company's dedication to program diversity in to other areas of the business. Comcast will add at least one person of color to its board in the next 24 months – creating the seat if necessary – and will increase minority hiring at all levels, particularly at the VP level and above, by working directly with leading minority professional organizations to recruit and cultivate top candidates. Both companies have pledged to build upon their exceptional supplier diversity records by expanding these efforts into areas such as financial services and office supplies.

To ensure that these proposals are not seen simply as empty promises, Comcast has agreed to form an external Diversity Council, with the support of leading civil rights organizations, which will assist Comcast executives in benchmarking and implementing these historic commitments. This is no small concession; indeed it instills confidence in the company's seriousness of purpose.

The Honorable Julius Genachowski

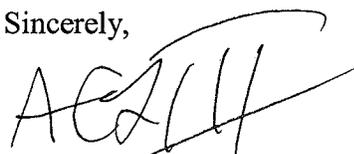
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But the ultimate acid test for me in evaluating this joint venture is the character of the company and its executives – character which I have experienced firsthand. I have no doubt that financial advisers warned Mr. Roberts that TV One was a gamble. But, then as now, Brian understood the power of images and knew that inspired television programming, backed by a sound business plan, could advance and uplift African- Americans and the American people as a whole.

Every major media deal like the Comcast/NBCU venture offers detractors an opportunity to lodge broadsides. But in evaluating this transaction we should ask whether the deal transfers the reigns to executives that appreciate media diversity, understand the social power of images, and have a proven track record of championing inspired multi-cultural programming.

By that measure the answer is yes. I hope you will agree and approve the transfer of ownership of NBCU from GE to Comcast without further delay.

Sincerely,

A handwritten signature in black ink, appearing to read 'AC Liggins, III', with a large, sweeping flourish above the name.

Alfred C. Liggins, III

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