



August 21, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MB Docket No. 14-57

Dear Chairman Wheeler:

I am writing on behalf of the National Organization of Black Elected Legislative Women (NOBEL Women) to outline the ways in which we think that the proposed transaction between Time Warner Cable and Comcast would benefit minorities and strengthen diversity in the cable industry.

When Comcast merged with NBCUniversal in 2011, it made many promises to increase diversity within the company, including increasing minority representation in leadership positions, adding more diverse programming choices, improving the supplier diversity program and establishing a new Joint Diversity Council to provide guidance on these and other related initiatives. Comcast has honored each of these pledges, which is encouraging as we examine this new proposed deal.

By establishing a Joint Diversity Council with representatives from leading civil rights and diversity organizations, Comcast created an outlet to discuss its corporate diversity initiatives and ensure that its plans were meeting the needs of minority constituencies around the country. Each constituency is given a voice and an opportunity to meet individually with the Chairman and Chief Executive Officer, Brian Roberts, so that he can better tailor Comcast's corporate diversity initiatives to their needs. In the last three years, Comcast and NBCUniversal's Diversity Councils rose from 5th place to 3rd place among the Top 25 Diversity Councils in the United States.

Since pledging to increase minority representation at Comcast and NBCUniversal three years ago, the number of people of color in high-level positions at both companies has risen 32%. The number of women in high-level positions has risen 21%, which led to Comcast being tied for first place on the Women in Cable Telecommunications (WICT) 2013 Best Operators for Women in Cable List and NBCUniversal getting first place on the Women in Cable Telecommunications

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(WICT) Best Programmers for Women in Cable List that same year. These improvements have contributed to job opportunities for both people of color and women.

Comcast has also made efforts to expand the number of diverse programming choices offered as well as to increase the number of VOD and online choices geared toward African American audiences. The number of diverse VOD hours has increased by more than 270% and the number of diverse online hours has increased by almost 170% since the merger. Comcast also received a 2014 Multicultural TV Front Runner Award and was nominated for multiple 2014 NAACP Image Awards.

Comcast has also founded the Internet Essentials program to make broadband available at a discounted rate to low-income families. They pledged \$20 million to a venture capital fund to give more opportunities to minority-owned businesses in the industry. I believe that the promises made – and kept – as well as the programs implemented during the merger with NBCUniversal would extend to millions more Americans if the FCC approves Comcast's transaction with Time Warner Cable.

I urge the Commission to consider all of the efforts that Comcast has made to increase diversity and inclusion in the industry and how much more they will be able to do if the transaction with Time Warner Cable is approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Hall". The signature is fluid and cursive, with the first name "Laura" being more prominent than the last name "Hall".

Rep. Laura Hall (AL)
National President
NOBEL Women