



1050 Connecticut Avenue, NW
10th Floor - Suite #1000
Washington, D.C. 20036
(202) 659-4929; (202) 659-5025 (fax)
www.ncbcp.org

August 22, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *In the Matter of Applications of Comcast Corp. and Time Warner Cable Inc. For Consent To Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-57

Dear Chairman and Commissioners,

I am writing to you to share my perspective on and support of the proposed merger between Comcast and Time Warner Cable. As President and CEO of the National Coalition on Black Civic Participation (NCBCP) and convener of the Black Women's Roundtable (BWR), I have witnessed the significant role Comcast has played in bridging the digital divide and supporting local residents and civic activities within the communities of the markets it serves.¹ Comcast has established a track record as both a key player in and major supporter of successful civic engagement programs, which bodes as a significant indicator of its future commitment to communities in the new markets that would be served as a result of a merger between Comcast and Time Warner Cable.

Historically, Comcast has demonstrated a remarkable commitment to education. From helping to wire schools and libraries for high-speed Internet² to creating mentorship programs for young people to gain

¹ See Chris Reidy, Comcast Steps Up Its Efforts to Bridge the Digital Divide, *boston.com* (February 28, 2014), available at <http://www.boston.com/business/news/2014/02/28/comcast-steps-its-efforts-bridge-the-digital-divide/jGdb3TxJLeAEhuz33q1AfM/story.html> (last visited August 20, 2014). See also Comcast Awards \$68,000 in Scholarships to 59 Virginia High School Seniors, *Emporia News* (May 23, 2014), available at <http://www.emporianews.com/article/comcast-awards-68000-scholarships-59-virginia-high-school-seniors> (last visited August 22, 2014). See also, Comcast NBCUniversal Leadership Awards 2014, (The Comcast NBCUniversal Leadership Awards recognized outstanding City Year alumni who are continuing their commitment to strengthening community, inspiring, mobilizing, and empowering others.), available at <http://alumni.cityyear.org/?2014Honorees> (last visited August 22, 2014).

² See Comcast NBCUniversal Make Million-Dollar Commitment to LIFT to Help Bridge the Digital Divide in Low-

job experience and professional skills³, Comcast has devoted both financial and human resources to help America's youth to learn and realize their full potential.

This commitment to education is most evident in Comcast's vaunted *Internet Essentials* program, which offers low-cost Internet access, equipment and training to eligible families.⁴ Through this program, Comcast has connected more than 350,000 families (approximately 1.4 million low-income Americans) to the transformative power of the Internet in their homes.⁵ Additionally, Comcast has pledged to continue the *Internet Essentials* program indefinitely and to expand the eligibility for the program to include 30% more students.⁶ And, if the merger between Comcast and Time Warner Cable is approved, Comcast has committed to extend the *Internet Essentials* program to include markets served by Time Warner Cable. This would extend the program to 19 of the 20 largest cities in our nation.⁷

Comcast's response to addressing the lack of broadband connectivity in communities that are most in need is evidence of its tremendous commitment to providing one of our nation's most essential ingredients for economic growth and job creation—broadband adoption.⁸ Every step each of us takes toward making sure that all communities have equal access to the opportunities that broadband provides move us all toward our nation's goal of becoming more competitive in the global economy. The merger of Comcast and Time Warner Cable would represent a large stride towards achieving our nation's goal.

One of the fundamental missions of both the NCBCP and the Black Women's Roundtable is securing a level playing field upon which people of all communities are served equally and have a chance to succeed. For this reason, Comcast's work with regard to diversity strikes a resonating chord with me. From Comcast's commitment to provide a program that encourages more people of color to join the

Income Communities, *Money Watch* (February 25, 2014), available at <http://www.marketwatch.com/story/comcast-nbcuniversal-make-million-dollar-commitment-to-lift-to-help-bridge-the-digital-divide-in-low-income-communities-2014-02-25> (last visited August 22, 2014).

³ See T. Charles Pierson, Big Brothers Big Sisters Taps into the Power of Corporate Classrooms for the Ultimate ROI, *Inside Philanthropy* (September 3, 2013), (Comcast hosts the largest workplace mentoring program in the country.) available at <http://philanthropyjournal.blogspot.com/2013/09/big-brothers-big-sisters-taps-into.html> (last visited August 22, 2014).

⁴ See Kevin Hardy, Comcast Offers Low-Cost Internet to Some Students, *Times Free Press* (August 11, 2012), available at <http://www.timesfreepress.com/news/2012/aug/11/comcast-offers-low-cost-internet-to-some/> (last visited August 21, 2014)

⁵ See Ayanna Jones, Comcast Eases Internet Access for Low-Income Families, *The Philadelphia Tribune* (August 19, 2014), available at <http://www.phillytrib.com/news/business/comcast-eases-internet-access-for-low-income-families.html> (last visited August 21, 2014).

⁶ See Marguerite Reardon, Comcast Extends 'Internet Essentials' Program Indefinitely, CNet, (March 4, 2014), available at <http://www.cnet.com/news/comcast-extends-internet-essentials-program-indefinitely/> (last visited August 21, 2014).

⁷ See *id.*

⁸ See President Obama's Guiding Principles on Technology, available at <http://www.whitehouse.gov/issues/technology> (last visited August 22, 2014). ("President Obama recognizes that technology is an essential ingredient of economic growth and job creation.")

online world - affordably and from home – to its hiring practices to its independently minority-owned programming, Comcast has demonstrated its dedication to diversity.

Since Comcast acquired NBCUniversal, Comcast's workforce diversity has risen to over half of the company's total workforce⁹. At the end of 2013, African Americans accounting for 22% of Comcast's total workforce.¹⁰ And at a total of 57%, women account for the highest percentage of Comcast's net hires and promotions into executive positions.¹¹ And since the Comcast-NBCUniversal merger, Comcast has consistently followed through on its commitment to launch minority-owned program networks—and has launched four minority-owned networks to date.¹² This is highly indicative of Comcast's future commitment to diversity and inclusion in the new markets that would be served by the Comcast-Time Warner Cable merger. The NCBCP and the BWR would whole-heartedly support the extension of Comcast's corporate diversity programs to those new markets.

Based on the reasons stated above, I strongly believe that individuals living in the Time Warner Cable markets will gain a substantial benefit from the Comcast-Time Warner Cable merger. I strongly urge your approval of this merger.

Sincerely,



Melanie L. Campbell
President & CEO and Convener, Black Women's Roundtable
National Coalition on Black Civic Participation

⁹ See Comcast NBCUniversal: Seeing the Bigger Picture (Comcast 2013 Diversity Report), (July 2, 2014) at 5-7, available at http://corporate.comcast.com/images/Comcast_Diversity_Report_060214.pdf, (last visited August 22, 2014). (“At YE 2013, our total workforce was 59% diverse. As we continue to grow and execute upon our strategy for diversity & inclusion, the diversity of our workforce will undoubtedly expand.”)

¹⁰ See *id.*

¹¹ See *supra* at 8

¹² See Third Annual Report Of Compliance With Transactions Conditions submitted by Comcast to the Federal Communications Commission, *In the Matter of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. For Consent to Assign Licenses and Transfer Control of Licensees* MB Docket No. 10-56 at 3, available at <http://apps.fcc.gov/ecfs/document/view?id=7521084937>, (last visited August 22, 2014). (“[W]ith the 2012 launch of AsPIRE and BabyFirst Americas, [Comcast] satisfied the first milestone of its voluntary commitment to launch independent networks with Hispanic American or African American ownership or management. Comcast has now satisfied the second milestone by launching two additional minority owned or operated independent channels during the Reporting Period: First, REVOLT, a new music and pop culture network created by music icon Sean “Diddy” Combs and MTV veteran Andy Schuon, launched in October 2013 and is now available in 25 Comcast markets. Second, in December 2013, Comcast began distributing El Rey, a new network by acclaimed writer-director Robert Rodriguez for Hispanic and general audiences that includes programming that features, and is produced or directed by, Hispanic celebrities and public figures. El Rey is now available in 18 Comcast markets.”)