



January 3, 2011

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: MB Docket No. 10-56

Dear Chairman Genachowski and Commissioners:

We write to bring to your attention the opportunities that we believe are created for the Hispanic community as a result of a historic Memorandum of Understanding ("MOU") negotiated by Comcast and NBCU with leading Hispanic organizations. This MOU was negotiated in the context of the joint venture between Comcast and NBCU.

This MOU is unprecedented in scope for any media or telecommunications company during the negotiation of a merger. We believe that with proper monitoring and collaboration between Comcast/NBCU and the National Hispanic Leadership Agenda the MOU will yield numerous tangible pro-diversity results. The spirit in which Comcast engaged in thoughtful and protracted discussions with leading Hispanic organizations demonstrates, in our judgment, that the new Comcast/NBCU joint venture will value diversity, not just as a social value but as a business philosophy as well.

We also note that many of the commitments memorialized in this MOU -- the creation of a Joint Diversity Council and the expanded commitment to carry independently-owned and -operated programming networks, for instance -- have benefited other communities of color in the execution of their MOUs.

The strength of this MOU begins with the formation of a new, nine-member, external Hispanic Advisory Council ("HAC"), tasked with benchmarking the new company's efforts and advising it on how best to realize the new goals outlined by the MOU.

Comcast's pledges on workplace diversity set a new standard for the media industry. Comcast will invest in existing programs and create new recruitment outreach to build

upon existing affirmative action plans. All programs will result in increased Hispanic hiring -- from senior management to entry-level employees -- through new techniques to identify strong candidates, developing action plans for increasing director-level representation of Latinos. Comcast has committed to have at least one person of color on the slate of every VP-and-above hire, to implement a "boot camp" for mid-level VP candidates which will include an 80 percent minimum of diverse candidates.

Both companies will also improve their company-wide, supplier-diversity programs in key sectors such as advertising, construction, information technology, legal services, financial services, office furniture and supplies, and promotion and marketing. In this connection, the companies have committed to working with our organizations as well as the Hispanic Chambers of Commerce and other business organizations to identify potential minority-owned business partners in these areas.

Comcast has also pledged to provide new outlets for Spanish-language programming, including news and public affairs shows. With approval of the joint venture, Comcast will build on this strong track-record by launching a new Spanish-language multicast channel on Telemundo's digital broadcast spectrum. In addition, Comcast Cable has committed to use its On Demand and On Demand Online platforms to feature Telemundo programming and to continue the expansion of mun2 -- Telemundo's youth-focused sister channel -- as well as other Latino content online.

Perhaps most noteworthy, Comcast has expanded upon its earlier commitment to add independently-owned and -operated programming and has agreed to add ten such channels over the next eight years following closing of the transaction. At least two of these channels will be Latino-operated and will be added to the primary digital tier within 36 months. Two additional Latino-owned channels will be added within six years of closing. Along with its new commitments to Spanish-language programming, offered through new outlets as well as via On Demand services, Comcast's offerings to bilingual Hispanic viewers will be unparalleled.

Comcast and NBCU have also stated that the new company's philanthropic efforts -- long focused in important areas like education, promoting community service, and digital literacy -- will also reflect an even sharper diversity focus. Comcast and NBCU have pledged to build on existing partnerships and to create even more partnerships with Hispanic-led and Hispanic-serving organizations with proven track records in working with the Latino community.

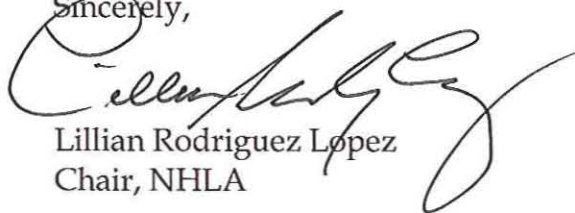
Comcast has also offered to expand diversity in its boardroom, pledging to name a U.S.-based Hispanic to its Board of Directors within 24 months of the deal's closing regardless of whether a board vacancy becomes available.

We strongly believe that this new business arrangement between Comcast and NBCU will promote the goals of expanding economic opportunity for Hispanic Americans and preserving and enhancing programming for Hispanic audiences. We have also been pleased to watch as the companies have entered into similar agreements with African American and Asian American leaders, each tailored to the distinct concerns and interests of their communities.

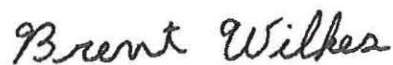
For these reasons, we support the approval of the Comcast-NBC Universal joint venture and urge speedy consummation of the transaction.

Thank you for your consideration of our views.

Sincerely,



Lillian Rodriguez Lopez
Chair, NHLA



Brent Wilkes
Vice Chair, NHLA