



December 17, 2021

Via FedEx to

Thomas J. Reid, Secretary
Comcast Corporation
One Comcast Center
Philadelphia, PA 19103

Mr. Reid,

I hereby submit the enclosed shareholder proposal (“Proposal”) for inclusion in the Comcast Corporation (the “Company”) proxy statement to be circulated to Company shareholders in conjunction with the next annual meeting of shareholders. The Proposal is submitted under Rule 14(a)-8 (Proposals of Security Holders) of the United States Securities and Exchange Commission’s proxy regulations.

I submit the Proposal as the Director of the Free Enterprise Project of the National Center for Public Policy Research, which has continuously owned Company stock with a value exceeding \$2,000 for at least 3 years prior to and including the date of this Proposal and which intends to hold these shares through the date of the Company’s 2022 annual meeting of shareholders. A Proof of Ownership letter is forthcoming and will be delivered to the Company.

Pursuant to interpretations of Rule 14(a)-8 by the Securities & Exchange Commission staff, I initially propose as a time for a telephone conference to discuss this proposal January 6, 2022 from 2-5 p.m. eastern. If that proves inconvenient, I hope you will suggest some other times to talk. Please feel free to contact me at sshepard@nationalcenter.org so that we can determine the mode and method of that discussion.

Copies of correspondence or a request for a “no-action” letter should be forwarded to Scott Shepard, National Center for Public Policy Research, 20 F Street, NW, Suite 700, Washington, DC 20001 and emailed to sshepard@nationalcenter.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Shepard", with a long horizontal flourish extending to the right.

Scott Shepard

Enclosure: Shareholder Proposal

EEO Policy Risk Report

RESOLVED

Shareholders request that Comcast Corporation (“Comcast”) issue a public report detailing the potential risks associated with omitting “viewpoint” and “ideology” from its written equal employment opportunity (EEO) policy. The report should be available within a reasonable timeframe, prepared at a reasonable expense and omit proprietary information.

SUPPORTING STATEMENT

Comcast does not explicitly prohibit discrimination based on viewpoint or ideology in its written EEO policy.

Comcast’s lack of a company-wide best practice EEO policy sends mixed signals to company employees and prospective employees and calls into question the extent to which individuals are protected due to inconsistent state policies and the absence of federal protection for partisan activities. Approximately half of Americans live and work in a jurisdiction with no legal protections if their employer takes action against them for their political activities or discriminates on the basis of viewpoint in the workplace.

Companies with inclusive policies are better able to recruit the most talented employees from a broad labor pool, resolve complaints internally to avoid costly litigation or reputational damage, and minimize employee turnover. Moreover, inclusive policies contribute to more efficient human capital management by eliminating the need to maintain different policies in different locations.

There is ample evidence that individuals with conservative viewpoints may face discrimination at Comcast.

Comcast’s most outward-facing properties are the NBC network, including its news channels and sites. These are substantially biased against center/right thought in ways that both suggest that the bias stretches backward through the Company and also in ways that cause it to offend potential customers,¹ fall away from best practices in the industry,² endanger employees,³ risk

¹ See, e.g., <https://www.breitbart.com/sports/2021/08/03/nolte-viewership-ratings-woke-olympics-continue-crash/>; <https://www.breitbart.com/the-media/2021/07/21/nolte-far-left-today-show-ratings-crater-30-year-low/>; <http://theeconomiccollapseblog.com/now-they-are-saying-that-the-republican-party-is-the-1-national-security-threat-to-the-united-states-of-america/>; <https://www.thedailybeast.com/inside-shepard-smiths-post-fox-news-crash-on-cnbc>; <https://freebeacon.com/media/wallace-walloped-by-ratings-nosedive/>

² See, e.g., <https://greenwald.substack.com/p/video-transcript-the-real-disinformation>; <https://townhall.com/tipsheet/spencerbrown/2021/12/01/body-cam-footage-from-kenosha-casts-doubt-on-nbcs-claims-about-following-rittenhouse-jurors-n2599895>; <https://hotair.com/ed-morrissey/2021/11/18/breaking-judge-boots-msnbc-from-rittenhouse-trial-over-jury-tracking-attempt-n430130>; <https://greenwald.substack.com/p/a-court-ruled-rachel-maddows-viewers>

³ See, e.g., <https://news.yahoo.com/nbc-crew-robbed-oakland-124839098.html>

litigation and other needless expenses,⁴ and otherwise pose financial and reputational risks. All of these risks could be diminished or avoided altogether if the Company were to provide protections against viewpoint discrimination that allowed employees of diverse viewpoints to warn the Company of the risks associated with ideologically blinkered behaviors.

Presently, shareholders are unable to evaluate how Comcast prevents discrimination towards employees based on their ideology or viewpoint, mitigates employee concerns of potential discrimination, and ensures a respectful and supportive work atmosphere that bolsters employee performance.

Without an inclusive EEO policy, Comcast may be sacrificing competitive advantages relative to peers while simultaneously increasing company and shareholder exposure to reputational and financial risks.

We recommend that the report evaluate risks including, but not limited to, negative effects on employee hiring and retention, as well as litigation risks from conflicting state and company anti-discrimination policies.

⁴ See, e.g., <https://www.washingtonexaminer.com/washington-secrets/liberal-media-scream-chuck-todd-calls-parent-led-opposition-to-critical-race-theory-fake>; <https://townhall.com/tipsheet/spencerbrown/2021/12/01/body-cam-footage-from-kenosha-casts-doubt-on-nbcs-claims-about-following-rittenhouse-jurors-n2599895>; <https://hotair.com/ed-morrissey/2021/11/18/breaking-judge-boots-msnbc-from-rittenhouse-trial-over-jury-tracking-attempt-n430130>; <https://greenwald.substack.com/p/a-court-ruled-rachel-maddows-viewers>