

Let's face it -- diversity in broadcast ownership is at a level that couldn't get worse if you tried. It's a rounding error at this point -- down to effectively zero.

The FCC's recent incentive auction will go down as perhaps the final nail in the coffin for diverse ownership. And the worst part is the Commission knew all about it and did nothing to ensure programming for diverse communities would continue.

From New York and Los Angeles to Houston and San Francisco, broadcast television is in far worse shape today than just 12 months ago -- all to aid a few hedge funds and telecom companies. And it will get worse before it gets better. The repack will leave even more communities alienated. It's a sad state of affairs.

While this effort to incubate diverse ownership has noble intentions, unless a wholesale change in perspective is made from 8th floor of the Commission to Madison Avenue, we will most assuredly be faced with an industry that will be utterly irrelevant to the majority of Americans in short order.

As someone that was a panelist asked to speak at Stanford University about the impact of New Media on Broadcast Ownership during the FCC's 2010 quadrennial review of its media ownership rules, it's pretty clear none of what was advised was adopted or even digested.

I should also mention I was able to purchase a full-power television station in 2014, KRDK-TV, with the FCC's blessing under the auspices of increasing diversity in broadcast ownership. The seller, Gray Television, transparently wanted a monopoly in the market and through this transaction, they were able to hold the NBC, CBS and Me TV affiliations and have since added other channels, including the CW.

Gray accomplished their mission -- 50% market share, limitless retransmission fee increases on consumers, not to mention surreal power over advertising agencies and MSO's. They were able to stop KRDK from getting on cable for more than year, tried to take away our Channel 4 brand identity and continue to stifle us from generating revenue from local advertising agencies. They play dirty. Just read our previous FCC filings on those matters.

Yet, as I write this, Gray wants more -- another full power television station in the Fargo DMA to further cement their dominance. Seriously.

Let me be abundantly clear -- this technique for diverse ownership incubation did not work. While our organization has been able to survive through sheer guile and willpower, the average minority broadcaster would not have survived this brutal test of wills.

Gray did everything they could to put us out of business the moment we took possession. Do you really think it will get easier for new entrants placed in a similar spot? It won't.

The FCC must stop issuing monopolies under the premise of helping minority ownership. That is not the solution. Ownership limits in a market were put into place for a reason. And it's a shame that lobbyists are trying to co-opt the very wise rules instituted by our forefathers who understood what monopoly forces can do to a community.

I should mention the FCC is wise to try and incubate diverse ownership. Under our ownership, KRDK now produces more local programming than every other television station in North Dakota combined. Viewers have embraced our hyperlocal approach. And we've done it all through collaboration with local groups like Bek Communications who were stymied in their efforts to provide more local service for nearly a decade before we entered the marketplace.

Competition is good, my friends. So let's come up with a system that will enable more voices to participate. The arguments for further consolidation are bogus. Please look seriously into finally granting low power television stations must-carry and Class A status. Have full-power television stations, who want to add to their largess, set aside up to 2 megabits of their 19.39 megabits to independent and women and minority-led organizations who can use that spectrum to provide services others won't venture into. There are ways to increase minority participation without harming incumbents. With ATSC 3.0 on the horizon, there should be more than enough bandwidth to enhance the marketplace.

The FCC issues licenses to serve the public interest. Let's get back to making sure that imperative is adhered to more strictly in the years to come.

Respectfully submitted,  
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