



# Future of Music Coalition

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## **VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Ex parte notice

### ***RE: 2018 Quadrennial Regulatory Review 18-349***

Dear Ms Dortch,

On Tuesday March 12, 2019, Kevin Erickson representing Future of Music Coalition (FMC) met with Michael Scurato of Commissioner Geoffrey Starks' office.

Matters discussed included the following:

#### **Quadrennial review: Local radio ownership caps**

FMC explained our view that consolidation in radio station ownership has harmed consumers and communities, musicians and composers, radio station employees, and the broadcasting industry itself, and that loosening or eliminating the local radio ownership caps would worsen the problem.

FMC noted our appreciation of the FCC's citation of our prior comments, jointly filed with MusicFirst Coalition, in the now-completed report to Congress on Competition in the Audio Marketplace (MB 18-277) approved in December 2018. These comments represented an unprecedented show of unity among diverse music industry stakeholders in opposition to consolidation at the local radio level. FMC is also aware that support for raising or eliminating the ownership caps is by no means universal among even commercial broadcasters.

FMC considers broadcasters' arguments that their competitors in digital audio are relatively under-regulated compared to terrestrial radio to be unconvincing. To the degree that FTC and other regulators have failed to exercise appropriate levels of oversight over the digital marketplace, this is not a reason for FCC to be less than

diligent in its approach to regulating radio. Rather, it is a reason to call for the agencies with regulatory authority to step up. FMC has, for example, called for the FTC to consider adopting the same language about sponsorship identification requirements for digital radio and on-demand music services as the FCC currently enforces for terrestrial radio broadcasters.

FMC underscored our view that radio has a special public interest responsibility given its use of the public airwaves and expressed concern about the lack of publicly available datasets to assess programming diversity on broadcast radio.

FMC also noted our broader concern about consolidation in other parts of our industries, and that the problems of consolidation in terrestrial radio interact with and amplify problems with consolidation in adjacent marketplaces.

Finally, FMC noted our interest in working with Commissioner Starks to open up additional lines of communication between the FCC and the music community, and the importance of hearing from musicians directly, as they constitute a community that is directly impacted by FCC decision making.

Respectfully submitted,

A handwritten signature in black ink that reads "Kevin Erickson". The signature is written in a cursive, flowing style.

Kevin Erickson  
Director