

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
2018 Quadrennial Regulatory Review—Review of)	MB Docket No. 18-349
The Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
The Telecommunications Act of 1996)	

**REPLY COMMENTS OF THE
LEAGUE OF UNITED LATIN AMERICAN CITIZENS (LULAC)**

The League of United Latin American Citizens (LULAC) is the nation’s oldest and largest civil rights organization and has as its core mission defending the civil rights of all Americans, including 58-million Latinos in the United States. As such, LULAC believes that amplifying the diversity of voices in every community through AM Radio is critical to ensuring that all Americans, including people of color, are heard on issues which are of interest to and impact their lives.

Indeed, the presence of AM Radio is part of our modern history as Hispanics in the United States. In the early 1940s, Raoul Cortez, an immigrant from Jalapa, Veracruz, Mexico recognized the importance of AM Radio as a way to engage and inform a growing Hispanic population on the eve of World War II. In his 1943 application he stated that a new, full-time AM station could even help the U.S. win support for the war effort among Spanish-language speakers and he was issued a license in 1946 which led to the founding of KCOR AM 1350 in San Antonio, Texas. Now, 74-years later, AM Radio continues to be the primary local conduit into Spanish-speaking households with

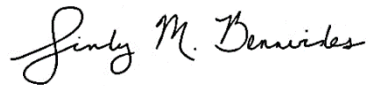
governmental information on programs relevant to Hispanics and which federal, state and local agencies utilize to reach an otherwise largely isolated segment of stakeholders. Even with the advent of FM radio and more recently, digital media, AM Radio is the leading source of local news, long form interviews and interactive call-in conversations on such issues as health, education, public safety and spirituality. No other media platform enjoys as long and trusted a history with Hispanics as AM Radio.

Moreover, AM Radio among Hispanics has strong cultural ties with generations of monolingual and bilingual listeners who have experienced its programming throughout their lives and whose daily on-air personalities are almost as an extended part of their family. These broadcasters are often among the most-trusted voices in the Spanish-speaking community and have proven to be a calming presence during natural disasters, incidents of violence and other civil disruptions that might otherwise provoke panic or have significant negative consequences. AM Radio is the place Hispanics turn to seek comfort and reassurance during the most difficult times as well as to share their views and emotions with others in the community.

LULAC associates itself with the concerns expressed related to the historic underrepresentation of minority ownership in AM Radio stations. Moreover, it is our view based on historical data that previous actions by the FCC created barriers to minority ownership based upon selective, racially-targeted criteria. Also, that the FCC permitted wholesale advertising discrimination against Spanish-language AM stations thereby endangering the fiscal viability of this valuable media platform for Hispanics. For these and many other

reasons, LULAC stands with commenters such as Salem Media Group¹ in seeking that the FCC protect, not relax the rules which enable AM Radio to thrive economically and to ensure their continued successful operations throughout the United States.

Respectfully Submitted,

A handwritten signature in black ink that reads "Cindy M. Benavides". The signature is written in a cursive, flowing style.

Sindy Benavides, CEO
League of United Latin American Citizens

May 29, 2019

¹ Comments of Salem Media Group in MB Docket 18-349 (filed April 29, 2019).