

nevertheless be deemed non-attributable if the investment vehicle qualifies for attribution relief because it is one in which minorities have voting control and hold at least a fifteen percent equity interest.

**CONCLUSION**

In order to create more effective incentives to promote not only the ability of minorities to enter the broadcast industry, but their access to ownership of those major broadcast properties that have the greatest potential to reach significant audiences in markets where disproportionate numbers of minority group members live, the Commission should adopt the attribution and "incubator" provisions it has proposed, with the modifications suggested by Qwest.

Respectfully submitted,

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