



November 14, 2014

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: MB Docket No. 14-50, 2014 Quadrennial Regulatory Review  
MB Docket No. 09-182, 2010 Quadrennial Regulatory Review  
MB Docket No. 07-294, Promoting Diversification of Ownership**

Dear Ms. Dortch:

On Wednesday, November 12, 2014, Jessica Gonzalez, Executive Vice President and General Counsel, and the undersigned on behalf of the National Hispanic Media Coalition ("NHMC"), met with Kalpak Gude, Associate Bureau Chief, and Julissa Marengo, Assistant Bureau Chief, of the Media Bureau to discuss the above-referenced dockets.

In the meeting, NHMC reviewed many arguments that it made in initial comments in the 2014 Quadrennial Regulatory Review of Media Ownership Rules proceeding.<sup>1</sup> Namely, NHMC expressed a desire for the FCC to retain or tighten existing media ownership rules as a race-neutral way to preserve or create ownership opportunities for new entrants, including women and people of color. NHMC expressed the opinion that the Prometheus line of cases out of the 3<sup>rd</sup> Circuit Court of Appeals prevents the Commission from relaxing any rules without first analyzing the impact that such relaxation would have on ownership rates by women and people of color.

NHMC also argued that radio does contribute to viewpoint diversity, and contrary conclusions should not be used as a justification for relaxation of the radio/newspaper and radio/television cross-ownership rules. To support this position, NHMC highlighted a number of examples that it included in its initial comments.

Finally, NHMC urged the FCC to continue to seek and analyze data about broadcast ownership by women and people of color and the impacts of such ownership. For instance, NHMC applauded the Commission's collection and release of Form 323 data and asked the Commission to begin performing an analysis of such data to look for trends and other

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<sup>1</sup> Comments of the National Hispanic Media Coalition, MB Docket Nos. 14-50, 09-182, 07-294 (filed Aug. 6, 2014), *available at* <http://apps.fcc.gov/ecfs/document/view?id=7521751409>.

important information. Further, NHMC asked that the Commission resume its collection of Form 395 Equal Employment Opportunity data and, eventually, release such data to the public.

This Ex Parte disclosure is filed pursuant to 47 C.F.R. § 1.1206(b). Please contact me should you have any questions regarding this submission.

Respectfully submitted,

\s\ Michael J. Scurato

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cc: Kalpak Gude  
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