



JAPANESE AMERICAN CITIZENS LEAGUE / JACL

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February 9, 2016

Marlene H. Dortch
Office of The Secretary
Federal Communications Commission
445 12th St, S.W.
Washington, DC 20554

Re: MB Docket No. 15-146 - *Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones*

Dear Ms. Dortch:

The Japanese American Citizens League is writing regarding the Vacant Channel Proposal, and urges the Commission to conduct a study examining the impact on minority communities before adopting the proposal.

Low Power Television (LPTV) plays an important role in encouraging greater diversity of ownership in the broadcast television ecosystem because it can be used as an entry point to increase broadcast ownership among minorities and women. African-Americans, Hispanics and Latinos, Asian Americans, and women are currently underrepresented in terms of broadcast ownership. Because access to capital remains a significant hurdle to increasing diversity of ownership, LPTV stations, which represent a far less costly entry point than full power stations, can serve as an effective way to promote diversity of ownership among underrepresented groups.

In 2009, the Community Broadcasters Association conducted a survey of LPTV stations titled, "Diversity Defined: A Report on the Diversity and Localism provided by Class A and Low Power Television Stations." The following data points are excerpts from this analysis of LPTV ownership and programming¹

Minority Owners of Low Power Television

- 45% of LPTV stations are owned or partially owned by a minority
- 43% of these stations have a minority owner of at least 51% of the station
 - 24% of LPTV owners are Hispanic
 - 10% of LPTV owners are African American
 - 3% of LPTV owners are Asian
 - 3% of LPTV owners are Native American
 - 34% of LPTV owners are multi-racial
 - 60% of LPTV stations are owned or partially owned by women

¹ See <http://www.spectrumevolution.org/wp-content/uploads/2010/10/LPTV-Industry-Survey-1.pdf>

Diversity in Programming on Low Power Television

- 66% of LPTV stations offer at least some foreign-language programming
- 78% of LPTV stations that offer foreign language programming air at least 10 hours weekly of foreign language programming
- 83% of LPTV stations have local programming

The Commission has frequently stated that increasing and promoting ownership by minorities and women is an important public policy goal. The Commission has also prioritized LPTV and translator stations over unlicensed operations. The proposed actions have the potential to restrict, and in some markets eliminate, opportunities for low-cost ownership entry for minority and women broadcasters.

These actions would also sever programming to underserved communities, including minority, ethnic and low-income viewers. The need for diversity in programming and language access – especially in low-income communities – is more critical than ever particularly in the Asian American community where over 100 different languages are spoken. Low power stations frequently provide in-language programming for which there is no immediate alternative. Underserved communities rely on these stations to provide in-language programming.

We urge the Commission to conduct a study prior to further consideration of the proposal to ensure it will not impact the Commission's longstanding goal of increasing broadcast ownership by minorities and underrepresented groups. Low power television stations provide both opportunity and critical programming.

Sincerely,



Priscilla Ouchida
Executive Director