



1050 Connecticut Avenue, NW
5th Floor, Suite 500
Washington, DC 20036

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: MB Docket No. 15-64, Request for Comment on the Report of the Downloadable Security Technical Advisory Committee

Dear Chairman Wheeler,

The Black Women's Roundtable¹ (BWR) urges the Commission to consider the impact your set-top box proposal will have on consumers, producers and providers of diverse programming. While we share in your goal to provide choice for consumers and increase competition among providers of video content², we are concerned that your proposal is silent with regard to its effect on diverse programming offerings to consumers and its impact on the owners, producers and providers of diverse programming.

As consumers, we want a choice of devices at lower costs. However, we do not want make the anguishing decision between lower costs at the expense of diminishing and diverting our choices to access diverse programming. We are concerned that your proposal does not address how tech and video streaming companies will ensure that consumers' viewing data does not fall victim to algorithms that steer us to certain video content, while burying our ability to choose other programs amid layers of predetermined and targeted programming and adverting.

1 The Black Women's Roundtable (BWR) is the women and girls empowerment arm of The National Coalition on Black Civic Participation (NCBCP). The BWR Public Policy Network is an intergenerational civic and issue engagement network that advocates for just and equitable public policy that promotes the health and wellness, economic security, education and global empowerment of Black women and girls.

2 See generally "It Time to Unlock the Set-Top Box Market" Re/code Newsletter, January 27, 2016, available at <http://recode.net/2016/01/27/its-time-to-unlock-the-set-top-box-market/> (last visited on February 10, 2016).

Black women are the fastest growing group of entrepreneurs in this country.³ Many of us are the owners, producers and programmers of video content on several different media platforms. The BWR wants to preserve and expand the avenues for video content and programming created producers of diverse content that speaks to us. We are very concerned that the new video content ecosystem that you present in your proposal does not address how producers and programmers of diverse content can find an audience and financially survive alongside the tech and video streaming players in this system that will be allowed to cherry-pick among the diverse content and programmers they provide to consumers.

Given the significant concerns regarding the impact your proposal will have on consumer choice and the producers and providers of diverse programming, we strongly urge the Commission to consider and include these perspectives before moving forward on a rulemaking proceeding regarding this issue.

Respectfully submitted,



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Convener, Black Women's Roundtable



Joycelyn Tate
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National Coalition on Black Civic Participation and Black Women's Roundtable

³ See Amy Haimerl, "The Fastest-growing Group of Entrepreneurs in America" Fortune, June 29, 2015, available at <http://fortune.com/2015/06/29/black-women-entrepreneurs/> (last visited on February 10, 2016).