

March 24, 2016

The Honorable Thomas Wheeler
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20054

RE: Expanding Consumer's Video Navigation Choices, MB Docket No. 16-42; Commercial Availability of Navigation Devices, CS Docket No. 97-80; Promoting the Availability of Diverse and Independent Sources of Video Programming, MB Docket No. 16-41

Chairman Wheeler:

We write to urge the Commission's rejection of a March 21 request to delay the Notice of Proposed Rule Making (NPRM) proceeding pending completion of a newly proposed "diversity" study and an additional 90 day comment period. The organizations requesting this study and delay have had over 20 years to make a case that a competitive set top box system harms minorities. In these 20 years, these organizations have not made a credible case in this regard. To the contrary, diverse programmers and cable networks have repeatedly made a compelling case that the current system of little to no minority ownership and programming is abhorrent and deserving of a solution such as that proposed in the NPRM.

We encourage all genuinely interested in diverse programming to participate in the FCC Notice of Inquiry (NOI) proceeding on Diverse and Independent Programming. We applaud Commissioner Mignon Clyburn and the Commission for pursuing a historic and long overdue inquiry into programming disparities in the cable marketplace. We also urge the Commission to not in any way be distracted from this important proceeding by the March 21 letter and the letter's constructive minimization of the NOI.

Finally, we encourage the FCC to move as swiftly as possible to end consumer dependency on leased set top boxes that force communities of color to significantly overpay for set top boxes. Communities of color deserve better than the "overpayment for limited content" status quo.

Thank you for your consideration of our request.

Respectfully Submitted,

Broderick Byers, CEO, iSwop Networks

Stephen Davis, CEO, New England Broadband

Eric Easter, Chair, National Black Programming Consortium

Clifford Franklin, CEO, GFNTV

Robert Townsend, Principal, The Townsend Group

cc:

The Honorable Mignon Clyburn, Commissioner

The Honorable Jessica Rosenworcel, Commissioner

The Honorable Ajit Pai, Commissioner

The Honorable Michael O'Reilly, Commissioner