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March 28, 2016

**VIA ECFS**

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

***RE: Promoting the Availability of Diverse and Independent Sources of Video Programming, MB Docket No. 16-41***

Dear Ms. Dortch:

The Urban Broadcasting Company is a Harlem, New York based broadcast multi-media company. The company produces and distributes content over multiple platforms, including cable, satellite, video on demand, set-top boxes, wireless devices, mobile, and social media. We offer sports, lifestyle, news, business, and health programming. I applaud the Federal Communications Commission's (FCC) inquiry on diverse and independent programming and appreciate this opportunity to share our views on this important subject.

The cable industry still has a 'Gate Keeper' mentality. This may have worked for them in the past but now it is their Achilles heel. By keeping companies with diverse programming out they have created a new and powerful movement of streaming and other distribution channels. Just as small businesses are the backbone of our economy, independent and culturally diverse content companies provide content that is representative of the 'Real' demographic who watches television and would actually help pull more viewers to cable. Cable programmers

must understand the 'Old' way of doing business has changed and in order for them to become more 'relevant', they are going to have to embrace culture and diversity.

Some large cable companies have not even historically wanted to entertain a conversation about diverse programming. I get the feeling that things are slowly changing. A few of them are beginning to get it and they know that diversity is the key to keeping their subscribers happy. The key to establishing change is ensuring open marketplaces accessible to diverse programmers.

The issue with minority content producers always revolves around 'Access to Capital'. This is a very capital driven business but there are ways to cut costs. Unfortunately, some costs cannot be cut. We need to create real funds that address the issue and that are not just disingenuous window dressing. It will take 'new faces' in the business to finally address this issue. I encourage the FCC to work with other agencies and organizations in conducting further inquiry and solutions to access to capital issues. Any future systems will only have non-discriminatory impacts when producers of all races and genders have equal access to capital.

I have encountered many different types of barriers in this industry. The most disappointing and persistent obstacle has been overcoming challenges as a woman of color. There is still the notion that women and minorities are not capable of running cable networks. Those people with the ability to green light projects or provide access to distribution seldom look like me. The inherent biases of programming decision makers significantly impact programming decisions. I believe I would have had a lot easier and faster road to success if my company was controlled by white males instead of a black female. The disparate impact in cable carriage, distribution, and ownership should be reviewed and addressed as the racial and gender discrimination it has always been!

Despite the challenges in today's programming marketplace, I have enjoyed some significant successes. I have had a great response to my sports programming. Comcast was key to helping UBC get to a national audience with HBCU football. Some viewers actually changed cable carriers in order to watch the games. It was an amazing thing for me to see how certain types of programming affect certain demographics. It was an affirmation that original content is king if you allow the stories to be told by the ones who created those stories.

Denial of access to diverse content results in more negative stereotypes filling television screens. TV is a powerful thing. It can make you feel happy, sad, hungry, etc. It can also have an impact on how people view other cultures and how other cultures view themselves. If you do not have a balance of content from diverse areas, we all suffer as a country. People are pushed to seek other content that is more representative of who and what they are. Cable is missing out on a grand opportunity to do something that is not the regular stereotypical programming. But, it will take courage for cable to change. When you have happy subscribers you have a healthy cable system. Unfortunately, subscriber fees have made some networks lazy. It seems that they feel they have to do nothing much except the same old thing to

continue making substantial profits from subscriber fees. Social media companies, Netflix, Apple and others have come into the industry to say, "That time has ended!!"

The FCC should put a panel together of independent content creators that will assist it in creating a fair and equal process where urban communities can get the channels they want to see in addition to the regular cable channels. The other thing is to listen to the communities, not just figure heads of those communities. Listen to the people directly via Town Hall meetings or something online. That way you will get community input directly instead of press releases from people who say they represent the community when they are only representing themselves and their own agenda.

Technology has enabled us to reach past our borders into a new world. We do not have to now only depend upon the U.S. market for viewers and revenues. With Virtual Reality and immersive reality and more coming into the fold, it is truly a new revolution in the world of content creation, distribution and culture. My goal has been to develop my own content and find alternative distribution. Now the time has come where there are many more options. As a result, I have had to rethink and re-organize my plan of action in reference to distribution. Sports, music, and fashion have significant appeal to international markets and the future looks very bright for streaming, live streaming, OTT and other formats. That is where UBC-TV is going and hopefully the FCC and Cable Carriers will embrace the new world instead of fighting it. It is all about inclusion.

Thank you,

A handwritten signature in black ink, appearing to read "Peggy Dodson". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Peggy Dodson  
CEO/President  
UBCTV