Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Expanding Consumers' Video Navigation Choices	)	MB Docket No. 16-42
	)	
Commercial Availability of Navigation Devices	)	CS Docket No. 97-80

REPLY COMMENTS OF THE BLACK WOMEN'S ROUNDTABLE

The Black Women's Roundtable[1] (BWR) respectfully submits these Reply Comments in response to the Federal Communications Commission's (Commission) Notice of Proposed Rulemaking (NPRM) in the dockets referenced above.

The BWR is committed to the social and economic empowerment of Black women. We advocate not only for the inclusion of Black women in all facets of this nation's media industry; but that Black women also have the opportunity to thrive as entrepreneurs, programmers and content providers within the industry.

Based on the plethora of diverse voices in the record that have cautioned the Commission regarding the adverse effects or unintended consequences that its NPRM could have on advancing diversity and inclusion in the media and all electronic media platforms, the BWR strongly urges the Commission to suspend this proceeding and conduct a disparity study in order to gather empirical data on the impact this NPRM would have on diverse programmers and content providers. This study should address how this NPRM would effect the advancement of a robust level of diversity and inclusion within the industry. The study should also address the

1 The Black Women's Roundtable (BWR) is the women and girls empowerment arm of The National Coalition on Black Civic Participation. 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.

impact that this NPRM would have on 1) advancing economic benefits for diverse programmers and content providers and 2) increasing underserved and diverse communities' access to new content and viewpoints from diverse content providers and programmers.

The Commission's current record in this proceeding lacks the necessary data to address the critical impact that this NPRM would have on the Commission's directive to advance diversity and inclusion. For this reason, a disparity study is particularly necessary before moving forward with this rulmaking proceeding to ensure that "unlocking the set-top box" will indeed promote diversity and inclusion. This study is particularly essential since unlocking the set-top box would deliver the power to access and monetize diverse content into the hands of a tech industry that continues to maintain a consistently dismal record of diversity and inclusion within its ranks--particularly of Black women[2].

In addition to the potential of crippling the advancement of diversity and inclusion in the industry, the Commission's NPRM also gives differentiating responsibilities for consumer privacy to the various content providers. The NPRM's lack of definitive requirements to ensure consistent consumer privacy protections as a responsibility of device manufacturers, video content aggregators and any other Internet media entity, creates uncertainty and confusion for consumers as privacy protections would vary based on the provider of the content. In order to reduce consumer confusion, the Commission should set forth a clear and consistent set of consumer privacy protections that are applicable to all content providers.

---

2 *See* The Black Women's Roundtable report, *Black Women in the United States 2016*, March 2016. Last accessed April 22, 2016. http://www.ncbcp.org/news/releases/5Black_Women_in_the_US_2016.pdf "While major tech company giants like Apple, Facebook, Google, Intel, Microsoft and Twitter are collectively hiring thousands of workers, these companies' average employment of Black women is only three percent; with Twitter averaging zero percent hiring of Black women. Black women working at the executive and management levels of major tech companies are almost negligible at only one percent."

Before the Commission imposes drastic changes to the video content industry, it should make a careful assessment of the potential impact these changes will have on the industry and consumers. For this reason, the BWR urges the Commission to suspend this rulemaking proceeding until it has conducted sufficient studies to determine the impact of any unintended consequences and/or collateral damage that this NPRM would have on advancing diversity and inclusion and consistent consumer privacy protections throughout the industry.

Respectfully Submitted,

Melanie Campbell,
President and CEO,
National Coalition on Black Civic Participation
Convenor, Black Women's Roundtable

Joycelyn Tate
Senior Technology Policy Advisor
Black Women's Roundtable and
National Coalition on Black Civic Participation

1050 Connecticut Avenue, NW
5th Floor, Suite 500
Washington, DC 20036
(202) 659-4929