

**MINORITY MEDIA AND
TELECOMMUNICATIONS COUNCIL**

3636 16th Street N.W., Suite BG-54
Washington, D.C. 20010

David Honig, Executive Director
Phone: (202) 332-7005 Fax: (202) 332-7511
e-mail: dhonig@crosslink.net

Henry M. Rivera
Chairperson

Erwin Krasnow
Deborah Lalhen
Vice Chairpersons

Lawrence Roberts
Secretary

Everett C. Parker
Treasurer

BOARD OF DIRECTORS

Andrew C. Barrett
Antoinette Cook Bush
Jeneba Jalloh Ghall
Julia Johnson
Erwin Krasnow
Deborah Lalhen
Nicolaine Lazarre
Alex Nogales
Everett C. Parker
Henry M. Rivera
Lawrence Roberts
Andrew Schwarzman
S. Jenell Trigg
Herbert Wilkins

BOARD OF ADVISORS

Raul Alarcon, Jr.
Eddie Arnold
Tyrone Brown
Amador Bustos
Angela Campbell
Thomas Castro
Jannette Dales
Belva Davis
Moctesuma Esparza
Jerome Fowlkes
Frank Halfacre
John Hane
Janis Hazel
Ragan A. Henry
Leo Hindery
Reginald Hollinger
Larry Irving
Eli Noam
Vincent A Pepper
Benjamin Perez
Linda Eckard Vilardo
Anthony Williams
Edward Young

DOCKET FILE COPY ORIGINAL

February 10, 2002

Hon. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

RE: **MB** Docket No. 02-277 (Biennial Review of
Broadcast Ownership Rules)

MM Docket No. 01-235 (Broadcast/Newspaper
Crossownership)

MM Docket No. 01-317 (Local Radio
Ownership)

MM Docket No. 00-240 (Definition of Radio
Markets)

Pursuant to 47 CFR 51.1206, this will disclose that in connection with these permit-but-disclose proceedings, on behalf of the Diversity and Competition Supporters, I held a meeting February 6, 2003 at 2:00 PM with Jane Mago, General Counsel, Michele Ellison, Deputy General Counsel, Susan Eid, Legal Advisor to the Chairman, and Paul Gallant, Esq., of the Media Bureau staff.

I discussed the importance of addressing minority ownership in the proceeding. To build a full record on this issue, I urged the Commission to convene a public hearing on minority ownership to mark the occasion of the 25th anniversary of the Statement of Policy on Minority Ownership of Broadcast Facilities, 68 FCC2d 979 (released May 25, 1978).

No. of Copies rec'd 073
List ABCDE

I described how the "Staged Implementation Plan" (see "Initial Comments of Diversity and Competition Supporters" filed January 2, 2003, pp. 82-101) might operate in practice and how it would comport with Section 202(h), on its own and in tandem with the parallel review of the substantive rules that would also need to be undertaken.

I also explained the "equal transactional opportunity" policy described on pp. 115-120 of our Initial Comments, and promised to amplify on what the text of such a rule would read, what the proposed certification would contain, and how the rule might operate in connection with the maintenance by the Commission of a buyer's list.

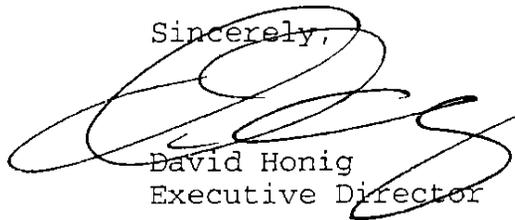
Our Reply Comments, filed February 3, 2003, contained a formula for an "HHI for Diversity" (pp.17-24). I explained how the formula was derived and how it could be used to take the temperature of the market in connection with a staged implementation plan.

Our Reply Comments also contained a tentative proposal for "Diversity Credits" (pp. 34-38). I explained how this would work in practice, and in particular how its adoption could be a substitute in many respects for diversity based bright-line regulation. I promised to further develop the concept with the assistance of economists specializing in this subject.

Finally, I expressed our endorsement of CWA's proposal for the use of JOAs (Joint Operating Agreements) in place of TV duopolies.

An original and two copies of this letter are being filed with the Secretary.

Sincerely,



David Honig
Executive Director

cc: Susan Eid, Esq.
Jane Mago, Esq.
Michele Ellison, Esq
Paul Gallant, Esq.

/dh