



# National Association of Hispanic Publications

21 Years of Growth, Service, and Success

July 16, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Applications for Transfer of Control of Hispanic Broadcasting Corp., and Certain Subsidiaries, Licensees of KGBT AM, Harlingen, Texas et al. (Docket No. MB 02-235, FCC File Nos. BTC-20020723ABL, et al.)**

Dear Ms. Dortch:

I am the Executive Director and CEO of the National Association of Hispanic Publications (“NAHP”). The purpose of this letter is to express to the Federal Communications Commission (“FCC”) our deepest concerns about the proposed merger between Univision and Hispanic Broadcasting Corporation (“HBC”). If approved, this merger would lead to a level of concentration in the Spanish-language broadcast market that is unrivaled by any English-language media company. In addition, approval of the merger would result in a crippling of the diversity of voices and opinions in the Hispanic media market.

Founded in 1982, NAHP is the premier organization representing Hispanic print nationwide. NAHP represents over 200 Hispanic newspapers, magazines, and other publications nationwide with a combined circulation of more than 14 million. Its member publications reach over 52% of Hispanic households in 55 U.S. markets every week. The mission of NAHP is to promote Hispanic print, the most effective medium to reach the Hispanic population. NAHP strives to continually inform and educate the Hispanic community on social issues, educate the readership of its member publications, provide technical assistance, and improve the quality of Hispanic publications nationwide.

NAHP fears that the concentration resulting from the proposed merger, and the monopoly power the combined entity will wield will silence the voices of the community which are represented by the growing and diverse Hispanic print and other media. The proposed merger will also further diminish the ability of national advertisers to include

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print media in their campaigns. If the merger is allowed, one single company will control over 70% of the national advertising dollars spent on Hispanic media in the United States. Hispanic media is one separate market, which includes Spanish-language television stations, Hispanic radio, Hispanic print, and other Hispanic media. When national advertisers specifically want to reach the Hispanic community, they purposefully choose Hispanic media, instead of opting for the English-language media (such as the major broadcast networks) which more broadly target the majority-language market. Because of the excessive consolidation that would result, the FCC should deny the Univision/HBC merger.

The Hispanic publications represented by NAHP deliver a vital service to the growing Hispanic community. For the Hispanic print industry to continue to prosper and educate the community, we need to ensure the existence of a level playing field where all Hispanic media can compete fairly. The proposed Univision/HBC merger threatens to stifle the diversity of voices and the fair competition of Hispanic media.

As NAHP President, Hernán Guaracao, has stated, “to the over 200 Hispanic publications represented by the National Association of Hispanic Publications and the 38 million Hispanics that get their news from this diverse spectrum of sources, this domination of the world of Hispanic media means one thing only: less diversity of news, less diversity of views, and less voices for the millions who are represented by this varied and thriving group of Americans.”

I hope that you will consider NAHP’s opposition to the proposed Univision/HBC merger in making your determination.

Respectfully submitted,



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