



THE NATIONAL ASSOCIATION OF HISPANIC PUBLICATIONS FOUNDATION

October 7, 2004

Hon. Marlene H. Dortch
Secretary
FCC - Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Dear Ms. Dortch:

RE: MB Docket No. 02-277

On behalf of the National Association of Hispanic Publications Foundation, I held a meeting on October 6, 2004 at 3:00pm with Royce Sherlock, Maria Baghdadi, Erin Dozier, Robert Ratcliffe, and Debra Sabourin.

At the meeting, I urged that the Commission carefully examine cross ownership issues:

1. relating to the preservation of minority owned business opportunities in communities where nationally defined minorities are a majority of the local population;
2. relating to defining 'dominant language,' how it is to be determined, who will make the determination, and how often it is to be applied;
3. relating application of the proposed rules to minority dominant language publications [non-English] in some communities that allows major corporate majority minority language publications [English] to qualify for non-dominant language exceptions, as Alice in Wonderland might say a "through the looking glass" phenomenon.

It is our goal to assist the FCC in growing the number of disadvantaged owners in the media business, to increase diversification of media and to help struggling minority entrants into the market. We have significant concerns that the pending implementation of the adopted rules will not facilitate those goals.

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

Sincerely,

Thomas L. Oliver
Executive Director & CEO

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Ex Officio

Hernan Guaracao President, NAHP Inc.
Thomas Oliver Executive Director & CEO, NAHP Foundation

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1085 National Press Building, Washington, DC 20045
202-662-7250 fax 202-662-7254 tomoliver@nahp.org www.nahp.org

