

RE: Docket No. 06-121, the review of the FCC's media ownership rules, please do not relax or eliminate the public interest limits on media ownership. Please rule in the public interest on this matter by preserving the FCC's Broadcast Media ownership rules: the Television-Radio Cross-Ownership Rule, the Broadcast-Newspaper Cross Ownership Ban, the National Television Ownership Rule, the Duopoly Rule for Radio, the Local Television Ownership Rule, and the Dual Network Rule.

Informed debate and discussion of current events, both locally and globally, a fundamental requirement of our representative government requires the sharing of information, which can be lessened when the media is restricted to only a few owners: multiple information sources controlled by a single voice provide an illusion of variety.

Three years ago, members of the American public spoke out in opposition when the FCC tried to relax ownership rules. Nothing has changed: rather than allowing further consolidation, the U.S. should instead be encouraging the creation of more local, community controlled media outlets.

I am glad that you allowed an extension in time to make comments. Regarding your awarding of study contracts, I am curious as to the amounts of the contracts and how you picked your contractors. For instance, I note that the Minority Ownership studies on barriers to entry will be authored by Allen Hammond, Santa Clara University and Barbara O'Connor, California State University, Sacramento.

Both Hammond and O'Connor are affiliated with Alliance for Public Technology (APT), which receives major funding from various telecommunications companies. The organization is a client of Issue Dynamics, Inc. (IDI), Washington, DC-based firm that organizes PR campaigns that partner corporations with NGO's to "advocate in support of causes that the companies support" according to Sourcewatch. "Its work has angered some consumer activists, who say IDI often does not disclose whom it is working for and argue that IDI's work amounts to astroturf PR." Additionally, Teletruth's Bruce Kushnick in "Bell SkunkWorks 101: A Look Behind the Curtain. Connect the Dots or be One of the Disconnected." notes that the

Executive Director of APT, Sylvia Rosenthal , is also Assistant Vice President of Issue Dynamics Inc. The firm's site says that she does so "IDI's management contract."

In "Snow Job in Washington : Telecom giants are pulling the strings at many 'user' groups, organizations that should represent your interests," which appeared in Network World on 1/26/98 , David Rohde writes of APT:

"The group's chairman, Dr. Barbara O'Connor, bristled at the suggestion that the alliance is a front for anything, noting that it has even held a seat on the FCC's prestigious Network Reliability Council.

"But of the alliance's \$190,000-per-year budget, approximately \$100,000 is supplied by the regional Bell operating companies, she said. Not surprisingly, last October, the alliance wrote the FCC in support of BellSouth's South Carolina long-distance application and has consistently supported other RBOC policy positions."

Glenn Fleishman. in February 8, 2005, entry Wi-Fi News "NMRC Pulls Its Board of Directors Page" notes that before New Millennium Research Council removed the page listing its board of directors, both O'Connor and APT board chairman Karen Buller were listed as board members and that the "NMRC was behind the report that came out last week agitating against municipal broadband; they are owned by IDI.

The idea that members of an astroturf group, or at least a group that has promoted the industry's position over that of the consumer is troubling.

Additionally, the study, Station Ownership and Programming will be authored by Tasneem Chifty, Vice President for Economic Litigation, CRA International, an anti-trust consultant to many industries. News Coverage of Cross-Owned Newspapers and Television Stations will be authored by Jeffrey Milyo, University of Missouri, a senior fellow at the conservative Cato Institute, not an organization known for its advocacy for all consumers.

The FCC's reputation was recently tarnished last September by the revelation of unreleased reports. (See my article, "Previously Unreleased FCC Reports on TV Localism Raise Questions About Media Diversity" at <http://www.llrx.com/extras/tvlocalism.htm>).

Public interest groups have presented convincing evidence of the ill-effects of media consolidation in its October 23, 2006 Compendium of Public Interest Research on Media Ownership, Diversity and Localism (<http://www.hearusnow.org/index.php?id=813>). It is time for the FCC to protect the interests of the general public and promote broad ownership of the industry.

Sincerely yours,
Beth J. Wellington