



Hispanic Information & Telecommunications Network Inc.

Building 292, Suite 211, 63 Flushing Avenue, Unit 281, Brooklyn, NY 11205 □ Tel (800) 294-HITN □ Fax (718) 797-2546 □ www.hitn.org

Mr. Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 07-52

Dear Chairman Martin and Commissioners,

I appreciate the opportunity to provide my views regarding the **Notice of Inquiry (NOI)** on broadband industry practices (**WC Docket No. 07-52**). I provide these comments as a minority programmer, a network operator and non-profit executive.

HITN-TV (Hispanic Information and Telecommunications Network) was created in 1987, as the first Hispanic public interest educational television network in the United States. The network's mission is to educate, enrich and empower the nation's largest minority group. We have focused on meeting the educational needs of our viewers. Our programming is carried on cable, satellite and new IPTV platforms.

Our network is richly unique and family friendly. It is one of the only sources of true instructional programming in Spanish which give viewers access to GED courses, English as a Second Language (ESL) and cultural and financial literary content. No current or proposed network can make that claim.

HITN has also established programming partnerships with the Congressional Hispanic Caucus Institute in Washington, DC, National Association of Hispanic State Legislators and the U.S. Hispanic Chamber of Commerce. We are currently the only service which broadcasts long form coverage of organizations serving the Latino community. Our network is also one of the last remaining Spanish language television networks controlled and managed by Latinos.

Media consolidation and the growing market power of video networks owned or controlled by cable, satellite or broadcast entities are challenging the very foundation of media diversity. For truly independent and minority controlled media, the opportunities in traditional media have contracted. The one bright spot for independent programmers has been the development of new IPTV broadband video platforms. We have found the new entrants offering a more welcoming environment to independent channels. These platforms also offer new opportunities to develop and distribute individual programming which meets the needs of our community.

HITN is also an operator of educational wireless and satellite networks. FCC policies which have given minority, educational and non-profit entities an opportunity to secure and utilize spectrum are very important to promoting minority opportunities in the broadband market. Similarly in the video market, DBS set aside requirements for non-profit public interest programmers have been a life raft for minority programmers in a rising tide of media consolidation.

It is important to note that modern broadband networks, especially advanced video networks require both capacity and intelligence. To meet customer needs, especially in the satellite environment, it is necessary to manage and prioritize traffic. Without that ability, applications like Internet protocol television (IPTV); video conferencing or distance learning offerings would be unstable, subject to interruption and not meet customer needs or expectations.

The FCC should take no action which would chill investment in new broadband services. The entry of new broadband video providers has been a welcome development for minority and independent programmers and media diversity. The FCC should also avoid regulations which would limit the ability of network operators to deploy and operate intelligent networks or subject broadband network operators to telephone-era tariff rate regulation.

Sincerely,



José Luis Rodriquez

Founder and CEO

Hispanic Information and Telecommunications Network

Brooklyn Navy Yard, Building #292, Suite #211

63 Flushing Avenue, Unit 281

Brooklyn, NY 11205-1078

Tel.: (877) 391-4486

Fax: (718) 797-2546