



National Hispanic Media Coalition
1201 West 5th St., Suite T-205
Los Angeles, CA 90017
Tel: (213) 534-3026
Fax: (213) 534-3027
Email: info@nhmc.org
www.nhmc.org

October 31, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. S.W.
Washington D.C. 20554

Re: MB Docket No. 06-121

Dear Ms Dortch:

The National Hispanic Media Coalition (NHMC) is a 21-year old non-profit Latino civil rights, media advocacy organization based in Los Angeles, California whose goals include the increase of Latino ownership in media.

NHMC is very concerned with the lack of minority media ownership. It is incredible to us that FCC Chairman Kevin Martin proposes a vote in December on eliminating media ownership limits when the FCC is unable to accurately assess the true state of female and minority broadcast ownership. In its entire history the FCC has never accurately kept track of women or minority broadcast ownership. Even the most recent FCC studies in July failed to assess this important data. In fact, economists hired by the Commission to study the problem were unable to do so because the data provided to them was quote, "useless." Without minority and women ownership data, it is impossible to have an adequate understanding of how different policies governing media ownership will impact minority ownership.

We do, however, have some data regarding minority and women ownership thanks to our media ally, Free Press. They are as equally concerned about the lack of diverse ownership in media. Two important studies conducted by Free Press – *Out of the Picture* and *Off the Dial* – demonstrate the alarming state of female and minority ownership. In respect to the Latino community, the first study finds that only 1.1 percent of the full-power commercial television stations are owned by Latinos. The second report on radio documents that Latinos own just 2.9 percent of full-power commercial radio stations. These numbers are unacceptable. Both studies confirm that relaxing the ownership rules will cause a further decline in female and minority ownership and yet the FCC is going to vote on eliminating ownership limits without considering the impact on minority and female ownership? This is unconscionable.

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We join FCC Commissioner Jonathan Adelstein in his call for an independent, nonpartisan task force to address this minority media ownership crisis. The task force should be empowered to go forward and ensure that an accurate accounting of the actual number of minority and female broadcast station owners be conducted. It should issue recommendations on policies that specifically address the inclusion of minority ownership so that people of color and women also have the opportunity to be media owners. When the work of this task force is completed, and only when this work is completed, should the FCC move forward with any changes to the rules governing media ownership.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Nogales', written in a cursive style.

Alex Nogales,
President & CEO