

I am writing to express my strong disapproval of any relaxation or elimination of media ownership rules. Your own research has shown that media consolidation hurts local news and reduces the number of independent voices in a given market. Relaxing the cross ownership rule simply does not serve the public interest.

In addition, independent studies have revealed that media consolidation has had a negative impact on minority broadcast ownership. The FCC has never bothered to conduct an accurate count on the number of female and minority broadcast owners, much less has it studied the impact of consolidation on female and minority ownership. This is simply unacceptable.

FCC Chair Kevin Martin has conducted the ownership proceeding by relying on junk science to justify a pre-determined conclusion set out without even the pretense of objective policy analysis. We know this because the first line in a December 2006 memo from the Commission's chief economist that was obtained as part of a FOIA request stated ³this document is an attempt to share some thoughts and ideas I have about how the FCC can approach relaxing newspaper-broadcast cross-ownership restrictions.²

The entire media ownership proceeding has been a rigged game. This is an unacceptable record of administrative abuse which creates an enormous credibility deficit which the Commission must overcome in order to win back public confidence in its conclusions before it moves forward with any rule changes on media ownership.