



Minority Media & Telecommunications Council  
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November 8, 2007

Hon. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

RE: Notice of *Ex Parte* Communication, MB Docket No. 06-121 (Media Ownership)

This Notice reports on three meetings I held as follows: (1) Commissioner Jonathan Adelstein and his Legal Advisor, Rudy Brioche, November 5, 2007, 11:00 AM; (2) Chairman Kevin Martin, his Legal Advisor, Michelle Carey, and Monica Desai, Chief of the Media Bureau, November 5, 2007, 2:30 PM; (3) Commissioner Jonathan Adelstein, November 5, 2007 3:30 PM; and (4) Commissioner Robert McDowell and his Legal Advisor, Cristina Pauze, November 6, 2007, 4:00 PM. MMTC member Jay Holloway participated in meetings (2) and (3) and MMTC Fellow Joy Tate participated in meeting (4). At each meeting, I presented a summary of some of the comments in the docket (attached) as well as a binder containing several of the comments themselves. I made these points:

- (1) There has always been broad consumer support for minority ownership initiatives, and there is also now broad industry support. Over 80 companies have variously endorsed different packages of proposals. The Commission should conduct a process, such as oral argument or a working session, to go through each of the proposals and agree upon an expansive package that fully addresses access to opportunity, access to spectrum and access to capital.
- (2) If the Commission relaxes the crossownership rule, it should do so only after fully addressing the minority ownership dilemma, and it should do so not because consolidation is desirable but in spite of the fact that consolidation is not desirable. The narrowest reason for rule relaxation is that newspapers are unique among media because they have lost classified ad support. Without new revenue sources such as content monetization across platforms, many newspapers have nothing else to cut except the investigative and enterprise journalism that perform a watchdog function essential to democracy.
- (3) The SBA's small business definition and variations on it are so dilute as to be powerless in advancing minority ownership. Yet because the FCC's database is inadequate and its Section 257 research is stale, it could take years to develop a sustainable race-conscious definition. While developing that definition, the Commission should apply an interim definition based on an applicant's success in overcoming disadvantages, the overcoming of which would naturally yield diversity of information and viewpoints and would be predictive of success in a challenging environment.

Sincerely,

*David Honig*

David Honig  
Executive Director

Attachment