

I agree with the Commission that promoting innovation, diversity, and especially competition are essential in the broadcast industry. However, the proposed program may not reach this goal as effectively as it could. It focuses on bringing diversity into the broadcast marketplace – a key element. But the program as proposed does not provide a means for attracting licensees that will also be innovative and competitive. I suggest that additional measures be developed to address these components. The “full file” approach described in the proposed rule would be an excellent starting position, with additional criteria included. For example, applicants could be asked not just what hardships they have overcome, but also to demonstrate why they believe they would be successful if granted a license. While creating a definition for socially and economically disadvantaged businesses seems to be a more efficient approach, a “full file” review would be more likely to produce licensees that would serve the Commission’s goals in granting the licenses.