

Minority Media & Telecommunications Council

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October 6, 2008

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

Dear Chairman Martin:

RE: Class A LPTV Must Carry (MB Docket No. 07-294, Diversification of Broadcast Ownership)

The Minority Media and Telecommunications Council (MMTC) welcomes the news that at its October 15 meeting, the Commission will consider a notice of proposed rulemaking to upgrade Class A television stations to full power status, thereby making these stations eligible for must-carry. Class A stations offer the best opportunity for minorities, women and small business to participate and compete in the television industry, which is increasingly consolidated with few opportunities for minority broadcasters. MMTC strongly encourages the Commissioners to support this initiative, which would do much to enhance diversity and localism in television.

Class A stations address important public interest needs by providing local and diverse content. Unlike full-power stations, Class A stations are required to meet local programming requirements; however, they do not enjoy comprehensive mandatory cable rights. Class A stations have the largest percentage of minority and female ownership of all the broadcast services, and are valuable assets to the communities they serve. Further, about a quarter of these stations are multilingual, and many provide extensive local programming.

The *MMTC Road Map For Telecommunications Policy* (July 21, 2008), at 17, outlines MMTC's support for must carry for those Class A stations that serve underserved viewers and providing local programming.¹ The Commission's forthcoming proposal would provide opportunity for minority broadcasters, increase diversity in broadcasting, enhance localism, and give Class A stations the stability necessary to compete in the digital world.

Sincerely,

David Honig

David Honig
Executive Director

¹ Therein we stated:

Unlike full-power TV stations, low power television ("LPTV") stations do not enjoy comprehensive mandatory cable carriage rights. Most LPTV stations do not offer unique or local programming service, but the nation's approximately 600 Class A LPTV stations are required to originate local programming and many Class A stations provide extraordinary local service. Approximately 15% of Class A stations are minority-owned and many of these stations provide multilingual and multicultural service unavailable from full power stations.

Blanket authorization of must-carry for all Class A stations could have the unintended effect of limiting the availability of cable channel space for other diverse programming. However, must-carry rights should be available to a subset of Class A stations, such as those providing regular daily local programming and serving underserved viewers. The implementation of must-carry rules for this subset of Class A stations would provide these broadcast outlets, many of which provide diverse programming, with instant access to about 60% of TV homes in a typical market.