



November 14, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: MB Dkt 09-182, 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996

Dear Chairman Genachowski:

We write on behalf of the undersigned members of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership to promote and protect the rights of all persons in the United States. We urge the Federal Communications Commission (FCC) to make diversity a central focus of its upcoming Quadrennial Media Ownership Rule Review, by evaluating the impact of the media ownership rules on ownership opportunities for women and people of color. The civil rights community has long regarded the expansion of minority and female ownership in media as an important goal because of the powerful role the media plays in the democratic process, as well as in shaping perceptions about who we are as individuals and as a nation.

Minority ownership in TV and radio has dropped substantially at a time when these populations are growing. The Leadership Conference conducted hearings in 2005 and 2007 on the importance of diversity in media, and the unanimous conclusion of media experts who participated in our hearings was that the FCC was doing an inadequate job of identifying and working to eliminate the barriers to participation of women and racial minorities in radio and television.

As research conducted by the advocacy group Free Press shows, while Latinos, African Americans, Asian Americans, and Native Americans make up one third of the U.S. population, they own only 7.2 percent of all full-power radio and TV stations. Women make up 51 percent of the U.S. population, yet own less than 6 percent of full-power commercial radio and TV stations. We believe there is a direct connection between those who own these stations and the content they produce.

Despite these statistics, the Commission presently has no meaningful policies to address racial and gender inequities in media ownership and has ignored the impact of its media ownership rules on those inequities. Indeed, this summer, the U.S. Court of Appeals for the Third Circuit admonished the Commission—for a second time—

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for adopting media ownership rules but “punting yet again” on measures to encourage and promote media ownership opportunities for women and people of color.¹

The FCC should heed the Third Circuit’s call. As media consolidation grows, people of color and women become less significant players in the media ecosystem. The Commission must acknowledge that fact and take action to remedy it. Please contact Leadership Conference Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, UCC Office of Communication, Inc., at 202-841-6033, or Chris Calabrese, ACLU, at 202-715-0839, or Corrine Yu, Leadership Conference Managing Policy Director at 202-466-5670, if you would like to discuss the above issues or any other issues of importance to The Leadership Conference.

Sincerely,

American Civil Liberties Union
Asian American Justice Center
Communications Workers of America
National Urban League
NAACP
National Consumer Law Center, on behalf of its low-income clients
National Hispanic Media Coalition
National Organization for Women
The Leadership Conference on Civil and Human Rights
UCC Office of Communication, Inc.

¹ *Prometheus Radio Project v. FCC*, Nos. 08-3078 *et al.*, slip op. (3d Cir. July 7, 2011) at 53.