



August 3, 2012

Officers
Interim Chairperson
Judith L. Lichtman
National Partnership for Women
& Families
Vice Chairperson
Karen K. Narasaki
Asian American Justice Center
Secretary
Barry Rand
AARP
Treasurer
Lee A. Saunders
American Federation of State,
County & Municipal Employees

Executive Committee
Barbara Arnwine
Lawyer's Committee For
Civil Rights Under Law
Arlene Holt Baker
AFL-CIO
Marcia Greenberger
National Women's Law Center
Linda D. Hallman
American Association of
University Women
Mary Kay Henry
Service Employees
International Union
Mark Perriello
American Association of People
with Disabilities
Benjamin Jealous
NAACP
Michael B. Keegan
People For The American Way
Floyd Mori
Japanese American Citizens
League
Marc H. Morial
National Urban League
Janet Murguia
National Council of La Raza
Debra Ness
National Partnership for Women
And Families
Terry O'Neill
National Organization for Women
Jacqueline Johnson Pata
National Congress of
American Indians
John Payton
NAACP Legal Defense and
Educational Fund, Inc.
Dennis Van Roekel
National Education Association
Anthony Romero
American Civil Liberties Union
Thomas A. Saenz
Mexican American Legal Defense
& Educational Fund
David Saperstein
Religious Action Center for
Reform Judaism
Shanna L. Smith
National Fair Housing Alliance
Joe Solmonese
Human Rights Campaign
Randi Weingarten
American Federation of Teachers
Elisabeth MacNamara
League of Women Voters
Warren David
American-Arab Anti-
Discrimination Committee

Compliance/Enforcement
Committee Chairperson
Karen K. Narasaki
Asian American Justice Center
President & CEO
Wade J. Henderson
Executive Vice President & COO
Karen McGill Lawson

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link-Up, WC Docket No. 03-109; Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 12-23; Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996 Petitioners' Alternative Rulemaking Proposal, CC Docket 96-128; 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, MB Docket No. 09-182; Promoting Diversification of Ownership in the Broadcasting Services, MB Docket No. 07-294; Literature Review of Research on Critical Information Needs and Market Entry, BO Docket No. 12-30; Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, CC Docket 96-115.

Dear Secretary Dortch:

On July 31, 2012 the following individuals, who represent members of The Leadership Conference on Civil and Human Rights Media and Telecommunications Task Force, met with Commissioner Rosenworcel and her advisors Holly Sauer and Priscilla Argeris. Attending the meeting were: Corrine Yu, The Leadership Conference on Civil and Human Rights; Chris Calabrese, American Civil Liberties Union, Task Force Co-Chair; Cheryl Leanza, United Church of Christ, OC Inc., Task Force Co-Chair; Madura Wijewardena, National Urban League, Eric Geist, Communications Workers of America; Mike Scurato and Brenda Villanueva, National Hispanic Media Coalition; Edward Carlson, National Conference of La Raza, and Olivia Wein, National Consumer Law Center. We met with the Commissioner to give her an overview of the priority areas for the civil rights community in the Commission's agenda.¹

Chris Calabrese reviewed the ACLU's perspective in the Commission's privacy docket. Mr. Calabrese explained the ACLU supports the Commission bringing transparency to

¹ We referenced and provided the Commissioner's staff with hard copies of the following filings from the above-captioned dockets: Lifeline comments and reply comments <http://apps.fcc.gov/ecfs/document/view?id=7021240533> and <http://apps.fcc.gov/ecfs/document/view?id=7021706791> and digital literacy comments <http://apps.fcc.gov/ecfs/document/view?id=7021976052>; Quadrennial media ownership review comments, <http://apps.fcc.gov/ecfs/document/view?id=7021898213>; Joint prison phone rate letter <http://apps.fcc.gov/ecfs/document/view?id=7021918702>; Literature review of information needs of communities comments <http://apps.fcc.gov/ecfs/document/view?id=7021994081>.



information collection by carriers. He then explained that CPNI includes location data and urged the FCC to use its authority to impose data retention limits on how long carriers retain location information.

Next the group discussed concerns with the Commission's current proposals on media ownership concentration. We reiterated our position that the Commission must collect better data on ownership by women and people of color before adopting any relaxation in the media ownership rules pursuant to the U.S. Court of Appeals for the Third Circuit's directive. Mr. Scurato encouraged the Commissioner to continue her efforts to improve Form 323 data collection efforts. Ms. Leanza expressed concern that even if the Commission found flaws with the initial data filing in 2009, the Commission had not identified publicly any of those flaws nor improved data collection by the time of the 2011 data collection. Ms. Leanza and Mr. Geist explained that UCC OC Inc. and CWA had filed on the proposed Tribune transaction and hoped the Commissioner would examine our filings in that docket. We provided the Commissioner a copy of our most recent filings.²

Ms. Yu next turned to The Leadership Conference's current concerns with prison phone rates. Mr. Carlson emphasized the immorality of the practice. He also explained that many states which have acted to reform their own rates did so as a cost-saving measure to reduce recidivism. Ms. Yu explained that other parts of the Administration, including the Department of Justice and the White House, have a strong interest in reducing recidivism and thus reducing prison phone rates.

Ms. Wein discussed our filings with respect to broadband and digital literacy. Ms. Wein expressed NCLC's disappointment that the broadband pilots offered only investigation of a few data points—rates and duration of service. Ms. Wein emphasized that the group's position with respect to the digital literacy program's legal authority was rooted in our desire to ensure that community organizations with expertise in digital literacy receive funding, rather than eligible telecommunications carriers (ETCs), which do not have such expertise. She also emphasized that mobile wireless is a potential means for broadband adoption by low-income communities, but that the Commission had declined to adopt standards for mobile wireless in the last order. Ms. Leanza drew the Commissioner's attention to The Leadership Conference's suggestion that the Commission reconsider the overall allocation of universal service funds among the four programs to better target funding and need.

We expressed our gratitude to the Commissioner for her long-standing commitment to public interest goals in telecommunications policy. We encouraged her to both set a high standard for action by the Commission, but also emphasized that perfect information should not be a barrier to action on these long-overdue and time-sensitive issues.

Sincerely,

Cheryl A. Leanza
Policy Advisor, United Church of Christ, OC Inc.
Co-Chair, Leadership Conference on Civil and Human Rights,
Media and Telecommunications Task Force

² Petition to Deny Applications for Consent to Assignment of Broadcast Station Licenses of the Public Interest Petitioners, Voluntary Assignment of Licenses of the Tribune Co. and Licensee Subsidiaries, MB Docket No. 10-104 (filed June 14, 2010), <http://apps.fcc.gov/ecfs/document/view?id=7020505221>; Reply to Opposition to Petition to Deny (filed July 12, 2010), <http://apps.fcc.gov/ecfs/document/view?id=7020522317>.