

Member Organizations

ASPIRA Association, Inc.

Cuban American National Council

Hispanic Association of Colleges and Universities

Hispanic Federation

Hispanic National Bar Association

Labor Council for Latin American Advancement

League of United Latin American Citizens

Mexican American Legal Defense and Educational Fund

MANA, A National Latina Organization

National Association of Hispanic Federal Executives

National Association of Hispanic Publications

National Association of Latino Elected Officials

National Conference of Puerto Rican Women, Inc.

National Council of La Raza

National Hispanic Caucus of State Legislators

National Hispana Leadership Institute

National Hispanic Council on Aging

National Hispanic Environmental Council

National Hispanic Foundation for the Arts

National Hispanic Medical Association

National Hispanic Media Coalition

National IMAGE, Inc.

National Institute for Latino Policy

National Puerto Rican Coalition

Self-Reliance Foundation

SER Jobs for Progress-National

Southwest Voter Registration Education Project

United States Hispanic Chamber of Commerce

United States Hispanic Leadership Institute

United States-Mexico Chamber of Commerce



NHLA National Hispanic Leadership Agenda

December 3, 2012

Chairman Julius Genachowski
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20054

Re: MB Docket No. 09-182, 2010 Quadrennial Review

Dear Chairman Genachowski:

On behalf of the National Hispanic Leadership Agenda (NHLA), a coalition of the 30 leading national Latino organizations in the country, I write to urge the Federal Communications Commission to reconsider its apparent decision to relax certain broadcast ownership rules without first analyzing the impact that allowing increased broadcast consolidation would have on communities of color and women. I am troubled by reports that indicate that this action may be imminent in spite of new data that indicates persistently low ownership levels by Latinos and other marginalized groups.

In NHLA's 2012 Hispanic Policy Agenda, the coalition's signature quadrennial blueprint for advancing the Latino community, member organizations recognized the importance of broadcast diversity. Specifically, NHLA recommended that the FCC adopt "policies to expand and promote media ownership diversity." Moreover, NHLA member groups agreed to oppose "[broadcast] consolidation as a race-neutral way to open doors for diverse owners to enter the media marketplace." The Agenda is available at http://nationalhispanicleadership.org/assets/NHLA_2012_Hispanic_Policy_Agenda.pdf.

Lack of Latino inclusion in the broadcast industry has resulted in reckless and false representations of Latinos and other people of color, fostering a climate of hate and intolerance that breeds racism and hate crimes. To achieve progress as a community, we must break away from the status quo and become empowered to fully participate in this nation's affairs. One important way of doing so is to increase Latino ownership of, and employment in, media outlets. Collectively, we oppose broadcast consolidation as a race-neutral way to open doors for diverse owners in this industry.

The recent data released by the Commission shows that the state of Latinos in the broadcast industry has remained extremely low in recent years, despite that the Latino population has grown significantly. In 2011, Latinos comprised over 16% of the U.S. population but only owned 39 out of 1,348 full power commercial television stations, a mere 2.9 percent. Latinos owned only 2.7 percent of FM radio outlets and 4.5 percent of AM radio outlets. These numbers are unacceptably low.

Thus far, the Commission has not satisfactorily considered the impacts that its proposed actions would have on ownership diversity and, therefore, has failed to adhere to the Third Circuit's direction in *Prometheus Radio Project v. FCC*. Perhaps more significantly, the Commission is on course to contravene its obligation to promote diversity and inclusion in the broadcast industry. This is squarely against the public interest. Therefore, NHLA urges the Commission to fully consider the consequences of its proposed action in light of the newly released data before relaxing any rules.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Sanchez", with a long horizontal flourish extending to the right.

Hector E. Sanchez
Chair

Hispanic Association of Colleges and Universities
National Association of Hispanic Federal Officials
National Conference of Puerto Rican Women
National Hispanic Caucus of State Legislators
National Hispanic Media Coalition
National Hispanic Medical Association
National Institute for Latino Policy
Labor Council for Latin American Advancement
League of United Latin American Citizens
SER – Jobs for Progress National
United States Hispanic Leadership Institute

CC: Commissioner Robert McDowell, Commissioner Mignon Clyburn, Commissioner Ajit Pai, Commissioner Jessica Rosenworcel; Media Bureau Chief William Lake