

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
2010 Quadrennial Regulatory Review –)	
Review of the Commission’s Broadcast)	MB Docket No. 09-182
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications)	
Act of 1996)	
)	
Promoting Diversification of Ownership in the)	MB Docket No. 07-294
Broadcasting Services)	

To: The Commission

COMMENTS OF ALLIANCE FOR WOMEN IN MEDIA, INC.

Alliance For Women in Media, Inc. (“AWM”), formerly American Women in Radio and Television, Inc. (“AWRT”) hereby submits these comments in response to the Media Bureau’s *Public Notice*, DA 12-1946 (rel. December 3, 2012), inviting additional comment on the Commission’s *Report on Ownership of Commercial Broadcast Stations*, DA 12-1667 (rel. Nov. 14, 2012) (“Report”), published November 14, 2012 with respect to the above-captioned proceeding.¹

AWM is a national, non-profit organization dedicated to advancing the impact of women in electronic media and allied fields through educating, advocating and acting as a resource for

¹ FCC 11-186 (rel. December 22, 2011).

its members and the industry. AWM members are professional men and women employed in radio, television, cable, digital media, advertising and closely allied fields.

For more than 60 years, AWM's mission has been to promote the entry and advancement of women in management and ownership of electronic media. Throughout its long history, AWM has been active in Commission proceedings, and has encouraged the Commission enact policies that provide equal opportunities for participation by women in broadcasting and other communications industries.² AWM therefore has a profound interest in the ownership rules governing the mass media and their impact upon women in today's media marketplace.

The Commission has undertaken this proceeding in keeping with its statutory mandate to review its media ownership rules every four years to "determine whether any of such rules are necessary in the public interest as the result of competition."³ AWM has previously participated in this proceeding, and submits these further brief comments as invited by the *Public Notice*. AWM wishes to recognize the efforts of the Commission, and of licensees, in

² 2 See e.g., *Comments of AWRT, 02-277* (filed March 27, 2002); *Comments of AWRT, In the Matter of Elimination of Market Entry Barriers For Small Telecommunications Businesses and Allocations of Spectrum-Based Services for Small Businesses and Businesses Owned By Women and Minorities*, MB Docket No. 04-228 (filed Oct. 12, 2004); *Comments of AWRT, In the Matter of 2002 Biennia Review, MD Docket In the Matter of 2006 Quadrennial Regulatory Review*, MB Docket No. 06-121 (filed Oct. 23, 2006) ("*AWRT 2006 Ownership Comments*"); *Comments of AWRT, In the Matter of Promoting Diversification of Ownership In the Broadcasting Services*, MB Docket No. 07-294 (filed July 30, 2008); *Comments of AWM, In the Matter of the Future of Media and Information Needs of Communities in a Digital Age*, GN Docket No. 10-25 (filed May 7, 2010); *Comments of AWM, In the Matter of 2010 Quadrennial Regulatory Review - Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996 and Promoting Diversification of Ownership*, MB Docket No. 09-182 and MB Docket No. 07-294 (filed March 5, 2012).

³ See Pub. L. 104-104, § 202(h), as amended by Pub. L. 108-199, § 629(3).

improving the level of media ownership data collected. AWM submits that the Report makes it abundantly clear that competition in the mass media has not developed to such a degree that the Commission's ownership rules are no longer needed. Indeed, the Commission's findings in the Report confirm the appalling lack of diversity in media ownership, and the lack of any discernible progress toward increasing ownership by women and minorities. AWM urges the Commission to keep this data in the forefront of its considerations as it contemplates further relaxation of the multiple ownership rules. It is clear from the Report that media consolidation in the wake of Telecommunications Act of 1996 has not created the opportunities for small businesses, minorities and women contemplated by Congress. *See e.g.*, 47 USC § 309(j)(3)(b).

This is not to disparage the large media owners, or suggest that those entities should in any way be penalized for owning multiple stations as permitted by the Commission's rules. The Telecommunications Act does require, however, that before the Commission eliminates or relaxes its multiple ownership rules, it must find that those rules are not "necessary in the public interest as the result of competition." AWM respectfully submits, that, in light of the Report and underrepresentation of women and minorities owning media properties, the ownership rules remain necessary to the public interest.

The Commission is well aware of the abysmal statistics for female ownership of broadcast properties: women, while comprising 51% of U.S. population, own only 6.8% of full power TV stations and 5.8% of full power FM commercial radio stations according to the Report.

AWM would like to underscore the continuing importance of diversity as a goal of broadcast regulation. Encouraging diversity of ownership is not merely a matter of what is

“fair” or a “nice idea,” it is part of the Commission’s statutory mandate. AWM therefore urges the Commission to take steps, consistent with its statutory authority and judicial precedent, to address the historic underrepresentation of women in the broadcast industry. AWM respectfully submits that the Commission’s ownership rules remain necessary in the public interest, and that the Commission should take additional steps to ensure the diversity of mass media ownership and participation by women and minorities. AWM looks forward to providing the Commission with additional input during the course of this proceeding.

Respectfully submitted,

ALLIANCE FOR WOMEN IN MEDIA, INC.

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