



January 25, 2013

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

Re: MB Dkt. No. 09-182, 2010 Quadrennial Review; MB Dkt. No. 07-294, Promoting Diversification of Ownership in the Broadcasting Services; BO Docket No. 12-30, Literature Review of Research on Critical Information Needs and Market Entry

Dear Ms. Dortch:

On Tuesday, January 22, I held a short telephone conversation with Alex Hoehn-Saric of Commissioner Rosenworcel's office in the above-captioned docket. I discussed UCC OC Inc.'s strong interest in preventing any changes to the current media ownership rules, and particularly strenuous concern that the ownership rules could be relaxed before the Commission completes its studies on the Information Needs of Communities. I explained that I have had some reservations with regard to the incubator proposals in the past but that UCC OC Inc. has not yet taken a detailed position on any new revisions to the proposal. I also was concerned that the current proposals with regard to overcoming disadvantage were not yet ready to be adopted with speed and noted that UCC OC Inc. has already explained that the Commission has not fully developed a record with regard to the effectiveness of a small business preference and thus it did not seem an effective means to promote ownership diversity. I noted my strong concern with any attempt by the Commission to retreat from the importance of ownership diversity with regard to its relationship to viewpoint diversity, the Supreme Court's conclusions in *Metro Broadcasting*, and the sufficiency of the record with regard to meeting strict scrutiny under *Adarand*. I encouraged Commissioner Rosenworcel to vote against the current media ownership draft as it has been reported in the press.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl A. Leanza".

Cheryl A. Leanza  
Policy Advisor, United Church of Christ, OC Inc.