

February 7, 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:

Yesterday I held a short telephone conversation with Media Bureau Chief Bill Lake. I reiterated several of the points made in my meeting with Mr. Lake and his staff last week and captured in the *ex parte* filing submitted by my counsel.¹ In short, I explained that radio stations provide a viewpoint even if they do not offer news. I explained that if the Commission concludes that radio stations do not augment the diversity of voices in a local market, that the Commission will substantially undermine its ultimate goal of adopting rules that promote media ownership diversity for radio. I pointed out that there are significant studies in the record over the course of this proceeding, such as several of the Future of Music studies, which provide evidence that radio stations do, in fact, offer a viewpoint regardless of whether they report original news. I noted the discussions of morning DJs, the choice of type of music (such as lyrics which are misogynistic, pro-peace, pro or anti-violence), and its selection of nationally syndicated programming all contribute to the viewpoints available in a local market which are determined by a radio station's owner. I cited, in particular, the problems associated with a Clear Channel-owned station in Los Angeles whose morning DJs routinely attack immigrants as one example of a non-news station that presents a viewpoint to the listeners in that market without reporting original news. I explained that there are no newspapers owned by people of color that I am aware of in the United States that are subject to the newspaper-broadcast cross ownership rule, and thus it was unlikely that changes in the NBCO would result in improvements in the provision of news by owners of color through joint ownership. I emphasized that, based on the record and under the quadrennial review provision, the Commission has the discretion to retain the ownership rules that promote diversity of viewpoint in radio.

Sincerely,

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

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

¹ Letter from Angela Campbell to Marlene Dortch, MB Dockets 09-182, 07-294 (filed Feb. 4, 2013).