



February 14, 2013

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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 Secretary Dortch:

On February 12, 2013 the individuals listed below, who represent members of The Leadership Conference on Civil and Human Rights Media and Telecommunications Task Force, met with Zac Katz, Elizabeth Andrion, Sean Lev, Thomas Reed, and Bill Lake. Attending the meeting were: Corrine Yu, The Leadership Conference on Civil and Human Rights; Cheryl Leanza, United Church of Christ, OC Inc. and Leadership Conference, Task Force Co-Chair; Gabe Rottman, American Civil Liberties Union, Task Force Co-Chair; Jason Lagria, Asian American Justice Center; Eric Geist, Communications Workers of America; Mike Scurato, National Hispanic Media Coalition; Patric Taylor, National Urban League; Lisa Bennett, National Organization for Women.

We made the following points:

- The Leadership Conference task force members emphasized that they share a common set of goals and seek to work with the Commission in collaboration, rather than individually.
- We continue to prefer that the Commission study the impact of consolidation on ownership by women and people of color before it acts on broader media reform proposals. Consolidation triggered by the 1996 Telecommunications Act has undermined ownership rates by women and people of color, and the impending spectrum auctions have already reduced the number of diverse owners. The situation is in crisis and we cannot afford to lose any others.
- We do not believe the Commission has released data or procured studies adequate to the task, particularly given the Commission only released its diversity of ownership data on November 14, and there has been no time to utilize this data in any studies. The extremely limited set of numbers released in the NPRM in early 2012 were not usable for any study of this question.
- Specifically, we believe that the question of whether ownership identity influences viewpoint is critical to the questions the FCC is addressing. If the Commission requires more evidence on this topic, it should procure studies to do that.



- Radio stations do contribute to viewpoint diversity and any decision to the contrary would undermine any future policy choices that would promote radio station owners who are women and people of color. National Hispanic Media Coalition has conducted studies showing the strong impact of radio on stereotypes held by people about Latinos.¹
- The Commission has evidence on the record that would, at a minimum, enable it to conclude that it should keep the existing ownership rules pursuant to the legal standard in the quadrennial review provision if it cannot obtain the diversity of ownership data it needs at this time.
- The Commission should not conclude that a race-neutral policy implicates strict scrutiny because it has implications for the broader legal environment regarding equity in the U.S.

We thanked the Commission staff for their time and attention and agreed to remain in contact with each other as the issues in this docket develop.

Sincerely,



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

¹ National Hispanic Media Coalition, *The Impact of Media Stereotypes on Opinions and Attitudes Towards Latinos* (Sept. 2012), available at <http://www.nhmc.org/sites/default/files/LD%20NHMC%20Poll%20Results%20Sept.2012.pdf>.