



April 9, 2013

Chairman Julius Genachowski  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: MB Docket No. 09-182, MB Docket No. 07-294, BO Docket No. 12-30

Dear Chairman Genachowski:

On behalf of the undersigned members and The Leadership Conference on Civil and Human Rights, we write to urge you to release, before you step down from your post as Chairman, the Federal Communications Commission's proposed methodology on the long-planned studies, conducted pursuant to Section 257, to assess the capacity of the contemporary media and telecommunications ecosystem to meet the information needs of all communities in the U.S. ("Section 257 studies"). We also request the Commission to publicly adopt and adhere to a schedule that will ensure that policy proposals will be ready for Commission consideration by 2015.

The Leadership Conference is a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the rights of all persons in the United States. Media diversity has long been a top priority of The Leadership Conference and our members because we understand that meaningful protection of civil rights and advancement of key policy objectives rely in great measure on an accurate, independent, and diverse media that serves our constituencies. A commitment to promote diverse media ownership is a fundamental component of our nation's communications policy.

The undersigned organizations believe that the Commission's media ownership review pursuant to the Quadrennial Review provision in the Communications Act requires a thorough analysis of the impact of any rule changes on minority and female ownership. Accordingly, while we support the Commission's apparent desire not to rush to an imperfect decision in the Quadrennial Review docket, we are concerned that the decision to await input from a single, narrowly focused, study before the Commission makes a decision in the Quadrennial Review docket,<sup>1</sup> could further delay the Section 257 comprehensive studies.

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And Families  
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American Indians  
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Educational Fund, Inc.  
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National Fair Housing Alliance  
Joe Solmonese  
Human Rights Campaign  
Randi Weingarten  
American Federation of Teachers  
Elisabeth MacNamara  
League of Women Voters  
Warren David  
American-Arab Anti-  
Discrimination Committee

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Karen K. Narasaki  
Asian American Justice Center  
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Wade J. Henderson  
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<sup>1</sup> News Release, Statement of FCC Chairman Julius Genachowski on the Status of the Media Ownership Proceeding (rel. Feb. 26, 2013), available at:

[http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2013/db0226/DOC-319131A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2013/db0226/DOC-319131A1.pdf)



Without the data produced by the Section 257 studies, it is impossible to make media and telecommunications policy decisions that address the needs of the constituencies we represent, including the vast disparity in media ownership by women and people of color. From public statements and meetings with your staff, it appears that the Section 257 studies are ready to move ahead to their next stage—a public comment period on the studies’ structure and methodology—and that there is therefore no reason for further delay.

For all of the above reasons, we urge you to move forward expeditiously on the Section 257 studies, so that the Commission can keep its promise to the civil rights community and federal courts that the research will be complete in time for the next Quadrennial Review in 2014.

We appreciate the willingness of you and your staff to consider the views of the civil rights community on these important issues. Please contact Leadership Conference Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, United Church of Christ, OC Inc., at 202-841-6033, Gabe Rottman, ACLU, at 202-675-2325, or Corrine Yu, Leadership Conference Managing Policy Director at 202-466-5670, if you would like to discuss the above issues or any other issues of importance to The Leadership Conference.

Sincerely,

American Civil Liberties Union  
Asian American Justice Center, Member of Asian American Center for Advancing Justice  
Common Cause  
Communications Workers of America  
National Urban League  
NAACP  
National Council of La Raza  
National Consumer Law Center, on behalf of its low-income clients  
National Hispanic Media Coalition  
National Organization for Women Foundation  
The Leadership Conference on Civil and Human Rights  
United Church of Christ, Office of Communication, Inc.

cc: Commissioner Mignon Clyburn  
Commissioner Robert McDowell  
Commissioner Ajit Pai  
Commissioner Jessica Rosenworcel