



April 15, 2013

Chairman Julius Genachowski
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re.: Request for clarification of the Commissions' policies and procedures under 47 U.S.C. § 310(b)(4) – Foreign Ownership; MB Docket 13-50; Public Notice, DA 13-281

Dear Chairman Genachowski and Commissioners:

On behalf of Asian American Justice Center (AAJC), member of Asian American Center for Advancing Justice, we write to request the Commission relax its foreign ownership policies pursuant to Section 310(b)(4) of the Communications Act.

Ownership of broadcast stations by minorities and women remains at unacceptably low levels, and as the Commission is aware, access to capital is a significant reason why women and minorities have lagged behind. Accordingly we urge the Commission to relax its strict application of Section 310(b)(4) and exercise its statutory discretion to allow foreign investors to own more than a 25 percent stake in a broadcast station when it would serve the public interest.

Relaxing foreign broadcast ownership and investment restrictions would provide additional opportunities for minority broadcasters to access capital and remain competitive in a fast moving global economy. Increasing foreign investment would also create reciprocal opportunities for American broadcasters in foreign markets.

Finally, as you may be aware, we joined with our partners at the Leadership Conference on Civil and Human Rights in a letter on April 9, 2013 urging Chairman Genachowski to move forward quickly on “Section 257 studies” to inform and expedite policy decisions the Commission must take to address the abysmal levels of media ownership by women and communities of color.¹ Our recommendation to relax the Commission’s foreign ownership policies should not be interpreted as a willingness to trade off on any of the media ownership policy concerns we have previously expressed.

We appreciate the Commission’s efforts to find solutions to improve minority media ownership. Please do not hesitate to contact me if you have any questions or would like to discuss this issue.

Sincerely,

/s/ Jason T. Lagria
Senior Staff Attorney, Media and Telecommunications
jlagria@advancingequality.org; 202-296-2300 ext. 122

¹ See Letter from American Civil Liberties Union *et al.* (Apr. 9, 2013) available at <http://apps.fcc.gov/ecfs/document/view?id=7022241834>.