

November 22, 2013



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

Re: MB Dkt. No. 09-182; MB Dkt. No. 07-294; BO Docket No. 12-30; WC Docket No. 11-42; WC Docket No. 12-375; GN Docket No. 13-5; GN Docket No. 12-353; MM Docket No. 00-168; MM Docket No. 00-44; GN Docket 10-127; MM Docket 99-25

Dear Ms. Dortch:

I write to submit for the record the priorities of the United Church of Christ, OC Inc. as Chairman Wheeler begins his term leading the Commission. I highlighted one issue on the attached list in a meeting Tuesday with Chairman Wheeler and a number of his staff, including Ruth Milkman, Gigi Sohn, Maria Kirby, Bill Lake, Roger Sherman, Daniel Alvarez, Renee Gregory, and Diane Cornell.

Specifically I highlighted that UCC OC Inc. supports the position of the Leadership Conference and Civil Rights Task Force on Media and Telecommunications that the Commission cannot move to relax media ownership limits until it has completed a thorough review of the impact of those rules on women and people of color as directed by the U.S. Court of Appeals for the Third Circuit. I noted that the pending Critical Information Needs research protocol—while broader than broadcast media—would go a long way toward meeting the Commission’s obligation in the 2010 Quadrennial Review. I noted that the Commission’s release of broadcast ownership data at the end of last year emphatically did not meet that obligation and that the Commission has not yet looked into the impact of private sector transactions on diversity of ownership—particularly those that have occurred in preparation for the forthcoming incentive auctions.

Sincerely,

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

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

Enclosure



- 1. Complete Critical Information Needs studies and look at the impact of spectrum auctions on broadcast ownership diversity before making any decision to consolidate media in the quadrennial review docket.** As outlined in [detail](#) in this Leadership Conference filing, the FCC has been remiss in collecting data about the impact of media consolidation on communities of color and women for more than 15 years. The existing 323 data remains inadequate. As such, because of the Third Circuit's decision in *Prometheus v. FCC*, the FCC cannot make a decision to consolidate the broadcast media without completing a thorough and complete analysis of the media ecosystem's ability to meet the needs of historically underserved communities. Moreover, the Commission has thus far taken little action to look at the impact of the upcoming incentive auctions on ownership rates by women and people of color.
- 2. Maintain and strengthen open Internet rules; protect communities during the IP transition.** As [described](#) in a National Council of Churches resolution and letter from UCC OC Inc. Board member, an open internet is critical for all noncommercial speech, including religious speech. The FCC's decision in 2010 was a partial victory, but did not go far enough. In particular, it did not adequately protect mobile platforms, which are used predominately by people of color. UCC OC Inc. supports full protection for all communities during the IP transition.
- 3. Expand broadband adoption to all people.** Ninety million people do not use broadband at home. The FCC must rapidly complete its pilot projects considering expansion of Lifeline to broadband and must protect Lifeline even as it expands the e-rate program in accordance with the President's ConnectED initiative. Existing corporate philanthropic efforts, such as Internet Essentials and Connect 2 Compete are commendable, but inadequate to address the need. Broadband adoption should be addressed in collaboration with other agencies.
- 4. Improve systems to hold broadcasters accountable and rapidly process LPFM applications.** As a proud member of the Public Interest Public Airwaves Coalition, UCC OC Inc. encourages the FCC to complete the broadcast enhanced disclosure docket and continue implementation of online public files. The FCC should end the backlog of actions on broadcast license renewals. UCC OC Inc. has petitions to deny still pending from 2004. Case-by-case decision-making in license renewals is a useful and incremental way to give meaning to the FCC's rules, particularly those protecting children. The just-completed LPFM window should move rapidly to granting construction permits.
- 5. Fully defend and aggressively enforce the inmate calling services order.** UCC OC Inc. was very pleased with the Commission's action this year on the inmate calling services item. We look forward to the Commission's defense of the decision in court and its aggressive enforcement of the decision. In particular, we hope the Commission will take steps to ensure that the complaint process is accessible for the families that have been paying egregiously high telephone rates for so long.