

December 12, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* disclosure pursuant to 47 CFR § 1.1206(b) in MB Docket No. 09-182, MB Docket No. 07-294, BO Docket No. 12-30; WC Docket No. 11-42; WC Docket No. 03-109; CC Docket No. 96-45

Dear Ms. Dortch:

On December 9, 2013 the following individuals met with Chairman Tom Wheeler and his advisors Gigi Sohn, Maria Kirby, Renee Gregory and Sagar Doshi: Nancy Zirkin, Corrine Yu, and Cheryl Leanza, The Leadership Conference on Civil and Human Rights; Chanelle Hardy and Hazeen Ashby, National Urban League; Lisa Navarette and Edward Carlson, National Council of La Raza; Marita Etcubanez, Asian Americans Advancing Justice | AAJC; Jessica Gonzalez, National Hispanic Media Coalition (by telephone); Rashad Robinson, Color of Change; Sandra Fulton, American Civil Liberties Union; amalia deloney, Center for Media Justice; Joe Torres and Chance Williams, Free Press; Sarah Morris, New America Foundation; Clarissa Ramon and Michael Weinstein, Public Knowledge; and Delara Derakhshani, Consumers Union.

Ms. Zirkin highlighted the issues these groups raised together in the attached letter. In particular, she encouraged Mr. Wheeler to include a wide diversity of backgrounds in FCC staff. She noted that at both the FCC and in the media industry, diverse inputs lead to higher quality outcomes. She emphasized the civil rights community's long-standing concerns with media concentration and thanked the Chairman for pulling the draft Quadrennial Review order from circulation. She encouraged the Chairman to use the upcoming incentive auctions as an opportunity for greater participation by people of all backgrounds. Ms. Zirkin emphasized the groups' collective and strong support for the Lifeline program and noted our support for the enforcement actions against carriers that the Commission has taken so far this year.

Ms. Hardy described the importance of both old and new networks. She noted that more established technologies like broadcasting are still very popular in the marketplace and provide opportunities for people of color to participate as owners and entrepreneurs, and emphasized the importance of supplier diversity in both the media and technology sectors. She explained that the civil rights community is looking for proactive policies to increase diversity in ownership in all technologies. Because data is necessary to undergird these new policies, the assembled groups strongly support the Section 257, Critical Information Needs studies currently underway. For new technologies, Ms. Hardy noted that a critical barrier to broadband adoption remains cost and education levels. At-home access to broadband is necessary to obtain the skills necessary for today's jobs. For this reason, she urged the Chairman to expand Lifeline to included broadband as an important mechanism to address the persistent adoption gap.

Mr. Torres thanked the Chairman for expressing concern about the use of shared services agreements (SSAs). He noted that Free Press research demonstrates that there are 103 markets where outsourcing

agreements are used to evade one or more of the Commission's broadcast ownership rules, equating to nearly half of the 210 U.S. media markets. These concentrated ownership structures harm economic opportunities by people of color. Mr. Torres noted that the Chairman's pillar of interconnection is particularly important for people of color and underrepresented communities. He noted that these communities often do not have an opportunity to own network infrastructure, which means they do not control the creation or distribution of their own stories. He described the moral implications of a society, which in a few decades will be majority people of color, but which places distribution networks outside of their control.

All assembled thanked the Chairman and his staff for their willingness to meet and offered our support and assistance to implement our common objectives. If you would like to follow up on any of the above issues, please contact Corrine Yu, Leadership Conference Managing Policy Director at 202-466-5670 or yu@civilrights.org or Cheryl Leanza, A Learned Hand Consulting, at cleanza@allearnedhand.com or 202-904-2168.

Sincerely,

Cheryl Leanza
A Learned Hand, LLC

Attachment