



January 17, 2014

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; GN 12-268

Dear Ms. Dortch:

On January 15, the following individuals met with Adonis Hoffman and Stefanie Frank in Commissioner Clyburn's office: Corrine Yu, The Leadership Conference on Civil and Human Rights; Cheryl Leanza, United Church of Christ, OC Inc.; Hazeen Ashby, National Urban League; Edward Carlson, National Council of La Raza; Jason Lagria, Asian Americans Advancing Justice | AAJC; Todd O'Boyle, Common Cause; and Olivia Wein, National Consumer Law Center.

The group thanked Commissioner Clyburn for her long-standing support for the Critical Information Needs Section 257 studies. We encouraged the Commissioner and her staff to ensure that the current test of the research protocol is finished on time and to help support funding for the full study to be completed by the end of 2014. We explained that we did not feel that the current record in the Quadrennial Review is sufficient for the Commission to approve further consolidation. Only studies of the caliber of the CIN studies would be sufficient to meet the long-standing gap in the Commission's knowledge base. We noted that neither the MMTTC study nor the 323 data released last year were sufficient. UCC OC Inc. and Common Cause emphasized their concern, along with the strong concern of Communications Workers of America and National Organization for Women, with Joint Services Agreements and Shared Services Agreements, which permit broadcasters to avoid complying with existing ownership limits and reduce the number of working journalists.

In addition, we noted the upcoming incentive auction has already had a devastating impact on diverse broadcast ownership, as many broadcast owners of color have already sold their stations to private equity firms. We strongly urged the Commission to make a more accurate count of the impact of the auction on broadcast diversity. We also encouraged the Commissioner to find ways to increase participation in the forward looking auction by women and entrepreneurs of color.

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We provided Mr. Hoffman with several copies of previously-filed comments in this docket.<sup>1</sup> All thanked Mr. Hoffman for his time and offered our support and assistance to the Commissioner and her staff. 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](mailto:yu@civilrights.org) or Cheryl Leanza at [cleanza@alhmail.com](mailto:cleanza@alhmail.com) or 202-904-2168.

Sincerely,



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

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<sup>1</sup> [Leadership Conference Quadrennial Review Comments \(Mar. 5, 2012\)](#); [Leadership Conference 323 Data Comments](#) (December 26, 2012); [Leadership Conference Letter to Chairman Genachowski](#) (April 9, 2013); Leadership Conference [Critical Information Needs Study Comments](#) (July 26, 2013).