

The Honorable Ajit Pai  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, DC 20554

March 21, 2014

Dear Commissioner Pai,

I am writing about the statement you released on March 20, 2014 applauding the benefits of the so-called joint sales agreements that reportedly benefit television stations owned by women and minorities.

In the statement you said 43% of female-owned full-power commercial television stations currently are party to JSA's. How many such television stations are owned by women in the United States?

You also say 75% of African-American-owned full-power commercial stations are currently parties to JSA's. Isn't it true that the 75% represents three of the only four stations owned by African-Americans?

I do not know how many female-owned stations exist. I do know that just ten years ago there were more than a dozen African-American-owned commercial television stations. Consolidations in the broadcasting industry and the recession have driven most of these owners out of business. Current conditions make it increasingly difficult for women and minorities to buy broadcast stations. If they own a station, they cannot compete for advertising dollars against the conglomerates.

Finally you say the FCC should study the effect this proposal would have on ownership diversity.

I agree that studies of how diversity in ownership affects localism and information needs are needed. In fact, the courts have mandated them. However, how do you conduct a study when even court-ordered studies on this topic receive such heavy criticism – including from you -- that they are cancelled?

I believe there may be some very limited cases where JSA's make sense. But I am concerned that the use of JSA's and shared services agreements have resulted in the closure of dozens of newsrooms and the loss of scores of journalism jobs.

The fact there are so few stations owned by women and minorities is reason enough to take a closer look at this issue.

*Bob Butler*

Bob Butler  
President  
National Association of Black Journalists