



# NATIONAL HEADQUARTERS

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May 8, 2014

Hon. Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Dear Chairman Wheeler and Commissioners:

Next week, the Federal Communications Commission will vote on how to implement and manage an Auction that will repurpose and free up additional spectrum to meet the increasing demands of companies and consumers. As the Rainbow PUSH Coalition has already urged the Commission to conduct a fair and open auction that allows for all bidders to participate, we also request that the agency foster diversity in competition by proactively enforcing and reforming the Designated Entities (DEs) rules mandated by Congress under Section 309(j) of the Communications Act.

The absence of qualified and eligible small businesses, rural telecommunications companies and minority- and women-owned businesses (MWBs) in the upcoming spectrum incentive auctions would reflect a lackluster policy focus on increasing diversity and competition in the wireless sector. As the media and telecommunications sectors continue to expand their reach and revenue, we must ensure that the bidders are as diverse as the consumers they serve.

To date, the Commission has failed miserably in promoting and implementing the DE program. Most notably, we have witnessed decreased DE participation due to abrupt policy changes that have stifled, and not encouraged diversity in spectrum ownership. In a country where the disruptive nature of technology is fostering positive economic development for communities, narrowing the reach to educational attainment and creating lower barriers to entry into new markets, the Commission should be inclined to create some regulatory certainty that encourages the inclusion of these bidders and stabilizes their access to capital.

The Commission should also be inclined to review and reform those DE rules that deter or limit full participation, especially for new DE entrants. As we stated in a Joint Letter dated March 7, 2014, we continue to urge the Commission to eliminate the attributable material relationship rule, increase DE bidding credits, and prioritize diversity and inclusion of DEs in the secondary markets. We are hopeful that the Commission will consider the concerns in this letter and send a message that meaningful participation of small businesses, rural telecommunications companies and MWBs is a crucial policy goal in the upcoming spectrum incentive auction. As I reflect upon the diminishing presence of minority broadcasters in the last 25 years, I urge the Commission to proactively cultivate and protect equal opportunities in minority spectrum ownership. Doing otherwise will suggest that the Commission has opted to do business as usual, without consideration for the economic contributions and aspirations of these entities.

Sincerely,

A handwritten signature in black ink that reads "Jesse L. Jackson, Sr." in a cursive script.

Rev. Jesse L. Jackson, Sr.  
Founder & President

Rev. Jesse L. Jackson, Sr., Founder & President  
Martin L. King, Chairman  
[www.rainbowpush.org](http://www.rainbowpush.org)