

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
2014 Quadrennial Regulatory Review –)	
Review of the Commission’s Broadcast)	MB Docket No. 14-50
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications)	
Act of 1996)	
)	
2010 Quadrennial Regulatory Review –)	
Review of the Commission’s Broadcast)	MB Docket No. 09-182
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications)	
Act of 1996)	
)	
Promoting Diversification of Ownership in the)	MB Docket No. 07-294
Broadcasting Services)	
)	
Rules and Policies Concerning Attribution)	MB Docket No. 04-256
of Joint Sales Agreements In Local)	
Television Markets)	

To: The Commission

REPLY COMMENTS OF ALLIANCE FOR WOMEN IN MEDIA, INC.

Alliance For Women in Media, Inc. (“AWM”) hereby submits these brief Reply Comments in connection with the Commission’s *Further Notice of Proposed Rule Making* (“*FNPRM*”) in the above-captioned proceeding.¹ AWM is a national, non-profit organization dedicated to advancing the impact of women in electronic media and allied fields through educating, advocating and acting as a resource for its members and the industry.

¹ FCC 14-28 (rel. March 31, 2014).

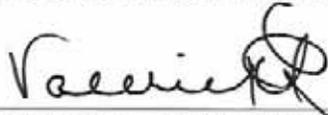
AWM is submitting this brief Reply on a single issue²: to urge the Commission to further explore the various non-structural proposals advanced by the National Association of Broadcasters (“NAB”) to encourage ownership of stations by women and minorities, including proposals to adopt incubator programs; allow reversionary interests in licenses to enable seller financing of station sales to women, minorities and other qualified buyers; and to seek legislation to reinstate the tax certificate program. *See Comments of the National Association of Broadcasters*, pp. 88-95. As NAB notes, and AWM has observed in many past proceedings, the lack of access to capital is a significant barrier to women-owned businesses seeking to enter the broadcasting industry. Proposals to overcome that historic lack of access to capital deserve the Commission’s attention and efforts.

Regardless of the status of its ownership rules, the Commission has a statutory obligation to encourage diverse entry into the communications industries, in particular by small businesses and businesses owned by women and minorities. AWM respectfully submits that NAB’s proposals (which include proposals similar to those made by AWM in past proceedings, and to recommendations made by the Diversity Advisory Committee) bear further investigation. AWM would welcome the opportunity to work with the Commission in exploring these proposals.

² Due to the diversity of AWM’s membership, and the companies and organizations they represent, AWM is not taking a position on other proposals in the *FNPRM* or the comments filed in response to the *FNPRM*.

Respectfully submitted,

ALLIANCE FOR WOMEN IN MEDIA, INC.

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