

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Dkt 09-182, 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996

Dear Chairman Genachowski:

We, the undersigned organizations, urge the Federal Communications Commission to make diversity a central focus of its upcoming Quadrennial Media Ownership Rule Review.

The strength of our country lies in the diversity of our people. Our media system will better serve the public interest when it draws on the diverse backgrounds, perspectives and talents of the population. Unfortunately, ownership of the nation’s media outlets consistently fails to reflect this diversity.

Women and people of color historically have been grossly underrepresented in ownership of radio and television stations — media forms that use the public airwaves and rank as our nation’s most popular and influential outlets. Women comprise over 51 percent of the population yet hold only 6 percent of radio and TV station licenses. And while people of color make up over 36 percent of the U.S. population, they hold just over 7 percent of radio licenses and 3 percent of TV licenses.¹

The continued absence of FCC action in the face of deep and intractable ownership disparities is unacceptable. The U.S. Court of Appeals for the Third Circuit recently affirmed that “ownership diversity is an important aspect of the overall media ownership regulatory framework.”² Yet the FCC has failed to adopt proactive policies to remedy these disparities. Furthermore, it has persistently neglected even to examine or address the impact of existing media market consolidation on broadcast ownership opportunities for women and people of color. The FCC must take care not to repeat the mistakes of prior administrations by “pun[ting] yet again on this important issue.”³

Most importantly, while the FCC assesses the impact of its media ownership rules and pursues more active measures to address longstanding disparities in broadcast media ownership, it must

¹ S. Derek Turner, *Out of the Picture 2007: Minority & Female TV Station Ownership in the United States*, 2007, <http://www.freepress.net/files/otp2007.pdf>, and S. Derek Turner, *Off the Dial: Female and Minority Radio Station Ownership in the United States*, 2007, http://www.freepress.net/files/off_the_dial.pdf.

² *Prometheus Radio Project v. FCC*, 652 F. 3d 431, 472 (Third Circuit, 2011)

³ *Id.* at 471.

not undercut the benefits of such measures by allowing greater consolidation of broadcast outlets.

Existing media concentration levels already limit ownership opportunities for historically underrepresented groups. Excess consolidation has crowded out female and minority owners, who tend to be single-station owners who cannot compete with consolidated groups for programming and advertising revenue. Allowing increased consolidation in local media markets would raise station prices and further diminish the already limited number of stations available for purchase. This would leave women and people of color with fewer opportunities to become media owners and promote diverse programming in local communities.

In conclusion, we urge the FCC to do the following:

1. Evaluate the impact of its media ownership rules on ownership opportunities for women and people of color.
2. Take proactive measures to promote ownership of broadcast stations by underrepresented groups.
3. Guard against further erosion of media ownership among these groups by maintaining existing media ownership limits.

Absent these measures, ownership levels among underrepresented groups will continue to decline and the promise of a diverse media system that serves the information needs of all people will continue to elude our nation.

Respectfully submitted.

Access Humboldt
Alliance for Community Media
American Association of University Women
Asian American Journalists Association
Bitch Media
Center for Media Justice
Center for Social Inclusion
Common Cause
Digital Sisters
Ella Baker Center for Human Rights
Fairness and Accuracy in Reporting
Feminist Majority Foundation
Free Press
Future of Music Coalition
Hollaback!
Institute for Local Self-Reliance
International Museum of Women
Media Alliance
Media Equity Collaborative
Media Literacy Project
MomsRising

National Alliance for Media Art & Culture
National Association of Black Journalists
National Association of Hispanic Journalists
National Council of Negro Women
National Council of Women Media and Technology Task Force
National Council of Women's Organizations
National Hispanic Media Coalition
National Lesbian and Gay Journalists Association
National Organization for Women Foundation
National Women's Law Center
Native American Journalists Association
Native Public Media
New Moon Girls
People's Production House
Prometheus Radio Project
Rainbow PUSH Coalition
Reclaim the Media!
Reel Grrls
Southern Connecticut State University Women's Studies Program
SPARK Movement
UNITY: Journalists of Color
Women, Action, & the Media
Women In Media & News
Women's Media Center
Women Who Tech