

December 1, 2011

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.<sup>1</sup>

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.”<sup>2</sup> 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.”<sup>3</sup>

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<sup>1</sup> 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](http://www.freepress.net/files/off_the_dial.pdf).

<sup>2</sup> *Prometheus Radio Project v. FCC*, 652 F. 3d 431, 472 (3d Cir., 2011)

<sup>3</sup> *Id.* at 471.

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 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 Access Project  
Media Alliance  
Media Council Hawai'i  
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 TV  
People's Production House  
Prometheus Radio Project  
Rainbow PUSH Coalition  
Reclaim the Media!  
Reel Grrls  
Southern Connecticut State University Sexuality and Gender Equality  
Center  
Southern Connecticut State University Women's Studies Program  
SPARK Movement  
Teen Voices Magazine  
UNITY: Journalists of Color  
Women, Action, & the Media  
Women In Media & News  
Women's Media Center  
Women Who Tech