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March 24, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: MB Docket No. 09-182, MB Docket No. 07-294, BO Docket No. 12-30

Dear Chairman Wheeler:

On behalf of the undersigned members and The Leadership Conference on Civil and Human Rights, we write to urge you to make promotion of racial, gender, and ethnic diversity in media a centerpiece of your policy agenda. The Leadership Conference is a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the rights of all persons in the United States. Media diversity has long been a top priority of The Leadership Conference and our members because we understand that meaningful protection of civil rights and advancement of key policy objectives rely in great measure on an accurate, independent, and diverse media that serves our constituencies.

We are pleased to see that you have heeded our call to postpone rule changes that would have permitted further media consolidation in the 2010 Quadrennial Review. We strongly urge you to commit to a timeline in the 2014 Quadrennial Review that will acquire meaningful, expansive data to consider how to promote media diversity as part of that review, in accordance with the U.S. Court of Appeals and Section 257 of the Communications Act, among other directives.

Media concentration, by definition, leads to fewer owners, fewer entrepreneurial opportunities, and fewer jobs, while actions to tighten the media ownership rules will lead to more owners and more such opportunities for people of color and women. Agreements that mimic joint ownership but do not offer true operational independence circumvent those rules and lead to the same negative outcomes as media consolidation. At best, a handful of these sharing arrangements promote diversity or employment for journalists or management or help to create wealth for people who face challenges in obtaining access to capital. With full disclosure of contract terms and financial interests, meritorious combinations should be able to easily demonstrate their need for appropriate waivers of Commission rules for the short time they will need to achieve operational independence.

A commitment to promote diverse media ownership is a fundamental component of our nation's communications policy. We look forward to working with you during your



Chairmanship to effectuate this goal. Please contact Leadership Conference Media/Telecommunications Co-Chairs Cheryl Leanza, UCC Office of Communication, Inc., at 202-904-2168, or Gabe Rottman, ACLU, at (202) 675-2325, or Corrine Yu, Leadership Conference Managing Policy Director at 202-466-5670, if you would like to discuss the above issues or any other issues of importance to The Leadership Conference.

Sincerely,

American Civil Liberties Union
Asian Americans Advancing Justice | AAJC
Common Cause
Communications Workers of America
The Leadership Conference on Civil and Human Rights
NAACP
National Consumer Law Center, on behalf of its low-income clients
National Hispanic Media Coalition
National Organization for Women
National Urban League
United Church of Christ, OC Inc.

cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly