



## REPLY COMMENT

August 22, 2022

Jessica Rosenworcel  
Chair  
Federal Communications Commission  
45 L Street NE Washington DC, 20554

### **Re. Content Vendor Diversity Rulemaking Reply Comment (Docket 22-209)**

Dear Ms. Rosenworcel,

On behalf of Asian Americans Advancing Justice | AAJC; OCA - Asian Pacific American Advocates; and the National Council of Asian Pacific Americans (NCAPA), we write in response to the Request for Comment regarding the Federal Communication Commission (FCC) adopting a rulemaking to establish a new content vendor diversity report and endorse the comments submitted by the National Urban League<sup>1</sup>.

**Asian Americans Advancing Justice | AAJC** (“Advancing Justice | AAJC”) is dedicated to civil and human rights for Asian Americans and to promoting a fair and equitable society for all. We provide the growing Asian American community with multilingual resources, culturally appropriate community education, and public policy and civil rights advocacy. In the communications field, Advancing Justice | AAJC works to promote access to critical technology, services, and media for our consumers.

**OCA - Asian Pacific American Advocates** (“OCA”) is a national membership-driven organization of community advocates dedicated to advancing the social, political, and economic well-being of AAPIs. OCA strongly believes that as our country continues to digitize and create

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<sup>1</sup> Comments of the National Urban League, Docket 22-209 (filed July 22, 2022), <https://www.fcc.gov/ecfs/search/search-filings/filing/1072221685634>

modern communications networks, it is pivotal that Asian Americans and Pacific Islanders shape the policies and regulations that create the framework for that innovation.

The **National Council of Asian Pacific Americans (NCAPA)** is a coalition of 38 national Asian American Pacific Islander (AAPI) organizations. Based in Washington D.C., NCAPA represents interests of the greater Asian American, Native Hawaiian, and Pacific Islander (AANHPI) communities, which comprise the fastest growing racial group in the nation.

Our organizations co-chair the **Asian American Tech Table**, which was created to facilitate a more unified voice and presence in national tech and telecom policy debates. The Table convenes regularly with its members to discuss relevant policy concerns, while also engaging with industry and other stakeholders to raise the visibility of the Asian American community in tech policy and digital civil rights issues. **Members of the Asian American Tech Table include The Center for Asian Pacific American Women, Filipina Women’s Network, Japanese American Citizens League, Asian Pacific American Institute for Congressional Studies, Council of Korean Americans, Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship, South Asian Americans Leading Together, and National Queer Asian Pacific Islander Alliance.**

As mentioned in National Urban League’s (NUL) comments, while the media ecosystem has tremendous power in shaping our social and political culture, the makeup of owners, board members, and full-time employees is not reflective of the diversity or buying power of communities of color. According to the Asian American Journalist Association, **while nearly half (48.3%) of the Asian American and Pacific Islander (AAPI) population lives in the top 20 designated market areas (DMAs), 25% of the stations have no AAPI’s on air**<sup>2</sup>. Furthermore, **70% of local TV stations do not have a proportionate number of on-air staff compared to the local AAPI population**, the only regions with on-air staff comparable to the local AAPI population are Phoenix, Denver, Miami, and Cleveland<sup>3</sup>. **In 2020, Asian Americans made up only 6% of the boards of the top 200 media companies** in the United States that year<sup>4</sup>. In addition, existing FCC ownership report data shows that **Asian American commercial broadcast station ownership has not gone above 1.4% since 2009**<sup>5</sup>. Of the 1,248 stations that reported data to the FCC in 2017, Asian, Native and Pacific Islander, and Native ownership

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<sup>2</sup> Asian American Journalist Association, AAJA Broadcast Snapshots Finds Underrepresentation of AAPIs in local TV News in Top 20 Media Markets (May 4, 2022) <https://www.aja.org/2022/05/04/aja-broadcast-snapshot-finds-underrepresentation-of-aapis-in-local-tv-news-in-top-20-media-markets/>

<sup>3</sup> Id.

<sup>4</sup> U.S.: board members media companies by ethnicity 2020 <https://www.statista.com/statistics/826879/media-companies-directors-ethnicity/#statisticContainer>

<sup>5</sup> The Abysmal State of Media Ownership Diversity in America - The Leadership Conference on Civil and Human Rights <https://civilrights.org/blog/the-abysmal-state-of-media-ownership-diversity-in-america/>

*collectively* totaled to 44 stations<sup>6</sup>. And in 2019 (the year of the latest data to be released so far by the FCC), only 1% of Asian Americans had majority ownership of commercial broadcast stations<sup>7</sup>.

AAPJ are both underrepresented and understudied as participants in the broadcasting industry. The knowledge we have on incongruities between AAPJ populations and their representation in the media ecosystem is based on data that is inconsistent and sparse. This type of erasure makes the issues relevant to our communities difficult to pinpoint and solve. **As civil rights advocates, we know how critical it is that AAPJ communities are adequately represented and accurately covered in the media, particularly during a time of increase anti-Asian violence and xenophobia.** As stated by NUL, “the collection of content vendor diversity data will give the public a better understanding of diversity in the video marketplace and will incentivize companies to improve or initiate meaningful diversity efforts”<sup>8</sup>. As stated by the Petitioners, collecting this data would “enhance the FCC’s ability to implement its goal of promoting competition and viewpoint diversity in the video marketplace”<sup>9</sup>.

**For these reasons Asian Americans Advancing Justice | AAJC, OCA - Asian Pacific Advocates (OCA), and the National Council of Asian Pacific Americans (NCAPA) supports the FCC in moving forward with a rulemaking to establish a content diversity report.**

Please contact Emily Chi, Director for Telecommunications, Technology, and Media at Asian Americans Advancing Justice | AAJC at [echi@advancingjustice-aaajc.org](mailto:echi@advancingjustice-aaajc.org) or Michael Nguyen, Associate Manager of Policy & Advocacy at OCA - Asian Pacific Americans Advocates at [michael.nguyen@ocanational.org](mailto:michael.nguyen@ocanational.org) or Nehanda Tankasala, Senior Fellow, National Council of Asian Pacific Americans (NCAPA) at [nehanda@ncapaonline.org](mailto:nehanda@ncapaonline.org).

Sincerely,  
Asian Americans Advancing Justice | AAJC  
OCA - Asian Pacific Americans Advocates (OCA)  
National Council of Asian Pacific Americans (NCAPA)

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<sup>6</sup> Id.

<sup>7</sup> FCC Report on Ownership of Broadcast Stations (Data as of Oct 1, 2019), released September 3, 2021 <https://www.fcc.gov/biennial-forms-323-and-323-e-broadcast-ownership-data-and-reports>

<sup>8</sup> Comments of the National Urban League, Docket 22-209 (filed July 22, 2022), <https://www.fcc.gov/ecfs/search/search-filings/filing/1072221685634>

<sup>9</sup> Media Bureau Seeks Comment on Petition for Rulemaking to Establish New Content Vendor Diversity Report, MB Docket No. 22-209, Public Notice, DA 22-567 (rel. May 23, 2022).