September 29, 2022

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

Re: MB Docket No. 19-177; MB Docket No. 98-204

Dear Chair Rosenworcel:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 230 national organizations to promote and protect the civil rights of all persons in the United States, and its Media/Telecommunications Task Force, we write to support the supplemental comments of the civil rights and labor advocates in the above referenced proceedings.¹

The Leadership Conference’s recent report, “Information Nation: The Need for Improved Federal Civil Rights Data Collection,” highlights the importance of data collection in tackling the problems created by structural racism, inequality, and other injustices.² Without complete, accurate, and disaggregated data, it is impossible to develop a full understanding of how the communities we represent are faring.³ As the report concludes, while better data collection will not solve the challenges created by systemic racism and historic levels of inequality, it is a necessary first step.⁴

The comments in the docket, including those previously filed by The Leadership Conference, reflect widespread consensus within the civil and human rights community that the Federal Communications Commission (FCC) must once again be a leader in equitable

³ Id.
⁴ Id. at 34.
employment obligations.\textsuperscript{5} This begins with collecting and publishing EEO-1 data by broadcasters, cable operators, and other multichannel video programming distributors and ensuring these data are made public via an easy-to-use portal that can also be used to aggregate data on state-by-state and regional bases and according to other factors, such as various demographic categories.\textsuperscript{6}

Collecting these data would be consistent with both the FCC’s Equity Action Plan and the core goals of the Biden/Harris Equity Agenda.\textsuperscript{7} It would also be consistent with the practices of other agencies within the federal government and with recent developments in the private sector. Investors have been calling on the Securities and Exchange Commission to mandate disclosure of EEO-1 data,\textsuperscript{8} and many private sector employers recognize the need to collect demographic data on their workforce in order to make progress toward equitable employment goals.\textsuperscript{9}

Today, we face a historically low amount of demographic data available on the news profession, and even surveys that are able to gather a stronger sample are unable to paint a full picture of the state of newsroom diversity.\textsuperscript{10} While broadband providers have in some cases been supportive of greater transparency for EEO-1 data\textsuperscript{11} and the industry has produced some reports on itself,\textsuperscript{12} the responsibility to ensure the industry, public, and federal government have a complete understanding of diversity in the communications industry falls on the FCC.

Mandatory data collection would benefit the government, industry, and civil society. The FCC can use EEO-1 data to advance the commission’s Equity Action Plan,\textsuperscript{13} and these data would allow the news and communications industry to better understand and target their diversity and inclusion efforts and also allow the public to hold these companies accountable.

Thank you for your consideration of our views. We look forward to working with you on this issue and others of importance to our country. If you have any questions about the issues raised in this letter, please


\textsuperscript{6} Civil Rights and Labor Advocates Comments at 2.


\textsuperscript{10} Civil Rights and Labor Advocates Comments at 15-16.

\textsuperscript{11} Notably, AT&T, Comcast, Verizon, and Lumen all voluntarily release their EEO-1 forms.

\textsuperscript{12} Civil Rights and Labor Advocates Comments at 15-16.

contact Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, United Church of Christ Media Justice Ministry, at cleanza@alhmail.com; Yosef Getachew, Media & Democracy program director, Common Cause, at ygetachew@commoncause.org; or Anita Banerji, senior program director, Media and Tech, The Leadership Conference, at banerji@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
American Civil Liberties Union
Asian Americans Advancing Justice - AAJC
Black Women's Roundtable
Common Cause
Communications Workers of America
JACL
Muslim Advocates
National Coalition on Black Civic Participation
National Consumer Law Center
National Council of Asian Pacific Americans (NCAPA)
National Education Association (NEA)
National Employment Law Project
National Fair Housing Alliance
National Urban League
SEIU
Sikh American Legal Defense and Education Fund (SALDEF)
Strategic Organizing Center