



November 9, 2007

The Honorable Kevin J. Martin, Chairman  
Commissioner Jonathan S. Adelstein  
Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Deborah Taylor Tate  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: MB Docket No. 06-121**

**Public Comments for November 09, 2007 Seattle, Washington Hearing**

AMERICAN CIVIL  
LIBERTIES UNION OF  
WASHINGTON  
FOUNDATION  
705 2ND AVENUE, 3RD FL.  
SEATTLE, WA 98104  
T/206.624.2184  
WWW.ACLU-WA.ORG

JESSE WING  
BOARD PRESIDENT

KATHLEEN TAYLOR  
EXECUTIVE DIRECTOR

Dear Commissioners:

The public has a fundamental right to diverse opinions and voices in the media. Access to varied viewpoints is essential to the public's ability to fully participate in democratic decision-making. The Federal Communications Commission is in a position to promote a marketplace of ideas in print media, radio and television through its statutory authority to issue licenses for use of the public airwaves.

Media consolidation is a growing problem. Currently, just six large multinational corporations (including TimeWarner, Viacom and News Corp) control most of the television and radio stations in the United States. In nearly half of the largest radio markets, the three largest corporations control 80 percent of the audience. Recently, it was reported that the Commission is considering repealing a rule that prohibits a company from owning both a newspaper and a television or radio station in the same city. If that occurs, the number of independent owners will decline even further.

The increase in media conglomerates has severely inhibited the information available through the public airwaves. Several studies have shown a marked decline in locally oriented public affairs, political, educational, and cultural programming presenting a diversity of viewpoints. According to a 2003 study by the Benton Foundation, 25 percent of broadcast stations no longer offer any local news or public affairs programming. Media consolidation also results in censorship and the decline of viewpoint diversity. While the media should be allowed to take positions on controversial issues, it cannot abuse the public trust by shutting out competing viewpoints on the public airwaves.

The ACLU of Washington believes that the Government should promote greater competition and thus encourage greater diversity of views. The Commission should

take extreme care to ensure that no monopoly in the presentation of news and opinion is created. Any media ownership rule the Commission adopts must permit a factual determination as to whether a particular media combination would adversely affect the diversity of expression and independence of editorial content. If it does, the combination should be rejected.

It is vital to note that today's media ownership also does not currently reflect America's greatest asset - the diversity of our people. While America's minority population is growing, minorities represent a mere 8% of radio and 3% of television station owners. Women only own 3% of radio stations and 5% of television stations. Diverse ownership is necessary to ensure that media is representative of the wide array of ideals and opinions held in this country.

An informed citizenry is the backbone of any democracy. When a few media voices speak in unison, there is little diversity of opinion and the citizenry is deprived of varying viewpoints. We remain concerned that greater media concentration will create barriers for new voices entering the market, and result in more homogenous news and entertainment.

We respectfully urge you to take an approach that prevents further consolidation, fosters minority ownership, and supports diverse voices in America's media.

Sincerely,

A handwritten signature in black ink, appearing to read "Christ Drummond". The signature is fluid and cursive, with the first name "Christ" and last name "Drummond" clearly distinguishable.

Christina Drummond  
Technology and Liberty Project Director  
American Civil Liberties Union of Washington Foundation