



June 22, 2022

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

Dear Chair Rosenworcel and Commissioners:

As a historic civil rights organization that advocates on behalf of and provides direct services to a diverse constituency through our 92 local affiliates, the National Urban League believes that economic opportunities for traditionally underrepresented groups can transform households, neighborhoods, and the future of our country. We remain committed to advocating for communities of color as we are consumers, workers, creators, business owners, and shareholders. That is why we have a vested interest in the Federal Communications Commission (FCC) adopting a rulemaking to establish a new content vendor diversity report.¹

The media ecosystem, from news to entertainment, has tremendous power in shaping our social and political culture. Despite the considerable influence, diverse representation including ownership, board membership, senior leadership, and full-time employees is not reflective of the diversity nor buying power of communities of color, particularly Black and Latinx communities. As it relates to broadcast media ownership, as of 2019, Black Americans have majority ownership of only 18 full power commercial broadcast television stations.² There are similar disparities in the larger media workforce. A 2021 GAO report commissioned by Congressman Joaquin Castro, the Congressional Hispanic Caucus, and the House Committee on Oversight and Reform found that Latinos made up an estimated 12 percent of workers in the media industry compared to an estimated 18 percent of workers in the overall workforce.³ It is evident that structural barriers continue to leave our communities locked out of paths to economic empowerment; however, these dismal numbers are not the full picture.

As civil rights advocates, we know that to understand the full scope of the disparities people of color face and to present the best path forward, access to data remains paramount. 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. As stated by the Petitioners, this data would also assist the Commission to “better implement its goals of promoting competition and viewpoint diversity in the video marketplace.”⁴

The National Urban League has long led efforts to advise companies on how to prioritize diversity, equity, and inclusion throughout their organizations. For example, we led a coalition of civil rights groups to develop MOUs around the Comcast and NBC Universal merger (2010)⁵, the Charter

¹ *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).

² *Fifth Report on Ownership of Broadcast Stations*, DA 21-1101 at 25 (Sept. 2021).

³ *Workforce Diversity: Analysis of Federal Data Shows Hispanics are Underrepresented in the Media Industry*, Government Accountability Office (Sept. 21, 2021) at 2, <https://www.gao.gov/assets/gao-21-105322.pdf>.

⁴ Petition for Rulemaking of FUSE, LLC, Common Cause, National Hispanic Media Coalition, Public Knowledge, and United Church of Christ Media Justice Ministry, MB Docket No. 22-209 (filed May 5, 2022) (“Petition”).

⁵ Comcast, NBCU Sign MOU With African American Groups (Dec. 17, 2010), <https://www.nexttv.com/news/comcast-nbcu-sign-mou-african-american-groups-111477>



Communications and Time Warner Cable merger (2016)⁶, and most recently, the T-Mobile and Sprint merger (2019).⁷ This advocacy and advisement have led to commitments to incorporate racial equity in corporate board membership, staffing, the C-suite, procurement, philanthropy, and community investment.⁸ As stated in our Lewis Latimer Plan for Digital Equity and Inclusion, these efforts to improve diversity should be mirrored by the federal government as well.⁹ One of our recommendations is for the federal government to better measure the implementation of corporate diversity initiatives and provide incentives for companies that incorporate such practices.¹⁰

More specifically, our Lewis Latimer Plan recommended that the FCC “collect information that allows the government and the public to understand and evaluate how the private sector, and particularly the technology and related sectors, are improving diversity, equity, and inclusion.”¹¹ As the Petitioners discuss, content is one of the most critical inputs of the video marketplace.¹² Content that video programming distributors choose to carry directly impacts what stories get told, what news and information gets shared, and what communities are represented in the media. Collecting data on content vendor diversity will help paint a more complete picture of whether programming that is currently carried is reflective of the nation’s diversity.¹³ Further, collecting content vendor diversity data would help spur a more competitive programming marketplace that incorporates diverse entrants while also ensuring the viewpoints of people of color are represented in our media ecosystem.¹⁴

For these reasons, we support the Commission moving forward with a rulemaking to establish a content diversity report. If you have any questions, please contact Alisa Valentin (avalentin@nul.org), Senior Director of Technology and Telecommunications Policy at the National Urban League.

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⁶ Charter and Multicultural Leadership Organizations Reach Significant Agreement on Diversity and Inclusion Efforts (Jan. 15, 2016), <https://corporate.charter.com/newsroom/charter-and-multicultural-leadership-organizations-reach-significant-agreement-on-diversity-and-inclusion-efforts>.

⁷ Civil Rights Groups Sign Groundbreaking Diversity Agreement with T-Mobile US, National Urban League (Oct. 15, 2019), <https://nul.org/news/civil-rights-groups-sign-groundbreaking-diversity-agreement-t-mobile-us>.

⁸ *Id.*

⁹ *The Lewis Latimer Plan*, National Urban League (March 30, 2021) at 92 https://nul.org/sites/default/files/2021-04/NUL%20LL%20DEIA%20041421%20Latimer%20Plan_vFINAL_1136AM.pdf.

¹⁰ *Id.*

¹¹ *Id.*

¹² *See* Petition at 1.

¹³ *Id.*

¹⁴ *Id.* at 6-11.