



**Minority Media &  
Telecom Council**

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February 19, 2013

Hon. Julius Genachowski, Chairman  
Hon. Robert McDowell, Commissioner  
Hon. Mignon Clyburn, Commissioner  
Hon. Ajit Pai, Commissioner  
Hon. Jessica Rosenworcel, Commissioner

Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Dear Chairman Genachowski and Commissioners:

RE: SSR Communication Inc.'s Petition for Rulemaking  
Proceeding No: PRM13MB

The Minority Media and Telecommunications Council (“MMTC”) respectfully submits this letter to support the recent petition for rulemaking filed at the Commission by SSR Communications Inc.<sup>1</sup> As you know, the petition asks the Commission to create a new FM category -- Class ‘C4’ stations. This new class would potentially allow several Class A FM stations owned by small and minority broadcasters to ‘upgrade’ to a new C4 classification and broadcast a stronger, more competitive signal over a radio market. As the petition notes, the Commission’s Advisory Committee on Diversity in the Digital Age recommended that the Commission make a similar change to its broadcast engineering rules by creating a new class of medium powered FM stations. MMTC has also urged the Commission to adopt the recommendation of the Advisory Committee, along with 46 additional pro-diversity proposals.<sup>2</sup> SSR considers its petition as a logical extension of the Advisory Committee’s proposal.<sup>3</sup>

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<sup>1</sup> See SSR Communications Inc., Petition for Rulemaking (Jan. 29, 2013), available at <http://apps.fcc.gov/ecfs/comment/view?id=6017160905> (last visited Feb. 13, 2013) (“Petition”).

<sup>2</sup> See Supplemental Comments of the Diversity and Competition Supporters in Response to The Notice of Proposed Rulemaking, 2010 Quadrennial Regulatory Review - Review Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 09-182 et. al. (April 3, 2012) at pp. 44-45, available at <http://mmtconline.org/wp-content/uploads/2012/04/Supplemental-Media-Ownership-Comments-040312.pdf> (last visited Feb. 13, 2013).

<sup>3</sup> See Petition at pp. 3-4 (citing Recommendation on Diversifying Ownership in the Commercial FM Radio Band, Emerging Technologies Subcommittee, Advisory Committee on Diversity for Communications in the Digital Age (Oct. 4, 2004), available at <http://transition.fcc.gov/DiversityFAC/adopted-recommendations/AdoptedFMRadioRules.pdf> (last visited Feb. 13, 2012)).

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If adopted, MMTC believes the petition could contribute to the Commission's policy goal of spectrum efficiency, while also providing greater opportunities for FM stations owned by small and minority entrepreneurs to strengthen their footholds in the broadcasting space. By potentially expanding coverage areas for these stations, the proposals made in the petition could also enable these stations to reach a more diverse audience of listeners. As the Commission seeks solutions to increase the dwindling numbers of minorities and women owning commercial broadcast stations,<sup>4</sup> implementing policy proposals like SSR's can help ensure that the broadcasting industry does not lose even more of these stations. MMTC remains committed to partnering with the Commission to increase diversity and inclusion in our communications industry and expresses our wholehearted support to work with SSR and its allies to implement the proposed rule changes made in its petition.

Respectfully submitted,

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<sup>4</sup> See, e.g., FCC Report on Ownership of Commercial Broadcast Stations, 27 FCC Rcd 13814, 13816-13818 (2012) (demonstrating that racial and ethnic minorities own a majority interest in eight percent or 756 of the nation's commercial radio stations, while women own less than seven percent of these stations).