May 22, 2010

Hon. Julius Genachowski  
Chairman  
Hon. Michael Copps  
Hon. Robert McDowell  
Hon. Mignon Clyburn  
Hon. Meredith Attwell Baker  
Commissioners  
Federal Communications Commission  
445 12th St. S.W.  
Washington, D.C. 20554

Dear Mr. Chairman and Commissioners:

RE: The Information Needs of Minorities (ref. GN Docket 10-25, Future of Media)

Often we forget why the Commission maintains structural, content-neutral policies that can overcome the inherent bias toward those who enjoy inherited privilege. Recently, in our Comments in the Future of Media docket, we addressed this timeless question by addressing why the information needs of minorities are not being adequately served. I hope you’ll find our analysis helpful in confirming the wisdom of the Commission’s approach to media diversity:

Presently and throughout the history of the media, neither traditional nor new media content adequately have reflected minority perspectives. Traditional media have long presented nonminority, middle-class culture as the ideal. Some have maintained that the result is a cultural hegemony promoting assimilation rather than individuality.¹

¹ See bell hooks, *Killing Rage* (2005) at 110 (“Eurocentric biases taught to blacks in the educational system were meant to socialize us to believe in our inherent inferiority, it was ultimately the longing to have access to material rewards granted whites (the luxury represented in advertising and television) that was the greatest seduction. Aping whites, assimilating their values, *i.e.* white supremacist attitudes and assumptions) was clearly the way to achieve material success. And white supremacist attitudes were projected into our living rooms, into the most intimate spaces of our lives by mass media. Gone was any separate space apart from whites where organized militant resistance could emerge. Even though most black communities were and remain segregated, mass media bring white supremacy into our lives, constantly reminding us of our marginalized status.”) See also Office of Communication of the United Church of Christ v. Federal Communications Commission, 359 F.2d 994 (D.C. Cir. 1966) (reversing the license renewal of WLBT-TV, Jackson, MS.)
Minorities, if they appear in the media at all, are often associated with negative stereotypes. As the National Hispanic Media Coalition et al. discusses in Comments in this docket, the media routinely cast Latinos in a negative light. African-Americans have more often been depicted in the media through associations with crime, entertainment, or sports than they have been associated with topics such as economics, foreign affairs or electoral politics. Even those who have access to the Internet, and thus benefit from its ability to provide hyper-targeted information, still encounter a medium where little of the most popular, mass appeal Internet content is produced by minorities. Further, those without Internet access, or who have not adopted the Internet, etc.


See Comments of the National Hispanic Media Coalition et al., In the Matter of The Future of Media and Information Needs of Communities in a Digital Age, GN Docket No. 10-25, filed May 7, 2010 (“NHMC Comments”) at Section B(2) (quoting Comments of Office of Communication, United Church of Christ, Inc., National Organization for Women, Media Alliance, Common Cause and Benton Foundation at 10-12, 13-14, 2006 Quadrennial Regulatory Review et al., MB Dkt. No. 06-121 et al. (Oct. 23, 2006) (“IPR Diversity Comments”) (“A report prepared for the National Association of Hispanic Journalists (NAHJ) found that Latinos are under-represented on network news and even when they are seen, the coverage is often negative and one-sided”) (citing Daniela Montalvo and Joseph Torres, Network Brownout Report 2006: The Portrayal of Latinos & Latino Issues on Network Television News, 19 (2006) (“Brownout 2006”)).

See id. (quoting IPR Diversity Comments “A study of network news by Entman and Rojecki found that the range of topics attributed to Black interviewees was quite limited. The study examined videotapes of four randomly chosen weeks of evening news from the ABC, CBS, and NBC networks in 1997. The study found that White people were given 1,289 total “sound bites” in the sample, while Black people had a mere 95. In the sample, only one Black person said anything in an economics story, compared with 86 sound bites for Whites. Only one said anything in story on foreign affairs, compared with 99 White sound bites. White voices were heard 79 times on electoral politics, whereas not one Black person said anything on the subject. The disparities were almost as great in any other area that either ‘invoked the common experiences or interests of Americans as a whole (disasters, foreign affairs, politics, death/rituals),’ or that ‘involved technical expertise (science, economics).’ Black voices were much more common in stories dealing with entertainment, sports, or discrimination – topics already stereotypically associated with African Americans.”)

See, e.g. Technorati, Top 100 Blogs (reporting that the number of popular blogs written by members of a minority group is almost statistically insignificant; of the top 100 blogs listed, just two, Matthew Yglesias and Michelle Malkin, are written by minorities), available at http://technorati.com/blogs/top100 (last visited May 2, 2010) (citing Robert M. Entman & Andrew Rojecki, The Black Image in the White Mind: Media and Race in America 62
remain beholden to traditional media. The touchstone of the information needs of minorities is thus whether information is being presented to minorities from a subjective point of view. However, even those outlets that are minority owned find it difficult to reach minority consumers. Overall, minority owned television stations reached just 30 percent of households occupied by people of color.

All citizens have the same basic need to receive information about jobs, healthcare, government services, education, emergencies, opportunities for civic engagement, and news. The relevant inquiry is into the degree to which some minority and multilingual groups use different types of information and whether the information is presented in a relevant cultural context. For example, according to a recent Joint Center for Political and Economic Studies survey, 78% of Black Internet users indicated that they go online to look for employment information, compared to just 48% of White users. Twice as many Black Internet users went online to look for ideas on starting an online business.

(University of Chicago Press 2000). These samples were collected for a report commissioned by the President’s Initiative on Race. Id. at 246 n. 9.)

6 See In the Matter of Petition for Rulemaking To Require Broadcast Licensees To Show Nondiscrimination In Their Employment Practices, 13 F.C.C.2d 766 (1968) (quoting Report of the National Advisory Commission on Civil Disorders (1967) (“Kerner Commission Report”) “[T]he media -- have not communicated to the majority of their audience -- which is white -- a sense of the degradation, misery, and hopelessness of living in the ghetto. They have not communicated to whites a feeling for the difficulties and frustrations of being a Negro in the United States. They have not shown understanding or appreciation of -- and thus have not communicated -- a sense of Negro culture, thought or history. And, in our judgment, the report makes clear that of all the media, broadcasting is the most important in this respect because it is most turned to by the ghetto.”)

7 See id.


9 See id.


11 See id. (twenty-eight percent of Black Internet users went online for information to find information on finding a job.)
Fifty-two percent of Black Internet users went online to look up religious or spiritual information, compared to 32% of Whites.\textsuperscript{12}

The Commission’s National Broadband Plan recommendations to promote ubiquitous home broadband access and adoption would provide consumers with the flexibility to customize their depth of engagement.\textsuperscript{13} However, government and industry must rise to the challenge of creating an online environment that is relevant and credible from the perspective not just of middle-class Americans, but also marginalized groups, especially low-income, less educated, and older non-adopters.\textsuperscript{14}

Sincerely,

David Honig
President and Executive Director

cc: Stuart Benjamin, Esq.
    Thomas Reed, Esq.
    GN 10-25 (Future of Media)

\textsuperscript{12} See id.


\textsuperscript{14} See generally Joint Center Broadband Adoption Report.