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June 2, 2017

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

RE: Preserving the Open Internet, WC Docket No. 17-108
Equal Employment Opportunity, MB Docket 98-204

Officials of the Multicultural Media, Telecom and Internet Council (“MMTC”) met May 31, 2017 with Chairman Pai and his Media Legal Advisor Alison Nemeth. Present were MMTC President and CEO Kim Keenan, Executive Vice President Maurita Coley, Vice President Dr. Rikin Thakker, and President Emeritus and Senior Advisor David Honig.

Ms. Keenan shared MMTC’s continued position that Section 706 of the Telecommunications Act remains available as an effective enforcement mechanism for anti-consumer practices, including specifically but not limited to redlining. Further, MMTC regards it as vital that the Commission include broadband in Lifeline so that the maximum benefit of this program is realized in connecting the unconnected.

Ms. Keenan, Ms. Coley and Dr. Thakker also discussed the need for apprenticeship programs in the industry, including a program MMTC is operating in conjunction with the Wireless Infrastructure Association (WIA). Ms. Keenan and Mr. Honig also discussed the importance of secondary markets and the impact that these transactions can have on new entrants, particularly minority entrepreneurs. MMTC will follow-up regarding additional means to foster these transactions, including legislation introduced by Congressman Robert Butterfield to restore the former tax certificate policy. Finally, Ms. Keenan noted two promising developments: the appointment of new leadership for the Office of Communications Business Opportunities (OCBO) to enable OCBO to continue its work, and the restoration of the Advisory Committee on Diversity (now known as the Advisory Committee on Diversity and Digital Empowerment).

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On June 1, I had a telephone conversation with Ms. Nemeth regarding an issue in the EEO docket. I suggested that it would be desirable for the Commission to identify broadcasters whose recruitment has each of these two attributes: (1) the pool of candidates is recruited primarily by word of mouth *and* (2) the staff doing the word of mouth recruitment is virtually homogeneous. These components, *together*, make out a case of intentional discrimination. Because the Commission is presently unaware of the second of these components, it commits two errors – it prosecutes and fines non-discriminators based on their failure of the first component; and it overlooks “bad apple” discriminators based on their failures of both components.

Sincerely,

David Honig

David Honig
President Emeritus and Senior Advisor

cc: Hon. Ajit Pai
Alison Nemeth, Esq.