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August 11, 2022

Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20002

Honorable Geoffrey Starks
Commissioner
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20002

Honorable Brendan Carr
Commissioner
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20002

Honorable Nathan Simington
Commissioner
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20002

RE: Latino Media Network applications 0000194661, 0000194638, 0000194656 to purchase TelevisaUnivision radio stations

Dear Chairwoman Rosenworcel and Commissioners Carr, Starks, and Simington:

The Multicultural, Media, Telecom and Internet Council (MMTC) respectfully submits this letter in support of the efforts of the Latino Media Network, Ms. Stephanie Valencia, and Jess Morales Rocketto, to acquire 18 Spanish language radio stations from TelevisaUnivision.

Since our founding in 1986, MMTC has worked to increase minority representation and diverse ownership in media, broadcasting, and content creation. It is important that our nation's airwaves and creative content reflect the voices, stories, and needs of every community, and particularly historically marginalized groups. MMTC does not weigh in on every broadcast acquisition or transaction, but the size and scope of this transaction and the size of the potential Latino audience mandates that we lend our voice in support.

This potential acquisition by the Latino Media Network will be a Latina owned and operated startup in the U.S. Significantly, \$80m in capital has been raised from a diverse set of investors. Latino Media Network will be a major media company serving the Latino community and is significant because it is owned and operated by Latinos for Latinos.

In February 2020, MMTC responded to the FCC's report on its biennial collection of broadcast ownership diversity. That report showed a marketplace that was abysmal in terms of minority ownership and affirmed a significant void in ownership diversity across all measures. The Commission's abysmal findings documented the culmination of years of regulatory and deregulatory efforts that collectively resulted in higher entry barriers, fewer incentives to generate access to capital for underrepresented voices, and widespread media consolidation

The report showed that women owned just 9.3% of commercial AM radio stations, and 7.2% of commercial FM radio stations and Latinos, who now are 19% of the U.S. population (62.1 million) owned only 6.1% of commercial AM radio stations, and 4.1% of commercial FM radio stations.

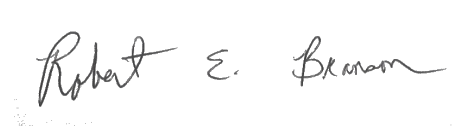
The Commission must make good on its commitment to advance diverse broadcast ownership. MMTC remains steadfast in our position that this is a critical issue for American society. Diverse ownership economically empowers historically marginalized and disadvantaged communities, uplifting America's entire economy.

Broadcasting is about more than entertainment or conveying information. What we see and hear, and who we see and hear it from, impacts the way we view our world, our society, and ourselves. Given the opportunity, the Latino Media Network's mission to help Latinos make sense of the world and their place in it can certainly help that community redefine its place in the world and create a community cohesion that will allow Latinos to build a new future in the US and abroad. Approval of these applications will assist the Commission in fulfilling its duty pursuant to the Communications Act to make available to all the people of the United States a rapid, efficient, Nation-wide and world-wide radio communication service.

MMTC urges the Commission to reaffirm and reprioritize its commitment to women and minority broadcast ownership by approving the applications of the Latino Media Network.

Sincerely,

Multicultural Media, Telecom and Internet Council

A handwritten signature in black ink, reading "Robert E. Branson". The signature is written in a cursive style with a large, stylized "R" and "B".

Robert Branson
Its President and CEO