

August 4, 2025

Chairman Brendan Carr  
Commissioner Anna M. Gomez  
Commissioner Olivia Trusty  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC. 20554

Re: Media Bureau Seeks to Refresh the Record in the National Television Multiple Ownership Rule Proceeding, MB Docket Nos. 17-318, 18-349, 22-459

Dear Chairman Carr and Commissioners Gomez and Trusty,

The National Hispanic Media Coalition is a woman-led non-profit, bipartisan, civil and human rights organization founded to eliminate hate, discrimination, and racism toward the Latino communities.<sup>1</sup> As we have for more than a decade under Administrations of both parties,<sup>2</sup> we write to express our strong opposition to any proposal that would weaken the Congressionally mandated National Television Audience Reach Cap (“Cap”) and undermine diversity in media ownership.

Congress mandated the 39 percent Cap in 2004 to preserve a healthy media ecosystem that reflects all communities and viewpoints.<sup>3</sup> In particular, Congress removed the Cap from consideration in the Commission’s Quadrennial Review Process, signalling their intent to maintain control over the Cap percentage.<sup>4</sup> Thus, as NHMC has raised time and time again, the Commission does not have the authority to override that decision by raising or eliminating the Cap.<sup>5</sup>

By virtually any measure, the Cap remains necessary in an era of continued media concentration and abysmally low minority ownership of broadcast outlets. In the Commission’s most recent report on media ownership in broadcasting released earlier this year, women held a majority stake in only 10 percent of stations, while Latinos held

---

<sup>1</sup> See e.g., Website of NHMC, [NHMC.org](https://www.nhmc.org).

<sup>2</sup> See, e.g., NHMC and Peers Comments on 2018 Quadrennial Review, April 29, 2019; LCCHR, NHMC, and Peers Comments on 2022 Quadrennial Review, March 20, 2023.

<sup>3</sup> Consolidated Appropriations Act, 2004, Pub. L. 108-199, §629(1) (setting the cap at 39%).

<sup>4</sup> *Id.* (removing the Cap from the Quadrennial review process).

<sup>5</sup> See NHMC, Leadership Conference on Civil and Human Rights et. al Comments, Amendment of Section 73.3555(e) of the Commission’s Rules, National Television Multiple Ownership Rule, MB Docket No. 17-318, <https://www.fcc.gov/ecfs/document/10320161268449/1>; Reply Comments of Public Interest Commenters, Amendment of Section 73.3555(e) of the Commission’s Rules, National Television Multiple Ownership Rule, MB Docket No. 17-318, <https://www.fcc.gov/ecfs/document/10418241271249/1> (“Reply Comments of Public Interest”).

the majority stake in only 6 percent of stations.<sup>6</sup> This is a stark contrast to the men holding a majority ownership interest in 59 percent and white persons having majority ownership in 74 percent of stations.<sup>7</sup> Ownership for Latinos is particularly low – despite making up the largest US minority group at nearly 20 percent of the entire population,<sup>8</sup> yet own just 6 percent of US commercial broadcast stations.<sup>9</sup>

Removing or increasing the Cap would undermine ownership opportunities available to Hispanic entrepreneurs and other under-represented groups. Specifically, as large regional and national station groups use their leverage and resources to buy control of more and more outlets, opportunities for ownership by new entrants will be even more limited than they are today. In turn, this will impugn longstanding core FCC values of localism and viewpoint diversity as well as the Commission’s overarching statutory mandate to serve the public interest.

The Commission already set those values back by reinstating the illogical and obsolete “UHF Discount,” which undercounts the reach of broadcasters that use UHF frequencies allowing them to circumvent existing Cap requirements.<sup>10</sup> Since then, behemoth national broadcast station ownership groups have only grown larger, and the carriage costs those owners impose on pay-tv customers, including millions of Latino consumers, have increased dramatically. Directly raising or eliminating the Cap would make a bad situation worse and lead to runaway concentration that will serve to weaken our democracy and narrow the most American value there is: diversity in viewpoint.

The harm would be most severe in local broadcast news, where 62 percent of Latinos continue to get some of their information.<sup>11</sup> While some commentators argue that the rise in internet and social media news sources justifies lifting the Cap, in fact the opposite is true. Misinformation and propaganda campaigns specifically targeting Latino communities run rampant online,<sup>12</sup> making the responsible, accountable check provided by locally owned broadcast media more important than ever. Yet with fewer competing stations and more centralized, must-run news segments, the ability of broadcast news to continue to provide this “accountability check” will erode if the FCC permits further nationwide concentration.

---

<sup>6</sup> Seventh Report on Ownership of Broadcast Stations, Federal Communications Commission, DA Docket No. 25-28, rel. Jan. 2025, at 3, <https://docs.fcc.gov/public/attachments/DA-25-28A1.pdf> (FCC Seventh Report on Ownership of Broadcast Stations”).

<sup>7</sup> *Id.* at 4.

<sup>8</sup> *US Census Release*, Hispanic Heritage Month 2024, August 15, 2024, <https://www.census.gov/newsroom/facts-for-features/2024/hispanic-heritage-month.html>.

<sup>9</sup> FCC Seventh Report on Ownership of Broadcast Stations at 4.

<sup>10</sup> See Reply Comments of Public Interest at 8-9 (“The loss of competition, diversity, and localism caused by consolidation [due to a proposed increase of the UHF discount] would particularly harm viewers that only have over-the-air access.”)

<sup>11</sup> *How Hispanic Americans Get Their News*, Pew Research Center, March 19, 2024, <https://www.pewresearch.org/journalism/2024/03/19/how-hispanic-americans-get-their-news/>.

<sup>12</sup> Cristina Fernando, *Latino voters are a target for election misinformation*, PBS News, April 8, 2024, <https://www.pbs.org/newshour/politics/latino-voters-are-a-target-for-election-misinformation>.

The Congressionally mandated 39 percent Cap remains legally required and practically necessary. We urge the Commission not to attempt to eliminate or increase it.

Sincerely,



Brenda Victoria Castillo  
President & CEO  
National Hispanic Media Coalition