

December 9, 2025

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: MB Docket No. 25-322, Empowering Local Broadcast TV Stations to Meet Their Public Interest Obligations

Ms. Dortch,

The undersigned organizations submit this comment in response to the Commission’s Public Notice in MB Docket No. 25-322, Empowering Local Broadcast TV Stations to Meet Their Public Interest Obligations. Our organizations previously wrote to Chairman Carr on October 7, 2025, to express serious concerns regarding recent Commission actions that appeared to place political pressure on news organizations, interfere with editorial independence, and deviate from longstanding bipartisan commitments to the First Amendment and the rule of law.¹ We file this brief comment to incorporate those concerns directly into the record for this inquiry and to underscore their relevance to the questions raised in the Public Notice.

The Public Notice frames this proceeding as an effort to “empower local broadcasters” in their dealings with national networks. But as we explained in our enclosed October letter, recent FCC actions have risked using regulatory authority not to promote independent journalism, but to influence newsroom behavior, constrain editorial decision-making, and encourage outcomes aligned with the personal or political interests of elected officials. Given this troubling pattern, the potential for strengthening the negotiating power of large, consolidated broadcast station groups with national networks must be carefully assessed.

As civil rights and consumer advocacy organizations, we strongly support genuine local journalism and robust competition. But policies that reshape the balance of power between station groups, networks, and newsrooms cannot be separated from the broader regulatory environment in which they operate. Several of the Commission’s recent interventions—including coercive conditions attached to the Skydance/Paramount transaction, and unlawful threats made to ABC and its affiliate stations in September demanding they remove Jimmy Kimmel’s show from the airwaves—illustrate how regulatory tools can be deployed in ways that undermine media freedom and risk political interference in programming and editorial decisions.

Accordingly, we urge the Commission to:

- Reaffirm its constitutional obligations and make clear that no FCC policies or rule changes adopted in this docket will be used—directly or indirectly—to influence newsroom content, editorial decisions, or journalistic judgment.
- Avoid granting new leverage or preferential regulatory treatment to large broadcast station groups, particularly where such leverage could be conditioned or abused to pressure newsrooms or extract concessions unrelated to the public interest.
- Ensure that any actions taken in this proceeding strengthen, rather than threaten, media independence, viewpoint diversity, and the ability of journalists to cover elected officials without fear of retaliation.

Our organizations remain committed to engaging constructively with the Commission on matters affecting local journalism, civil rights, and the health of our information ecosystem. We respectfully request that the Commission incorporate our October 7 letter fully into the record of this proceeding and affirm the principles it reflects.

Yours in the Movement,



Brenda Victoria Castillo
President & CEO
National Hispanic Media Coalition



October 8, 2025

Brendan Carr
Chairman
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Dear Chairman Carr,

In recent months, the American public has witnessed increasingly brazen examples of President Trump abusing his power to attack Americans' constitutional rights, erode the Rule of Law, and advance his own personal and financial interests at the expense of the public interest. The undersigned organizations represent a broad and diverse group of people in the United States, and we write to express our deep alarm and condemnation of recent Federal Communications Commission actions that are aiding and abetting this pattern of authoritarian conduct.

President Trump's unconstitutional and un-American attacks on the free press are hardly new. His second term, however, has seen these unseemly rhetorical attacks accompanied by an unprecedented weaponization of the FCC's regulatory authority against television broadcasters to gain leverage in personal legal matters, extract financial settlement payments, and intimidate their news divisions to silence dissenting views and critical coverage.

The President has repeatedly called for ABC¹, NBC², and CBS³ to lose their broadcast licenses in response to what he deems unfair coverage. While the President is entitled to his opinions as a media critic, the First Amendment clearly prohibits government officials from abusing federal power to silence, censor, or intimidate news media organizations. We recognize, just as our Founders did nearly 250 years ago, that a free and open press is Democracy's last and best defense against tyranny. Your Democratic and Republican predecessors had the courage to defend this fundamental American value, publicly rejecting calls to regulate or punish broadcasters for their perceived political views.⁴ You too affirmed this principle in 2021, stating: "A newsroom's decision about what stories to cover and how to frame them should be beyond the reach of any government official, not targeted by them."⁵

Yet the Commission appears to have fully abandoned this principle in its review and approval of Skydance Media's recent acquisition of Paramount Global, including CBS News and Stations. As you know, President Trump – acting in his personal capacity – filed a \$10 billion lawsuit against CBS in late October, alleging that routine editing of a 60 Minutes interview with Vice President Kamala Harris amounted to "Election Interference and Fraud." Trump's lawsuit was widely panned as "legally groundless,"⁶

¹ Fox & Friends: Interview With Donald Trump, Season 1, Episode 7 (Fox Nation, released September 11, 2024), <https://nation.foxnews.com/watch/0b4945c117519626995f180d8cd80056/>, ("To be honest, they [ABC] are a news organization, they have to be licensed. They ought to take away their license for the way they did that.")

² Donald Trump (@realDonaldTrump), Truth Social, (Jul 26, 2025, 8:14 PM), <https://truthsocial.com/@realDonaldTrump/posts/114922310106523572> ("Networks aren't allowed to be political pawns for the Democrat Party. It has become so outrageous that, in my opinion, their licenses could, and should, be revoked! MAGA").

³ Donald Trump (@realDonaldTrump), Truth Social (October 17, 2024, 1:07 PM), <https://trumpstruth.org/statuses/27457> ("60 Minutes is a major part of the News Organization of CBS, which has just created the Greatest Fraud in Broadcast History. CBS should lose its license, and it should be bid out to the Highest Bidder, as should all other Broadcast Licenses, because they are just as corrupt as CBS — and maybe even WORSE!").

⁴ Margaret Harding McGill, *FCC chairman defends First Amendment after Trump broadcaster threats*, Politico, October 17, 2017, <https://www.politico.com/story/2017/10/17/trump-nbc-license-fcc-ajit-pai-response-243865>; Anna Betts, *Outgoing FCC chair rejects TV bias complaints that 'curtail press freedom'*, The Guardian, January 16, 2025, <https://www.politico.com/story/2017/10/17/trump-nbc-license-fcc-ajit-pai-response-243865>.

⁵ Statement of then-FCC Commissioner Brendan Carr, February 22, 2021, <https://docs.fcc.gov/public/attachments/DOC-370165A1.pdf?utm>.

⁶ Jonathan Turley, "No, Trump Should Not Sue CBS," October 20, 2024, <https://jonathanturley.org/2024/10/20/no-trump-should-not-sue-cbs/>.

“frivolous and dangerous,”⁷ and “ridiculous junk”⁸ by legal experts from across the political spectrum. Yet the Commission withheld its approval of the transaction until CBS capitulated and agreed to pay \$16 million. Moreover, the Commission’s eventual approval was conditioned on CBS accepting unprecedented and unconstitutional infringements on its editorial independence, including the hiring of a “bias monitor” to police alleged unfairness toward President Trump and his allies.

With CBS now effectively coerced into self-censorship, we’re troubled by recent Commission actions appearing to aim for similar outcomes at ABC and NBC. In letters sent to the Walt Disney Company (December 21, 2024)⁹ and Comcast Corporation (July 29, 2025),¹⁰ you warned of potential FCC intervention in ABC’s and NBC’s relationships with affiliated broadcast stations. Neither letter identified any statutory authority for such intervention. Nor did they offer any economic rationale why corporate broadcast groups, some of which own more than 100 stations apiece and rake in billions of dollars a year, would require or warrant the FCC’s assistance in standard business negotiations.

Absent any valid statutory authority, and in light of President Trump’s repeated attacks on these networks and calls to put them out of business – and your own media appearances cheering on his attacks on “these legacy broadcast media outfits and the New York and Hollywood elites”¹¹ – these letters read as thinly-veiled shakedown threats: Nice business you’ve got there. It’d be a shame if anything happened to it.

Let us be clear: The FCC has no lawful authority to influence network newsrooms’ editorial decisions. The FCC has no lawful authority to coerce networks’ parent companies to pay millions of dollars to the President (or to a non-profit “library foundation” controlled by one of the President’s sons¹²) as a condition of doing

⁷ Rashard Rose and Jon Passantino, *Trump sues CBS over ‘60 Minutes’ interview with Harris. Legal experts call it ‘frivolous and dangerous’*, CNN, November 1, 2024, <https://www.cnn.com/2024/11/01/media/trump-cbs-lawsuit-harris-60-minutes-interview>.

⁸ *Id.*

⁹ Letter from Brendan Carr, Commissioner, FCC, to Bob Iger, CEO, The Walt Disney Company (Dec. 21, 2024), <https://www.fcc.gov/sites/default/files/Carr-Letter-to-Disney-12212024.pdf>.

¹⁰ Letter from Brendan Carr, Chairman, FCC, to Brian Roberts, CEO, Comcast (July 29, 2025), <https://www.fcc.gov/sites/default/files/carr-letter-comcast-july2025.pdf>.

¹¹ Transcript, FCC Chairman Carr’s interview on Fox News Channel’s America’s Newsroom, July 24, 2025, <https://www.foxnews.com/media/fcc-chairman-sounds-clarion-call-return-unbiased-trustworthy-journalism>.

¹² David A. Fahrenthold and Maggie Haberman, *Eric Trump Starts Nonprofit to Build His Father’s Presidential Library*, The New York Times, May 23, 2025, <https://www.nytimes.com/2025/05/23/us/elections/eric-trump-presidential-library-foundation.html>.

business. These are the actions of lawless authoritarians – not of honorable public servants.

As Chairman of the Federal Communications Commission, your sworn duty is to the Constitution – not to any President. We urge you to speak up, as your predecessors have done and you yourself were once willing to do, in defense of the First Amendment and the Rule of Law. Affirm unequivocally that the FCC will no longer serve as the enforcer in President Trump's unconstitutional shakedowns of media organizations. Your oath of office demands nothing less.

Sincerely,

Brenda V. Castillo
President & CEO
National Hispanic Media Coalition

John Yang
President and Executive Director
Asian Americans Advancing Justice | AAJC

Rosario Palacios
Executive Director
Common Cause Georgia

David Bowles
Co-founder
#DignidadLiteraria

Noreen Farrell
Executive Director
Equal Rights Advocates

Kathy Spillar
Executive Director
Feminist Majority Foundation

Jessica J. González
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