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December 10, 2025

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

Re: Opposing Gray Media's Proposed Broadcast License Transfers[1] , Empowering Local Broadcast TV Stations to Meet Their Public Interest Obligations: Exploring Market Dynamics Between National Programmers and Their Affiliates (MB Docket No. 25-322)

Dear Chairman Carr, Commissioner Gomez, and Commissioner Trusty:

The National Hispanic Media Coalition (NHMC) submits these comments to express our strong concerns regarding Gray Media Group's plans to acquire 26 broadcast stations across 16 markets. These applications arrive at a time when media consolidation is accelerating, local journalism is in crisis, and Latino communities have become increasingly vulnerable to mis- and disinformation and are seeing their access to culturally responsive news diminish. The Commission's responsibility to act in the best interest of the public interest, as mandated by the Communications Act,[2] has rarely been more important.

For decades, NHMC has advocated on behalf of Latino consumers in the U.S. and pushed to advance equitable representation in the nation's media systems. As expressed in our August 2025 comments opposing efforts to weaken the National Audience Reach Cap[3], we have long held that excessive consolidation poses a threat to Latino ownership opportunities, a healthy variety of viewpoints available to consumers, and democratic accountability. We similarly evaluate these proposed transactions not as isolated business deals, but as developments with deep implications for democratic participation and the information needs of millions of Latino households.

What the applicants seek here is not a routine reshuffling of licenses, but rather a restructuring of entire local broadcast ecosystems—one that would concentrate control of major network affiliates in ways that shrink competition, sideline what few Latino voices exist in broadcasting,

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[1] NHMC objects to all of Gray's proposed transactions with Block Communications (Application file numbers 0000276772, 0000276778, 0000276779, 0000276783), Sagamore Hill (application file numbers 0000276662, 0000276663), and Allen Media (Application file numbers 0000277192, 0000277193, 0000277194, 0000277196, 0000277199, 0000277200, 0000277203, 0000277205, 0000277206, 0000277208).
[2] 47 U.S.C. §309.
[3] See NHMC Comments filed August 4, 2025 in MB Docket Nos. 17-318, 18-349, 22-459.

and jeopardize the quality and accessibility of local news. For the reasons described below, NHMC urges the Commission to decline to approve the proposed transfers.

I. Disadvantaging Communities Who Rely Most on Local Broadcast Media

Latino audiences continue to rely heavily on broadcast television. Sixty-two percent receive some portion of their news from local TV sources—a higher reliance than many other groups. For communities navigating language diversity, immigration status issues, or lower broadband access, broadcast stations remain indispensable.

The proposed transactions put this critical institution at risk. Gray seeks to add 26 stations to its already expansive portfolio of 180 stations across 113 markets. Notably, the transactions would result in 13 markets where Gray would control two or more Big-Four network affiliates, including three "triopoly" markets and one "quadropoly" market in which Gray would singlehandedly control the local affiliates of *all four major broadcast networks*.

This level of clustering reshapes how information flows within a community. Fewer independent owners mean fewer editorial voices, fewer newsrooms, fewer investigative priorities, and fewer culturally specific perspectives. Latino communities already struggle to see themselves reflected in local media; these transactions would make that problem significantly worse.

II. Impeding on Editorial Integrity and Eroding Local News

Local journalism does not vanish all at once; it erodes through incremental reductions: shared anchors, merged newsrooms, syndicated content replacing in-market reporting, and "must-run" programming coming from distant corporate headquarters.

NHMC has observed these patterns repeatedly as large national station groups expand their holdings. Whenever one owner controls multiple top-ranked stations within a single market, incentives shift toward efficiency in ways that directly reduce the diversity and quantity of local reporting. Independent news teams are consolidated. Distinct editorial practices flatten into uniformity, and corporate priorities supersede local civic ones.

For Latino communities, this erosion is particularly consequential:

- Coverage of issues such as immigration enforcement, housing, education, and local elections becomes thinner and less reflective of lived experiences.
- Culturally and linguistically relevant reporting (which is already rare) faces further displacement by standardized content produced elsewhere.
- Must-run political or issue-advocacy segments risk overshadowing local reporting entirely.

The Commission has long recognized that its public-interest mandate requires special attention to localism. The structures created by these transactions move decisively in the opposite direction.

III. Increasing Consumer Costs

The Commission cannot ignore economic impacts when they result from reduced competition. NHMC has previously explained that carriage fees imposed by the largest broadcast groups have risen sharply over the past decade, contributing to higher monthly bills for millions of Latino households.

Gray is already among the industry's most aggressive negotiators. When stations transition from independent or smaller-group ownership into a large conglomerate portfolio, fees usually escalate to match the new owner's higher rate structure. Consolidation gives broadcast-station groups greater leverage under retransmission-consent rules, which can lead to sharp increases in retransmission-fee revenues for broadcasters. For Latino households, who face high cost burdens and are often disproportionately reliant on cable or bilingual bundles, the effects are immediate: higher monthly bills for the exact same channels.

These economic harms fall squarely within the Commission's obligations under Sections 309(a) and 310(d) to assess competitive effects and downstream consumer impacts.

IV. The Proposed Transactions Fail the Public-Interest Test

Under the Communications Act, broadcast licenses may not be transferred unless the Commission affirmatively determines that doing so serves the public interest. That test requires the FCC to evaluate effects on competition, implications for localism, impacts on ownership and viewpoint diversity, and the broader public consequences of concentration. Measured against those standards, the Gray transactions fall short. The proposals would create unprecedented ownership concentration in numerous markets, weaken newsroom independence and local coverage, and heighten the economic burdens on consumers.

For these reasons—consistent with NHMC's long-standing advocacy to protect diversity, localism, and equity in media—we urge the Commission to deny the pending applications.

Thank you for your attention to our concerns.

Sincerley,

Brenda Victoria Castillo
President & CEO
National Hispanic Media Coalition