Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Gray Media, Inc. pending transactions with Allen Media, Block Communications, and Sagamore Hill	)	Lead File Numbers 0000277192, 0000277193, 0000277194, 0000277195, 0000277196, 0000277197, 0000277198, 0000277199, 0000277200, 0000277201, 0000277202, 0000277203, 0000277204, 0000277205, 0000277206, and 0000277208
	)	
Applications to transfer control of Tegna, Inc. to Nexstar Media, Inc.	)	MB Docket No. 25-331
	)	
Sinclair Broadcast Group's bid to acquire the E.W. Scripps Company	)	

Submitted: December 10, 2025

OBJECTION OF NATIONAL CIVIL RIGHTS ORGANIZATIONS TO MAJOR LOCAL TV CONSOLIDATION TRANSACTIONS

The undersigned civil rights, consumer protection, and public interest organizations submit these comments to express our strong opposition to a series of proposed television station group mergers that pose a considerable risk of harming consumers, local news, and media viewpoint diversity.

Specifically, we object to:

- Gray Media, Inc.'s applications to acquire 26 local broadcast stations across 16 markets via a series of transactions with Allen Media Group,[1] Block Communications,[2] and Sagamore Hill.[3]
- Nexstar Media Group's pending acquisition of TEGNA, Inc.'s 64 television stations.[4]
- Sinclair Broadcast Group's widely reported bid to acquire the E.W. Scripps Company and its 61 local TV stations.

Our organizations participate regularly in Commission proceedings concerning media ownership, diversity, and the health of local journalism. Across Administrations, we have consistently

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[1] FCC application file numbers 0000277192, 0000277193, 0000277194, 0000277196, 0000277199, 0000277200, 0000277203, 0000277205, 0000277206, 0000277208
[2] FCC application file numbers 0000276772, 0000276778, 0000276779, 0000276783
[3] FCC application file numbers 0000276662, 0000276663
[4] MB Docket 25-331

warned that unchecked consolidation harms the very communities the Communications Act obligates the FCC to protect. This set of transactions would violate the Commission's local ownership rules and/or the statutory National Audience Reach Cap, and as such trigger many of the same concerns that civil rights organizations, consumer advocates, labor representatives, and community groups previously highlighted in the record of the ongoing Audience Cap proceeding:[5] TV station consolidation concentrates economic power, narrows viewpoint diversity, reduces opportunities for minority entrepreneurs, harms workers, and erodes local news coverage. Those concerns apply with full force here—at a moment when vulnerable communities can least afford more media contraction.

I. These Transactions Would Create Extreme Local Concentration and Erode Competition

Based on the public descriptions of the deal, Gray seeks to acquire 26 full- and low-power stations in 16 markets, producing market structures far beyond what the Commission has traditionally permitted. The transactions would result in:

- Nine markets where Gray would own or operate two of the Big-Four network affiliates, forming "top-four duopolies;"
- Three markets where Gray would effectively control three Big-Four affiliates, consolidating the majority of high-value local news inventory into a single owner; and
- One market (Lima, Ohio) where Gray would control *all four* major network affiliates, creating a local quadropoly that eliminates meaningful competition altogether.

The Department of Justice has consistently treated similar concentrations as anticompetitive in prior broadcast transactions, requiring divestitures to preserve competition. Several of the stations included in Gray's applications were themselves previously subject to DOJ-imposed divestiture requirements designed to mitigate undue concentration. Attempting to reassemble those properties under a single owner undermines the logic of those remedies, places the burden back on viewers and competitors, and invites a return to the very structural harms DOJ sought to prevent.

Nexstar, meanwhile, seeks Commission approval to merge with Tegna, Inc. in a deal that would combine the first- and fourth-largest national station groups by revenue. The combined entity would control 265 stations and reach 80 percent of U.S. homes, which more than doubles the statutory 39% limit on audience reach allowable under federal law. The merger would also create new top-four duopolies or triopolies in more than two dozen local markets.

Sinclair's publicly reported bid for Scripps, if completed, would similarly combine two of the five largest affiliate station groups whose combined reach would also far exceed the 39 percent

[5] See comments submitted in MB Docket No. 17-318 by Asian Americans Advancing Justice | AAJC (August 4, 2025); The National Hispanic Media Coalition (August 4, 2025); Advancing Justice | AAJC, Filipina Women's Network, OCA – Asian Pacific American Advocates, and Sikh American Legal Defense and Education Fund (August 4, 2025); The Multicultural Media, Telecom and Internet Council *et al* (August 22, 2025); United Church of Christ Media Justice Ministry *et al* (August 22, 2025)

cap allowable by statute. A combined Sinclair-Scripps entity would also create several instances of top-four duopolies, including in Cincinnati, OH; Nashville, TN; and Baltimore, MD.

The Commission has long recognized that markets with two or more top-ranked stations under common ownership exhibit reduced competition in advertising, higher retransmission fees, fewer independent newsroom operations, and diminished incentives to respond to community needs. Gray's proposal recreates this dynamic on an unprecedented scale.

II. Consolidation of This Magnitude Will Reduce Local News, Increase Duplication, and Harm Community Coverage

The FCC's public-interest standard requires protection of localism—the bedrock that ensures communities have access to news and information about their civic institutions, emergencies, and public affairs. But experience shows that when a single broadcaster controls multiple top stations in a market, the incentives shift sharply away from robust local news.

Across past acquisitions, including those involving these large station groups, communities have consistently seen:

- Consolidation of newsrooms and merging of formerly independent reporting teams;
- Reduced investment in original local journalism, including the loss of investigative units, beat reporters, and culturally specific coverage;
- Increased use of centralized or regionalized "must-run" content that displaces local reporting;
- Greater duplication of news segments across formerly competing stations; and
  Reduced editorial diversity, as common ownership erases the competitive tension that encourages different perspectives and story selection.

The Commission's own findings in past merger reviews make clear that these effects are not speculative—they are the predictable outcomes of excessive horizontal consolidation.

For communities of color, immigrant audiences, and multilingual households, the consequences are amplified. Latino, Black, Asian American, Native Hawaiian and Pacific Islander (NHPI), and rural audiences all rely heavily on local broadcast journalism for trustworthy, accessible news. Yet these are the very communities that most often experience under-representation in newsroom staffing, limited culturally relevant reporting, and the disappearance of local beats. Adding more markets to a structure in which one or two massive station groups control two, three, or four major affiliates will further weaken the presence of diverse voices and locally anchored programming.

III. The Transactions Will Increase Consumer Costs

These transactions would each substantially increase the acquiring company's leverage in retransmission consent negotiations. Larger station groups routinely secure higher retransmission fees—fees that flow directly into consumers' cable, satellite, and other MVPD bills. When stations operating under lower rate structures are acquired by a larger broadcaster, rates typically "reset" upward to the acquiring company's level, immediately raising costs for distributors and, ultimately, their millions of subscribing households.

This is not an abstract economic theory. It is well-documented in industry practice and repeatedly acknowledged by the FCC and DOJ. Households, particularly low-income and minority viewers who rely on cable or satellite bundles for access to local broadcast channels, will pay more as a direct result of these acquisitions and for the very same stations they already receive today.

At a moment when affordability is a top concern for families across the country, the Commission should be especially cautious about approving transactions like these that heighten market power and will increase consumers' monthly bills.

IV. These Transactions Further Shrink Already Scarce Opportunities for Minority and New Entrant Ownership

Civil-rights organizations have for decades sounded the alarm on the shrinking number of women- and minority-owned broadcast outlets. According to the FCC's most recent media ownership report:

- Women hold a majority interest in only a small fraction of full-power TV stations;
- Latinos, Asian Americans, Black owners, and NHPI communities remain chronically underrepresented;
- Ownership opportunities for new entrants have narrowed dramatically as large groups accumulate the most valuable local properties.

These disparities have persisted despite decades of Commission recognition that ownership diversity is essential to viewpoint diversity and core First Amendment values.

The proposed transfers would significantly worsen this landscape. Gray, Nexstar, and Sinclair are attempting to accumulate an even larger share of highly rated affiliates—affiliates that almost never become available to smaller buyers or entrepreneurs of color. Allowing this consolidation to proceed forecloses the already-limited paths for underrepresented communities to enter broadcasting as owners, investors, or innovators. It also contradicts Congress' and the Commission's longstanding commitments to promoting diverse media ownership.

V. The Transactions Fail the Commission's Public-Interest Standard

To approve a broadcast transfer, the Commission must make an affirmative determination that the transaction serves the public interest, convenience, and necessity. This requires assessing:

- The effect on competition;
- The implications for localism and news coverage;
- The consequences for ownership and viewpoint diversity; and
- The broader impact on consumers and communities.

Measured against these criteria, the proposed acquisitions do not pass.

They would create extreme concentration, contradicting decades of FCC precedent; reduce local news output at a time when local journalism is in crisis; raise costs for consumers; and constrict opportunities for diverse ownership. The Commission cannot rely on generalized claims of "efficiency" or "scale" when the record and industry history show these efficiencies are typically achieved through newsroom consolidation, centralized content production, and the elimination of jobs.

VI. Conclusion

For the reasons described above, the undersigned organizations urge the Commission to deny the license transfers related to these transactions.

These transactions would diminish competition, weaken local journalism, narrow editorial diversity, and further constrain opportunities for underrepresented communities in broadcasting. They would also impose higher costs on consumers and reduce the ability of small businesses to reach audiences in their own communities.

The public interest standard requires more than deference to industry preferences. It requires ensuring that the nation's communications infrastructure serves *all* communities—urban and rural, English-language and multilingual, affluent and working-class, majority and minority. Approving these transactions would move the country in the opposite direction.

We respectfully urge the Commission to reject the proposed acquisitions.

Respectfully submitted,

Asian Americans Advancing Justice – AAJC
Asian and Pacific Islander American Vote (APIAVote)
Common Cause
Consumer Action
Hispanic Tech and Telecommunications Partnerships (HTTP)
Japanese American Citizens League
LGBT Tech
MANA, A National Latina Organization
Multicultural Media & Correspondents Association (MMCA)
Multicultural Media, Telecom and Internet Council (MMTC)
NAACP
National Action Network (NAN)
National Black Justice Collective
National Coalition on Black Civic Participation
National Council of Asian Pacific Americans (NCAPA)
National Council of Negro Women (NCNW)

National Hispanic Media Coalition (NHMC)
National LGBTQ Taskforce Action Fund
National Newspaper Publishers Association (NNPA)
National Urban League
OCA-Asian Pacific American Advocates
Sikh American Legal Defense and Education Fund (SALDEF)
The Leadership Conference on Civil and Human Rights