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May 26, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20054

Re: MB Docket No. 10-71, Petition for Rulemaking to Amend the Commission's  
Rules Governing Retransmission Consent

Dear Chairman Genachowski:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the rights of all persons in the United States, we are writing to support the Federal Communications Commission's review of all rules governing programming negotiations between and among multichannel video programming distributors and content providers. We encourage the Commission to ensure that the same rules are applied to retransmission consent negotiations as to program access and program carriage rules.

The Leadership Conference has long been concerned that existing media consolidation has a negative impact on the creation and distribution of programming created by and for women and people of color. Our current media landscape is significantly lacking in programming that features women and people of color as actors, directors, and producers in popular entertainment and news.

In the present media system, only a small handful of content creators negotiate with a small handful of program distributors to bring video programming to the public. This means that artists and independent creative entrepreneurs have a very difficult time bringing to Americans the perspectives and content that reflects the true diversity of our nation.

Congress and the Commission have developed a series of rules governing the relationships between content providers and distributors that are designed to promote a diversity of voices and ensure communities have access to essential local news and information offered by over-the-air broadcasting. Unfortunately, when large companies negotiate carriage agreements, subscribers and viewers are often left in the middle, possibly being deprived of programming if corporate negotiations fail. Even worse, the highly concentrated media marketplace means that independent programming is left on the sidelines, while large cable programmers and broadcasters receive nationwide distribution for programming that offers little that serves the full diversity of the audience.

Many issues currently confront this Commission, and we strongly support the Commission's current efforts to focus on bringing broadband to all Americans as one of the most important priorities of this administration. At the same time, issues of traditional media and the marketplace structures that limit American access to independent and diverse voices are part of the underlying structural problems that perpetuate inequality in every aspect of American society.

May 26, 2011  
Page 2 of 2



Please contact Leadership Conference Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, UCC Office of Communication, Inc., at 202-841-6033, or Chris Calabrese, ACLU, at 202-715-0839, or Corrine Yu, Leadership Conference Senior Counsel at 202-466-5670, if you would like to discuss the above issues or any other issues of importance to The Leadership Conference.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wade Henderson', followed by a long horizontal line.

Wade Henderson  
President & CEO

A handwritten signature in black ink, appearing to read 'Nancy Zirkin', followed by a long horizontal line.

Nancy Zirkin  
Executive Vice President