

May 10, 2020

Marlene H. Dortch
Secretary
Federal Communications Commission
VIA Email – Barbara.Kreisman@fcc.gov

RE: Petition to Deny – BALCDT – 20200408AAL

Dear Ms. Dortch:

As the President and CEO of one of the nation's largest organizations representing minority media enterprise, I am writing to petition to deny application BALCDT – 20200408AAL and share my sincere objection after hearing that one of my members viewed the recent public service announcement regarding the assignment of the television licenses of one of the few remaining minority-owned broadcasters, Marshall Broadcasting Group, back to Nexstar Broadcasting. Nexstar used minority-owned Marshall Broadcasting to satisfy then former FCC Commissioners to get a \$500 million media deal completed. It also made promises about minority programming and content production that never materialized.

More than five years ago, the Congressional Black Caucus endorsed the Nexstar-Marshall Joint Services Agreement based largely on pledges from Nexstar executives to “lead the industry in incubating a new, minority-controlled entrant to broadcasting and bring additional news, information and specialized programming to markets where MBG [Marshall] will operate.” It appears Nexstar never intended for this experiment to succeed.

This was all just a Nexstar ploy to sidestep concerns over the efficacy of such “joint service agreements” and, ultimately, manipulate and sidestep federal guidelines and FCC ownership limits to get their larger deal done. That is deliberately deceitful and wrong. Upon gaining FCC approval for the transaction, Nexstar obviously had little further use for Marshall and, thus, began to undermine its station operations in an effort to squash the minority-owned company.

Marshall's record on providing people of diverse background opportunities to participate in roles often blocked to the is unquestioned. Since the company has operated the three stations in Iowa, Louisiana and Texas, it has hired and trained, African Americans to be Station Managers, Directors of Sales, and General Manager. In fact, greater than 90% of the team critical to managing a television station have been minority and women. As the nation's oldest civil rights organization, we can not stand idly by while these gains, in an industry long denied to people of color, stand to be lost because Nexstar failed to fully live up to the commitment it made to consummate its merger.

We further feel that any action taken during this current COVID19 crisis would not receive the same diligent process that it would were the Commission at full strength and were staff not separated and unable to perform their duties to the fullest extent. Therefore we ask that no consideration be given to this request and that our petition to deny be

reviewed and given the full weight of consideration. We have also expressed our concerns to the US. Congress.

Thank you in advance for your attention and consideration to this petition to deny.

Sincerely,



Dr. Benjamin F. Chavis, Jr.
President and CEO
National Newspaper Publishers Association (NNPA)

Cc: Hon. Karen Bass, Chairwoman, Congressional Black Caucus
Hon. Frank Pallone, Chairman, Energy & Commerce
Hon. John Cornyn, US Senate
FCC Chairman Ajit Pai
FCC Commissioner Jessica Rosenworcel
FCC Commissioner Geoffrey Starks
Barbara Kreisman, Chief – Video Division
David Brown, Deputy Chief – Video Division