



930 E. 50th Street
Chicago, Illinois 60615

VIA ECFS

December 10, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Meeting with Commissioner Mignon Clyburn on Ownership, Prison Phone Rate, and Lifeline Issues

Dear Secretary Dortch:

On December 6, Rev. Jesse L. Jackson, Sr., Dr. George Korn, associate professor, Ohio University School of Media Arts and Studies and advisor to Rev. Jackson, Dr. Sean MacMillan, director of the Rainbow PUSH Coalition's program for corporate responsibility, Bishop Tavis Lane Grant, national field director for the Rainbow PUSH Coalition, and Steven Smith, director, Rainbow PUSH Coalition Telecommunications Project, met with Commissioner Mignon Clyburn and members of her staff, David Grimaldi, chief of staff and media legal advisor, and Angela Kronenberg, wireline legal advisor, regarding a number of issues.

Rev. Jackson expressed his concern about predatory prison telephone rates and indicated that the issue will be a major focus for the Rainbow PUSH Coalition in the months ahead. He asked about steps that are being taken within the agency to address the problem and Commissioner Clyburn and Ms. Kronenberg provided an update on the status of the Wright Petition and other initiatives that are underway. It became clear that, while the FCC can have an impact on interstate rates, it has very little jurisdiction on intrastate calling rates. Dr. MacMillan explained that Rainbow PUSH will be focusing on predatory intrastate rates as it is currently doing in Cook County, Illinois. The Rainbow delegation indicated plans to sponsor hearings on predatory prison phone rates in Chicago and possibly New York and asked for the FCC's participation.

Rev. Jackson expressed our organization's ongoing support for the Lifeline program for low-income Americans and our commitment to making it work as efficiently and effectively as possible. Dr. Korn observed that, while compliance plan approval has been slow since the requirement was implemented, there are signs that the pace of approvals will be picking up and he expressed appreciation for that. He also expressed the hope that, as the mechanics of the process continue to take shape, it will be marked by clarity of criteria, transparency and fairness.

Korn also addressed the Lifeline 10 federal state petition process. He indicated that the approval process has been virtually frozen for the past 2 years, creating an anticompetitive situation in these states. A competitive Lifeline situation in the 10 federal states will most likely offer low-income citizens improved pricing, hardware, and other options that the current duopoly does not provide. We urge the FCC to move forward on the 10 state approval process and allow qualified companies to begin offering service. This will improve access and choice for the most needy citizens in those states. Korn also asked about progress on the Lifeline database. He reminded the Commissioner that the database is the best answer for problems of fraud, waste and abuse and urged rapid action on its implementation.

Rev. Jackson and his colleagues expressed their concern regarding the ownership rule changes that are currently under consideration at the agency. He made clear, as did the court, that diversity issues must be addressed before there is any further relaxation of ownership rules. The group also indicated their feeling that the current 30 day response period is not enough time for meaningful input from those concerned about this important issue. New ownership data has been released and appropriate analysis must be done regarding ways to address the diversity issues that are apparent in the data. This will take some time.

At present, Rainbow PUSH does not support relaxation of any existing ownership rules—including the newspaper rule. A full analysis must be done on the effect of any possible changes on minority ownership, and solutions to diversity issues must be offered, as the court mandated.

Media consolidation rules are inextricably linked to minority ownership. Allowing additional media consolidation will harm minority owners. The FCC cannot split the two issues and it must demonstrate a way to improve minority ownership before moving forward with any relaxation of ownership rules.

If you have questions regarding this letter, please contact me directly.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'George Korn', with a long horizontal line extending to the right.

George Korn, Ph.D.
Advisor to Rev. Jesse L. Jackson, Sr.

Cc: Commissioner Mignon Clyburn, Mignon.Clyburn@fcc.gov
David Grimaldi, Dave.Grimaldi@fcc.gov
Angela Kronenberg, Angela.Kronenberg@fcc.gov