

July 11, 2025

Federal Communications Commission

445 12th Street SW
Washington, DC 20554

Re: MB Docket No. 17-318 — National Television Multiple Ownership Rule

To the Honorable Commissioners:

We, the Board of the Documentary Producers Alliance, a nonprofit organization dedicated to amplifying the voices and impact of documentary film and TV producers, write to you on behalf of our membership in response to the Commission's ongoing review of the National Television Multiple Ownership Rule.

While we recognize the need to modernize legacy policy frameworks, **we urge the Commission not to eliminate the national audience cap or expand the UHF discount in ways that would accelerate the consolidation of broadcast ownership.** Doing so would move broadcasting in the same direction as streaming, which has become a highly concentrated media ecosystem dominated by a small number of gatekeepers who have little obligation or incentive to serve the public interest.

Broadcasting remains one of the last media sectors governed by rules that promote local accountability and provide access for independent voices. Over the past two decades, streaming platforms have dramatically reshaped how audiences access content. Despite their cultural and market dominance, these platforms are not subject to the same ownership limits, localism rules, or viewership obligations as broadcasters. Consequently, they now wield enormous influence over what stories are seen, by whom, and on what terms.

For documentary producers, this shift has had serious economic and creative consequences. As streaming platforms have grown in size, their willingness to

commission, purchase, or license independent and public interest content has sharply declined. Producers face shrinking opportunities to finance and distribute films that fall outside the narrow commercial topics now favored by major streaming companies.

This impacts not only producers, but also the entire production ecosystem, including editors, cinematographers, researchers, composers, and countless other creative professionals. The result has been a dramatic contraction in our nation's creative economy and an exodus of highly specialized production workers from the industry. The long-term sustainability of one of America's most unique and lucrative industries (and GDP exports) is increasingly in peril.

The National Television Multiple Ownership Rule is more important than ever to documentary producers and the public we serve. We have long relied on a diverse network of local stations, public broadcasters, and independent affiliates to license and distribute our work.

We believe a meaningful review of the national ownership cap must include analysis of:

- How further consolidation may reduce broadcast access for independent documentary producers;
- And how proceeding with deregulation without addressing streaming's dominance replicates the very inequities the broadcast rules were designed to mitigate.

Please do not hesitate to contact the Documentary Producers Alliance with any questions or for additional input. Thank you for your attention and leadership on this matter.

Respectfully submitted,

The Board of Directors
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<https://www.docproducers.org>

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