

Comment of the Future Film Coalition

Regarding MB Docket No. 17-318

Re: National Television Multiple Ownership Rule

Submitted to: Federal Communications Commission (FCC) via electronic filing

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1. Introduction

The Future Film Coalition (FFC) appreciates the opportunity to submit comments in response to the Commission's proceeding on the national television audience reach cap. We represent stakeholders in the American film and television industry who regularly collaborate with broadcast entities, both large and small, across the United States in rural and urban areas. Notably, over **122,000 U.S. businesses comprise the film and television industry, and 92% of these have fewer than 10 employees**, underscoring that small, independently owned

businesses are the backbone of this sector. These businesses—including award-winning filmmakers and content creators, local media producers, film distributors, cinema exhibitors, sales agents, and affiliated small business owners and nonprofit organizations—are vital drivers of innovation and critical contributors to the television and video programming marketplace.¹²

As an independent film stakeholder, the Future Film Coalition (FFC) believes the FCC's current review of media ownership regulations presents a critical opportunity to modernize our media policies to reflect the realities of a digital age. While we support thoughtful modernization of the national audience reach cap to reflect profound changes in the media landscape, we are particularly concerned about the impact of any new or revised regulations on small businesses, local news and journalism, and the public interest.

2. Competition in a Changed Marketplace

Our primary concern is that relaxing ownership caps will lead to further consolidation within the broadcast industry, which will exacerbate existing problems within the media ecosystem. When the cap was originally implemented, over-the-air television dominated audience attention and advertising revenue. Today, broadcasters face intense competition from unregulated digital platforms (such as Netflix, YouTube, TikTok, and global technology companies), none of which are subject to ownership limits. The increasing convergence of technology and the film industry—exemplified by Amazon recently joining the Motion Picture Association following its acquisition of MGM and the rise of Prime Video—underscores how dominant tech platforms are reshaping production, distribution, and market power in ways that warrant careful regulatory oversight.³

We recognize that this imbalance warrants reconsideration of policies to achieve economies of scale, foster healthy competition, and invest in innovation. However, as the Future of Music Coalition (FMC) has observed in its previously submitted comments to the FTC and FCC, increasing the concentration of ownership carries significant risks: powerful gatekeepers

¹ Motion Pictures Association, "The American Motion Picture and Television Industry: Creating Jobs, Trading Around the World," <https://www.motionpictures.org/research-docs/the-american-motion-picture-and-television-industry-creating-jobs-trading-around-the-world-6/>; https://www.motionpictures.org/wp-content/uploads/2023/01/MPA_US_Economic_Contribution_2021_Final.pdf

² The *Independent Media Arts Field Briefing Report* published by the National Endowment for the Arts in partnership with the Sundance Institute (Nov 2022) states a significant number are self-employed individuals, independently owned production companies, and nonprofit organizations employing independent contractors. Further, the field relies on an ecosystem of small and medium-sized nonprofit and for-profit entities such as regional film festivals, independent arthouse cinemas, public broadcasters, educational distributors, and media art centers to independently distribute film. This network makes it possible for films to reach audiences who may have limited access otherwise. <https://www.arts.gov/sites/default/files/IMAG-Field-Briefing-KMR2.pdf>

³ Gene Maddaus, "Amazon Joins Motion Picture Association, as Entertainment and Tech Converge," *Variety*, September 19, 2024.

dictating unfavorable terms, narrowing the range of content available to audiences, and marginalizing smaller, regional or locally owned entities representing independent film and music.⁴⁵ **These dynamics dismantling a fair media system also predominate in the current film and media marketplace.**

Drawing from testimonies before the U.S. Senate Committee on Science, Commerce, and Transportation Subcommittee on Communications, Technology, Innovation, and the Internet regarding “The State of the Television and Video Marketplace” held on June 5, 2019, witnesses discussed in detail about how the current television and video programming marketplace conditions have created an imbalanced environment for small businesses, local news, and journalism.⁶ In particular, the testimonies from Michael Powell (President & CEO of NCTA: The Internet & Television Association) and Craig Aaron (CEO of Free Press) reveal that while the current television and video marketplace is more technologically advanced and competitive in some ways, the benefits have accrued mainly to large corporations. Small business owners are being squeezed out, and the public is left paying more for less local, less diverse, and less accountable media. This imbalance is not just an economic issue; it undermines the public’s right to information, civic participation, and cultural representation, which are cornerstones of a healthy democracy.⁷

Their testimonies show the trickle-down effect of massive consolidation in both broadcasting and cable on pushing out local owners, creating insurmountable barriers to entry for small industry businesses across the nation. This consolidation allows large companies to prioritize profit over public service, while homogenizing content (“cookie-cutter content from coast to coast”) and draining revenue away from communities into corporate headquarters.⁸

As an independent film stakeholder representing filmmakers, local media producers, and small businesses, we witness firsthand how the growing imbalance in the media marketplace harms

⁴ Joint comment from Future of Music Coalition & musicFIRST Coalition submitted in 2019, regarding the 2018 Quadrennial Regulatory Review: Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Under Section 202 of the Telecommunications Act of 1996 (April 29, 2019)

⁵ Joint comment from Future of Music Coalition & musicFIRST Coalition submitted in 2023 regarding the 2022 Quadrennial Regulatory Review: Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Under Section 202 of the Telecommunications Act of 1996 (March 3, 2023)

⁶ Documented testimonies from U.S. Senate Committee on Science, Commerce, and Transportation Subcommittee on Communications, Technology, Innovation, and the Internet regarding “The State of the Television and Video Marketplace” (June 5, 2019): <https://www.commerce.senate.gov/2019/6/committee-announces-hearing-on-television-and-video-marketplace>

⁷ Testimony of Michael K. Powell, President & CEO of The Internet asnd Television Association, before the Senate Committee on Commerce, Science and Transportation (June 5, 2019): <https://www.commerce.senate.gov/services/files/E03C5B30-5F27-4463-93A1-C25D01EF1FD6>

⁸ Testimony of Craig Aaron, President & CEO of Free Press and Free Press Action, before the Senate Committee on Commerce, Science and Transportation (June 5, 2019): <https://www.commerce.senate.gov/services/files/2BE3238B-710F-4BCA-8FF3-67206A882A8B>

these communities. This imbalance is accelerating rapidly, fueled by consolidation, the unchecked dominance of streaming platforms, and shrinking opportunities for local and independent voices to compete.⁹

In an opinion piece, FCC Commissioner Nathan Simington and his Chief of Staff and Senior Advisor, Gavin M. Wax, offer a similar observation: “[u]nlike satellite, cable, and broadcast TV, streaming isn’t regulated by the FCC and faces no such constraints. They are classified as ‘online video distributors,’ not ‘multi-channel video programming distributors,’ and thus escape the FCC’s oversight. This loophole allows a handful of powerful players to grow larger and more monopolistic, often while avoiding even the most basic public interest obligations.”¹⁰

3. The Incomplete Frame: Beyond Broadcast to Streaming

While the Commission’s proposal to update the ownership cap acknowledges significant changes in the marketplace, its scope remains too narrow. Broadcasting still plays a vital role, particularly for lower-income, rural, and older communities, but the dominant forces in today’s media ecosystem are online video providers, or streaming platforms.

We urge the Commission to expand its regulatory framework beyond broadcast and address how the absence of meaningful oversight over streaming platforms undermines the very goals that broadcast rules were designed to protect: balanced competition, access to quality information, and local relevance.

As Simington observes, “*Today’s patchwork of regulation favors the largest, most entrenched, and least regulated players, who are already restricting viewpoint diversity by controlling what content reaches the public. In fact, their greatest competitive advantage comes not from offering a better product or service but rather from simply dodging regulation. Leveling the playing field would empower smaller competitors, be they local stations or independent streamers, to survive and thrive.*”

⁹ Examples include: Dear Producer blog post compiling direct quotes from acclaimed industry producers and production companies regarding inequities in the marketplace and the state of the industry: https://www.dearproducer.com/p/15047617_the-sky-is-falling-take-shelter; IndieWire’s [Future of Filmmaking initiative](#): Compilation of articles, news, and case studies for the independent film and media industry dedicated to pressing topics; Future Film Coalition’s News Digest: <https://www.futurefilmcoalition.org>; Hope for Film: The Blog for Aspiring and Established Filmmakers of Independent Films by Ted Hope: <https://hopeforfilm.com>; Keri Putnam, *US Independent Film Audience and Landscape Study*, Shorenstein Center on Media, Politics and Public Policy, 2024: <https://shorensteincenter.org/us-independent-film-audience-landscape-study/>; Center for Media & Social Impact, *Stories for a Stronger Nation: Building an Inclusive and Sustainable Future with Independent Film and Media*, July 2021; Anthony Kaufman, “A Netflix for Indie Films and Documentaries?” *Anthony Kaufman’s Column, Substack*, April 18, 2024: <https://anthonykaufman.substack.com/p/a-netflix-for-indie-films-and-documentaries>.

¹⁰ Gavin Wax and Nathan Simington, “Opinion: Time for the FCC to Level the Media Playing Field,” *Daily Caller*, May 27, 2025.

Historically, broadcasting was regulated on the principle that the airwaves are a scarce and valuable public resource. In much the same way, streaming platforms have emerged as the central arena for public discourse, yet they function without substantive oversight. Without also addressing the dominance of streaming platforms, adjustments to support broadcasters will not create a more balanced media system or broaden viewership choice.

4. Safeguards Are Essential

We respectfully urge the Commission to adopt strong safeguards that preserve and support the independently owned businesses and creators who are the backbone of the film and television industry in every state.

As highlighted in the testimonies of Craig Aaron and Michael Powell, and consistent with the Communications Act of 1934's public interest mandate, structural changes in the media marketplace have disadvantaged small businesses, local news, and journalism, eroding the public service obligations the Act was designed to uphold.¹¹ The musicFIRST Coalition and Future of Music Coalition, in their 2022 Quadrennial Review comments (MB Docket No. 22-459, GN Docket No. 25-133), similarly cautioned that excessive consolidation enables national conglomerates to act as gatekeepers while failing to reinvest in meaningful, locally relevant content.¹² We have observed, as they did, that consolidation rarely translates into benefits for local communities; rather, it consolidates power at the top. Research further indicates a correlation between decreased regulation and the disappearance of credible local news and information.¹³

These concerns remain pressing today, especially given the unchecked dominance of streaming platforms, which operate outside the FCC's jurisdiction. Former FCC Chairman Tom Wheeler recognized this imbalance as early as 2014 (MB Docket No. 14-261), when he proposed reclassifying streaming services as MVPDs to bring them under a comparable regulatory framework.¹⁴

Our perspective aligns with Commissioner Simington's view: "This does not mean unchecked mergers, but rather smart, targeted reforms that reflect economic realities. Local stations need

¹¹ Communications Act of 1934, § 309(a), 47 U.S.C. § 309(a) (public interest standard); testimony of Craig Aaron and Michael Powell at Senate hearing on broadcast ownership (2024).

¹² musicFIRST & Future of Music Coalition, *Comments on 2022 Quadrennial Review*, MB Docket No. 22-459, GN Docket No. 25-133 (Apr. 11, 2025)

¹³ Craig I. Forman, *Solutions to America's Local Journalism Crisis: Consolidated Literature Review*, Shorenstein Center on Media, Politics and Public Policy, Harvard Kennedy School, October 12, 2021. <https://shorensteincenter.org/solutions-americas-local-journalism-crisis-consolidated-literature-review/>;

¹⁴ FCC Chairman Wheeler proposal to classify online video distributors as MVPDs, MB Docket No. 14-261 (2014)

the ability to scale, pool capital, and share infrastructure, particularly in rural or low-population markets where the cost of operations is high and advertising revenue is shrinking”.¹⁵

In short, without meaningful safeguards, continued broadcast consolidation threatens independent film, local news, and the diversity of public discourse—outcomes that run contrary to the FCC’s public interest obligations.

5. Considerations on State Tax Incentives for Independent Creators

As states increase film production tax incentives and invest in local film offices to compete globally, it is critical to assess how these policies impact small, independently owned businesses and content creators—the stakeholders we represent.

On the positive side, expanded state incentives have the potential to benefit the broader creative ecosystem. In California, for example, the state Film Commission projects that doubling the credit to \$750 million could increase direct employment by 40–50%, adding 4,400–5,500 jobs and strengthening the industry’s local infrastructure.¹⁶ Similarly, renewed attention to competitiveness and calls for a federal incentive program could help independent creators nationwide retain work locally and contribute meaningfully to their communities.¹⁷

However, the current structure of many incentive programs, particularly in states like Texas, disproportionately benefits large-budget productions, such as productions with more than \$20 million budgets. Independent filmmakers often find the sums available to smaller projects negligible, with administrative costs outweighing any potential benefit. In Texas, as one analysis notes, “it costs more to hire an accountant for the application than they’d get back,” leaving independent creators effectively shut out of meaningful participation, and any downstream effects of providing media content to broadcasters and streaming platforms.¹⁸

Furthermore, even substantial increases to state incentives may not fully address the scale of industry job losses, nor do they sufficiently lower barriers for small and independent applicants who lack the resources to navigate complex compliance requirements.

We urge the Commission, in evaluating the competitive landscape and the public interest, to consider how tax incentive structures can be made more equitable, ensuring that small independent businesses and creators have access to these benefits without disproportionate administrative burdens, and that incentives are calibrated to support not just large-scale productions but also the locally-rooted, independent productions that operate as small businesses in the film and video marketplace.

¹⁵ Statement of Commissioner Nathan Simington (2024) on ownership reform

¹⁶ Gene Maddus, “How Many Jobs Will California Film Credit Expansion Create?,” *Variety*, June 3, 2025.

¹⁷ Gene Maddus, “Jon Voight and Steven Paul Pitch Trump-Backed Plan for Hollywood,” *Variety*, May 5, 2025.

¹⁸ Richard Whittaker, “The Good, the Bad, and the Unknown of Texas’ New Film Incentives,” *The Austin Chronicle*, June 5, 2025.

6. Closing Statement:

A modernized ownership framework must reflect today's media realities while protecting localism, competition, and public access to trustworthy information—the foundation of a healthy democracy. The Commission must hold broadcasters accountable to their public interest obligations, which are currently unmet. Historical evidence shows that raising ownership caps has failed to empower regional content creators and small businesses to compete effectively, and there is no reason to believe it would succeed now.

We respectfully urge the Commission to:

- **Expand its regulatory scope to include streaming platforms**, recognizing their outsized influence on competition, access to information, and local relevance.
- **Ensure that any changes to media ownership rules serve the public interest**, rather than the interests of large media conglomerates at the expense of the public good.
- **Prioritize policies that support localism, regional content creators, and small businesses within the broader film and media ecosystem**. These stakeholders regularly work across cable, public television, national broadcast television, and streaming platforms are crucial elements of the television and video marketplace. The Commission should carefully consider the potential impact of any deregulation on these aspects of the industry landscape.
- **Conduct regional public hearings** to better inform the modernization of media ownership rules. Filing formal comments can be burdensome for small, independent entities with limited resources. We recommend conducting regionally-focused studies and convenings that capture on-the-ground perspectives, particularly on the competitive and civic impacts of streaming and social platforms.

This is a critical moment for the Commission to reaffirm its commitment to fostering a diverse, competitive, and locally responsive media landscape that truly serves the public.

Thank you for considering these comments.

Sincerely,

Future Film Coalition
futurefilmcoalition.org

DOCUMENTARY
 PRODUCERS
ALLIANCE

July 11, 2025

Submitted via ECFS

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
Documentary Producers Alliance
<https://www.docproducers.org>

CC:

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July 10, 2025

Federal Communications Commission

RE: Comments on Media Ownership Regulations (MB Docket No. 17-318)

To the Honorable Commissioners:

My name is Stephanie Jenkins, and I am submitting these comments on behalf of the Archival Producers Alliance (APA). The APA represents individuals who regularly research and license archival materials for non-fiction film and media, working with cable, public and network television, and streaming platforms. More information about our organization can be found at <https://www.archivalproducersalliance.com>.

Our primary concern is the increasingly limited and expensive access to local news archives (when there is access at all), which is critical to supporting a thriving independent film, broadcast media ecosystem, education, and a local community's understanding of their own history. The APA urges the Commission to seriously consider how the current media ownership framework impacts access to archival local news footage, which is often inaccessible and unaffordable.

Essential historical and culturally significant news is currently held by local and international media conglomerates. News conglomerates are often the stewards of their station's history, and any changes affect the often fragile and undigitized assets the stations own. We must ask how deregulation and the probable consolidation of media ownership will influence local news organizations' stewardship of their archival collections. Revising ownership rules without addressing the broader media ecosystem, including the dominance of streaming platforms, will ultimately harm the public interest in these cultural assets. Simply put, commercial media companies don't have the incentive to operate in the public's best interest, in this case the fragile and significant materials of history.

As professional researchers for film and TV, our 550+ members face considerable challenges in accessing and licensing local news archives in the United States. The costs of research and licensing are often prohibitive, and in many cases, the material is simply unavailable or has been destroyed. This is particularly concerning given the vital role these archives play in documenting local history, informing public discourse, and enriching our understanding of the past. According to "Background Information – Channel US," a staggering 67% of local television collections are undiscoverable online and 70% are not viewable. This lack of accessibility undermines the public's right to know their own history and hinders the ability of independent filmmakers and journalists to tell important stories.

There is an urgent need to preserve local news archives, given the key threats of dwindling resources, corporate neglect, and environmental risks (such as fires, floods, and high heat). Changes in broadcast rules without the consideration of archives may only exacerbate these problems. As media companies prioritize short-term profits, the long-term preservation and accessibility of local news archives may be further neglected. Independent filmmakers, documentary producers, historians, educators, and researchers are important stakeholders in ensuring that these archives remain accessible and usable for future generations, yet we often face insurmountable bureaucratic hurdles in this effort.

To uphold the FCC's public interest mandate in this transformed environment, we urge the Commission to:

1. Conduct public hearings to inform the FCC's approach to modernization of media ownership rules. Initiate studies and convenings that can more accurately capture the television and video programming marketplace, to cover urgent topics such as the competitive and civic impacts of streaming and social platforms.
2. Consider the needs of historians, educators, independent filmmakers, and journalists when evaluating media ownership rules. Ensure that changes in legislation do not further disadvantage small creators and limit their ability to access and utilize local news archives.
3. Incentivize or mandate the preservation and digitization of local news archives. This could include tax incentives for stations that invest in archival preservation or requirements for new owners to maintain and make accessible existing archives. (Models of public-private partnerships between Universities and non-profits can be successful).
4. Consider policies that could incentivize or subsidize the ability of broadcasters to preserve and provide affordable access to their archival footage, or consider establishing a public fund to subsidize licensing fees for independent filmmakers and journalists.
5. Focus on Quality Content and Civic Engagement: A robust media policy must prioritize quality content, civic engagement, and equitable access, extending beyond broadcast to the platforms where audiences now spend the majority of their time.

The APA believes that a vibrant and diverse media landscape is essential for a healthy democracy. We urge the Commission to carefully consider the consequences of deregulation and to prioritize policies that promote access, preservation, and affordability of local news archives. We ask that the FCC not only adjust broadcast rules but also consider how these changes will impact the health and vitality of the independent media ecosystem.

Thank you for your time and consideration.

Sincerely,

Stephanie Jenkins
Archival Producers Alliance

Express Comment of the International Documentary Association

Regarding MB Docket No. 17-318 National Television Multiple Ownership Rule

July 11, 2025

Federal Communications Commission 45 L Street NE Washington, DC 20554

****Re: Review of Media Ownership Regulations****

To Whom It May Concern:

My name is Dominic Asmall Willsdon, and I am writing as the Executive Director of the International Documentary Association (IDA), an organization representing over 3,000 documentary filmmakers. Our members' ability to create and share their work, and meet the needs of American viewers across the country, is directly impacted by the FCC's media ownership regulations.

We are particularly worried that relaxing broadcast ownership regulations risks further consolidation of media ownership, political fairness of content, and increasing costs for consumers. Our members rely on a healthy and distributed media landscape to share important stories, engage communities everywhere, and contribute to informed civic discourse.¹

Greater consolidation would threaten this ecosystem. While we understand the argument that broadcasters face asymmetric burdens compared to streaming platforms, we disagree with the premise that deregulation of broadcast is the only solution. Instead the Commission should broaden its regulatory scope beyond broadcast and consider how the lack of regulation over online video providers and streaming platforms undermines the goals of competition, access to quality information, and local balance.

IDA urges the Commission to recognize that streaming platforms have become the de facto public square and must therefore be subject to meaningful oversight. Just as broadcasting was regulated because the airwaves were a finite public resource, streaming platforms wield immense power over information dissemination and cultural expression, yet operate without comparable accountability. IDA is concerned that further consolidation in the broadcast industry, coupled with the unchecked power of streaming platforms, will exacerbate the challenges already faced by independent documentary filmmakers and the audiences for their work. These challenges include dwindling funding, lack of discoverability, and unequal market leverage.²

Over the last year, IDA's investigative reporting, published in Documentary magazine, uncovered how risk-averse economics, political sensitivities, and a lack of support from major distributors and streaming platforms limit the access that the American public has to important stories.³ Further deregulation of broadcast, without addressing the streaming platforms, will only compound these issues. We acknowledge the importance of local journalism, the challenge of broadcast, and the potential for consolidation to provide financial stability to struggling local stations. However, we remain concerned that increased consolidation will lead to homogenized content and reduced coverage of local community issues. Furthermore, a 2022 Sundance Institute report asserts the interests of large media companies, including national broadcasters, do not always align with those of individual creators.⁴

A healthy media ecosystem requires openness and choice, and the Commission must consider the needs of film makers and creators as small business owners when evaluating regulatory changes. Therefore, the International Documentary Association urges the FCC to:

1. Expand its regulatory focus to include streaming platforms.** We recommend a thorough examination of the market power of these platforms and the development of regulations to ensure fair competition, promote viewpoint diversity, and protect the interests of independent creators.
2. Consider the impact of deregulation on independent creators and local communities.
3. Before making any changes to media ownership regulations, the Commission must conduct a thorough analysis of the potential consequences for viewpoint diversity, localism, and the ability of independent media makers to reach audiences. A robust media policy must prioritize quality content, civic engagement, and equitable access—and extend beyond broadcast to the platforms where viewers now spend the majority of their time.

We believe that by adopting a more comprehensive and forward-looking approach to media regulation, the FCC can help ensure a vibrant and democratic media ecosystem for all Americans.

Sincerely,

Dominic Asmall Willsdon
Executive Director
International Documentary Association

References:

1. Working with Broadcasters: Getting Independent Film Voices Heard. International Documentary Association, 9 July, 2024, documentary.org/event/working-broadcasters-getting-independent-film-voices-heard.
2. “Could Policy Be the Answer?” Documentary, International Documentary Association, 17 Apr. 2025, documentary.org/feature/could-policy-be-answer.
3. “No Other Distribution: How Film Industry Economics and Politics Are Suppressing Docs.” Documentary, International Documentary Association, 15 Jan. 2025, documentary.org/online-feature/no-other-distribution-how-film-industry-economics-and-politics-are-suppressing-docs.
4. “Independent Film and Media Field Briefing November 2022,” Sundance Institute and National Endowment for the Arts, Nov. 2022, arts.gov/sites/default/files/independent-film-and-media-field-briefing-2022.pdf.

****RE: FCC Media Ownership Regulations Review****

To Whom It May Concern:

My name is Gordon Quinn, and I am writing on behalf of Kartemquin Films, an organization dedicated to supporting emerging independent documentary storytellers. We regularly work with filmmakers who contribute content to cable, public television, and national broadcast television and streaming platforms. Our perspective, grounded in a commitment to quality content, civic engagement, and equitable access, compels us to express our deep concern regarding the current review of media ownership regulations.

We believe that the Commission's regulatory efforts must extend beyond broadcast to address the dominance of streaming platforms and ensure a media ecosystem that prioritizes quality, community, and information. We recognize the FCC's need to modernize its regulations in light of the evolving media landscape. However, we urge the Commission to avoid the trap of simply deregulating traditional broadcast media in a desperate attempt to make them competitive with digital giants. This approach risks undermining the very principles of viewpoint diversity, localism, and public interest that the original broadcast regulations were designed to protect.

As commercial media companies are incentivized to convert eyeballs into revenue sources, we believe a more nuanced strategy is needed. While arguments are made that consolidation allows broadcast groups to realize efficiencies, reduce overhead, and gain leverage in negotiations, we are concerned that these purported benefits will come at the expense of independent creators and the communities they serve.

The "diminishing capacities for cultural coverage" that could result from excessive consolidation would be detrimental to the diversity of expression that is essential to a healthy media ecosystem. Our primary concern is that focusing solely on broadcast regulations ignores the elephant in the room: the largely unregulated streaming platforms that now dominate the media landscape. Just as broadcasting was regulated because the airwaves were a finite public resource, streaming platforms have become the de facto public square, yet operate without meaningful oversight. The absence of comparable constraints on digital platforms, which face few, if any, licensing requirements or public-interest obligations, creates an uneven playing field and undermines the goals of competition, access to quality information, and local relevance.

We believe the Commission needs to reframe the debate.

Instead of merely adjusting broadcast rules, the FCC should begin considering how to regulate streaming platforms to ensure they operate in the public interest. This includes exploring options for promoting local content, supporting independent creators, and ensuring that these platforms are not used to spread misinformation or harmful content. A robust media policy must prioritize quality content, civic engagement, and equitable access, and extend beyond broadcast to the digital and streaming platforms where audiences now spend the majority of their time.

We urge the Commission to begin framing its regulatory efforts beyond broadcast, to consider how the lack of regulation over streaming platforms undermines the goals of competition, access to quality information, and local relevance that the broadcast rules originally sought to protect. Without addressing their dominance, merely adjusting broadcast rules risks tinkering at the margins.

Therefore, we respectfully request that the FCC:

1. Expand its regulatory framework to include streaming platforms, recognizing their significant impact on the media landscape.
2. Prioritize the preservation of viewpoint diversity, localism, and the public interest in any decisions regarding media ownership regulations.
3. Consider the impact of deregulation on independent creators and the communities they serve.

Thank you for considering our comments. We believe that a thoughtful and comprehensive approach to media regulation is essential to ensuring a vibrant and equitable media ecosystem for all.

Best,

Gordon Quinn
Co-founder of Kartemquin Films