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Before the
Federal Communications Commission
Washington, DC 20554

In re Application of	)	
ECHOSTAR COMMUNICATIONS CORPORATION, GENERAL MOTORS CORPORATION, HUGHES ELECTRONICS CORPORATION (Transferors) and	)	CS Docket No. 01-348
ECHOSTAR COMMUNICATION CORPORATION (Transferee)	)	
For consent to transfer of control	)	

TO THE COMMISSION

PETITION TO DENY and MOTION TO DISMISS

National Council of La Raza
1119 19th St., N.W.
Washington, DC 20036

May 20, 2002

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TO THE COMMISSION

PETITION TO DENY and MOTION TO DISMISS

The National Council of La Raza (NCLR), pursuant to §§214 and 310 of the Communications Act, respectfully requests that the Commission deny the above-referenced application on structural grounds in order to preserve competition. In the alternative, the Commission should approve said application solely upon the condition that EchoStar provide a plan designed to serve all diverse sectors of its consumer base, especially addressing and rectifying the glaring omission of English-speaking Latino-based programming. NCLR respectfully requests that if Echostar fails to provide such an unconditional promise or at minimum, a firm commitment to achieve this goal, the Commission should immediately designate this application for hearing, and if the evidence so warrants, it should be denied.

SUMMARY

The primary issue presented in this Petition is Applicant's failure to provide carriage commitment on Latino-based, English-language programming. As a preliminary matter, NCLR notes that rapid media consolidation has already impacted a whole range of consumer choices.

Industry efforts to date have not kept pace with the dramatic increase in the number of younger Latino viewers in this country. Accordingly, the younger Spanish population, for whom English is the first language, will be disenfranchised from the communications marketplace if Spanish speaking programming is all that is offered for their consumption.

Our concern is fueled by Applicant's post-merger status as the second-largest Pay –TV company in America and its impact on diversity of voices in programming.

With such searing indicators of harm to diversity of voices, economic competition, and consumer welfare, a closer examination is warranted to ensure that this proposed merger will indeed serve the public interest.

Background

Two major direct broadcast satellite providers, Hughes Electronics Corporation and Echostar Communications Corporation, and their subsidiaries and affiliates,("Applicant") are seeking Commission approval for a transfer of control. The merger will result in the new entity renamed as The New Echostar. Applicant has made several public interest statements to support request of the grant. Subsequent developments, including Applicant seeking authority to launch and operate the New Echostar 1 DBS Satellite, led to Commission designation as a major amendment, and the proceeding was re-opened for comments. The Commission is allowing broad comments from interested parties as submissions on the Transfer of Control application.

Jurisdiction

The Commission has personal and subject matter jurisdiction pursuant to 47 U.S.C. §§ 308 and 309. The allegations herein, with the exception of those upon which official notice may be taken, are supported by the declaration under penalty of perjury of persons with knowledge of the facts alleged. 47 U.S.C. §309 (d) (1).

NCLR is a private, non-profit, non-partisan organization established in 1968 to reduce poverty and discrimination and improve life opportunities for Hispanic Americans. The organization has consistently promoted policy and advocacy efforts to improve media coverage and portrayals of the Latino community. In the 1970s, we called attention to the virtual absence of Hispanics in entertainment and news programming. In the 1980s, we catalyzed and supported some of the first Latino-focused, Latino-produced, English language feature films and TV programs. In the 1990s, we issued a series of research reports documenting that, not only had the situation not improved, it had gotten worse. In the mid-1990s, we launched the ALMA Awards, the only prime time, network TV Hispanic awards show covering the full spectrum of media entertainment. Three years ago, we helped lead a coalition effort to encourage the major networks to increase the number of minorities on television and air more accurate and sensitive Latino programming.

Our members and representatives referred to herein are viewers and listeners of Echostar and/or DirectTV. Attached hereto is a declaration from Sarah Ruizz Cruz, an authorized member of NCLR, Thus, we have standing as a Petitioner. See United Church of Christ v. FCC 359 F. 2d 994 (D.C. Cir. 1966).

In addition, this Petition complies fully with the Commission's rules governing practices and procedures, 47 CFR Sec. 1.415, 47 CFR 1.419, and 47 CFR 1.51(c). Thus, we have met all jurisdictional requirements for our allegations to be considered on the merits.

I. APPLICATION IS VOID OF SUBSTANTIVE PUBLIC INTEREST BENEFITS AND MUST BE REJECTED

A. Merger's market impact poses potential for competitive and Consumer harm

It is no secret that media consolidation has proven detrimental to NCLR's goal of increased media diversity. To date, in every merger approval application, we have witnessed declarations stating that said mergers are in the public interest. Unfortunately, the reality has been that time after time, these mergers only contribute to a communications marketplace replete with generic, bottom-line service to the public.

In the cable, common carrier, satellite and wireless contexts, one of the factors the Commission is charged with considering in determining whether a transaction is in the public interest is whether the merger promises to yield affirmative public interest benefits that could not be achieved without the merger. [1]

NCLR is concerned that this proposed transaction signals a further retreat from the Commission's goals to ensure promotion of the public interest, necessity and convenience.

With service to virtually every home-satellite subscriber (FCC Seventh Annual Assessment, CS Docket No. 00-132, January 8, 2001), Echostar and DirectTV already serve as

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[1] See e.g., *Applications of MediaOne Group, Inc., Transferor, and AT&T Corp., Transferee, for Consent to Transfer Control of Licenses and Section 214 Authorizations*, CS Docket No. 99-251, FCC 00-202 (rel. June 6, 2000), at P9; see also *In re Application of GTE Corp., Transferor, and Bell Atlantic Corp., Transferee, for Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, CC Docket No. 98-184, FCC 00-221 (rel. June 16, 2000) at P22.
See e.g., *Applications of MediaOne Group, Inc., Transferor, and AT&T Corp., Transferee, for Consent to Transfer Control of Licenses and Section 214 Authorizations*, CS Docket No. 99-251, FCC 00-202 (rel. June 6, 2000), at P9; see also *In re Application of GTE Corp., Transferor, and Bell Atlantic Corp., Transferee, for Consent to Transfer Control of Domestic and International Sections 214 and 310 Authorizations and Application to Transfer Control of a Submarine Cable Landing License*, CC Docket No. 98-184, FCC 00-221 (rel. June 16, 2000) at P22.

dominant forces in their current individual structure. Presently, most consumers have three satellite provider choices for pay-TV services. A grant of this application would reduce the number of pay–TV selections for most consumers from three to two. An adverse effect on competition surely awaits a video channel market dominated by only two information providers. Consolidation rarely increases competition. And it is well-documented that a reduction in market competition often results in significantly reduced programming.

With consumers faced with the prospect of a two-firm universe, applicants should face an even higher burden of persuasion regarding its public interest benefits. [2]

NCLR's concern is also fueled by the fact that for the 13 million homes across America (See, *Advanced Telecommunications in America, report by Rural Utilities Service and National Telecommunications and Information Administration*) in rural and other areas where cable is difficult to penetrate, and where a high concentration of Hispanic viewers may reside. [3]

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[2] There is little difference in this merger request and *In the Matter of the Applications of Shareholders of AMFM, Inc. (Transferor) and Clear Channel Communications, Inc.(Transferee); For Consent to the Transfer of Control of AMFM Texas Licenses Limited Partnership, AMFM Radio Licenses, LLC, Capstar Texas Limited Partnership, WAXQ License Corp., WLTW License Corp., Cleveland Radio Licenses, LLC, and KLOL License Limited Partnership. Licensees of WTKE(FM), Andalusia, AL, et. al.* 15 FCC Rcd 16062; 2000, which was found to be lacking public service benefits and designated for hearing. There, the Commission found that the proposed transaction raised competitive concerns by reducing the number of effective competitors in the Charlottesville radio market from three to two. The Commission was unable to find sufficient public interest benefits on the record to outweigh the high level of concentration and potential for competitive harm. Accordingly, the FCC was unable to find that the application served the public interest and, as required by Section 309(e) of the Communications Act, issued a Hearing Designation Order. The Commission stated "This level of concentration, in the absence of any countervailing considerations or public interest benefits, is simply too significant for us to conclude that, on balance, the transaction is consistent with the public interest."

[3] Households of Hispanic Origin in Metropolitan/Nonmetropolitan Areas Source: U.S. Census Bureau, 1999 American Housing Survey; Inside metropolitan statistical areas 8,194,000; In central cities 4,300,000; Suburbs 3,894,000; Outside metropolitan statistical areas 847,000;
Other data:Total Units w/Hispanic Householder; 1990 Census of Population and Housing; Metro Areas Nonmetro Areas 5,427,548 574,170

In these unwired markets, satellite TV may serve as the only viewing choice.

This merger would result in New Echostar serving as a virtual gatekeeper into what Hispanic viewers see in their home. Many, particularly the younger viewers, are largely at the mercy of home viewing practices gaining ground as a principal pasttime of Hispanic culture. Applicant's public interest responsibilities to serve the total community must be maintained at a level consistent with its stronghold in the pay-TV market.

With such searing indicators of harm to diversity of voices, economic competition, and consumer welfare, a closer examination is warranted to ensure that this proposed merger will indeed serve the public interest. [4]

B. APPLICATION IS VOID OF PROGRAMMING SERVICE TO THE TOTAL COMMUNITY.

Applicant also offers the following as part of its claim that this proposed transaction promotes the public interest:

For example, the merged entity could provide several more channels of Spanish-language programming than the companies' combined current offerings, as well as increased exposure for foreign language programming with smaller followings-a very important benefit for audiences that desire this programming. [5]

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[4] See Section 257 of the Telecommunications Act of 1996,, which requires the Commission to identify and eliminate "market entry barriers" to *diversity of media voices, vigorous economic competition, technological advancement, and promotion of the public interest, convenience, and necessity.*

[5] *Echostar Communications Corporation, General Motors Corporation, Hughes Electronic Corporation, Transferors, and Echostar Communications Corporation, Transferee*, Consolidated Application for Authority to Transfer Control, December 3, 2001, at pg. 34.

It also touts the "diverse programming choices" a post-merger spectrum would be capable of providing. [6]

One glaring omission undermines these offerings: Applicant does not plan to provide even one Hispanic-theme, English language channel.

Instead of applicants' public interest assertions, what would be promoted is a troubling assumption that has prevailed throughout the media industries. Even in the year 2002, media companies and advertising agencies contend that the Hispanic market is served adequately solely through Spanish language programming. Likewise, the conventional wisdom is that most Latinos prefer Spanish language programming, a stereotype which has been shattered by the U.S. Census and other data.

According to a recent survey, 87% of Latinos watch television in English.

In addition, the U.S. Census provides that more than 21% of Latino-Americans speak only English. Of those who are Spanish-speaking, almost 55% speak English "very well" or "well." Combined, this means that more than three-quarters of the total Latino population would not be adequately served by the merged company, which offers only Spanish language programming. [7]

This would be particularly true with respect to young people. In 2000, about half the Latino population was under 25 years of age (49.3% of total). Latinos also had the lowest median age (25.8 years) of major racial-ethnic groups, compared to 35.3 of the entire U.S. population. [8]

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[6] Application, at pg. 29

[7] U.S. Census Bureau, Census 2000, "Number and Percent of Hispanics/Latinos in U.S. who speak English, Ages Five and Over." (See Attachment B)

[8] U.S. Census Bureau, Census 2000, "Summary File and Supplementary Survey Summary Tables." (See Attachment C)

Because Latinos are disproportionately young, this populace is more likely than the general Hispanic population to be prevalently English dominant or English-fluent- and in the heavy TV watching range. [9]

Furthermore, notwithstanding high levels of immigration, the 2000 Census reveals that 60% of Latinos are native-born and, of greater long-term significance, 80% of Hispanics under the age of 18 were born in the U.S. In addition, language proficiency surveys show that a significant proportion of foreign-born Hispanics are fully bilingual.

Thus, in the event of merger approval, with its having, at best one other competitor in each market, Applicant's failure to provide English-speaking programming is tantamount to shutting out a significantly underserved demographic group-arguably the largest subset of the largest majority-minority in the country. [10]

These are the same viewers already long-suffering at the hands of network TV, with recent studies showing that little progress is being made by the networks to diversify their programming. [11]

With that much potential power, Applicant should be required to meet all of the principal needs of the community. For sure, its present submission falls short of meeting the needs of the

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[9] Compared to the 1990 Census figures, these 2000 numbers have changed little or, rather, the percentage points have changed little. In spite of the influx of new immigrants, the English proficiency of the Hispanic population has stayed relatively the same.

[10] See *NWCG Parent Holdings Corporation v. NWCG Holdings Corporation (Transferor) and Fox Television Stations, Inc. (Transferee)* 11 FCC Rcd 16318, 16322(1970), which Fox ultimately provided a fourth network for American viewers. Niche programming for the fastest-growing Hispanic market should be viewed as just as importantly. Secondly, the last time such narrow programming was presented was in *Office of Communication of the United Church of Christ(UCC) v. FCC*, 425 F.2d 543 (1969), where neither one of the stations only carried programming that featured Black people in stereotypical roles. In light of Applicant's limited programming, this merger could result in UCC on a national scale for Latino Americans.

[11] *"1999 vow to do better unfulfilled", (Study by Children Now, May, 2002)*

majority-minority. If the merger is allowed without regard to this omission, viewers will be denied access to Hispanic-theme, English language programming.

In order to justify this greater level of influence, Applicant is obligated to implement measures leading to more diversity, not less. [12] Despite this overwhelming influence over the viewer market, Applicant chooses to overlook this emergence of a younger Latino audience, just as likely to speak English as well as Spanish.

Here, Applicant claims to meet its obligation to the Latino community through Spanish language programming. However, the Commission itself has ruled that EchoStar's "two-dish plan" under which certain channels, including potentially Spanish language channels, would be carried by subscribers who paid additional fees for a second dish, violates both existing statutes and FCC regulations.

This, even the Spanish language audience is not guaranteed access to relevant programming.[13] Applcant's failure to commit to programming serving the fastest-growing segment of the Hispanic population deems the public interest component of the application as incomplete, and thus ungrantable.

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[12] *See In the Matter of Implementation of the Satellite Home Viewer Improvement Act of 1999: Retransmission Consent Issues: Good Faith Negotiation and Exclusivity*, CS Docket No.99-363 (March 16, 2000), which set forth guidelines aimed to give consumers "more and better choices" in selecting a multichannel video program provider.

[13] *See Turner Broadcasting System v. FCC,520 U.S. 180, 1997* affirming that must carry provisions further important government interests such as the widespread dissemination of interest from a multiplicity of sources. Here, in ensuring public access, widespread dissemination of information to a significant segment of the community falls under, and consistent with, Congress' stated interests in enacting must-carry.

II. IF THE COMMISSION DOES NOT REQUIRE APPLICANT TO PROVIDE LATINO BASED, ENGLISH SPEAKING PROGRAMMING, IT WILL PLACE ITSELF AS A "PASSIVE PARTICIPANT" IN THE DISENFRANCISEMENT OF THE LATINO CONSUMER

For over 30 years, the FCC has recognized and understood its obligation to monitor the public airwaves (Cf. MM. Docket 96-335). As such, it must ensure that licensees utilizing the public airwaves provide programming that serves the special needs of the public.

Thus, its approval of this application will not be appropriate unless Applicant forthrightly affirms and warrants to the FCC that it will include Latino focused programming which is high quality and English language based.

Television reaches 98% of American homes including well over 90% of households with annual incomes below $5000. Furthermore, statistics have proven that children 2-17 of all races watch television over three hours a day. These statistics are even more acute within the Latino community, thus magnifying the need for English speaking Latino-based programming.

NCLR respectfully submits to the Commission that a grant of this application makes the Commission a "passive participant" in the disenfranchisement of the Latino television consumer, a position that the Commission has never before taken. The Commission is not prevented from remedying the exclusion of English based Latino oriented programming from the public airwaves once it has determined that it is likely to become such a "passive participant" otherwise. see City of Richmond v. J.A. Croson, 488 U.S. 469 (1989).

The unhappy persistence of both the practice and the lingering effects of racial discrimination in programming against minority groups in this country is a unfortunate reality, and this Commission is not disqualified from acting in response to it. See Adarand Constructors v. Pena, 515 U.S. 200 (1995).

Furthermore, the Commission must be mindful of Title VI of the Civil Rights Act of 1964, 42 US Code 2000(d) which states that no person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal assistance. (emphasis added). NCLR submits that untold numbers of Latino consumers will be denied their rights under this provision of the law unless this Commission acts to grant NCLR's entreaty to this Commission. At minimum, the Latino consumer is a third party beneficiary of effective Commission oversight as it carries out its responsibility as trustee of the airwaves. As such, Latino consumers have a right to expect English based Latino oriented programming.

Accordingly, this Commission has the responsibility, the obligation, and the authority to require Applicant to include English speaking Latino based programming among its array of services.

CONCLUSION

Undoubtedly, the general Latino population is on the radar of American media industry as a potent market force. Spanish-language programming continues to expand accordingly, as industry leaders develop new ways to gather data on Spanish- speaking households. [14] The conventional wisdom that Latino Americans prefer Spanish language programming is not only inaccurate, the opposite is true – what is most needed by Hispanics today is more English-language, Latino-focused programming.

It is important to note that NCLR is not against Spanish language programming. We simple embrace the notion that due to the changing cultural and linguistic diversity of Latino Americans, more than one option should be available. We simply seek clear, enforceable carriage commitments for programming reflective of all segments of Hispanic culture.

Ironically, the applicants predict that the transaction will result in providing consumers with additional programming diversity and enhanced services-but none in English.

In the wake of rapid consolidation of media properties, before the Commission considers this inherently suspect merger, it must at least be sure that a major segment of the community is not shut out.

[14] " Survey of Spanish-speaking TV Viewers May change," latimes.Com, May 16, 2002.

REQUEST FOR RELIEF

For these reasons, NCLR has been opposed to proposed media mergers in which the companies do not specifically and adequately outline their plans for increasing diversity within their ranks. the merged company delineates a plan that would a) increase the number of Latino employees and officers in the company, particularly at the management and governance levels; b) increase the participation of Latino-owned companies in the company's vendor relationships and the participation of Latino organizations in its philanthropic efforts; c) provide, at a reasonable cost, access to their services to Latinos for whom satellite is their only option; and d) agree to increase Latino-focused programming on their "tier one," or basic service, menu by including at least one channel of Latino-focused, English language programming.

Thus, requests that the FCC deny merger on structural grounds to preserve competition OR, in the alternative Grant on condition that EchoStar pledge to serve all significant groups, including rectifying the glaring omission of English-speaking Latinos.

Respectfully submitted,

NATIONAL COUNCIL OF LA RAZA

By: Cecilia Muñoz

Cecilia Munoz
Vice President
Office of Research, Advocacy and Legislation

ATTACHMENT INDEX

A. Declaration of Sarah Ruizz Cruz on behalf of National Council of La Raza ("NCLR")

B. U.S. Census Bureau, Census 2000, "Number and Percent of Hispanics/Latinos in U.S. who speak English, Ages Five and Over"

C.. U.S. Census Bureau, Census 2000, "Summary File and Supplementary Survey Summary Tables"

D. NCLR Disclosure Statement

DECLARATION

Re: Consolidated Application for Authority To Transfer Control ("The New EchoStar")

My name is Sarah Ruizz Cruz. I am a member of the National Council of La Raza("NCLR") and I am a 2nd generation Latino-American. I am 38 years old. My primary means of communication is through the English language.

I have carefully reviewed, and I hereby subscribe to the foregoing Petition to Deny and Motion to dismiss on behalf of NCLR. The facts stated herein are true to my personal knowledge except where identified as having been based upon official records such as material on file with the Federal Communications Commission.

I am a regular viewer of satellite home TV programming.

I would be seriously aggrieved if the Petition to Deny and Motion to Dismiss is not granted, since as a consequence of its denial members of NCLR, including myself, would be deprived of program service and diversity in the public interest.

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed May 20, '02

Sarah Ruiz Cruz

Sarah Ruizz Cruz
6514 E. Medalist Circle
Plano, TX 75023

Number and Percent of Hispanics/Latinos in U.S. who Speak English, Ages 5 and Over

	Number	% of Latino Population	% of Latinos who Speak Spanish
Total Latino Population	**30,687,875**		
Speak only English	6,581,645	21.4%	n/a
Speak Spanish	23,953,202	78.1%	
Speak English "very well"	12,166,266	39.6%	50.8%
Speak English "well"	4,597,802	15.0%	19.2%
Total speak English "very well" and "well"	16,764,068	54.6%	70.0%
Total speak English only and speak English at least "well"	23,345,713	76.1%	

Source: U.S. Census Bureau, Census 2000 Supplementary Survey
NOTE. Data based on twelve monthly samples during 2000.

Number and Percent of Hispanics/Latinos, by Sex and Age (5 to 24 years)

	Number	Percent
Total Latino Population	**35,305,818**	
Male		
5 to 9 years	1,851,885	5.2%
10 to 14 years	1,617,185	4.6%
15 to 17 years	965,343	2.7%
18 and 19 years	723,213	2.0%
20 years	379,615	1.1%
21 years	369,418	1.0%
22 to 24 years	1,126,106	3.2%
Total	7,032,765	19.9%
Female		
5 to 9 years	1,817,543	5.1%
10 to 14 years	1,546,227	4.4%
15 to 17 years	871,850	2.5%
18 and 19 years	611,240	1.7%
20 years	310,559	0.9%
21 years	299,677	0.8%
22 to 24 years	924,052	2.6%
Total	6,381,148	18.1%
Total male/female 5 to 24 years	13,413,913	38.0%

Source: U.S. Census Bureau, Census 2000

ATTACHMENT C

Table 1

AGE DISTRIBUTION OF LATINOS IN THE US: 2000

Under 18 years of age	18-24	25-44	45-64	65 and over
12,342,259 (35.0% of total Latinos)	4,743,880 (14.3%)	11,639,548 (33.0%)	4,846,543 (13.7%)	1,733,591 (4.9%)
			Total	35,305,818 (100.0%)

Table 2

MEDIAN AGE

Latinos	White (non-Latino)	Non-White (non Latino)
25.8 years	38.6	28.2

Data Source: U.S. Census Bureau, Census 2000 Summary File

Table 3

SPANISH SPOKEN AT HOME

5-17 years old	18-64	65 and over	Total
6,625,553 (68.1% of those who speak other than English at home	18,519,675 (59.6% of those who speak other than English at home)	1,599,839 (39.4% of those who speak other than English at home)	26,745.067 (59.6% of those who speak other than English at home)

Data Source: Census 2000 Supplemental Survey Summary Tables

ATTACHMENT D

DISCLOSURE STATEMENT

In the interest of full disclosure, we note that an NCLR subsidiary corporation, the Raza Development Fund (RDF) -- a Treasury Department-certified Community Development Financial Institution (CDFI) is currently in negotiations with SiMedia regarding a potential investment. We note further, however, that RDF is not a party to these proceedings, has no involvement in NCLR policy-making or advocacy activity, and in any event NCLR's positions on these issues have been consistent over several decades.

Therefore, our affiliation has not impacted our decision to oppose this merger. Our concerns remain embedded in our long-standing tradition of protecting our constituents' access to a diverse range of programming.

CERTIFICATE OF SERVICE

I, Cecilia Munoz, hereby certify that on this 20th day of May, 2002, I have caused a copy of the foregoing "Petition to Deny" and "Motion to Dismiss" to be delivered by First Class Mail, postage prepaid, to the following:

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Rhonda M. Bolton
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Washington, DC 20036-1795

Cecilia Munoz

CERTIFICATE OF SERVICE

I, Cecilia Munoz, hereby certify that on this 20th day of May, 2002, I have caused a copy of the foregoing "Petition to Deny" and "Motion to Dismiss" to be delivered to the following:

Honorable Michael Powell
Chairman
Federal Communications Commission
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