When Alex Nogales, president and CEO of the National Hispanic Media Coalition (NHMC), narrates the history of his organization, he tells a story of continuity and change. The core mission of the group—to integrate Latinas/os into more jobs behind and in front of the camera, ameliorate derogatory images of Latinas/os in the media, and advocate for telecommunications policies that serve the needs of Latina/o publics—has remained consistent since the NHMC was founded in 1986. What has changed, according to Nogales, is the organization’s strategies, which have evolved with the group’s experiences in media activism and advocacy. In his telling, the NHMC went from being a comparatively naïve organization, committed to addressing the exigent concerns of local communities, to a sophisticated group capable of exerting meaningful pressure on a national scale, especially via participation in the policymaking sphere.¹

The NHMC’s emphasis on media labor has been in keeping with the priorities of other identity-based media advocacy groups who have worked to bring people of color into media industry workforces at all levels. For the NHMC, to ensure that Latinas/os have access to these jobs is, like other equal employment advocacy, to enable them to participate in a sector that had historically discriminated against them; in addition, it is to transform the kinds of stories told and perspectives voiced in media texts, from news reports to entertainment programming. While securing Latina/o jobs has been a consistent goal of the NHMC, it has had to navigate a legal environment increasingly hostile to race-conscious policies to promote diversity and a regulatory system increasingly committed to media deregulation. In response, the NHMC, like other advocacy groups, has had to rethink how to promote diversity in the absence
of what had been essential regulatory tools and in a climate unreceptive to such interventions.

Media advocacy, the kind of actions undertaken by groups like the NHMC, thus not only has been centrally concerned with media labor, but has constituted its own form of work. The work of media advocacy often is a labor-intensive enterprise, one that relies on myriad forms of capital—financial, cultural, institutional—to function. While media advocacy has often depended on uncompensated labor, from the work of volunteers whose contributions create the scaffolding upon which media advocacy efforts are built to the citizens who respond to calls to action by filing letters with or calling the Federal Communications Commission (FCC) or members of Congress, it also has been guided by media advocacy professionals. These are professionals in two senses of the term: they have expertise and they are compensated for their labor.

To examine media advocacy as work is to alter the kinds of questions we ask and the kind of narratives we construct. While there are meaningful differences in how scholars have understood the political stakes, moments of opportunity, and mobilizing structures and strategies of media advocacy efforts, what they share is an understanding of media advocacy as a social movement or as a form of civic participation that has sought to transform the media to meet the communication needs of citizens in a democracy. Media advocacy campaigns are often narrated as David-and-Goliath stories, in which public interest groups try to reform the media only to be defeated by better-resourced media corporations that more successfully manipulate public opinion and gain sway over public officials.

The emphasis of media advocacy scholarship, furthermore, often is the media advocacy campaign, a temporally bounded effort undertaken at a particularly propitious moment when political changes or new technologies introduce fissures that make reform seem possible. Media advocacy has also often been analyzed along a success/failure binary, an assessment of how and why media advocacy has or has not attained its desired goals. As the first section of this article discusses, to see media advocacy as work is to shift our focus off outcomes and onto process and to rethink the success/failure binary that has structured much of media advocacy scholarship. Media advocacy for groups like the NHMC is a long-term, multifaceted commitment that shifts with technological, political, and regulatory changes, as well as with the increasing savvy of the media advocates themselves. Their work is continuing, not contingent on singular campaigns or issues. Viewed through this lens, media advocacy can be seen less as a rhythmic exercise in hope and failure and more as a continuous hum of activity that sometimes yields actionable policy changes, in which communities outside the official regulatory sphere make themselves legible as stakeholders in the policymaking process. To consider media advocacy as work is to see it as ongoing, cumulative, and flexible.
In addition, as the second section demonstrates, many contemporary media advocacy groups in the United States are engaged in media work, labor that contributes to, rather than interferes with, media production and the interests of media companies. Media advocacy, however, has been invisible to scholars of media labor, who mostly have been interested in how the production process under which media are made, as well as the occupational cultures and power relations structuring the mode of production, affects the narratives, values, and images that media audiences consume. Deploying ethnographic and historical methods, and focusing on a range of media, this subfield traditionally has focused on above-the-line workers (directors, writers, producers, and executives); labor within these texts is imagined as both the creative labor of artists and the managerial labor of executives, the friction between them understood as alternately stifling and generative for the production of media texts.

More recent scholarship, however, has expanded the methods and subjects of media labor scholarship. John Caldwell, for example, has blended ethnographic research with sophisticated discourse analysis to investigate not only the diverse range of labor practices—both above and below the line—that constitute film and television production, but the discursive labor involved in shaping and sustaining the occupational cultures within the entertainment industry. In a similar vein, Vicki Mayer, in her *Below the Line*, has broadened the definition of production to include the “invisible labor” that is constitutive of television production but frequently absent in both industry and academic discourse. Conceptions of media labor thus have been extended to the myriad forms of work that contribute to media production and to the discursive formations that sustain its division of labor.

While media advocacy has often existed outside media production, it has also intersected with, and contributed to, both the workflow of media production and the underlying assumptions about audience and narrative that structure it. For decades, media advocacy groups’ work with media producers has been a constitutive part of their reform efforts. Increasingly, however, this collaboration has extended to advocacy groups using their position as representatives of the public to promote the policy agenda of media corporations. As the second section discusses, for some organizations, media advocacy work thus has given way to media work, their adversarial role transformed into a collaborative—or, to some critics, collusive—one with media and telecommunications corporations.

**MEDIA ADVOCACY AS WORK**

In the United States, public participation in media policymaking is technically part of the process. The FCC is required to solicit public input on new policies or changes to existing regulations. By design, members of public are to have their say
in the shaping of regulations; in actuality, the role of the public has been far more constrained. Not only have industry lobbyists and attorneys had far more purchase with policymakers than members of the public, but administrative law requires federal agencies to consult the public but does not require them to pay heed to what the public says. As a result, a range of social movement and civil society organizations have included media advocacy in their broader fights for social justice and political reform, and a number of dedicated media advocacy groups have emerged with the mission to reform the media. Many of these groups have been engaged in media advocacy for decades and have adapted to changes in media technologies, regulatory decisions, and broader political and social conditions.

As Becky Lentz and I have argued elsewhere, media advocacy hinges on the acquisition of media policy literacy, a set of competencies to understand not only the processes by which media policies and laws are formed, debated, and enacted, but also how to participate in a milieu of action to effect meaningful change. This literacy forms out of experience; that is, it is through sustained participation in advocacy that individuals and organizations gain the capacity to critique the socio-political impact of media structures, media practices, and media representations, and to strategize how best to tackle them. Part of this literacy involves recognizing the myriad functions of a media advocacy campaign. While campaigns have identifiable goals, they also make an advocacy group legible as a stakeholder in the policymaking process and can establish the group’s credibility with fellow advocacy practitioners. The work of the NHMC, which has been committed to media reform for nearly thirty years, exemplifies the long-term, multifaceted, and flexible nature of media advocacy work.

The history of the NHMC shows the organization expanding its understanding of how media and communications matter to the Latina/o community and accordingly increasing the scale of its activities. When the NHMC first began its media advocacy work, it focused primarily on the practices of local broadcast stations. The NHMC utilized the petition to deny license renewal to broadcast stations as its primary means of redressing discriminatory employment practices and derogatory programming. The threat of a petition often would incline local stations to negotiate with the group rather than face the legal fees and irritations of a license challenge. In its early years, the NHMC reached agreements with local Los Angeles stations and soon extended its reach to television and radio stations in heavily Latina/o areas across the United States. The NHMC, in the process, also built ties with Latina/o groups in communities across the nation and began to establish its visibility as a Latina/o rights organization centrally committed to reforming media practices.

Throughout the 1990s, the NHMC enlarged its focus to include not only local stations but also broadcast and cable networks, along with the media conglomerates that owned them. In addition to an extensive economic boycott of the
entertainment holdings of Disney-ABC in 1997, the NHMC targeted media consolidation, specifically the merger of ABC and Disney and the sale of the Spanish-language network Univision to non-Latina/o interests, in its advocacy campaigns. The NHMC was especially concerned over the potential transformation of Univision, the largest Spanish-language television network in the United States at the time, into an adjunct to Mexican and Venezuelan media empires. For the NHMC, media consolidation in the English-language sphere and foreign control of the Spanish-language sector would portend fewer jobs for Latinas/os, diminished opportunities for Latinas/os to gain control of their own stations, and the continued invisibility of Latina/o concerns and perspectives in the national media.

Throughout, the NHMC confronted a regulatory apparatus that was seemingly disinterested in enforcing existing policies, especially around media ownership restrictions. These experiences signaled to the NHMC a divide between policy and enforcement and exposed a persistent willingness on the part of the FCC and the federal courts to facilitate media consolidation even in the face of the commission's own rules against it. In addition, though the NHMC was not able to prevent the sale of Univision in the 1990s, its tenacity in fighting it established the organization as a formidable Latina/o advocacy group. Univision sent representatives to meet with the NHMC in the mid-1990s, and in exchange for ceasing their legal actions, the NHMC gained programming commitments in areas like children's educational television, which it viewed as critical to the needs of the Latina/o community.

These experiences in the 1990s were highly instructive for the NHMC in its approach to media advocacy. It more fully committed to affecting policy at the national level—as Nogales states, the NHMC realized that the “big game” was being played in DC—and in the early 2000s hired two attorneys specifically to do policy advocacy work. In addition, its scope continued to increase as telecommunications issues of particular concern to the Latina/o community arose—for example, the expansion of broadband connectivity, the preservation of network neutrality, the maintenance of the Universal Service Fund. And as nativism accelerated in the United States in the mid-2000s over undocumented immigrants, the NHMC has made hate speech one of its top priorities, combating what NHMC executive vice president and general counsel Jessica Gonzalez refers to as “low-hanging fruit,” the programs that circulate what strikes the NHMC as particularly dangerous invective against the Latina/o community.

Media consolidation has continued to be a top policy issue for the NHMC. Since 2003, it has worked continually to prevent the FCC from diminishing its ownership restrictions. And while it has fought some media mergers—most notably the 2011 proposed merger between T-Mobile and AT&T—it also has sanctioned mergers in exchange for concessions for communities of color. Perhaps most controversially, the NHMC encouraged the FCC to approve the merger of
Comcast and NBC-Universal in 2010. When asked to serve on a Hispanic advisory board, the NHMC and other Latina/o groups negotiated a memorandum of understanding (MOU) with Comcast and NBC-U for diversity measures such as the creation of a Hispanic Advisory Council, increased Latina/o representation in the companies’ workforce, enhanced procurement diversity, and the expansion of Spanish-language broadcasting. Members of the NHMC subsequently held ex parte meetings with FCC commissioners in which they described the conditions of the MOU and asked, should the merger be approved, that enforcement of the MOU be written into its conditions.

A galvanizing moment for the NHMC took place in 1999 and 2000, when it banded together with other identity-based advocacy groups to secure memoranda of understanding with each of the Big Four (ABC, CBS, NBC, and Fox) broadcast networks. Greg Braxton in the Los Angeles Times had reported that of the twenty-six new prime-time shows premiering across the major networks, not one had a person of color in a recurring role. Working in a “grand coalition” with the NAACP, the Asian Pacific America Media Coalition, and Indians in Film and Television, among others, the NHMC secured MOUs that included hiring commitments, mentorship and training programs, commitments to work with minority-controlled vendors and production companies, and designations of in-house executives to promote diversity. These MOUs were struck at a low point for minority advocacy work, as the federal courts and Congress by 1999 had eliminated or ruled unconstitutional all the rules adopted in the 1960s and 1970s to promote minority employment and ownership in broadcasting. Direct negotiations with the networks were, at this moment, the most immediate and advantageous way to bring more people of color into the television industry. It was this experience with the networks, according to Nogales, that shaped how the NHMC approached the NBC-Comcast merger.

The NHMC was certainly not the only civil rights or advocacy group to support the merger. The NAACP, National Urban League, and National Action Network similarly secured an MOU with the two companies for programming and hiring commitments, as did a consortium of Asian American civil rights groups. The stance of these organizations put them at odds with public interest and consumer advocacy groups who had been allies, especially over media consolidation issues, including Free Press, whose then president and CEO Josh Silver labeled the merger a “comcastrophe,” fearing that with it would come an onslaught of greater levels of consolidation that would diminish diversity, raise prices, and gut network neutrality.

While the NHMC feels ambivalent about its role—Nogales referred to the NHMC’s action as something of a “cop-out”—its actions speak to a tension within its advocacy agenda. While philosophically the NHMC sees public interest harms in media concentration, it also, as part of its mission, has prioritized the inclusion
of Latina/o perspectives and narratives in the media and Latina/o access to jobs within media industries. Its decision to support the merger thus speaks to the experience of the NHMC in unsuccessfully fighting mergers of the past, its assessment of the FCC’s inclination to approve, and its estimation that this was the best way to secure some services to its community. And to be sure, identity-based media advocacy groups historically have butted heads with public interest advocacy groups over the issue of media consolidation. While the latter have imagined substantial public interest harms in enabling fewer companies to own more media properties, the former at moments have been willing to sanction media mergers in exchange for concessions, especially hiring and programming commitments. When the NHMC supported the NBC-Comcast merger, it followed in a longer history of civil rights organizations choosing to secure benefits for their communities at a moment when it seemed like the regulatory sphere was inhospitable to considerations of minority media rights.

As the shifting strategies of the NHMC illustrate, examining media policy advocacy as work illustrates that it is an ongoing process in which advocates continually learn and revise the optimal way to intervene in the policymaking process. Their campaigns hinge on and are informed by previous experiences with advocacy. Accordingly, media policy advocacy is a cumulative process in which advocacy groups both acquire the skill sets and resources necessary to intervene in policymaking while at the same time adjusting their expectations of what can be accomplished at particular historical junctures. Sometimes, as in the case of the NBC-Comcast merger, this experience leads advocacy groups to work with media companies and to use their standing as public interest representatives to sanction their interests. In other words, as the next section addresses, media advocacy work can constitute media work.

MEDIA ADVOCACY AS MEDIA WORK

Media advocacy has long been concerned with shaping the parameters of what media production can be and how it can be profitable. Battles over, for example, media ownership limits, equal employment rules, children’s television requirements, and indecency regulations are efforts to influence the labor conditions of media companies, the composition of their workforce, and the cultural products they make. While not engaged directly in the creative labor of media production, media advocacy groups frequently have intervened in the economic and cultural logics of production. In addition, media advocacy groups have contributed their labor to media producers. Frequently this work has been advisory—the reading of scripts, for example, to ensure that the politics of representation within them are not demeaning or harmful—and accordingly, it has been part of the mission especially of identity-based advocacy groups. Work on behalf of media companies
has more recently extended for some advocacy groups to their policy work, as they have supported positions that, to their critics, do the bidding of media companies at the expense of the communities they ostensibly represent. Critics of the NHMC’s support for the NBC-Comcast merger have read its actions in this light.

This recent synergy of interests in the policy sphere between advocacy groups and media companies is inseparable from the increased financial support advocacy groups receive from media corporations. Fund-raising, as Gonzalez has put it, is the “dirty skeleton in the closet” of advocacy work. While many media advocacy groups at first rely on volunteer labor, over time they require a sustained staff who can pursue both long-term and short-term objectives. Thus sustained media advocacy requires sustained access to financial support. Early media advocacy groups were funded by a combination of donations and grants from philanthropic foundations. Action for Children’s Television (ACT), for example, founded in 1969 to combat commercialism in and raise the quality of children’s programming, was supported by individual membership fees, higher donations from “benefactors,” and grants from the Ford Foundation and the Markle Foundation. While grants from philanthropic organizations and individual donations continue to provide substantial support for media advocacy work, they are either inaccessible or inadequate for many organizations. The NHMC, when it formed, relied on the volunteer labor of its members. In the 1990s, it formalized as an organization, secured its 501(c)(3) status as a nonprofit organization, and expanded the scope of its activities. While it initially had been difficult to attract foundation support, the NHMC in the 2000s secured a Ford Foundation grant to support its policy advocacy. Both Ford and the Media and Democracy Fund continue to support the NHMC, the latter also operating as an important advocate for the NHMC’s work with other potential funders. Professional and personal networks can be pivotal for media advocacy groups, often making the difference between being visible or invisible to potential funders, regardless of the significance of the organization’s advocacy commitments or its credibility with the community it represents.

While foundation support has been crucial, it also can be insufficient. Thus a number of advocacy groups rely on corporate donations and sponsorship. The NHMC itself receives financial support from media companies like Univision, Entravision, Disney/ABC, and Comcast/NBC-Universal. This funding enables the NHMC’s writers’ program, a screenwriting workshop that prepares Latina/o writers for writing careers in the television industry, and its pitch program, which trains writers to package their ideas as “pitches” and connects them to executives at broadcast and cable networks. The NHMC’s goals with these programs—to bring
more Latinas/os into above-the-line creative positions in television—lines up well with the interests of media companies seeking not only potential new series but strategic hires that can underline their dedication to diversity.  

The NHMC also raises money through annual events that fuse the organization’s fund-raising with its mission to promote Latina/o talent and to honor allies and advocates for Latina/o rights. These include an annual gala held in Beverly Hills to honor Latina/o performers; an annual conference that brings together industry personnel, artists, and activists in substantive conversation about contemporary media practices and Latina/o creators and publics; a local impact awards luncheon that honors local talent in the Los Angeles area; and an impact awards reception in Washington, DC, to recognize individuals in the policymaking and legislative sphere who have championed issues central to the NHMC mission. To organize these events, the NHMC has two staff members who spend half their time on fund-raising, along with one dedicated intern to support fund-raising, out of a total staff of six full-time and two part-time employees.

With these activities, the NHMC operates a sort of para-industry, which trains creative talent and honors the accomplishments of media workers. In return, they strengthen the NHMC’s identity as a Latina/o media advocacy organization and its personal ties with media professionals. Yet they also link the NHMC to companies whose policy objectives often contrast with its own. As both Gonzalez and Nogales insist, NHMC’s record should quell concerns that it is a shill to the companies that help fund its work, as the NHMC has routinely taken positions contrary to their interests. The organization has been a consistent advocate of network neutrality, has filed comments or signed onto comments filed by other public interest groups in support of retaining current media ownership restrictions, and has aggressively opposed some proposed media mergers that it has seen as harmful to its community.

In addition, the NHMC has sought to distance itself from other civil rights organizations that have similarly accepted corporate monies but whose integrity allegedly has been compromised for it. As Juan González and Joseph Torres have argued, civil rights stalwarts like the National Association for the Advancement of Colored People (NAACP) and the League of Latin American Citizens (LULAC), which “used to rail against the injustices of the white media,” now often advocate for policies that support media and telecommunications companies at the expense of the communities they represent. For González and Torres, this turn constitutes a “startling and tragic” setback for minority media rights and is directly tied to the financial support provided to these organizations by media corporations.

Most notably, in June 2013, David Honig and his advocacy group, the Minority Media Telecommunications Council (MMTC), came under attack as being under the sway of their corporate donors. Honig is a long-standing media advocacy professional, who, prior to forming the MMTC, had worked for the NAACP
on a range of minority media rights campaigns. Honig’s longtime experience as an advocate for minority media rights put him in strong standing to advise civil rights groups on media policy issues. And so when the MMTC—along with the NAACP, LULAC, and others—supported diminished media ownership restrictions, opposed network neutrality, and backed media mergers, other media advocates cast suspicion on the integrity of the MMTC’s position and the influence of corporate donations in its decision making.

The MMTC’s about-face on media ownership issues is of especial concern. When the FCC voted in 2003 and 2004 to diminish its existing ownership restrictions, it faced an enormous public backlash and had its rules remanded by the Third Circuit Court of Appeals for procedural violations and failure to consider how the changes would affect female and minority ownership of broadcast stations. When, in 2010, the FCC voted to repeal its newspaper-broadcast cross-ownership rule, the Third Circuit once again remanded the rule to the FCC and admonished it for not considering the change’s impact on female and minority ownership of broadcast stations. In each review, as the FCC has asked for comments on its ownership rules, the NHMC, often in collaboration with other advocacy groups, has drawn on the concern over levels of minority ownership to persuade the commission not to diminish or repeal existing regulations. Thus for one of the leading civil rights–based media advocacy groups to argue that media consolidation poses no harm to communities of color, and that the loosening of ownership restrictions could benefit them, is a tremendous opportunity for advocates of deregulation and the media companies who would benefit from it, and a substantial obstacle to public interest advocates who fear the impact of consolidation on the diversity and quality of the media.

The MMTC’s opposition to network neutrality has similarly raised the ire of advocacy groups and elicited accusations that the MMTC and the civil rights organizations with which it works have forsaken a public interest agenda for a corporate agenda. Opposition by the MMTC, NAACP, LULAC, and National Urban League to network neutrality rules indeed echoes the claims of media companies that open Internet provisions would harm communities of color by reducing jobs and inhibiting the expansion of broadband into underserved communities. James Rucker, cofounder of ColorofChange.org, has characterized this advocacy as “the deployment of our civil rights organizations in support of a corporate agenda,” one facilitated by the heavy financial support provided by telecommunications companies to these groups. Honig has responded to these charges by reasserting that his organization and other civil rights groups are centrally committed to protecting communities of color, accusing his “netroots” critics of paternalism toward communities of color that in fact misunderstands their interests.

In 2013, Nogales publicly admonished Honig and the actions of the MMTC, accusing Honig of having become “too chummy with the industry.” Nogales also
resigned his position on the MMTC’s board because of concerns over the organization’s ties to media corporations. In this, Nogales joined a chorus of media advocacy group leaders who sought to delegitimize the MMTC as an advocate of the public interest broadly, and of the civil rights community specifically, on media regulation issues. In the process, Nogales was able to distance the NHMC from damning accusations that advocacy groups who accept corporate monies become corporate mouthpieces rather than watchdogs or opponents. Such a move was necessary for the NHMC to retain its credibility with its own community and with fellow advocacy practitioners.

Thus part of the current practice of media advocacy groups is to police what counts as an acceptable relationship with a media company and what constitutes advocacy capture, the process by which public interest groups adopt the priorities of their funders over those of their communities; it is to distinguish the kinds of media work that are acceptable forms of media advocacy work. Significantly, it is the ongoing, cumulative nature of media advocacy work that has rendered the recent actions of the MMTC, NAACP, and LULAC so threatening to other advocacy groups and their allies. The power of these groups’ positions on media ownership and network neutrality hails from their clout as long-standing media advocates for communities of color and their past record of reform campaigns to ensure that the media meet the needs of a multiracial public. This work is what makes them credible advocates to policymakers, desirable allies for media and telecommunications companies, and heartbreaking adversaries to other media advocacy groups.

CONCLUSION: THE PRECARITY AND POLITICS OF MEDIA ADVOCACY WORK

Precarity—the central theme of this collection—defines media advocacy work in many ways. The NHMC has been motivated by what it has seen as the precarious status of its community. Its work has been premised on the belief that Latinas/os’ security—as well as their political, economic, and social rights—would be affected by their visibility within the media and their ability to access communication technologies. The capacity to enact reform is also precarious, as the outcome of advocacy campaigns rarely hinges only on the solidity of the arguments presented or the extent of popular support for an issue, but also depends on the ideological commitments of the regulatory community, the sway of industry interests, and the political culture at a historical juncture. The ability to do advocacy work is precarious, as groups not only have to continually raise money to support their organization, but consistently have to shore up their informational and reputational capital in order to be legible and credible stakeholders to regulators, other advocacy groups, and their own community. Indeed, the very precarity of media
advocacy only underlines how critical it is to honor the ongoing labors of media advocacy groups who continually work amid uncertainty as to outcome as well as to their own survival.

When civil rights organizations become, in the words of Nogales, “too chummy” with the media corporations, when they use their standing as representatives of communities of color to promote the agenda of media companies, they only intensify the precarity of media advocacy work. Not only do they lend support to policies that most likely will diminish the diversity of voices in the public sphere, but they discredit the notion that communities of color have not been, and will not be, served well by deregulation. In this, they mask their media work as media advocacy work and upend the very purpose of media advocacy on behalf of the public interest.

NOTES

1. Alex Nogales, interviewed by Allison Perlman, July 10, 2013, offices of National Hispanic Media Coalition, Pasadena, CA.

2. Philip Napoli makes this very point in his wide-ranging overview of media advocacy scholarship. See Philip Napoli, “Public Interest Media Advocacy and Activism as a Social Movement,” *Communication Yearbook* 33 (2009): 394–401

3. Hortense Powdermaker, *Hollywood: The Dream Factory* (New York: Grosset & Dunlap, 1950); Leo Rosten, *Hollywood: The Movie Colony, the Movie Makers* (New York: Harcourt Brace, 1941); Thomas Schatz, *The Genius of the System: Hollywood Filmmaking in the Studio Era* (New York: Pantheon Books, 1988); Todd Gitlin, *Inside Prime Time* (New York: Pantheon Books, 1983); Horace Newcomb and Robert S. Alley, *The Producer’s Medium: Conversations with Creators of American TV* (New York: Oxford University Press, 1983).

4. John Caldwell, *Production Culture: Industrial Reflexivity and Critical Practice in Film and Television* (Durham, NC: Duke University Press, 2008).

5. Vicki Mayer, *Below the Line: Producers and Production Studies in the New Television Economy* (Durham, NC: Duke University Press, 2011).

6. Seeta Peña Gangadharan, “Public Participation and Agency Discretion in Rulemaking at the Federal Communications Commission,” *Journal of Communication Inquiry* 33 (2009): 337–353.

7. Becky Lentz and Allison Perlman, “Media Advocacy Practice Produces Media Policy Literacy,” presentation at the International Communication Association Annual Meeting, Seattle, Washington, May 25, 2014.

8. The NHMC, for example, in 1988 filed four petitions against stations in Los Angeles, and in 1989 went after WNET in New York for low levels of Latino employment. See Victor Valle, “Latino Group Challenges TV Licenses,” *Los Angeles Times*, November 2, 1988, 1; Victor Valle, “Latino Coalition’s Bid For KTTV: Full Assault, Long Odds,” *Los Angeles Times*, November 10, 1988, H1, H13; Victor Valle, “Latinas/os Claim Job Bias at KCBS,” *Los Angeles Times*, December 31, 1986, J1, J2; “NHMC Signs Landmark Agreement with KABC-TV,” press release, November 11, 1993, Box 7, Folder 1, Papers of the National Hispanic Media Coalition, University of California, Los Angeles (hereafter NHMC Papers).

9. For documents relating to the Disney boycott, see Box 33, Folders 1–2, NHMC; for a discussion of the struggles of Spanish language broadcasting, see Allison Perlman, *Public Interests: Media Advocacy and the Struggles over U.S. Television* (New Brunswick, NJ: Rutgers University Press, forthcoming), chapter 6.
10. Notice of Appeal, *NHMC v. FCC*, filed October 20, 1992; Notion of Intention to Intervene, *NHMC v. FCC*, filed November 5, 1992, Box 32, Folder 2; Settlement Agreement, Entered into Between National Hispanic Media Coalition and the Univision Television Group, Inc., May 20, 1994; Letter from Enrique Baray to Armando Durón, October 18, 1995, Box 31, Folder 3, NHMC Papers.

11. Jessica Gonzalez, interviewed by Allison Perlman, April 17, 2014, offices of National Hispanic Media Coalition, Pasadena, CA.

12. Interview with Nogales; Electronic Filing, Correction to *Ex Parte* Presentation Letters, filed by Jessica Gonzalez, September 21, 2010, http://apps.fcc.gov/ecfs/comment/view?id=6016055968. See the letter to Genachowski outlining the terms of the MOU, http://apps.fcc.gov/ecfs/comment/view?id=6015694189.

13. Greg Braxton, “A White, White World on TV’s Fall Schedule,” *Los Angeles Times*, May 28, 1999, 1.

14. Interview with Nogales; Greg Braxton, “Groups Join to Protest Exclusion, Television: Coalition Forms in Response to the Absence of Minorities on New Shows in Prime Time This Fall,” *Los Angeles Times*, June 25, 1999, 1; Paul Bernstein and Michael Schneider, “NAACP, NBC Reach Pact,” *Daily Variety*, January 6, 2000, 1; Lisa de Moraes, “TV Networks Adding Some Color For Fall: New Minority Roles Receive Little Applause,” *Washington Post*, May 21, 2000, A01.

15. Interview with Nogales.

16. Letter to Chairman Genachowski from Benjamin Todd Jealous, Marc H. Morial, and Rev. Al Sharpton, December 16, 2010, http://apps.fcc.gov/ecfs/comment/view?id=6016064629; Letter to Chairman Genachowski from Karen K. Narasaki, December 15, 2010, http://apps.fcc.gov/ecfs/comment/view?id=6016064415.

17. Josh Silver, “Comcastrophe: Comcast/NBC Merger Approved,” *Huffington Post*, January 18, 2011, www.huffingtonpost.com/josh-silver/comcastrophy-comcastnb_mc_b_810380.html.

18. Erwin G. Krasnow, Lawrence D. Longley, and Herbert A. Terry, *The Politics of Broadcast Regulation* (New York: St. Martin’s Press, 1982), 57–58.

19. See Kathryn C. Montgomery, “Special Interest Citizen Groups and the Networks: A Case Study of Pressure and Access,” in *Telecommunications Policy Handbook*, ed. Jorge Reina Schement, Felix Gutierrez, and Marvin A. Sirbu, Jr. (New York: Praeger, 1982), 241–254.

20. Interview with Gonzalez.

21. Donald Guimary, *Citizens’ Groups and Broadcasting* (New York: Praeger, 1975), 125–126.

22. Jefferson Pooley, “From Psychological Warfare to Social Justice: Shifts in Foundation Support for Communication Research,” in *Media and Social Justice*, ed. Sue Curry Jansen, Jefferson Pooley, and Lora Taub-Pervizpour (New York: Palgrave-MacMillan, 2011), 211–240.

23. Interview with Gonzalez.

24. Ibid.

25. Ibid.

26. Juan González and Joseph Torres, *News for All the People: The Epic Story of Race and the American Media* (London: Verso, 2012), 371.

27. Ibid., 372–376.

28. Jason McLure, “Civil Rights Group’s FCC Positions Reflect Industry Funding, Critics Say,” *Center for Public Integrity*, June 6, 2013, www.publicintegrity.org/2013/06/06/12769/civil-rights-groups-fcc-positions-reflect-industry-funding-critics-say.

29. *Prometheus Radio Project v. FCC*, 373 F.3d 372 (2004).

30. *Prometheus Radio Project v. FCC*, 652 F.3d 431 (2011).

31. James Rucker, “Net Neutrality, Civil Rights, and Big Telecom Dollars,” *Huffington Post*, September 10, 2014, www.huffingtonpost.com/james-rucker/net-neutrality-civil-rights-orgs_b_5796944.html.

32. “David Honig Pushes Back against the ‘Digital Activists,’” *Field Negro*, July 30, 2014, http://fieldnegro.blogspot.com/2014/07/david-honig-pushes-back-against-digital.html#.VBDiiizylK.

33. McLure, “Civil Rights Group’s FCC Positions Reflect Industry Funding.”