



Alliance for Community Media

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March 18, 2019

VIA ECFS

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

Re: Notice of Ex Parte, Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992, MB Docket No. 05-311

Dear Ms. Dortch,

On March 13, 2019, Mike Wassenaar of the Alliance for Community Media; Jim Horwood of Spiegel & McDiarmid; David Gautier of Wincam, Winchester, MA; Keith Thibault of Fall River Media Center, Fall River, MA; and Richard Turner of Community Media Center of Westminster, MD met with Michelle Carey, Brendan Murray, Kathy Berthot, Martha Heller, Holly Saurer and Olivia Avery of the Media Bureau.

We expressed our concerns about the impacts of proposed rules in the proceeding on PEG (Public, Educational and Government) Access services especially in the context of academic studies reflecting the reduced amount of local information available to small cities and rural and suburban communities in so-called “media deserts”. And we reiterated our position from earlier comments that the proposed rules are contrary to the Cable Act.

As to the exclusion of equipment costs from the definition of capital costs as proposed by the rules, we emphasized the necessity of fixed assets and durable goods for video production and media distribution businesses, including PEG Access operations, and referred to the common and recognized inclusion of durable goods such as equipment in the definition of capital costs in American business practice.

This letter is being filed electronically pursuant to section 1.1206 of the Commission’s rules.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mike Wassenaar', with a long horizontal flourish extending to the right.

Mike Wassenaar
President & CEO
Alliance for Community Media

CC: Michelle Carey
Brendan Murray
Kathy Berthot
Martha Heller
Holly Saurer
Olivia Avery