

ORIGINAL

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DEC - 5 1991

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ORIGINAL
FILE

In the Matter of)	
)	
Reexamination of the Effective)	MM Docket No. 90-4
Competition Standard for the)	
Regulation of Cable Television)	
Basic Service Rates)	
)	
Carriage of Television Broadcast)	MM Docket No. 84-1296
Signals by Cable Television Systems)	
)	
Provision of Local and Other)	RM-
Public Service Programming by)	
Television Broadcast Stations)	

FURTHER PETITION FOR RULEMAKING

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December 5, 1991

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TABLE OF CONTENTS

	Page
SUMMARY	iii
INTRODUCTION	1
I. Broadcasters Have No Meaningful Obligation to Carry Public Service Announcements	3
II. Broadcasters Now View the Presentation of Public Service Announcements Not as an Obligation But as a "Luxury" -- Which They Will Provide in Return for Political Support	6
CONCLUSION	13

ATTACHMENTS

- National Association of Broadcasters, "Cable Bill Update:
August Action Plan Kit," Aug. 8, 1991, pp. 8-9.
- Letter of the National Association of Broadcasters, et
al., to Hon. George J. Mitchell, Nov. 7, 1991.
- Letter of Helen Petty to Nancy McMurray.
- Letter of Donald D. Custis to Sen. George Mitchell,
Nov. 12, 1991.
- Letter of Nanci J. Freedberg to Sen. Dennis DeConcini,
Nov. 15, 1991.

SUMMARY

In a previously filed Petition for Rulemaking, NCTA showed that, while broadcasters continue to cite their supposedly unique public service obligations as a basis for obtaining special regulatory benefits and protections, the rules and requirements that once defined such obligations no longer exist. NCTA's initial petition did not call for the general reregulation of broadcasters. Our point, however, was that the Commission could not reasonably adopt rules and regulations designed to assist or protect broadcasters in the video marketplace based on the unique public service obligations of broadcasters, unless it also adopted rules reimposing those obligations.

New evidence further demonstrates that there is nothing left of the broadcasters' public service obligations. While the broadcasters typically cite their carriage of public service announcements as an example of their unique requirements, they have recently made clear that their carriage of such announcements has little to do with any compulsion to serve the public interest.

Indeed, as the documents attached to this Further Petition indicate, the broadcasters now view the presentation of public service announcements not as an obligation but as a "luxury," which they are free to discontinue at any time. Moreover, pursuant to an "action plan" devised by the National Association of Broadcasters, the broadcasters are now making clear that, in return for carrying public service announcements, they expect

charitable and non-profit organizations to endorse their political agenda on Capitol Hill.

Trading public service announcements for political support demonstrates the cynicism with which broadcasters now treat their supposed public service obligations. Even before they were deregulated, broadcasters had substantial discretion with respect to the types and amounts of public service announcements to be carried in furtherance of their public service obligations. But two requirements remained constant -- that they carry such announcements at "no charge" and that they decide whether or not to carry particular announcements on the basis of good faith determinations of how best to serve community interests.

Public service announcements are not free when there is a quid pro quo of political support. Moreover, establishing such a quid pro quo ensures that decisions as to whether to carry particular public service announcements are based not on the community's needs and interests but on the broadcaster's needs and interests.

The broadcasters' use of public service announcements to further their political agenda belies their assertions that such announcements are carried in furtherance of their obligation to serve the public interest. Indeed, such a plan is directly at odds with the public interest -- especially insofar as it subverts the political process by inducing public service organizations to take a stand on political issues for reasons that have nothing to do with their own goals or political interests, and with which they might otherwise disagree.

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FURTHER PETITION FOR RULEMAKING

The National Cable Television Association, Inc., (NCTA) hereby submits this Further Petition for Rulemaking.

INTRODUCTION

On July 25, 1991, NCTA, the principal trade association representing the cable television industry in the United States, submitted a Petition for Rulemaking, asking that the Commission consider whether to reimpose rules placing meaningful public service obligations on commercial broadcasters. In its petition, NCTA noted that broadcasters had historically been granted certain benefits and protections -- including the free use of valuable scarce spectrum -- in return for their assumption of general and specific obligations to provide programming that addressed the needs, interests and concerns of their local communities.

Furthermore, NCTA noted that broadcasters were currently seeking additional benefits and protections from Congress and the Commission, at cable's expense -- including the reimposition of "must carry" requirements and the grant of "retransmission consent" rights -- that were also premised on their supposed unique public service obligations. What NCTA showed, however, was that the specific rules and requirements that once gave meaning to the broadcasters' public service obligations no longer exist.

NCTA's point was not that broadcasters should, as a matter of public policy, be reregulated. Our point was that it was now unreasonable to grant broadcasters special protections and benefits based upon their public service obligations -- because any examination of the existing rules and of the broadcasters' current programming would make clear that those obligations are wholly illusory. Therefore, NCTA maintained, the Commission could not reasonably consider whether to adopt new must carry rules based on broadcasters' public service obligations without simultaneously considering whether to adopt rules reinstating ascertainment procedures, programming guidelines, review of uncontested renewal applications, and other requirements that would make those public service obligations meaningful.

The Commission has not yet assigned a file number to NCTA's petition, nor has it given public notice of the petition, pursuant to Section 1.403 of the Rules. In the meantime, additional conduct by the broadcasters has come to light, which further demonstrates how cynically the broadcasters now treat their

supposed public service obligations and how meaningless those general obligations have become.

I. Broadcasters Have No Meaningful Obligation to Carry Public Service Announcements.

Broadcasters typically trumpet their provision of "public service announcements" as a principal means by which they meet their public service obligations. According to Edward O. Fritts, President and CEO of the National Association of Broadcasters, "[a]ny discussion of broadcasters' service to the public must include the outstanding work we do on public service campaigns."^{1/} And a large component of those campaigns are public service announcements:

Public service announcements are usually 30-second non-commercial messages which are sponsored and produced by public and community interest groups. Stations often help to produce these messages and air them free of charge to better serve the interests of their local communities.^{2/}

Even before the deregulation of the 1980s, the broadcasters' obligation to make room for free public service announcements was hardly overwhelming. Indeed, the Commission specifically refused ever to adopt rules "imposing specific obligations on broadcasters as to the number, duration, content and source of PSAs

1/ Testimony of Edward O. Fritts before the Senate Communications Subcommittee, June 20, 1991, at 5.

2/ Id. at 5-6, n. 9.

which they should present."^{3/} To the contrary, the Commission noted that it had

regularly followed a practice of according the licensee broad discretion in programming matters, including the scheduling and selection of PSAs. We noted that decisions as to the quantity, nature, source and scheduling of PSAs aired depend on the community to be served and each licensee's individual situation.^{4/}

Still, the Commission did expect broadcasters to accept and schedule public service announcements on a good faith basis, as part of their obligation to meet the needs and concerns of their local communities.^{5/} Moreover, the Commission devised a system of specifically crediting broadcasters, at renewal time, for their carriage of such announcements.^{6/}

3/ Petition to Institute a Notice of Inquiry and Proposed Rulemaking on the Airing of Public Service Announcements by Broadcast Licensees, Report and Order, 81 F.C.C. 2d 346, 347 (1980).

4/ Id.

5/ The Commission stated its

expectation that licensees would make a good faith effort to tailor and schedule PSAs so as to enhance their effectiveness and to provide a meaningful, local, public service. Thus, we noted, the predominant scheduling of PSAs in "graveyard" hours or perfunctory treatment of such announcements could not be considered the type of reasonable effort expected by the Commission. Further, we indicated an expectation that a significant proportion of PSAs on television should be aired during prime-time and on radio during drive-time.

Id. at 348.

6/ Id. at 367.

As the Commission made clear, the principal means for enforcing any obligations with respect to public service announcements were the program logs, problems-program lists and long-form license renewal applications that broadcasters were required to complete and submit.^{7/} Thus, the Commission also recognized that any subsequent elimination of such procedural requirements would make the obligations meaningless:

The Commission is presently reviewing the existing scope of radio regulations in a rulemaking proceeding, BC Docket No. 79-219. Action taken in that docket could mandate removal of the ascertainment requirements currently imposed on radio broadcasters including the obligation to file a problems-program list, as well as removing any logging requirements for these licensees. If this proves to be the case, the credit procedures provided in this decision, as they affect radio stations, will have limited effect.^{8/}

The Commission ultimately did, of course, delete its ascertainment requirements, program logging requirements, and long-form license renewal applications for all broadcasters -- television as well as radio. As a result, broadcasters no longer have any meaningful obligation to carry public service announcements that distinguishes them from any other medium.

Indeed, as we now show, the broadcasters have essentially acknowledged that their carriage of public service announcements is not a requirement but a "luxury." Moreover, they have made clear that they expect something in return for the supposedly

7/ See id. at 368.

8/ Id. at 370 n. 46.

"free" carriage of public service announcements -- namely, the explicit support of charitable and non-profit organizations for the broadcasters' political agenda.

II. Broadcasters Now View the Presentation of Public Service Announcements Not as an Obligation But as a "Luxury" -- Which They Will Provide in Return for Political Support.

Following a recent press conference on Capitol Hill, the National Association of Broadcasters released a list of organizations allegedly supporting pending cable legislation.^{9/} That legislation would subject cable television to comprehensive rate regulation while also granting broadcast stations the alternatives of demanding free carriage on cable systems or requiring cable systems to obtain "retransmission consent" (i.e., to pay broadcasters for the retransmission of broadcast programming).

The reasons for the broadcasters' support of that legislation are easy to understand. First, forcing cable operators to pay for retransmission of local broadcast signals would subsidize broadcasters with funds that would otherwise be spent on cable programming. Second, a must carry provision would give broadcasters a unique advantage over all other programmers by granting them guaranteed carriage on cable systems. Finally, regulation of cable rates would artificially limit the amounts that cable

9/ The list is attached to this petition. See Letter from National Association of Broadcasters, et al., to Hon. George J. Mitchell, Nov. 7, 1991.

operators could spend in attempting to provide viewers with a competitive alternative to broadcast programming.

The reasons why numerous public service organizations would endorse the cable legislation were, initially, more difficult to comprehend. Cable television, after all, affords local and national public service organizations significant opportunities that cannot be matched by broadcasters. Local origination and public access channels provide substantial time not merely for 30-second spot announcements but for full-length programming provided by or focusing on the concerns of public service organizations. And national cable networks provide far more news, public affairs and documentary programming -- along with national and local availabilities for public service announcements -- than now appear on broadcast stations. It was, therefore, a mystery why organizations such as the Salvation Army, the American Red Cross, the March of Dimes and the Camp Fire Boys and Girls would actively enlist in the broadcasters' campaign to stunt the continuing growth of cable systems and cable programming.

That mystery, however, was cleared up by examining an "Action Plan Kit" sent in August by the National Association of Broadcasters to its members. That kit, the relevant pages of which are attached to this petition, detailed a coordinated plan to enlist the support of community organizations for the pending legislation in a very direct way. Specifically, NAB exhorted its members to suggest to community organizations that such support

was expected in return for the carriage of their public service announcements.

In its "Suggested Talking Points for Public Service Directors," NAB first makes clear that it does not view the provision of public service announcements as a regulatory requirement but simply as an optional service, which it is free to discontinue at any time. Thus, it urges local broadcasters to tell community organizations that, if competition from cable systems cuts too deeply into broadcasters' profits, "we can no longer afford the luxury of providing the amount of community service your organization has come to expect."^{10/}

The object, in the first instance, is obviously to persuade community service organizations that if protective legislation is not enacted, broadcasters will exercise their prerogative to cut back on or discontinue the carriage of public service announcements. NAB concedes that community organizations cannot be expected to understand the details of the legislation or its overall effects in the video marketplace and the public interest. All they need to understand is the simple threat that if legislation is not enacted, broadcasters will discontinue the "luxury" of carrying public service announcements:

This is a soft-sell message. Charity groups will not be knowledgeable about retransmission/
must carry. But they can play an important role in reminding Congress that if broadcasters

^{10/} NAB, Cable Bill Update: August Action Plan Kit, Aug. 8, 1991, p. 9 (emphasis added).

continue to lose ground to the cable industry,
their organization will also be hurt.^{11/}

But the message to be conveyed to charitable organizations is not simply that their public service announcements will not be carried unless cable legislation is enacted. The not-so-veiled threat is much more direct. It is that their announcements will not be carried unless they explicitly endorse the legislation.

The quid pro quo is clear. Broadcasters are directed to tell charitable organizations that "[w]e never ask your organization for anything in return [for public service announcements and other support]. But now, I must ask you for a personal favor."^{12/} The "favor," of course, is to contact members of Congress and express support for the cable legislation.^{13/}

Lest there be any doubt that the extent of future provision of free time for public service announcements may depend on whether or not an organization agrees to endorse the broadcasters' political agenda, broadcasters are directed to ask organizations to "send a follow-up letter to the Congressman/
Senator with a blind copy to me."^{14/} And -- the coup de grace --

11/ Id. at 8.

12/ Id. at 9 (emphasis added).

13/ "For Senators, the message is support S.12. For Congressmen, the message is support retransmission/
must carry legislation." Id.

14/ Id. (emphasis added).

"we won't forget your help."^{15/}

In the days when broadcasters had meaningful public service obligations, this trading of public service announcements for political support would have been prohibited and, most likely, punished. While the Commission gave broadcasters substantial discretion with respect to the types and amounts of public service announcements to be carried in furtherance of their public service obligations, two elements remained constant -- that there be "no charge" for the carriage of public service announcements, and that such announcements be accepted or declined, based on good faith determinations of broadcasters as to how best to "serv[e] community interests."^{16/}

Granting "free" time for public service announcements in return for support of the broadcasters' political agenda violates both these precepts. Public service announcements are not free when there is a quid pro quo of political support. Remembering a charitable organization's help -- or refusal to help -- on cable legislation when that organization next seeks time for public service announcements ensures that such announcements are run not on the basis of the community's needs and interests but on the basis of the broadcasters' needs and interests.

15/ Id.

16/ See Report and Order, supra, 81 F.C.C. 2d at 370.

Accepting any payment -- monetary or otherwise -- for what appear to viewers to be public service announcements is a deceptive abdication of the broadcasters' editorial discretion. Absent any disclosure that the charitable organization has paid for air time like any commercial advertiser, viewers will trust that the organization's announcements are carried because, in the broadcaster's view, the announcements serve the needs and interests of the community. In the days of regulation, radio broadcasters whose music playlists were selected on the basis of secret monetary payments, rather than on the basis of the critical judgments that listeners expected, were punished severely for betraying their public trust.^{17/} Allocating time for public service announcements on the basis of political support would no doubt have been treated equally severely.^{18/}

The most pernicious effect of trading public service announcements for political support is not, however, its impact on viewers, who are deceived as to why such announcements are being carried. It is its impact on the political process. To ask charitable organizations, in return for receiving free air time, to take a stand on political issues -- a stand that has

17/ See, e.g., Public Notice, FCC 88-175, "Commission Warns Licensees About Payola and Undisclosed Promotion," May 18, 1988.

18/ See, e.g., Plugola Policy, Report and Order, 76 F.C.C.2d 221, 222 (1980), noting the principle "that the public is entitled to know by whom it is being persuaded; to know of any private financial interests which may have influenced the use or promotion of a product or service."

nothing to do with the goals or political interests of those organizations, and with which they might otherwise disagree -- unfairly subverts the political speech of such organizations. And it subverts the political process by using the credibility of those organizations to advance political views that may not be their own.^{19/}

19/ Indeed, several organizations that were induced by the broadcasters' threats to express their support for cable legislation, and that were cited by NAB as supporters of the legislation, have subsequently made clear that they do not, in fact, endorse the legislation. For example, the North Texas Chapter of the National Multiple Sclerosis Society has made clear that it "did not give endorsement of the particular piece of legislation mentioned in the [NAB] letter or authorize the use of our organization's name." Letter of Helen Petty to Nancy McMurray. Similarly, the Executive Director of the Arizona Chapter of the Cystic Fibrosis Foundation has written to Senator DeConcini to retract its support for the pending legislation, noting that "[t]he Cystic Fibrosis Foundation is completely non-committed and has no opinion regarding the Senate Bill 12." Letter of Nanci J. Freedberg to Sen. Dennis DeConcini, Nov. 15, 1991.

After writing (on United Way letterhead) to express support for S.12, the President of the local United Way in Grand Rapids, Michigan sent a follow-up letter to Senator Mitchell clarifying that while he personally supported S.12, his letter "does not represent the Board of Directors of any local United Way. It does not represent the United Way of Michigan or United Way of America." Letter of David D. Custis to Sen. George Mitchell, Nov. 12, 1991. (Emphasis in original.)

These initial, unauthorized expressions of support for S.12 were, of course, precisely what NAB sought. NAB directed its members to emphasize to local representatives of public service organizations "that we don't want or expect you to get an official board position on this legislation." Action Plan, supra, p. 9. After inducing such "personal" calls from various individuals, however, NAB apparently felt free to list their organizations -- not the individuals -- as

(Footnote continues on next page)

Most of all, the cynical effort to obtain political support in return for free air time simply belies the broadcasters' claims that they have unique regulatory obligations to carry public service announcements. Indeed, it belies their claims that they are still subject to any meaningful public interest obligations at all. Because if they were, their plan to use public service announcements as an inducement for political support would never have been contemplated, must less executed.

CONCLUSION

The broadcasters' use of public service announcements to promote their political action plan provides further evidence that, as demonstrated in our initial Petition for Rulemaking, the public service obligations that the broadcasters cite so loudly and frequently do not, in fact, exist. That may or may not be a good thing, and NCTA does not generally advocate the reregulation of broadcasting.

We do maintain, however, that rules, policies and laws that protect or subsidize broadcasters at the expense of cable operators and other competitors cannot reasonably be premised on the existence of the unique public service obligations of broadcasters unless meaningful obligations really exist. Accordingly, we once again urge the Commission, while it is

(Footnote continued)
supporters of the legislation. See Letter from National Association of Broadcasters, et al., supra.

considering the adoption of must carry rules and other provisions based on the public service obligations of broadcasts, to consider at the same time the adoption of rules and regulations that once again make those public service obligations real.

Respectfully submitted,

NATIONAL CABLE TELEVISION
ASSOCIATION, INC.

By Brenda L. Fox
Brenda L. Fox

By Michael S. Schooler
Michael S. Schooler

ITS ATTORNEYS

December 5, 1991

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Washington, D.C. 20036
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CABLE BILL UPDATE

A Grass Roots Bulletin from NAB Government Relations

AN OPEN LETTER TO TELEVISION BROADCASTERS

August 8, 1991

It's August, and many of you have your vacation plans in place? But how many of you have your CABLE BILL ACTION PLAN in place? Congress is in recess until September 10. That means most members of Congress—House and Senate—will be spending a good deal of their time back in their states. You need to make plans NOW to communicate with your Senators and Representatives about the importance of cable legislation to YOUR FUTURE!

Setting up meetings between a group of local or state broadcasters and your elected representatives in Congress is crucial to our ability to convince these lawmakers to support cable legislation further eroded by the growing cable monopoly. If you need help setting up a meeting, call NAB Government Relations at 1-800-424-8806.

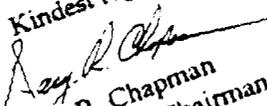
If you are not concerned about your future as a broadcaster, then this kit is not for you. But if you realize that without fundamental changes, the video marketplace will slide further and further towards cable and away from a healthy broadcasting system for all Americans, then you must act THIS MONTH to gather the support we need to pass meaningful cable legislation.

Everything you need to be successful in this effort is included in this August Action Kit. I urge you to read it—use it—and report back to NAB on your contacts with Senators and Congressmen, as well as your activities to promote this issue to your local community.

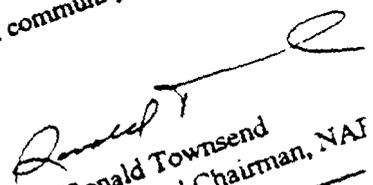
Time is of the essence. The cable industry is spending millions of dollars to defeat this legislation and keep you and other broadcasters under its thumb. If broadcasters do their part, we can win this issue and gain the economic fairness we need to compete in an increasingly competitive marketplace.

Do it now—for your station, for yourself, and for your local community. The future of broadcast television is at stake.

Kindest regards,


Gary R. Chapman
Joint Board Chairman, NAB


Eddie Fritts
President & CEO, NAB


Ronald Townsend
TV Board Chairman, NAB

August ACTION PLAN KIT

SECTION 5

A GRASS ROOTS REPLY TO THE CABLE INDUSTRY

The cable industry recently launched a false and misleading advertising campaign in major newspapers across the country to derail retransmission/must-carry legislation.

The campaign's goal is to frighten consumers by alleging that cable rates will rise if legislation is passed. The cable industry hopes that if consumers are scared, so too will be members of the U.S. Senate and House of Representatives.

You can play a critical role in blunting these false charges, as well as promoting your station's valuable community service activities. Congress must be made aware that it is the broadcasters who are on the side of consumers and that if the industry is threatened, their constituents will also lose.

We suggest you activate a plan to address the cable industry's deceptive ads. Here's what we recommend:

1) Catalog your community service activities.

Make a list of all the community service activities your station has sponsored during the last twelve months. Also include a list of PSAs you've aired during this same time frame. Then write your Senators and Congressmen using the enclosed sample letter as a guide. The thrust of the letter is to remind them that unlike cable, broadcasting is a truly local service with deep roots in the community.

2) Call your Senators and Congressmen.

Tell them you are angry about the cable industry distorting the facts concerning retransmission/must-carry legislation. Point out that the legislation is designed to keep a lid on cable rates, and that retransmission/must-carry simply puts broadcasters on an equal competitive footing. Remind them that your station's local news coverage is one of the most important means for communicating with their constituents. If the cable industry succeeds in destroying local broadcasters, that source of information will be lost or seriously compromised.

3) Activate your Public Service Directors (PSDs).

Ask your PSD to personally contact 5-10 community organizations your station actively promotes. PSDs are the ideal choice since they are the "gate keepers" for your station's free air time. The PSDs should explain to the local directors of these organizations that their help is needed to insure that your station can continue to provide the kind of community support they have come to expect (see enclosed "Talking Points"). As a personal favor, your PSDs should ask the local director to place a call to the same Members of Congress mentioned above to express their support for the continued community service activities of local broadcasters. This is a soft-sell message. Charity groups will not be knowledgeable about retransmission/must-carry. But they can play an important role in reminding Congress that if broadcasters continue to lose ground to the cable industry, their organizations will also be hurt.

We recognize that these suggested action steps are time-consuming. However, we ask that you consider the alternatives to allowing the cable industry's charges to go unanswered. Cable operators around the country are already mobilizing to lobby each and every Member of Congress. Our stations must do the same.

Our initial efforts have been highly successful. Station groups in the Southwest have received support from organizations as diverse as the YMCA and the local Catholic Archdiocese in a letter-writing campaign to Congress. Another station organized a group of 10 Hispanic organizations which met with members of their state's congressional delegation to voice concern about the need for must carry to protect Spanish-language stations.

The connections are endless. We need you to tap a similar reservoir of potential support in your community and put it to work for our common goal.

SUGGESTED TALKING POINTS FOR PUBLIC SERVICE DIRECTORS

- For years, we have provided your organization with countless hours of free air time and indirect support.
- We do these things because we want to do them, and because we think it is an important part of our community responsibility.
- We never ask your organization for anything in return. But now, I must ask you for a personal favor.
- We in the broadcast industry are fighting for our survival. Cable has grown enormously in recent years, largely by charging viewers monthly service fees to watch our programs.
- If the situation continues, we can no longer afford the luxury of providing the amount of community service your organization has come to expect.
- Legislation pending before Congress can help address the current problems and help put broadcasters on an even competitive footing with cable. The bill has been endorsed by all sorts of community-oriented organizations, including the Consumer Federation of America, the U.S. Conference of Mayors, and many, many more.
- What we need you to do is to contact Senators _____ and Congressman _____ and let them know the kind of community service activities we have provided for you. Tell them that you think it is important to preserve the integrity of free, local broadcast television. For Senators, the message is support S. 12. For Congressmen, the message is support retransmission/must-carry legislation.
- Let me emphasize that we don't want or expect you to get an official board position on this legislation. This is a personal call from you to your representatives.
- I would also like you to send a follow-up letter to the Congressman/Senator with a blind copy to me.
- This is a favor to me and the station. And we won't forget your help.



Consumer Federation of America



November 7, 1991

The Honorable George J. Mitchell
United States Senate
Room 176
Russell Senate Office Bldg.
Washington, DC 20510

Dear Senator Mitchell:

The undersigned organizations wish to express our strong support for S.12, the Cable Television Consumer Protection Act. As you can see, we represent a broad coalition of consumer, senior citizens, labor, communications, rural and civil rights organizations.

We believe the time has come for Congress to end the abuses of the cable television industry. Cable is an unregulated monopoly, and has acted accordingly. Rates to subscribers for basic service have increased an average of 56% over the past four years. Service to cable customers is inadequate. Cable interests have unfairly assumed the role of the ultimate gatekeeper for the video signals that reach consumers. Cable has stifled competition and denied consumers a choice for too long. It clearly is time for Congress to act.

The Senate Commerce Committee adopted S.12 by a bipartisan, 16-3 vote. We believe that it is crucial that the Senate not weaken this bill or in any way water down its pro-consumer, pro-competition provisions.

Our organizations strongly urge you to vote in favor of S.12. Thank you for your consideration of our collective views.

Sincerely,

(See attached for individual signatures)

Edward O. Fritts
President & CEO
National Association of Broadcasters

Gene Kimmelman
Legislative Director
Consumer Federation of America

7047 1 1988

Robert F. Harbrant
President
Food & Allied Trades Department, AFL-CIO

James B. Hedlund
President
Association of Independent Television Stations, Inc.

Linda Golodner
Executive Director
National Consumers League

George J. Kourpias
International President
International Association of Machinists and Aerospace Workers, AFL-CIO

Lawrence T. Smedley
Executive Director
National Council of Senior Citizens

Barbara J. Easterling
Executive Vice President
Communications Workers of America, AFL-CIO-CLC

John DeConcini
President
Bakery, Confectionery & Tobacco Workers Union, AFL-CIO-CLC

J. J. Barry
International President
International Brotherhood of Electrical Workers, AFL-CIO

Larry Jackson
President
American Federation of Grain Millers, AFL-CIO

Al DiTolla
International President
International Alliance of Theatrical Stage Employees & Moving Picture Machine Operators of the U.S. & Canada, AFL-CIO-CLC

Bob Bergland
Executive Vice President
National Rural Electric Cooperative Association

B.R. Phillips III
Chief Executive Officer
National Rural Telecommunications

Evelyn Dubrow
Vice President & Legislative Director
International Ladies' Garment Workers' Union, AFL-CIO

Robert Schmidt
President
Wireless Cable Association

Jack Sheehan
Director/Legislative Department
United Steelworkers of America

E. Brandt Gustavson
Executive Director
National Religious Broadcasters

Steve Sprague
Secretary-Treasurer
American Federation of Musicians

James P. Nolan
International President
National Association of Broadcast Employees and Technicians, AFL-CIO

The following is a sampling of state and local organizations from across the nation who also endorse S.12:

Arizona

Cystic Fibrosis Foundation

California

Self-Help for the Elderly

Valley Children's Hospital Foundation

Illinois

Access Living

AETA Creative Arts Foundation

Archdiocese of Chicago

Bethlehem Association of Baptist Churches of Greater Chicago

Blessing Hospital, Quincy

Cameron Communications

Chicago Fire Department, Public Education

Chicago Teachers Union

Chicago Public Schools

Chicago Park District

Chicago Coalition for the Homeless

Chicago Area Project

City of Quincy, Recycling Manager

City of Quincy, City Hall

Cosmopolitan Chamber of Commerce

DePaul University

Dunbar Vocational High School

Ensemble Espanol

Gorham United Methodist Church

Illinois Cancer Council

Junto a Aguas de Reposo

Korean American Senior Center

Korean Nurses Association of Midwest

Latino Institute

Leadership Council for Metropolitan Open Communities

Life Source

Midwest Hispanic AIDS Coalition

N Communications

National Organization of Black Law Enforcement Executives -

Chicago New Hope Center

Northwest Action Against Rape

Operation PUSH Inc.

Operation ABLE

Progressive Community Center

Project IMAGE

Quincy College, Office of Public Relations

Quincy Society of Fine Arts

Quincy Public Schools

Quincy Broadcasting Company

Regional Organ Bank of Illinois

State of Illinois, Department on Aging
 The Dusable Museum
 The Christian Brothers
 The Salvation Army, Quincy
 Voices for Illinois Children
 Williams Communications Systems
 Women United for a Better Chicago

Iowa

City of Algona
 City of Pocahontas

Kansas

American Red Cross - Blood Services, Wichita Region
 Goodwill Industries - Easter Seal Society of Kansas, Inc.
 March of Dimes - Birth Defects Foundation
 Music Theatre of Wichita
 The City of Wichita, Fire Department
 Wichita Symphony
 YWCA, Wichita

Louisiana

Big Brothers/Big Sisters of Southwest
 Children's Miracle Network/St. Patrick Hospital

Massachusetts

Massachusetts Consumers Association

Michigan

The United Way

New Jersey

Clark S. Herman Associates, Inc.

Texas

Camp Fire Boys and Girls - Lone Star Council
 Cenikor
 Chicano Family Center, Inc.
 Cystic Fibrosis Foundation - Northeast Texas Chapter
 Dallas Water Utilities
 Dallas Theater Center
 Dallas Museum of Natural History
 Diocese of Galveston-Houston
 Happy Hill Farm Academy and Home
 Heritage Media Corporation
 Junior Black Academy of Arts and Letters, Inc.
 National Multiple Sclerosis Society
 Park Cities Baptists Church
 The Salvation Army
 YMCA of Metropolitan Dallas