July 23, 2019

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary

Federal Communications Commission 445 12th Street, SW

Washington, District of Columbia 20554

*RE: 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, Third Report and Order - MB Docket No. 05-311*

Dear Ms. Dortch,

I am writing to express my serious concern and disagreement to the FCC’s proposed Third Report and Order requiring Local Franchising Authorities (“LFA’s”) to treat cable-related, in- kind contributions as franchise fees subject to the statutory five percent franchise fee cap.

This change would be devasting to the PEG Access Center that I manage and that serves our community in many important ways:

We provide live and archived video recordings of virtually all government meetings. This allows our community transparent access to their government. This access especially serves those who are mobility-challenged or otherwise unable to attend meetings.

We operate a robust TV/media education program in collaboration with Chelmsford Public Schools. In this program, we teach students the skills to be proficient in this media age. Equally important, those students help create high-quality coverage of school sports, concerts and other educational programming to their peers, parents, grandparents and other community members.

Lastly, we give our citizens a platform to express their views to the greater community. In today’s day and age, this communication channel is more important than ever.

The loss of revenue caused by the Order will force municipalities to either divert resources away from core municipal and school services to maintain existing PEG programming, suffer a dramatic reduction in the scope of PEG channels, or lose them altogether.

I believe the FCC is a guardian of the public interest, and yet it is my strong contention that the effects of this order work directly against the public interest. Rather, they amount to a windfall for cable providers eager to shed their civic responsibilities under Federal Law, i.e., the Cable Act of 1994. Further, this FCC Order violates both the letter and the spirit of the contract that is already in place between our municipality and our cable providers – Comcast and Verizon.

I strongly urge you to reconsider.



Sincerely,

Pete Pedulla

Executive Director, Chelmsford TeleMedia

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