



## City of Grand Rapids, Michigan

OFFICE OF THE MAYOR

ROSALYNN C. BLISS  
MAYOR

December 12, 2018

The Honorable Ajit Pai, Chairman  
The Honorable Michael O'Rielly, Commissioner  
The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner  
Federal Communications Commission  
455 12<sup>th</sup> Street, Southwest  
Washington, DC, 20544

*RE: MB Docket No 05-311 In the Matter of 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*

The City of Grand Rapids opposes the FCC's proposed rulemaking which would allow cable companies to assess the value of a wide range of "in-kind" services related to providing public, educational, and government (PEG) channels and to deduct the fair market value from their franchise fee obligations. We agree and support the Comments of the Cable Act Preservation Alliance in the Second Further Notice of Proposed Rule Making (FNPRM).

We appreciate and greatly value our partnership with Grand Rapids Community Media Center (GRCMC). The GRCMC provides a multitude of media resources for the West Michigan community, all of which are available to area residents and organizations on a non-discriminatory and intentionally inclusive basis. The work of the GRCMC ensures that a diverse array of individuals and partner organizations can use and participate in building community through all of GRCMC's media platforms, tools, education opportunities and resources. It introduces local audiences to new voices and ideas on stage, screen and over the air. Our Community Media Center enhances community engagement and creates local connections.

In addition, not all residents can attend meetings or are willing to stream media. We utilize our PEG infrastructure to broadcast City Commission meetings, and other meetings of value, as they occur and replay the meetings throughout the month in English and Spanish. PEG channels ensure the City is using all avenues to communicate with residents and allows residents the ability to participate and have a voice in democracy.

This local presence encourages viewers in Grand Rapids, Michigan to watch cable television as was intended by the 1984 Cable Act – by enhancing local voices, serving local viewers and strengthening our local democracy. By defining “in-kind” support in an overly broad fashion, the proposed rulemaking will shift the fair balance between local and state authorities and cable operators and will force communities to choose between franchise fees and PEG channels.

Furthermore, by allowing cable operators to reduce franchise fee support for local communities if they opt for local channels, it will diminish the ability of PEG channels to serve local communities like ours.

We appreciate your consideration and urge you to protect PEG channels in our community and others and abandon the proposal to treat cable-related nonmonetary franchise requirements as a franchise fee and the modification and expansion of the “mixed-use” rule.

Sincerely,



Rosalyan Bliss