



**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Section 621(a)(1) of the Cable)	MB Docket No. 05-311
Communications Policy Act of 1984 as Amended)	
by the Cable Television Consumer Protection and)	
Competition Act of 1992)	

COMMENTS OF MARSHFIELD COMMUNITY TELEVISION

Marshfield Community Television appreciates the opportunity to file comments on the Second Further Notice of Proposed Rulemaking (“FNPRM”) in the above-referenced docket. We strongly oppose the tentative conclusions in the FNPRM that cable-related in-kind contributions are franchise fees and that local governments have no authority regarding cable operators’ use of the rights of way to provide non-cable services.

Marshfield Community Television (MCTV) is the 501c3 Non Profit Organization that serves the town of Marshfield Massachusetts, a coastal town of 25,000 people thirty miles south of Boston. Since our inception in 2008, MCTV has trained and supported individuals and organizations in creating hyperlocal content about their community.

We support Digital Media and Telecommunications program at Marshfield High School which has over 150 students in it and over the past ten years have taken the students from the program who are interested in going into a communications based

career and have them intern for us during their senior year. We've also worked with the Marshfield Public School Department to create a grant program for teachers district wide that want to incorporate video and related subjects into their teaching. We also cover extra curricular activities such as arts and athletics.

Last and certainly not least we are the conduits for transparent local Government. MCTV covers nine boards and committees on a consistent basis; in addition to that we cover live gavel-to-gavel coverage of town meeting and work with local, regional and state officials to create programming that informs residents about important information related to government.

What makes MCTV unique is its members; our members range in ages, genders, races and backgrounds. We have Ivy League educated lawyers and people who have emotional and intellectual challenges amongst our membership. We also have a substantial set of our membership who are on the autism spectrum. MCTV is the common bond all these people have. They all come in, learn and create programming that is vital to the community in which they live.

The proposed rules in the FNPRM would debilitating to MCTV and the community which we serve. Some examples include:

The reduction in funding would result in a loss of jobs. MCTV currently has a full time staff of five individuals all under the age of forty who contribute to the local economy. These are people who have student loan, mortgages to pay and families to raise. With the reduction in staff, that would also mean the remaining staff would be stretched thin and would have limited time in attempting to meet the needs of our members and the community as a whole.



The reduction in funding would not allow us to support open and transparent government; MCTV would be unable to cover as many Government meetings as we currently do, in addition to that equipment used in the broadcast of government meetings would not be updated on a consistent basis so people watching would not be able to see and hear as well as they should.

One of the longest serving members of MCTV is Road to Responsibility. Road to Responsibility is human service organization that serves individuals with intellectual and emotional challenges. Over the past ten years, individuals from Road to Responsibility have been working with MCTV to create programming about items such as self-advocacy and the Special Olympics.

Local Non Profit Organizations have been a partner of MCTV's over the past ten years. In many ways we serve as the promotional arm for these groups as many of them don't have fiscal ability or knowhow to create promotional material about who they are, what they do and how others can help them. Throughout the typical year, MCTV produces close to thirty high quality promotional videos that local non profits use to help in their promotion; the highlight being the gala video we produce for the Marshfield Boys and Girls Club, a video which if they paid someone to do would cost the club over ten thousand dollars, a price which they would be unable to afford. The reduction in funding would not allow us to serve the local non-profits that serve our community so well.

In closing I want to thank the commission for allowing organizations like Marshfield Community Television to comment. This proposed rule would not only significantly impact organizations like ours but also members, governments, schools and non-profit organizations who we serve.

Respectfully submitted,
Jonathan Grabowski

Executive Director
Marshfield Community Television

November 2, 2018