**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 C-NET, Centre County, PA**

C-NET, the Government and Educational Access Network for Centre County, Pennsylvania appreciates the opportunity to file comments on the Second Further Notice of Proposed Rulemaking (“FNPRM”) in the above-referenced docket. C-NET provides local Government and Educational programming for all of Centre County, Pennsylvania. C-NET is a 501(c) 3 non-profit organization, operating two channels on the Comcast and Windstream Cable systems, as well as online at cnet1.org. C-NET provides programming for Centre County Government, Bellefonte Borough, State College Borough, College Township, Ferguson Township, Halfmoon Township, Harris Township, Patton Township, the Bellefonte Area School District, the State College Area School District, the Centre Region Council of Governments, the State College Borough Water Authority, Schlow Centre Region Library and Penn State University.

C-NET is strongly opposed to the proposed ruling that allows negotiated franchise obligations between cable companies and municipalities related to PEG channels to be deducted from franchise fees. The municipalities which support C-NET do so with franchise fees paid by the cable companies in exchange for the right to use the public rights-of-way.

Any negative impact to these franchise fees would negatively impact the financial support which these municipalities are able to provide to fund C-NET’s operational costs. The programming which C-NET provides to the public is unique in that it provides for a level of transparency in local government which may not be found elsewhere. C-NET provides gavel to gavel meeting coverage for approximately 400 meetings per year. Citizens are given the opportunity to watch meeting coverage in its entirety – without interpretation, summary or “spin”. In an era when the most outrageous sound bite often rules the news cycle, C-NET’s programming is a welcome alternative to residents who truly want the facts and the opportunity to make up their own minds.

C-NET’s election and candidate coverage is one of the most important service we offer to the Centre County community. Candidates for Local, County, State and Federal offices are all invited to participate in interviews prior to each Primary and General Election. C-NET extends interview invitations to all candidates, including major party, independent and third-party candidates, and the interviews are conducted by a member of the local press. The interviews provide an opportunity for the candidates to make their views known to the public at no cost, and encourage engagement and participation in our democracy. As mentioned earlier in these comments, C-NET believes that an informed electorate is essential to our system of government and quality of life.

In addition to election coverage and County, municipal and school district meeting coverage, C-NET records, televises and web streams Military History lectures, Healthy Aging lectures, Public Issues Forums, coverage of local festivals and ceremonies, concerts and sporting events. We provide coverage of events often ignored in other local or regional media, and retain an archive of this programming for the good of the community.

It has long been acknowledged that the provision and support of PEG channels are not franchise fees. The provision of PEG channels is for the public good, and an important component to ensuring an informed electorate. From providing information about new high school construction to the location of a planned gas pipeline, from evaluation of voting machines to conservation easements, and from support for entrepreneurship to infrastructure projects, C-NET is a vital and unique source of public information. C-NET therefore rejects the implication in the FNPRM that PEG programming is for the benefit of the local franchising authority (LFA) or the PEG provider, rather than the public.

C-NET welcomes the Commission to view our programming, all of which is available on cnet1.org.

In closing, it is our position that cable companies use the public rights of way to do business, and the provision of PEG channels is part of their obligation to the public. C-NET believes that PEG organizations exist for the good of the constituencies and communities which they serve, and provisions which support PEG media should not be redefined as “franchise fees”.

Respectfully submitted,

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