

City of Cedar Hill

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DR. CHRIS L. ROSE
Mayor



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AL ARMISTEAD
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RAY L. WILLIAMS
GREG VICK, CITY MANAGER

January 28, 1993 RECEIVED

Federal Communications Commission
Dockets Branch
Docket MM92-266
Room 230
1919 M. Street N.W.
Washington, D.C. 20554

FEB 02 1993

FCC MAIL ROOM

Dear Sirs:

The City of Cedar Hill would like to respectfully submit its comments for late filing, regarding the Cable Television Consumer Protection and Competition Act of 1992 and FCC enforcement regulation.

In reference to the "buy-through" prohibition, the City of Cedar Hill supports this provision and recognizes that the cable operator will not be permitted to discriminate between subscribers to the basic service tier and other subscribers with regard to the rates charged for the per channel or per program basis. It is the City's understanding that a subscriber would only be required to buy basic service in order to obtain the per channel or per program video programming. The basic service tier would include television broadcast signals carried pursuant to the must carry provisions and PEG channels. The city does, however, favor providing the signal of any broadcast station received by the cable operator by any means including satellite transmission if the original signal is one of a broadcast nature such as WGN, TBS, etc.

Turning to the establishment of customer service standards the City of Cedar Hill supports the National Cable Television Associations's (NCTA) "Recommended Industry Customer Service Standards" to be used as a guide in developing Federal standards. Cedar Hill would like the cable operators to pay particular attention to the requirement that a 30 day advance notice be given for rate increases or channel changes.

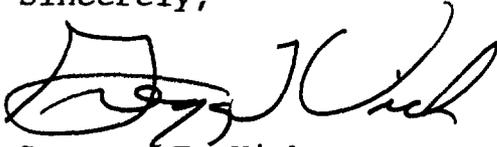
However, without proper rate regulation, the cable operators could use the Act as a means to raise rates and not lower them. Rate regulation should be derived from a benchmark approach presuming that the rates are reasonable and protect the subscribers. The close supervision of rates should be part of the benchmark system. Cedar Hill does support establishing a procedure in which franchising authorities can be certified to "enforce" the administration of the FCC's basic rate regulations.

However, the franchising authority should not be required to file for certification with the FCC if there is a lack of effective cable competition in the cable served area.

Finally, the City of Cedar Hill supports action which would allow the franchising authority to collect appropriate fees from two-way communications when and where applicable. Technology is moving forward to allow two-way telecommunication transmissions through cable lines and the city feels that those should be regulated by the local franchising authority.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory T. Vick". The signature is stylized with a large, looped initial "G" and a long, sweeping underline.

Gregory T. Vick
City Manager

GTV/mmp