

**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 EERO JOHNSON | BELLINGHAM PUBLIC ACCESS TELEVISION**

My name is Eero Johnson and I am a video instructor in the City of Bellingham's public access program. This letter is to express my strong opposition to the tentative conclusion in the FNPRM that the value of cable franchise obligations, such as those that allow our programming to be viewed on the cable system, can be deducted from franchise fees.

The franchise fees support a wide range of services to our City, including our City television station and our public access station. These stations provide vital programming centered on government, education, and community created content. The service that Bellingham Television provides is instrumental in creating an informed and educated public, transparency in government, and strengthening our community voice through public access.

I believe:

- 1) The impact of these reduced franchise fees would severely impact our City television station, forcing the reduction of programming or even the potential loss of the station altogether.
- 2) We have a long-standing agreement from the cable operator that such obligations are not franchise fees.
- 3) That using fair market value to determine the amount to be considered a franchise fee will lead to arbitrary deductions.
- 4) I also reject the implication in the FNPRM that our PEG programming is for the benefit of the local franchising authority or a third-party PEG provider, rather than for the public or the cable consumer.

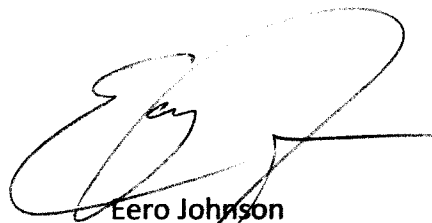
Bellingham Television provides important local programs such as: access to our government in action, programs that showcase the history and culture of the area, and educational programs

on current issues and society. These programs are fundamental to an educated public, well-informed on local and important issues.

As an instructor for our public access station, I see first-hand the benefits public access offers our community. In a society increasingly dependent on information found on television and video, public access gives a voice to those who would never otherwise have a chance to be heard. It is our opportunity to share local stories and interests in a way that no other medium or outlet offers.

There is a saying that I have been thinking on lately: "If you want to go fast, go alone. If you want to go far, go together." I believe the franchise fees and other obligations are a fair exchange for our cable provider to be part of our community. Supporting strong local programming, providing internet to the schools and government buildings, and transparency in government are not only part of the cable providers non-negotiable agreements, but are important components of a strong democracy and part of how we move forward together as a society. While the short-term benefits of renegotiating the fees will diminish, the loss of the vital services they provide will be a heavy cost and felt forever.

I appreciate the opportunity to add my comments to the record of this proceeding.

A handwritten signature in black ink, appearing to read 'Eero Johnson', is written over the printed name.

Eero Johnson  
Director, EJ Visuals  
November 9, 2018