

SPC-TV
25 Cottage Rd.
South Portland, ME 04106

November 9, 2018

The Honorable Ajit V. Pai
Chairman
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai,

I am writing to express my concern about and disapproval of the proposals and tentative conclusions set forth in the FCC's September 25 Further Notice of Proposed Rule Making in *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*, MB Docket 05-311.

South Portland Community Television provides the residents of our city with a window into their local government. The station serves the people of South Portland every day by providing coverage of municipal meetings, events and issues. We provide service to individual community members, local nonprofits, citizens action groups and governmental bodies; all of whom routinely access and benefit from our direct connection to viewers through the medium of cable television. SPC-TV is the platform that residents of South Portland rely on to connect with the issues they care about most.

By defining "franchise fee" in an overly broad fashion to include "in-kind" support, the FCC's proposals will shift the fair balance between cable franchising authorities and cable operators and will force communities to choose between franchise fees and PEG channels like SPC-TV. This is something that the 1984 Cable Act never intended. This skewed definition of 'in-kind' support is disingenuous and misleading. It will erode not only the financial base which makes public access stations possible, but citizens' ability to participate in their communities. Simply put, this Second Further Notice and Proposed Rulemaking amounts to an attack on local self governance and our nation's democratic ideals.

We appreciate your consideration and hope you will protect PEG channels in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

W. Maurice Amaral
Station Coordinator
South Portland Community Television

CC: The Honorable Michael O'Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner