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November 13, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

*RE: 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 No. 05-311*

Dear Ms. Dortch,

As a member of the Broadband Deployment Advisory Committee (BDAC) and as Executive Director of the Georgia Municipal Association, I write to express my strong opposition to the Federal Communications Commission's Second Further Notice of Proposed Rulemaking (FNPRM) regarding cable-related, in-kind contributions as required by local franchising authorities. The Georgia Municipal Association (GMA) is a voluntary, non-profit organization that provides legislative advocacy, educational, employee benefit, and technical consulting services to its members. It is the only state organization that represents municipal governments in Georgia. Currently, GMA's membership totals 521 municipal governments, accounting for more than 99% of the state's municipal population.

In addition to serving as a voting member of the FCC's Broadband Deployment Advisory Committee (BDAC), I also served as Vice-Chair of the Model Code for Municipalities Working Group, served on the Harmonization Working Group, and presently serve on the Rates and Fees Working Group. Most recently, I have been appointed to Chairman Pai's Disaster Response and Recovery Working Group. Throughout my service to the FCC, I have been conscientious to balance the interest of all parties in this process and to be a voice of reason and compromise, while working with the various committees to reach consensus.

The FCC's FNPRM seems to be an attempt to address the imbalance created by the FCC's recent unprecedented action to benefit providers of new wireless technology through the recently-approved Third Report and Order (Order) that has put cable providers at a competitive disadvantage. The FCC should not undermine long standing negotiated agreements that have been of mutual benefit to all parties.

For over fifty years, cable providers have worked in good faith as community partners with local governments to negotiate mutually beneficial agreements that include PEG channel capacity, connections to programming origination points, and complementary cable services to schools and

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other public buildings. These agreements have been negotiated and entered into by willing, amenable parties and reflect local priorities. The FNPRM is a gross overreach into and preemption of signed agreements made between local franchising authorities and cable companies. Cable companies were knowledgeable participants in the agreement negotiations and adoptions. Cable companies also benefit greatly from using public rights of way to provide cost-effective service to their customers.

Georgia cities and cable providers have worked successfully together for decades to forge agreements that are mutually beneficial and meet the needs of local residents. We urge partnership and respect for local decision making, and we urge you to oppose this FNPRM.

If the FCC wishes to level the playing field, it should first look to the cause and that is the FCC's own preemption action on the Third Report and Order. This Order should be rescinded or modified to be consistent with agreements of other users of public rights of way. One industry should not be given preferential treatment and local governments should not be put in a position by FCC action to face claims of discriminatory treatment by the many other users of public right of ways.

Thank you for your consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Larry H. Hanson". The signature is fluid and cursive, with the first name "Larry" and last name "Hanson" clearly distinguishable.

Larry H. Hanson
Executive Director