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February 16, 1993

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: MM Docket No. 92-266

RECEIVED
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Madam Secretary:

On behalf of the National Association of College Broadcasters ("NACB"), we herewith submit Reply Comments on the narrow question of whether the FCC should establish preferential leased access channel rates for not-for-profit programmers.

NACB strongly supports such preferential rates. NACB is a non-profit media association comprised of college TV and radio facilities. NACB member TV facilities help student film and video artist-producers create new work, and bring such work before the public. From this vantage point, NACB sees two interrelated problems: artists have great difficulty in getting innovative work before the public and audiences have no ready means of viewing it on television. Broadcast and cable television largely ignore the works of these innovative student artist-producers. And, when these works are transmitted, the programs are rarely presented in an organized format.

While many colleges have managed to negotiate free access time on their local cable systems, many others have not been as fortunate. NACB believes that leased access cable channels offer a means to increase awareness and distribution of film and video art. However, it is doubtful that organizations such as NACB could afford channel lease rates established for commercial programmers. Thus, the FCC should mandate reduced rates for non-profit organizations.

One of the Congressional purposes in mandating leased access channels is to ensure a diversity of information sources for the public. Encouraging non-profit participation in channel leasing through preferential rates is necessary to accomplish the Congressional mandate.

Respectfully submitted,

By: 
Cary S. Tepper, Esq.
NACB Counsel