**COMMENTS OF**

**NORTHERN BERKSHIRE COMMUNITY TELEVISION CORPORATION**

Northern Berkshire Community Television Corporation (NBCTC) appreciates the opportunity to file comments on the Second Further Notice and Proposed Rulemaking(“FNPRM”) in the above-referenced docket.

NBCTC is a local Public, Educational and Government Access Corporation located in Northern Berkshire County in Western Massachusetts. We provide our communities of Adams, North Adams, Cheshire and Clarksburg access to television production equipment, training, technical support and cablecast time on our three PEG access cable channels to create programming for the local community. The television programming created by NBCTC and by members of our communities is carried to over ten thousand cable subscribers in Northern Berkshire. These programs include many genres such as general interest talk shows, music, religion, political, local sports, education, community events and festivals and much more. Several of the programs produced here at NBCTC have gone on to win prestigious awards on local, state and national levels.

Northern Berkshire Community Television Corp. is uniquely important to our communities for geographic reasons as well. Being nestled in the valleys of the Berkshire Mountains the average household here is unable to receive over the air broadcasts from local stations. To further complicate matters the entire area is included in the Albany, NY market so the local cable company restricts which Massachusetts channels it carries while the Albany stations mostly ignore any local coverage. NBCTC is crucial to filling the gap by offering our local communities access to important coverage of what is happening in local politics, the local schools and events that are important to our local ethnic, religious and community organizations

We feel that the tentative conclusion in the FNPRM that cable-related in-kind contributions, such as those that allow our programming to be viewed on the local cable system, are franchise fees is meant to further marginalize our PEG Access facility in a short-sighted attempt to boost an already profitable industry’s bottom line. The impact of this to our budget would be catastrophic and will most certainly mean a loss of staff, hours of operation and a marked reduction in the ability to serve a community that has grown to depend on the services we offer.

We reject the implication in the FNPRM that PEG programming is for the benefit of the local franchising authority, or a third-party PEG provider, rather than for the local community or the cable consumer. As noted above, NBCTC provides valuable local programming that is not otherwise available on our cable system or in other modes of video delivery such as satellite.

We appreciate the opportunity to add to the record in this proceeding.

Respectfully submitted,

David M. Fabiano

Executive Director, Northern Berkshire Community Television Corp.

Union Street Station, Unit 1A

North Adams, MA 01247

November 13, 2018