

**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 GREATER NORTHSHIRE ACCESS TELEVISION, INC. (GNAT-TV)**

Greater Northshire Access Television, Inc. (“GNAT-TV”) appreciates the opportunity to file comments on the Second Further Notice and Proposed Rulemaking (“FNPRM”) in the above-referenced docket. GNAT-TV, founded in 1995, is a not-for-profit community media center providing Public, Education and Government programming for eleven towns in rural Southwestern, Vermont. We reach nearly 7000 households via the Comcast Cable system and many thousands of constituents via our online outlets. We provide a platform for civic and cultural engagement, hyper-local news and information and high quality youth education programs. Residents, government entities, community organizations and schools within our rural eleven-town service territory produce and broadcast non-commercial television programs. GNAT maintains community television studio facilities, lends high quality video equipment and provides technical training to the community. GNAT maintains a vibrant youth program including internships, media production camps and in-classroom training. GNAT-TV partners with local schools and other local non-profit organizations to provide and supplement programs in the media arts. GNAT-TV strongly opposes the tentative conclusion in the FNPRM that

cable-related in-kind contributions, such as those that allow our programming to be viewed on cable systems, constitute franchise fees.

GNAT-TV derives the majority of its funding from franchise fee payments. A reclassification of in-kind contributions, which may lead to reduction or elimination of this funding, would be devastating to our small communities. Our citizens rely on our programming to be informed about their local governments and school boards, to share their local news and information, and to gain new media skills that can impact their productivity and value in the workforce. Reclassification of in-kind contributions goes against decades of long standing structures present in our agreements with cable operators and we are concerned that this reclassification would create arbitrary deductions from the franchise fees in a manner that would severely impact our local community. Commercial television stations in Burlington, VT and Albany, NY rarely cover our region. GNAT-TV's local programs and services are the only local resource available and vital to keeping our citizens informed, and able to make educated decisions regarding issues that impact the community.

We reject the implication in the FNPRM that PEG programming is for the benefit of the local franchising authority (LFA) or a third-party PEG provider, rather than for the public or cable consumer. As demonstrated herein, GNAT-TV provides valuable local programming that is not otherwise available on the cable system or in other modes of video delivery such as satellite. In 2017 alone, GNAT-TV produced and distributed 839 local programs, including 233 local Government meetings, and 204 local news segments. Community members reserved our facilities and equipment 622 times to produce their own programming and GNAT-TV trained 565 local citizens. Yet the Commission tentatively concludes that non-capital PEG requirements should be considered franchise fees because they are, in essence, taxes imposed for the benefit of

LFAs or their designated PEG providers. By contrast, the FNPRM tentatively concludes that build-out requirements are not franchise fees because they are not contributions to the franchising authority. The FNPRM then requests comment on “other requirements besides build-out obligations that are not specifically for the use or benefit of the LFA or an entity designated the LFA and therefore should not be considered contributions to an LFA.”<sup>1</sup> PEG programming fits squarely into the category of benefits that do not accrue to the LFA or its designated access provider, yet the Commission concludes without any discussion of the public benefits of local programming that non-capital PEG-related provisions benefit the LFA or its designee rather than the public at large.

We invite the Commission to view the work of GNAT-TV and our community producers at [www.gnat-tv.org](http://www.gnat-tv.org). The work exemplifies the vital role community media and PEG programming plays in the civic and cultural life of our small communities. Topics include local history, financial education, election results and candidate forums, children’s programming, community event coverage, and local resource information to name a few.

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

Respectfully submitted,  
Tammie M. Reilly  
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November 14, 2018