

**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 CAMPBELL COUNTY MEDIA CENTRAL

Campbell County Media Central, a service of the Campbell County Cable Board appreciates the opportunity to file comments on the Second Further Notice and Proposed Rulemaking ("FNPRM") in the above-referenced docket. Campbell County Media Central is located in Northern Kentucky, a neighbor to Northern Kentucky University. We operate 7 cable stations, one of which is run by NKU and two other channels are shared with the four school districts in our county. Campbell County Media Central operates a full government channel, dedicated to the thirteen local governments we serve. We provide gavel to gavel coverage of all of their government meetings. We operate CCMC which is a facility produced programming channel, including local sports, Veterans stories, music festivals, community forums, cooking programs, conservation programs, historic presentations, documentaries and many other types of programs we produce in conjunction with organizations we have partnered with. We have two other channels that are filled with programming produced by local residents and organizations producing their own programming. Campbell County Media Central 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 the cable system, are franchise fees.

Our channels are extremely important to our community. Since our facility took over the operations of these channels from the cable company in 1999, they have only continued to add in their value to our community. The multiple cable companies that have operated in our county have always tried to get out of the agreement of providing PEG since the beginning. They failed to provide adequate operations and education about the facility during the period they were required to provide it. When it came time for renewal back in 1996 they wanted to dismantle it. Our community came out strong in support and our board took over the operations. To say the usage of the facility grew exponentially would be an understatement. Campbell County Media Central is an important asset to the community. We are the only true local programming in our area. We are located directly across the river from Cincinnati. Northern Kentucky is the shadow of Cincinnati in all of the television coverage. CCMC provides true local television for Campbell County, Kentucky.

The impact to our operations of this ruling will be detrimental to operations of our facility. We operate on a shoestring budget. The arbitrary deductions that would take place under this ruling would dramatically impact what we are able to do. We are a small staff of three full time and one part time. What we have been able to accomplish is nothing short of amazing. We provide some of the only television coverage relevant to our community or of interest to them to even watch with a strong impact. From capturing and preserving Veterans' stories to providing an informed citizenry through government meeting coverage and debates to football and basketball games, instructional videos and everything in between. Not only do we provide excellent programming but we also provide workforce training and internship opportunities to local college students.

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 the cable consumer. As demonstrated above, Campbell County Media Central provides valuable local programming that is not otherwise available on the cable system or in other modes of video delivery such as satellite. 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.”¹ 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 for themselves the important benefits provided by local content in PEG programming. The first link below is to a video capturing WWII Veteran and local resident Chester Hardwood Henderson, sharing his experience as part of Patton’s Third Army around the Battle of the Bulge. Comments on the program have been such things as “amazing...what a treasure.....great to preserve his story...beautiful tribute...awesome interview” The second and third links are for coverage of a high school football game we won awards for. Members in our community would not receive coverage of their athletic events if it were not for

¹ FNPRM ¶ 21.

our facility. It has been priceless to the students and community. The last link is to a state senate debate for a highly watched state senate race between Wil Schroder and Rachel Roberts. Our community was able to view the debate and form their own opinion on which candidate they felt would be best fit for the state senate seat. We receive a large amount of positive feedback that our coverage of events like this truly help make informed voters.

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

<http://campbellmedia.org/video/11761/> - Veterans in Their Own Words

<http://campbellmedia.org/video/10589/> - Campbell County vs Boone County Football

<http://campbellmedia.org/video/11615/> - Campbell County vs. Ryle High School Football

<http://campbellmedia.org/video/11655/> - Debate for State Senate District 24

Respectfully submitted,

A handwritten signature in dark ink, reading "Jennifer Teipel". The signature is written in a cursive, flowing style.

Jennifer Teipel
Executive Director
10 Hilltop Drive
Highland Heights, KY 41076

November 14, 2018