11/14/18

The Honorable Ajit V. Pai  
Chairman  
Federal Communications Commission

455 12th Street, Southwest  
Washington, DC, 20544

Dear Chairman Pai,

We write to express our concern about and disapproval of the proposals and tentative conclusions set forth in the FCC’s September 25 Further Notice of Proposed Rule Making in *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 05- 311.

Salem Community Television is a Town Public - Educational - Government organization

that runs the community media center for the Town of Salem, New Hampshire.

We are dedicated to providing the base necessities for functioning community media – physical space, staff, up-to-date equipment, local governance, broad multimedia training

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The Town of Salem has one MVPD provider: Comcast provides three cable channels for use by Salem Community Television.

SLC-6 (Salem Learning Channel) - the Educational Channel,

SCTV-17 (Salem Community Television) - the Access Channel, and

SGC-23 (Salem Government Channel) - for cablecasting local municipal meetings and town government information.

These channels are placed on the lowest tier of cable provided. If residents only have

analog television sets they require a digital converter box to receive this basic service.

SCTV has been in operation for almost 42 years, with our first channel starting to cablecast in 1971. In the mid 1980's an educational channel was added, and a government channel completed the PEG Access channels in 2005.

Unfortunately, our provider does not allow for distribution of our programming schedule

on the system’s on-screen program guide. Residents must navigate to our web site to view our

programming schedule, though we can provide all necessary data required for inclusion on an

on-screen program guide.

SCTV's PEG programming has grown in utilization, viewership, relevance, variety, and quality.

Significant investment in station infrastructure was made following an increase in the franchise fee from 3% to 4% in 2005, allowing physical plant and computer upgrades.

Challenges in the NH legislature to change franchise regulation were defeated, which allowed local municipalities to continue individual negotiations with the cable company. In many cases, state wide boards have been detrimental to PEG access channels, causing many to be disbanded due to lack of leverage on local issue.

In the last 12 years, SCTV has grown to embrace new technologies to become an information hub for the community, integrating programming, social media, and the internet to exchange ideas and information to the surrounding community.

A Video On Demand system was installed in 2006 which allows flexibility to the residents on when shows can be viewed. 3 channels are streamed on the web, so all residents connected to the internet can view the government meetings as they happen.

Salem Community Television reports on local elections, covers local athletics events, parades, reports on municipal projects, creates new and varied programs by our residents, and gives local residents a destination to learn what is going on in their community, and a way for local groups to communicate their message to the rest of the community.

One issue we've been discussing with Comcast is compression of the signal, and signal breakup because of the high level of compression that has been used for the PEG channels. We're in discussions with them to allow a higher bandwidth and HD signal availability, but currently there is no plan in place to allow the higher quality signal our channels send out to be picked up by people at home. Until there is a standard in place with Comcast, we'll continue to be sending a higher quality signal to the Comcast headend than makes it into the home.

PEG Access channels have survived many challenges, but remain a vital link for local groups, families and individuals to communicate with the town and each other. We look forward to new challenges with future technologies and to continue to serve this community for Salem NH, and hope the FCC recognizes the need for our services and helps us achieve these goals for our community.

This local presence enables the residents of our Town to watch uniquely local programming about their community and local events and issues of interest to them. And that was the intent of the PEG provisions of the 1984 Cable Act – to enhance local voices, serve local community needs and interests, and strengthen our local democracy. By defining “franchise fee” in an overly broad fashion to include “in-kind” support, the FCC’s proposals will shift the fair balance between cable franchising authorities and cable operators and will force communities to choose between franchise fees and PEG channels, – something that was never the intent of the Act.

We appreciate your consideration and hope you will protect PEG channels in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

**Thomas Giarrosso**

**Executive Director**

**Salem Community Television**

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**Salem NH 02079**

**(603) 893-7069 x-1135**

**11/14/18**

CC: The Honorable Michael O’Rielly, Commissioner

The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner