

I oppose the conclusions of the FNPRM 05-311. While I understand that the local franchising process is cumbersome for large cable providers, it is relevant and necessary for the communities they seek to deliver services to. It has been successful in the past and it will continue to be important in the future.

This lever of self determination is beneficial to individual communities as the content is to the cable operators themselves. The worth of local cable access is incompatible with the framed redefinition of "in-kind" contributions. The proposed new treatment of these fees removes the support for a vital piece of local communication and information infrastructure.

Beyond hours of original programming, of which there are thousands across the country, the value of the existing rules can better be assessed as part of a checklist of a healthy community: clean air, fresh water, well paved roads, good schools, local communication network. Moreover, the FNPRM 05-311 has it backwards - the LFA's franchise fee would in the fact best be represented as the whole of broadband services, not just cable.

Local access cable provides consumers with more original programming than most other channels. Easton Community Access Television in Easton, Massachusetts is the cable access station where I work. We utilize the franchise fees to generate over 17 hours of cablecast content week. We serve the schools, town government, the Chamber of Commerce, the Lions Club, Veteran's organizations, Historical Society, Council on Aging, area colleges and more. It is the go to source for local information for thousands of residents.

The following link is a sweeping example of the unique, irreplaceable value of local content that would be eradicated with the recommendations laid forth in the FNPRM 05-311. This is a collection of videos from community cable access stations from around the country. There are almost 5,000 local parades filmed and archived by local cable access stations. There is no better record of our communities in the digital networked world than those facilitated through the funding provided by the existing LFA agreements. <https://bit.ly/2TilCE2>

For all of this, cable operators don't even have to pay for the content, the franchise fees are passed through from the consumer. The "in-kind" support that the FNPRM 05-311 seeks to revoke is a death blow to community as expressed through electronic communications. Obligating cable and telecommunication operators to dedicate a sliver of their resources, separate from these franchise fees, to localism on their expanding global content and information networks is a fair mandate in the public interest. We must reject the conclusions of the FNPRM 05-311.

Jason Daniels
9 Ruth Dr.
Framingham, Mass