

**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 THE CITY OF GARLAND, TEXAS

The City of Garland, Texas (“Garland”) appreciates the opportunity to file comments on the Second Further Notice of Proposed Rulemaking (“FNPRM”) in the above-referenced docket.

Garland is a major suburb of Dallas, Texas. Garland has embarked on an effort to provide transparency and modern-day access regarding its operations to its more than 235,000 residents. While people still like to personally attend and participate in meetings and events relating to the functions of their local government, Garland is far better able to reach more of its citizens by providing modern communications options in the form of cable and internet presentations of the meetings of its City Council and the boards and commissions that make decisions and recommendations regarding the services provided to the people. Currently, Garland is studying the possibility of expanding its communications outreach programs by making more meetings and events available on its cable channel and online. The FNPRM would limit if not curtail those outreach efforts by, in practical effect, allowing cable providers to discontinue paying the PEG fees that are used to fund such programs. Garland opposes any rule that would allow PEG funds to be deducted from franchise fees, thereby essentially eliminating those fees.

Garland utilizes PEG fees to support government transparency and allow more access to the local government process. Without the revenue from these fees and the use of PEG channels, Garland will not be able to provide live and replayed access to various government meetings and proceedings or important video messages about local government services and resources. PEG fees in Garland cover the costs of broadcast equipment and facilities for producing and distributing this vital information. Technology is constantly changing - our facilities must keep up in order to be of use to our residents. Without the ability to utilize this funding source for these expenses, we will not be able to maintain this important service.

The public's access to the affairs of its local government has been enhanced considerably by the programs Garland has implemented with the use of PEG funds. Accordingly, Garland respectfully urges the Commission to reject the potential reduction in PEG services provided to its citizens.

Respectfully submitted,

Brad Neighbor
City Attorney
City of Garland, Texas
200 N. Fifth Street, 4th Floor
P.O. Box 469002
Garland, Texas 75046-9002
(972) 205-2380
(972) 205-2389 [FAX]
bneighbor@garlandtx.gov