



November 27, 2018

The Honorable Ajit Pai, Chairman  
The Honorable Michael O’Rielly, Commissioner  
The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner

Chairman  
Federal Communications Commission  
455 12<sup>th</sup> Street, Southwest  
Washington, DC, 20544

Dear Chairman Pai,

I am writing on behalf of the Vermont Access Network (VAN) to support the Comments of the Cable Act Preservation Alliance (“CAPA,” File ID 1114050901562) and to disapprove 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.

VAN represents its state’s 25 Public, Educational, and Governmental (PEG) Access Centers. Collectively, we employ over 100 people and produce over 18,000 hours of original local content each year. Our member centers provide valuable links between residents and their governments, schools, libraries, and non-profit organizations. We also provide the equipment, training, and channel time for Vermonters to create their own content and distribute it via a unique and vibrant public forum. In cities and towns where other forms of community media have been eliminated entirely or absorbed so fully into national conglomerates as to be unrecognizable, our state’s PEG Access Centers are frequently the last such connection residents have to the places where they live.

The presence of PEG Access enables Vermont residents to watch uniquely local programming about their community and 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 Access in our Vermont communities and other communities throughout the country by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Christopher'.

Kevin Christopher  
President