

November 30th, 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 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai,

The Intercommunity Cable Regulatory Commission ("ICRC") is writing to support the Comments of the Cable Act Preservation Alliance ("CAPA") 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.

Located in Southwest Ohio, The **ICRC** was established in 1979 as a regional council of governments and currently provides PEG access services to **23** municipalities in the Cincinnati area. Our consortium consists of cities, townships and villages with a combined population of over 67,000 households. All of our member communities are served by Charter Communications (Spectrum) and a majority are also served by Cincinnati Bell reaching a combined total of over 40,000 subscribers. The ICRC manages five channels on both cable systems, and annually produces over 500 programs providing more than 3000 hours of programming. Below is a brief outline of the PEG services we provide to our members.

- **Public Access:** ICRC provides media production training to the citizens of our member communities. Residents can learn the techniques needed to produce their own TV shows. Local community groups, religious organizations and other non-profits can submit their programming for playback on our channels. We also cover numerous civic and cultural events including parades, festivals, musical performances, ground breaking ceremonies, award presentations, youth sports and much more.
- **Educational Access:** Within ICRC's 23 member communities there are 16 school districts. We provide coverage of board meetings, educational seminars, public forums, performing arts, graduations and numerous sporting events throughout each school year. We have built partnerships with several high school media programs, providing production training and internship opportunities. We have also been able to provide grants and other resources.
- **Government Access:** Each month, ICRC cablecasts gavel to gavel coverage of over 40 government meetings. In addition, we cover events such as mayor and state of the city addresses, town hall meetings and public hearings. During local election years, we cover forums and debates as well as inaugural ceremonies. Also, we invite all candidates to our studio to record a brief introduction video that we playback several times on our channels leading up to election day. We also produced training videos for our various police and fire departments.

I encourage you to take a few moments to watch this short video: <http://icrcvtv.com/video/peg>

These invaluable PEG services we provide, enable the residents of our member communities the ability 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 communities and others by choosing not to adopt many of the proposals in the Further Notice of Proposed Rulemaking.

Sincerely,



Tim Neumann
Executive Director
ICRC