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Chairman Ajit V. Pai
Federal Communications
Commission 455 12th Street,
Southwest Washington, DC, 20544
RE: MB 05-311

Dear Chairman Pai,

11/29/18

We are writing to support the Comments of the Cable Act Preservation Alliance ("CAPA") and to strongly 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. The FNPRM is so vague and ill-defined it will result in municipal franchise holders being forced choose between sacrificing one public interest service over another. The level of damage will be determined by the whims of cable operators who are given free rein to set arbitrary values on forms of "in-kind support" which are now redefined in defiance of the intent of the Cable Act. This FNPRM is merely an invitation for lengthy litigation, nothing will be gained by this.

The Community Media Center of Marin serves the County of Marin and 11 different municipalities including the schools and 250K plus residents of the county. We operate the Public, Educational and Governmental cable channels and provide training and facility access to all residents. We partner with non-profit organizations, work with schools throughout the County and run our own youth programs. Our media education programs are unique within the County and the resulting government transparency, free speech and hyper-localism that our programming provides residents is not available elsewhere.

If allowed to stand, the FCC's FNPRM for 05-311 will result in the end to our work at the Community Media Center of Marin. The local PEG channels, vital to so many in the community, will go dark and be lost forever. We are not alone, this FNPRM will negatively impact more than 300 PEG channels throughout California and result in the loss of more than a thousand related non-profit, educational and government jobs. Across the country, the cumulative total of lost jobs could number in the tens of thousands. This fallout will be the unintended and very real consequence of this FCC FNPRM, we can only assume this was not your original intent.

The FCC's mission cites four strategic goals, three of which are external to the agency;

- 1) Promoting Economic Growth and National Leadership
- 2) Protecting Public Interest Goals
- 3) Making Networks Work for Everyone

PEG centers around country, are in fact your partners in achieving these goals, we work to implement these very same goals locally every day, seven days a week. We urge you to reconsider and withdraw this ill-advised FNPRM.

sincerely,

Michael Eisenmenger
Executive Director