

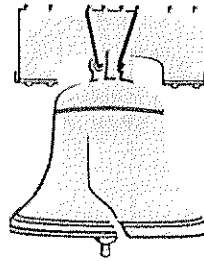
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CHARTER TOWNSHIP OF INDEPENDENCE

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November 27, 2018

The Honorable Ajit V. Pai
Chairman
Federal Communications Commission
455 12th Street, Southwest
Washington, DC, 20544

Dear Chairman Pai:

The Charter Township of Independence writes to express concern about and disapproval of the proposals and tentative conclusions set forth in the FCC's September 25 Further Notice of Proposed Rulemaking 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.

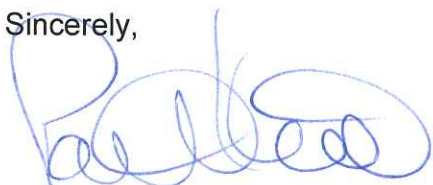
Independence Township, according to the 2010 Census, has a population of 34,681 residents. In recent years our Township and school district, Clarkston Community Schools, formed a partnership with Independence Television (ITV), allowing for an increase in higher quality content in the following areas: televising meetings, high school sporting events, community events, helping the community make their own shows, and other videos.

The value of having PEG in our community is tremendous, as it has allowed for greater government transparency and for hyper local content to be created and enjoyed. Independence Television works with three unique townships/cities: Independence Township, the City of the Village of Clarkston and Springfield Township. ITV collaborates with several departments within those organizations, such as Parks Recreation and Seniors. Independence Television is housed inside of Clarkston High School allowing for greater collaboration with the school district through their media program. ITV also works with our local library, Clarkston Independence District Library, as well as with entities like the Clarkston Area Chamber of Commerce and many local businesses. These local governments, businesses, non-profits, and community members all benefit from PEG through greater transparency and information distribution.

This local presence enables the residents of Independence Township, the City of the Village of Clarkston and Springfield Township to watch uniquely local programming about their community, local events and issues of interest. That is 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.

Independence Township appreciates your consideration and hopes you will protect PEG channels in our community and others by choosing not to adopt many of the proposals in the Further Notice of Proposed Rulemaking.

Sincerely,



Patrick J. Kittle
Independence Township Supervisor

CC: The Honorable Michael O’Rielly, Commissioner
The Honorable Brendan Carr, Commissioner
The Honorable Jessica Rosenworcel, Commissioner