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December 6, 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,

My name is Christine Winge and I am the Executive Director of Access Monterey Peninsula, a nonprofit Community Media Center serving the residents and local jurisdictions of Monterey County on the Central Coast of California. We write to support the Comments of the Cable Act Preservation Alliance (“CAPA”) and to strongly oppose 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 impact of such a misguided conclusion would eviscerate our budget and fatally harm our existing operations. More importantly, communities we serve would lose support for public health and safety, for education, for economic development, for culture and arts, and for informed civic engagement.

Since Access Monterey Peninsula’s inception, private commercial cable operators have agreed to support local non-commercial channels, institutional networks, transmission services, promotional support and other in-kind benefits beyond their franchise fees and PEG support as part of their overall obligation to serve the communities from which they profit. In return, the cable operators receive direct access to our public rights of way, and to our homes.

The FNPRM implies that non-commercial community access media is merely a benefit to the local franchising authority or PEG access operator. We reject that implication in the strongest possible terms and would argue that Public Education and Government access (PEG) media are essential social infrastructure serving a multitude of essential functions for the public, for education, and for local

government purposes. Local non-commercial access channels, network connections, transmission services, promotional support and other public benefits directly reach the communities served - providing support for public health, safety and community resilience; for education, training and lifelong learning; for economic opportunity and the marketplace of ideas; for diverse culture and arts; and, for civic engagement. These community benefits are designed to meet local needs and interests with the local franchising authority acting on behalf of local residents to ensure that private commercial operators meet their obligations as originally agreed. As such, they should not be considered contributions to the local franchise authority as they are not specifically for the use or benefit of the franchise authority or their designated community access provider - but rather to meet purposes identified by locally accountable means.

Access Monterey Peninsula's presence enables the residents of our county to watch uniquely local programming about their community and local events and issues of interest to them. That was the original 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 many local communities to choose between franchise fees and PEG channels, something that was never the intent of the Act.

Thank you for the opportunity to add our perspective to the record in this proceeding. We appreciate your consideration and hope you will protect PEG channels in our community and others by choosing not to adopt many or all the proposals in the Further Notice.

Sincerely,

A handwritten signature in dark ink, appearing to read "Christine Winge", with a stylized, flowing script.

Christine Winge
Access Monterey Peninsula
Monterey, CA