**Federal Communications Commission**

**Washington, D.C.**

**Comments to Notice of Proposed Rulemaking**:

*In the Matter of Implementation of Section 621(a)*

*of the Cable Communications Policy Act of 1984 as* **MB Docket 05-0311**

*amended by the Cable Television Consumer*

*Protection and Competition Act of 1992*

**COMMENTS OF LINDA JOY SULLIVAN,**

**REPRESENTATIVE, VERMONT HOUSE OF REPRESENTATIVES**

I am a member of the Vermont House of Representatives. I represent a district comprised of five towns in South Central Vermont. Our towns are rural and far from major media centers. My district is nestled between Burlington far to our north (2.5 hours away by automobile), Albany to our southwest (1.75 hours away) and Springfield, Massachusetts to our southeast (2+ hours away).

As a result of our lack of proximity to regional media centers, news pertinent to our district is rarely if ever featured on television outlets serving Albany, Burlington and Springfield. Instead, for local news, we must rely almost entirely on coverage supplied by GNAT-TV, a not-for-profit community media center which provides public, education and government programming for eleven towns in rural Southwestern, Vermont.

I write to comment on the rule making proposal that would allow our only cable TV provider, Comcast, to reclassify and value for itself certain in-kind contributions, which could potentially be used as an entire substitute for community access franchise fee payments now being made to GNAT-TV. The proposal as I understand it has the potential of leading to a substantial reduction or even the elimination of franchise fee funding now being received by GNAT-TV.

Whatever the extent of the reduction actually realized by GNAT-TV should the new regulations be adopted, I can attest that *any* reduction in the franchise fee payments will likely compromise the important role GNAT-TV now plays in the communities it serves. GNAT-TV is everywhere – it provides coverage of our local town and school board meetings; it runs highly informative news and public interest pieces featuring local business and community leaders; it has partnered with our local schools in providing educational opportunities; it provides supplemental online programming for non-Comcast subscribers; GNAT-TV has allowed its facilities to be used by community groups looking to produce content; most importantly it sponsors and broadcasts virtually all of our important debates and public events. Last year it ran close to 1000 broadcasts. It is run professionally, by serious journalists who care about the mission of the franchise. GNAT-TV is a critical institution in these parts. It directly contributes to our civic and cultural vitality. The rule making proposal, if adopted, will in my opinion, and in the eyes of many of my constituents, pose a direct and immediate threat to the vibrancy of our communities.

The benefits provided by GNAT-TV, then, predominantly accrue to the public. The franchise fee payments do not represent some form of windfall to GNAT-TV or to our local franchise authority. It is not too dramatic to say that the franchise fee is the lifeblood of GNAT-TV, without which our communities – the public – will directly suffer.

I urge the Commission in the strongest terms to reject the proposed rulemaking

Respectfully submitted,

Linda Joy Sullivan

Representative (Ben-Rut District)

Vermont House of Representatives

December 6, 2018

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