**Center for Digital Art**

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December 10, 2019

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,

We write to support the Comments of Brattleboro Community Television, Inc. (File ID 1113560010350) 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.

The Center for Digital Art is a 501c3 nonprofit organization founded by my wife and I in 1998 with the purpose of creating educational opportunities in film and art to the Brattleboro and Southern Vermont residents. Since it’s founding, CDA has partnered with the Windham Regional Career Center to offer classes and workshops in film and digital media to High School students and adults. Additionally, we have partnered with local organizations to facilitate work and creative opportunities to our students and graduates. To that end, BCTV has proved to be an invaluable resource. Several of our students and graduates have found part and/or full time employment at this wonderful organization – an organization that not only benefits our organization, but the community and environs with creative programming and news. At a time when media outlets and news organizations have become more and more centralized and oftentimes fall short of providing significant access to local populations, BCTV offers opportunities to re-establish contact with local issues and concerns. It does this without any other agenda than safeguarding channels of expression regardless of opinion and political agenda, and to that end significantly contributes to maintaining our Democracy.

This local presence enables the residents of Brattleboro and Windham County to create and 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 – something that was never the intent of the Act – and could ultimately result in such reduction in franchise fees as to defund PEG Access in our state.

We appreciate your consideration and hope you will protect PEG Access in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,

Michel Moyse

Director, Center for Digital Art