

December 11, 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,

We write to support the Comments of the Cable Act Preservation Alliance (“CAPA,” File ID 1114050901562) 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.

As an independent producer, whose diversity advocacy programming has won 6 regional and 2 national awards through the Alliance for Community Media, GNAT-TV (our local community media organization) has been an invaluable asset to our community. They have provided studio space, equipment and professional production support to independent content providers to produce shows of local interest and entertainment. The potential loss of funding for this valuable community asset would be devastating for those of us who work to present our creative vision through local media.

This local presence enables the residents of our town to 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 and will force communities to choose between franchise fees and PEG channels – something that was never the intent of the Act.

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,

Steve Dunning