12 December 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 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.

So many important local events and artistic or community programs are covered by our local television station, BCTV. They also produce documentaries and musical videos. BCTV has sponsored and supported local students at area colleges and high schools to learn media production work in a quality television studio with professional supervision. The local station is a critical institution in our community, one real pillar of democracy in Southern Vermont.

This local presence enables the residents of Brattleboro, Vermont 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,

Dr. John Ungerleider

Professor, Community College of Vermont