December 13, 2018

The Honorable Ajit Pai, Chairman  
The Honorable Michael O’Rielly, Commissioner

The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner

Federal Communications Commission

455 12th Street, Southwest  
Washington, DC, 20544

*RE: MB Docket No 05-311 In the Matter of 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*

BRIC supports the Comments of the Cable Act Preservation Alliance (“CAPA”) in the Second Further Notice of Proposed Rule Making. We oppose the tentative conclusions the FCC reaches in the proceeding because of the damaging impact they would have on our community if enacted.

BRIC is the Public Access operator for the Brooklyn, a community of nearly 3 million wonderful people. Our channels are home to hundreds of religious and spiritual communities of breath-taking diversity. Programs on Brooklyn Free Speech Television channels include every denomination of Christianity imaginable as well as both Orthodox Judaism and non-secular. Native American spirituality sits beside Islam- including American and Pakistani-American versions. Buddhism, Hinduism, Yoruba, secular-Humanism and atheist share these channels. Services are in dozens of languages, including Russian, Haitian Creole, Albanian, Mandarin, Spanish and English. Many churches use their cablecasts to reach sick and home-bound members who cannot worship in person.

We are the embodiment of the first amendment, but not only as the home of free speech. We also give life to the clause that protects the right to worship freely the God of one’s personal choice. We are a model of the clause that protects free association, a safe place that teaches the tolerance that is central to expression of religious life in America.

Brooklyn Free Speech Television truly strives to be the meadow in which the lion may lay peacefully with the lamb.

Public Access uplifts the potential of cable television as was anticipated by the 1984 Cable Act. By changing the decades-old definition of “in-kind” support in an overly broad fashion, the rule-making will *rend* the fabric of long-established communities of faith by allowing cable operators to arbitrarily reduce franchise fee support. The FNPRM diminishes the ability of PEG channels to serve communities such as ours. We ask that it not be adopted.

Thank you.

Sincerely,

Kristina Newman-Scott Anthony Riddle

President Vice-President, Community Media