December 14, 2018

The Honorable Ajit V. 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 Competitions Act of 1992*

We are writing in support of 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 their impacts on our community.

For many years, I have been videotaping our church worship service each Sunday, editing the video, bringing it to our local cable station, and airing it on a time slot provided by our community television station. People have a choice of viewing this service at three different times each day for each week’s broadcast. People in our Avon Lake viewing area can watch these services if they have been traveling, have been sick, are shut-in and unable to attend a church service, or are just interested in viewing the service. Our cable station has other local producers that create programs on a variety of topics, such as local history, church services, civic organizations programs, services provided by our local fire and police departments, exercise programs, and other topics. These programs are also aired three times daily for a period of one week. Each week a new set of programs is broadcast on each of the government, public access, and educational channels. Each of the Monday city council meetings and well as other sessions are recorded and then aired each day. No national or major city television station would be aware of all of these local events or would want to provide the time to broadcast them. Each local television can provide the unique opportunity to share events in the life of each community with its viewers. Employees of our cable station, as well as many civic volunteers, leaders, and organizations, work with compassion and diligence to provide programs, services, and events at a local level to involve and inform the local citizenry. If community residents cannot attend events, the local television allows the citizens to experience the fireworks display, the homecoming and Memorial Day parades, concerts in the park, council ward meetings, speakers, high school commencement, and other celebrations unique to each town and city in the country. Residents can feel a greater pride in their community if they well connected and well informed. The community benefit to its individuals is not usually measured in monetary value, but in the enrichment of the minds and hearts of its citizens.

This benefit for people was what was intended when Congress set-up the Cable Act. PEG Access does not solely benefit a local government or franchising authority; it benefits and strengthens the community as a whole.

By allowing cable operators to reduce franchise fee support for local communities if they opt for local channels, the FNPRM diminishes the ability of PEG channels to serve communities such as ours. Please do not adopt it.

Thank you.

Sincerely,

John P. Runyan