

12/13/18

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”) 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.

Community Television of Santa Cruz County (CTV) is a 501c3 non-profit organization that fosters dialogue, civic engagement and self-expression through television, the internet, and other electronic media.

Community Television provides services to the county of Santa Cruz, California.  As of 2015, Santa Cruz County had a population of 274,146 of which approximately half (134,164) of the population lived in unincorporated areas, meaning the county has a significant rural population.  The County is mountainous and has **no broadcast television stations**.  Citizens depend on Comcast in the northern part of the county and Charter in the southern part.  Cable channels carry out of the area programming. The only in-county originator of programming is Community Television of Santa Cruz County.

County ethnicity is: White: 58.4%, Hispanic: 33.4%, Black or African American: 1.4%, Native American or Alaska Native: 1.8%, Asian: 4.8% and Native Hawaiian and other Pacific Islander: (0.2%).  There are 94,219 households in Santa Cruz county. 47.1% of those households are married couples and 62.7% of all households are family households. The average family size in Santa Cruz is 2.72 people.

Community Television dedicates one of its 3 channels to government broadcasting.  The following government agency meetings are regularly broadcast and archived on our website, <http://communitytv.org>:

* Santa Cruz County Board Of Supervisors
* Santa Cruz City Council
* Capitola City Council and Planning Commission
* Santa Cruz Metro Transit District
* Santa Cruz Regional Transportation Commission
* Soquel Creek Water District
* San Lorenzo Valley Water District
* Pajaro Valley Unified School District

In addition Community Television occasionally broadcasts several other meetings, such as the Aptos-La Selva & Mid-County Fire Protection District, the California Conservation Corps and the Mid County Groundwater Agency.

Community Television has 2 other channels dedicated to bringing material not otherwise available to the citizens of our county.  This includes NASA programming and live feeds, Link TV, Democracy Now and Free Speech TV. Community Television’s Public Access channel has numerous independent, local producers providing content relevant to county residents.

Community Televisions Government Channel provides live, closed-captioned broadcasts of government meetings.  63% of County residents are of working age and 15% are of retirement age. Working residents depend on Community Television’s archived meeting coverage to keep up with our local government.  Many retired people depend on Community Television’s live coverage due to mobility issues.

Community Television’s Education Channel broadcasts educational content not available elsewhere, such as NASA programming and live feeds.

Community Televisions Public Access Channel broadcasts content provided by local residents.  Approximately 50% of county resident submitted content is religious and spiritual related content.  County shut-ins depend on this channel’s rebroadcast, as they cannot attend services in person.

Community Television’s Public Access Channel also broadcasts content from producers who use the facilities and equipment provided by Community Television’s PEG fees.  Some of these programs, such as the “Central Coast Poetry Show” have viewers all over the world. Local poets get exposure not available elsewhere. Other programs include:

* Human Rights Here Now - a look at human rights in Santa Cruz County
* Public Safety Santa Cruz - how local public safety agencies provide services to the county, including disaster services and preparedness.
* Non-Profit Spotlight - an in-depth look at local nonprofits and their benefit to the county.
* Elected Spotlight - an in-depth interview with local politicians.
* Public service content such as voter information.

In addition, monthly PSA days bring in local non-profits to create 60-second long public service announcements that run on the Public Access Channel and are made available to the non-profit for their website.

Community Television also conducts special orientation sessions for non-profits, which includes training on how to use our services as well as how to create effective PSAs with simple equipment.

Community Television provides low cost access to professional facilities and equipment which allow community members to cover local events.

Community Television administers an Equipment Grant program for local nonprofits serving youth in our county.  This program provides equipment grants for local high schools and employment development nonprofits. Modern, professional equipment helps area youth train for employment in many fields, as current job skill requirements often include media production skills.  Recent donations have included:

* Digital Nest - Community Television provided a full studio and field production environment for Digital Nest.  Digital Nest’s motto is “High Tech for Young Minds.” Digital NEST is a non-profit, high-tech training and collaboration space for young people, located in Watsonville California.  Watsonville’s community has an Hispanic majority, including many recent immigrants who work in agriculture. Digital Nest is providing training for the youth of the area so that they can participate in the digital economy of the 21st century.
* Watsonville High School Video Program - Watsonville High School also serves the youth in the agricultural area of Santa Cruz County.  The program received a complete field production setup which is used for high school sports team coverage. This program is multi-disciplinary and includes many school departments in the program.
* Aptos High School ROP Video - Aptos High school received a studio production system which enables their students to produce many programs related to school activities.  They also produce public service announcements for their community.

This local presence enables the residents of Santa Cruz County 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 channels in our community and others by choosing not to adopt many of the proposals in the Further Notice.

Sincerely,



Becca King Reed

Executive Director,

Community Television of Santa Cruz County