

December 14, 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

I am writing in support of the Comments of the Cable Act Preservation Alliance ("CAPA") in the Second Further Notice of Proposed Rule Making. I oppose the tentative conclusions the FCC reaches in the proceeding because of their impacts on our community.

The City of Elsmere is a member of the Telecommunications Board of Northern Kentucky (TBNK,) which is the cable regulatory board for our member cities, and provides Public Educational and Governmental Access (PEG) channels, programming, and services, as well as access to a TV studio and production equipment for residents and community organizations and agencies in our city and the county at large. The PEG channels air a variety of local programming as a service to the viewing public, including community events, high school and college sports, public affairs programs, government meetings, election programming, talk shows with elected officials, and much more.

Our PEG channels provide a local presence for viewers in our city and county to watch programming about Northern Kentucky. Local programming like this that serves the public by serving local viewers, enabling local voices to be heard on the PEG channels, and strengthening our local democracy is what congress envisioned in 1984 Cable Act. By defining "in-kind" support in an overly broad fashion, the rule making will shift the fair balance between local and state authorities and cable operators and will force communities to choose between franchise fees and PEG channels, which was never the intent of the Act.

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. I ask that it not be adopted.

Yours sincerely,

Matt Dowling- City Administrator
City of Elsmere, KY