Cambridge Community Television

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Before the
Federal Communications Commission
Washington, D. C. 20554

In the Matter of
Implementation of Section 302 of
The Telecommunications Act of 1996

CS Docket No. 96-46

Reply Comments of Cambridge Community Television in the Notice of Proposed Rulemaking

Cambridge Community Television respectfully submits the following reply comments in response to initial comments the Report and Order and Notice of Proposed Rulemaking, FCC 96-99, in the above captioned proceeding, released March 11, 1996 ("NPRM"). The Commission seeks comments on how it should implement the requirements of the "open video system" ("OVS") framework. We believe that OVS regulation must promote fair competition between providers, encourage competitive offering of video services, allow meaningful access to all who desire it, and protect the interests of subscribers, both as consumers and as citizens whose rights to participate in our national life will undoubtedly be affected by the development of 21st century telecommunications.

At a minimum, Congress must:
•implement PEG access to OVS platforms in a way which matches the implementation of PEG on cable systems;
•allow meaningful platform access to unaffiliated third parties by allowing reasonable rate regulation or other mechanisms to keep access prices affordable:
•ensure that OVS remains a tool to create competitive entry to the video services market, by prohibiting cable operators from becoming OVS platform operators.

Cambridge Community Television is in full agreement with the comments filed by the Alliance for Community Media, et al; the National League of Cities, et al; and the State of New Jersey Division of the Ratepayer Advocate in this proceeding. We urge the Commission to give these comments their most favorable consideration - they represent the views of non-profit organizations, local governments, teachers, librarians, education professionals, and the more than one million volunteers who work to provide quality local educational, governmental, and public access television programming for our nation's children, seniors, charities, community groups, colleges and universities. These organizations and individuals are the intended beneficiaries of the growth of the NII. The Commission should do all in their power to protect the interests of these potential OVS subscribers and users, and ensure that the power of the advanced telecommunications to improve people's lives is not lost in this rulemaking.

Respectfully Submitted,

Susan Fleischmann
Executive Director

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