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**August 31, 2015**

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12<sup>th</sup> Street, SW

Washington, DC 20554

Re: Promoting Innovation and Competition in the Provision of Multichannel Video Programming Distribution Services (DN 14-261)

Dear Ms. Dortch:

I am writing on behalf of The Public Access Television Corporation. The Public Access Television Corporation (PATV) is a private, 501(C) (3), not-for-profit (NPO) governed by a Board of Directors designated by the incorporated villages of Great Neck, Great Neck Estates, Great Neck Plaza, Kensington, Kings Point, Lake Success, Munsey Park, North Hills, Flower Hill, Plandome, Plandome Heights, Plandome Manor, Russell Gardens, Saddle Rock and Thomaston, New York State. Funding for PATV is provided through payments pursuant to cable television franchises, grants and donations. Currently PATV cablecasts on Channel 20 (Cablevision) and Channel 37 (Verizon FIOS), reaching a large cable TV viewership.

Our mission is to promote and produce television programming of an educational, literary, cultural and civic nature for cablecast on the Public Access Channels in the incorporated villages of Great Neck/North Shore. To accomplish this mission, PATV provides training, program development and channel time. Through our resources and training PATV develops the audiovisual skills and media awareness of our community residents and organizations. PATV promotes broad participation in civic and cultural life by encouraging effective use and understanding of community media.

**PATV's purpose can best be described with three words – Educate, Communicate, Participate.**

We are concerned about the impact the proposed rulemaking (DN 14-261) will have on our organization and our ability to provide Public, Educational and Government (PEG) Access services to our community. We strongly support the comments and reply comments of the City of San Antonio and of Anne Arundel County *et al.* in this proceeding.

We are particularly concerned about the rulemaking's proposal to classify over-the-top (OTT) video services provided by cable franchise holders as something other than a "cable service." Such a designation would allow cable franchise holders to undercut their public interest obligations.

Losing our PEG Grant funding would adversely affect PATV's efforts in the community by limiting our outreach capabilities:

- To create Public Service Announcements for Not for Profit Organizations
- To run educational workshops for students and community members.
- To broadcast original programming created by the community for cablecast.
- To offer internships in conjunction with accredited colleges and universities intern programs in video production.
- To offer our community facilities to create programs in the community interest.

We ask the Commission not to diminish these vital PEG public interest requirements as it considers this proposed rulemaking.

Respectfully submitted,

**Thank you,**



**Shirley Ann Bruno**

**Executive Director, The Public Access TV Corporation**

Cc: Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly