



September 1, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Promoting Innovation and Competition in the Provision of Multichannel Video Programming Distribution Services, MB Docket No. 14-261

Dear Ms. Dortch:

On August 31, 2015, the undersigned had a telephone conversation with Chanelle Hardy, Chief of Staff and Media Legal Advisor to Commission Mignon Clyburn, to discuss the above-referenced proceeding.

During the conversation, I mentioned that NATOA had filed comments in the proceeding and that we were very interested in a number of the issues raised. While local governments welcome innovation and new services and products, we are concerned that longstanding public interest obligations, such as PEG operations, and revenues could be adversely affected depending on what actions the Commission takes in this matter. To that end, I stated that NATOA – like many other commenters, including NCTA – agreed with the Commission’s proposal that a cable operator’s status does not change simply because it provides its service in an IP format.

However, I voiced our disagreement with the Commission’s proposal that cable operators that offer video services to ISP customers via the Internet should not be treated as cable operators as far as those services are concerned. Rather, NATOA asserted that such services should be treated in a manner similar as to how Comcast proposes to treat its new Internet streaming video service – Stream – as an IP cable service, subject to franchise fees and important public interest obligations.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Traylor". The signature is fluid and cursive, written in a professional style.

Stephen Traylor
Executive Director/General Counsel

Cc: Chanelle Hardy