



LAKE CHAMPLAIN ACCESS TELEVISION

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September 2, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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 Lake Champlain Access Television (LCATV), a not-for-profit community media center which serves eight rural towns in northern Vermont and provides media services to a number of local organizations and a means by which members of our communities can produce and distribute video content via three cable channels and our website.

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.

Were organizations like LCATV to lose PEG funding and channel capacity, our member communities and their residents would in turn lose important connective and informational services. We are in many cases the only providers of municipal meeting coverage, which allows a vital link between local governments and constituencies. The many media services we offer to schools, parks departments, libraries, and other youth-service organizations would be

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jeopardized. And residents and organizations such as churches, performing arts groups, and a variety of non-profits would be deprived of a rare and crucial outlet for free speech.

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

Respectfully submitted,



Kevin Christopher
LCATV Executive Director

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