



September 10, 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:

On behalf of Winchester Community Access & Media, a non-profit community media organization in Eastern Massachusetts, I would like to express our concerns 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. Over 7,000 cable subscribers in the Town of Winchester have access to our cable programming and over 21,000 of the population are invited to take part in the workshops, social events and modern production facilities we offer.

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. Without this funding, our organization simply could not carry out its mission of providing an electronic forum for the free exchange of information and ideas across this town. It doesn't stop with our organization. Dozens of local non-profits and town boards depend on WinCAM for dissemination of information to residents and potential clientele. These types of very personal, very local connections are impossible to duplicate. Our organization has made tremendous strides with the help of local government to deliver quality programming and vital information to Winchester residents. Curtailing this momentum would do irreparable damage to this town's established system of communication.

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

Respectfully,



David Gauthier, Executive Director

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

