



BILLERICA ACCESS
TELEVISION, INC.

BATV, Inc.
430 Boston Road
Billerica, MA 01821

September 18, 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 Billerica Access Television, Inc. (BATV). BATV is Billerica Massachusetts's designated Public, Education and Government Access Television Corporation. While BATV is fundamentally a First Amendment forum for the community, the Corporation also provides a space, tools and education to help the community adapt to the ever-changing technological interfaces of cable, television, web and mobile platforms.

We are concerned about the impact the proposed rulemaking (DN 14-261) will have on BATV and its 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.

Successful, productive communities are a result of citizens freely exchanging unfettered speech. Simply put, PEG resources help build successful communities by empowering and encouraging citizens to exchange ideas and information to large audiences through traditional and / or innovative media; information important at a local level and most often, important information and ideas not disseminated by any other media at any other level.

While PEG plays an important role in providing individuals the opportunity to disseminate important local information to the community, PEG also provides users of all ages an opportunity to better understand modern media through shared learning and citizen journalism development. The complexity of media and its effects upon society are becoming more evident daily and PEG plays an important role in fostering citizens' understanding, imagination and creativity.

Through the power of PEG, local municipal governance becomes transparent, local non-profits educate the community of their services, church services are viewed by the disabled, elderly shut-ins view local events, and educational community partnerships and collaborations are formed to work towards the betterment of each unique community.

We believe preserving and advancing provisions that encourage and promote the expression of free flowing ideas and speech produce successful communities. Losing, or reducing PEG fees will certainly impact community speech, collaboration, imagination and creativity. As an organization that strongly believes more communication is better than less, we hope you will do everything in your power to not diminish PEG public interest requirements.

Thank you for your consideration

Respectfully submitted.

Sam Schauerman, Executive Director
Billerica Access Television, Inc.

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