



September 22, 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 Manhattan Neighborhood Network (MNN), the Community Access Organization serving the borough of Manhattan. MNN works to give our constituents access to the knowledge and skills they need to thrive in the information economy and access to high-speed Internet.

MNN – along with our sister organizations in the Bronx, Brooklyn, Queens and Staten Island – are the largest media education institutions in the City of New York. In the last five years, MNN alone has averaged an annual total of more than 1,600 enrollees who have learned how to write, direct, edit and produce high-quality television and video. Comparable training in the city would cost thousands of dollars.

Today, NYC Community Access TV outlets are the single largest cablecasters of original content anywhere in the country. At MNN, more than 700 Community Producers use our studios and equipment annually and more than 1,000 Manhattan producers submit some 11,000 hours of original, independently produced content each year—including 70 live shows each quarter. There is simply nowhere else in New York City where residents can access affordable media education, use cutting-edge equipment and access the most updated facilities for free.

MNN and other community media centers are concerned that the proposed rulemaking (DN 14-261) will severely hinder our ability to provide services to our community. The classification of over-the-top (OTT) video services as anything other than a “cable service” will enable cable franchise holders to decrease their public interest obligations. Commercial media is not willing or able to support local voices. Community Access TV outlets like MNN are true champions of localism, and I ask the Commission to protect these public interest requirements while considering any proposed rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Coughlin". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Dan Coughlin
President & CEO