



Boston  
Neighborhood  
Network

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:

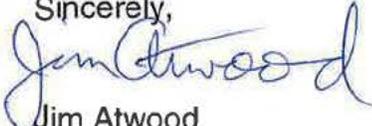
I am writing on behalf of Boston Neighborhood Network, a 501(c)(3) non-profit community media center providing Boston residents and organizations with the means to share information, perspectives, and creative expression throughout the city and beyond. BNN offers training and access to production resources, including field equipment, editing facilities, television studios, a mobile production truck and a multimedia computer lab. BNN also produces programming of local interest that would otherwise be unavailable, such as the nightly Neighborhood Network News, political debates, neighborhood parades, cultural festivals and high school sports. This non-commercial community programming is available to three-quarters of Boston households on our two cable channels, and to the world via our website: [www.bnntv.org](http://www.bnntv.org).

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.

Community media fills a need for local content that is not being met by other media outlets. Although the number of channels is growing, the number of media companies is declining through consolidation and merger, investing each with a disproportionate capacity to shape public opinion. Through the training, production facilities, channels and websites provided by community media centers like BNN, an empowered citizenry shares independent perspectives, strengthening our understanding of each other, our communities, and the world we live in.

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

Sincerely,

A handwritten signature in blue ink that reads "Jim Atwood". The signature is fluid and cursive, with the first name "Jim" and last name "Atwood" clearly legible.

Jim Atwood  
Operations Manager

Cc: Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
BNN General Manager Curtis Henderson, Jr.