



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 Willamette Falls Media Center, a non-profit organization serving the PEG media needs for the greater Clackamas County, Oregon region. WFMC operates and manages five cable channels and a full service production studio, with a sixth channel that is shared collectively with other PEG service providers WFMC reaches over 500,000 homes. The programming and complete media services WFMC provides is depended upon by all the local proceedings such as City Council, Planning Commission, Candidate Forums and School Board meetings. These meetings shown on our channels provide a connection between residents and their government and local events.

We are concerned about the negative impact the proposed rulemaking (DN 14-261) will have on its ability to provide Public, Educational and Government (PEG) Access services to our diverse community. The rulemaking's proposal to classify over-the-top (OTT) video services provided by cable franchise holders as something other than a "cable service," will allow cable franchise holders to undercut their public interest obligations. This is not in the best interest of our community.

The issue of cable franchise fees and by extension, future broadband fees, universal service fees, or other fees being assessed for public interest use in exchange for the use of public rights of way is a fundamental tenet of U.S. Communications Law. As you may know, this is the reason why we have public access channels on cable today. Non-profit, non-commercial community access centers are essential to the health of our

democratic society.

In addition, we believe multichannel video programming distribution services (MVPD) is a way to circumvent the payment of franchise fees for the use of valuable local Rights of Way. We urge the FCC to adopt specific language in this rulemaking to prevent this from happening.

WFMC as a valuable community resource ask the FCC to not diminish these vital PEG public interest requirements as it considers this proposed rulemaking. We thank you for considering our views and comments on this most important matter.

Respectfully submitted,

Melody Ashford,
Executive Director
Willamette Falls Media Center