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Sept. 30, 2015

Federal Communications Commission
Ms. Marlene H. Dortch, Secretary
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 Portland Community Media. We are a nonprofit, public benefit organization dedicated to promoting local, non-commercial media developed and produced in the community, by the community and for the community.

We are troubled by the impact that proposed rulemaking regarding Multichannel Video Programming Distribution Services (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.

Of particular concern is the proposal's attempt to classify over-the-top (OTT) video services provided by cable franchise holders as something other than a "cable service." Such a designation will allow cable franchise holders to undercut their public interest obligations, which enable groups like Portland Community Media to provide diverse local programming to local audiences.

The ripple effect caused by a lack of PEG franchise funding and loss of channel capacity will prevent a large section of Portland's youth, minority, and other underserved communities from having a local voice in today's media — and it would deprive Portland audiences from receiving a rich array of local educational, civic affairs, and cultural programming.

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

Respectfully submitted,

Whitney Jacobson, ~~Vice~~ President, Portland Community Media
On behalf of the Board of Directors

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

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