

CENTRAL VERMONT



TELEVISION

Tom Wheeler, FCC Chairman  
445 12th Street, SW  
Washington, D.C. 20554

October 28, 2015

Dear Mr. Wheeler:

On behalf of Central Vermont Television, a PEG station serving customers across central Vermont and one of only two PEG stations in the state supported by Charter Communications, we are gratified that a proposed merger between Charter, Time Warner Cable and Bright House Network will continue to benefit cable and Internet customers within our 14-town footprint.

New Charter promises faster Internet for online video; a commitment to net neutrality; and investing in customer care — all practices that we feel Vermonters require in order to remain engaged in this age of digital and mobile technology.

While CVTV successfully negotiated a new Certificate of Public Good and Memorandum of Understanding with Charter Communications and the state's Public Service Department in 2014, the board of trustees of Central Vermont Television remains cautiously optimistic that any merger will continue to protect the tenets of the Cable Communications Act of 1984 that allows local franchising authorities to require cable companies to set aside channels for locally produced content. In short, CVTV wants clear assurances that as New Charter moves toward 100 percent digitization, there will be no erosion of those principles and mechanisms that sustain public access nationwide.

Because the federal act no longer takes into account Internet as a broadcast form, a crucial vehicle in the modern public access delivery system, there is no equitable method in which cable companies can measure bundled cable/phone/Internet audiences — the key factor in any equation for public access funding. CVTV's board of directors believes that moving forward on any merger requires taking Internet revenue into account; otherwise, cable companies are simply ignoring a major portion of the audience that these PEG stations serve. Some industry leaders say that without such assurances the long-term viability of this federally mandated form of community building and government transparency is at risk. We are certain that is not the consequence, intended or otherwise, of any merger.

As a partner in Charter's ongoing role in helping to provide public access, CVTV's board of directors appreciates all commitment toward sustaining PEG. However, we do not necessarily condone many of the business practices of the cable giants, including channel slamming and price spikes, and trends within the broadcast industry as a whole. We continue to remain focused on the public needs of our local community, and feel that while important, mergers of companies like Charter, Time Warner and Bright House Network might actually lead to a diminished perspective at the top toward the key role public access plays in all our local communities.

Respectfully yours,

Steven Pappas  
President, CVTV Board of Directors