



November 19, 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 Greater Northshire Access Television, Inc. (GNAT-TV), a community media and training center located in Southwestern Vermont. GNAT-TV operates five PEG Access cable channels providing public, educational and government content. Our local programming is available to approximately 7000 subscribers in nine rural towns within three counties.

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.

PEG Access programs and services are vital to the information needs of our communities. We are the only local television source in our region; schools, libraries, town governments, non-profits and other community groups including seniors and youth rely on GNAT-TV's communication services. Our local programming enables citizens to be educated, informed and connected to their communities. Any rule changes that weaken or eliminate the funding mechanisms for PEG Access will negatively impact our ability to provide these services that are essential for our communities and democracy.

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

Respectfully submitted.

Tammie Reilly
Executive Director, Greater Northshire Access Television

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