

3.30.16

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554



Re: Promoting the Availability of Diverse and Independent Sources of Video (DN 16-41)

Dear Ms. Dortch:

I am writing on behalf of Cape Ann Television, a community media center serving Gloucester, Rockport, Manchester, and Essex, Massachusetts.

We appreciate the opportunity to provide information for the FCC's inquiry.

The FCC asks the following questions regarding Public, Educational and Government Access channels in the inquiry:

"We seek comment on MVPD's practices with respect to making PEG programming information available to subscribers. To the extent that MVPDs do not make this information available, is this for technical reasons, and if so, can the technical barriers be surmounted? Is the Congressionally-imposed prohibition against editorial control of PEG channels relevant to this issue? What is the source of the Commission's authority in this area, if any?"

Cape Ann Television has three community broadcast television stations that serve four communities north of Boston. Comcast provides our broadcast stations. All three stations are standard definition channels. Today, standard definition is not the standard. High definition is the standard.

We have requested HD capacity from Comcast and they have not provided it. We explained to them that we, like the majority of community media stations in Massachusetts, are already HD capable. All of our equipment AND our content is high definition. Comcast will not give us an answer as to why they will not provide HD capacity or provide a timetable as to when this might occur.

In addition to the HD issue, Comcast will not allow us or other community media stations to put our content listings in the electronic program guide. This is severely detrimental to our ability to serve our community. Television viewers are accustomed to searching for and recording content on the program guide. On ALL other channels, subscribers can see what content is airing when, for days in

advance. When they scroll through our channels on the program guide the only thing listed is “Local Content.” There is no way to tell what specific content is airing. To make matters worse, it’s not even separated into blocks of time in the event you knew what time a program was airing and wanted to record it. You would be forced to record 24 hours of programming. Again, Comcast has not responded to requests for inclusion on the electronic program guide.



Community media stations like Cape Ann Television need the ability to broadcast their content in high definition. We need to have our channels in the HD programming tier. We need to have our content listed on the electronic program guide. Our survival depends on it.

Cape Ann Television and other community media stations aren’t looking for provisions that are above and beyond the norm. We’re simply looking for parity with the other available stations. This is simply to ensure that the people we serve can access the important local content we provide.

Many of us in the community media industry believe that Comcast and other cable providers withhold these services to marginalize community media. Comcast, in our case, hasn’t given us any reason to believe otherwise. All requests are met with resistance and without sufficient explanation as to why they aren’t met.

Community media stations and the thousands of dedicated people who work for them provide a valuable community service. The communities they serve deserve proper access to that service. Again, this is not about special treatment. It’s about equality.

We appreciate the opportunity to enter this information into the record.

Sincerely,

Erich Archer

Executive Director,

Cape Ann Television