

May 26, 2016

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Media Bureau Seeks Comment on Petition for Declaratory Ruling Filed by National Cable & Telecommunications Association and American Cable Association; MB Docket No. 16-126

Dear Ms. Dortch,

The undersigned 83 small and mid-sized cable operators support the Petition for Declaratory Ruling of NCTA and ACA asking the Media Bureau to clarify that cable operators may use electronic communications to meet certain customer service notification requirements, as long as the information is also available in print upon customer request.¹ Allowing us, and cable operators like us, to provide customer service information via email would reduce the burden of sending paper notices, but more importantly would benefit our subscribers, who increasingly prefer to receive all of their communications electronically.

ACA and NCTA's proposal will ensure that all subscribers receive important notices in the manner that they prefer. Our subscribers would still have the flexibility of choosing to continue receiving a paper version of the required notices,² but experience tells us that most subscribers will welcome the opportunity to forego wasteful paper notices that clutter households and, in many cases, are thrown directly into the recycling bin. Further, our customers are already receiving other important information electronically, including information about service offerings, changes to programming lineups, outage information, and billing information. Allowing us to electronically provide the notices required by Section 76.1602(b) will reduce consumer confusion by ensuring that all communications are delivered the way the customer prefers.

Most importantly, the proposal would help keep subscriber fees in check, because it would significantly reduce the operational costs of producing and distributing paper notices. In a time when ever-increasing costs are unfortunately leading to higher subscriber fees, any regulatory relief that reduces the cost of providing service can only be seen as a net benefit for consumers.

For all the reasons above, the undersigned small and mid-sized operators urge the Media Bureau to grant ACA and NCTA's petition to adopt a declaratory ruling to clarify that the "written

¹ Petition for Declaratory Ruling of NCTA and ACA, MB Docket No. 16-126 (filed Mar. 7, 2016). The petition specifically asks the Media Bureau to clarify that "written information" requirement of Section 76.1602(b) of the Commission's rules encompasses electronic writings, and that electronic dissemination to subscribers for whom a cable operator has a confirmed email address, by the provision of appropriately-noticed links to websites, or by other electronic measures reasonably calculated to reach individual customers, satisfies the requirement if the information is also available in print upon customer request.

² *Id.* at 4.

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information” requirement of Section 76.1602(b) of the Commission’s rules encompasses electronic writings under certain circumstances.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, a copy of this letter is being filed via ECFS.

Respectfully submitted,

Randy Tilk
Utility Manager
Alta Municipal Broadband Telecommunication
Utility
223 S. Main St.
Alta, IA 51002
Number of Video Customers: 403

James H. Smith
President / CEO
Americable International Inc.
10735 SW 216 Street , Unit 404
Miami, FL 33170
Number of Video Customers: 2,500

Amber Reineke
Chief Financial Officer
Antilles Wireless, LLC
920 E 56th St. Suite B
Kearney, NE 68847
Number of Video Customers: 1,598

John Neys
Manager
Arlington TV Cooperative, Inc.
30 Shane Dr.
Arlington, OR 97812
Number of Video Customers: 38

Chris Schweitzer
Manager
City of Auburn, Essential Services (dba Auburn
Essential Services)
210 S Cedar St., 3rd Floor City Hall
Auburn, IN 46706
Number of Video Customers: 650

Scott Shilling
Vice President
Bay Country Communications
502 Maryland Ave.
Cambridge, MD 21613
Number of Video Customers: 321

Paul Butcher
Owner/President
Big Sandy Broadband, Inc.
510 KY RT 302
West Van Lear, KY 41268
Number of Video Customers: 1,600

Richard L. McBurney
Chief Executive Officer
Butler-Bremer Communications
715 Main St
Plainfield, IA 50666
Number of Video Customers: 1,370

Christopher A. Dyrek
President
Cable America Missouri LLC
7822 E Gray Rd
Scottsdale, AZ 85260
Number of Video Customers: 9,500

Herb Longware
President
Cable Communications of Willsboro, Inc.
3669 Essex Rd
Willsboro, NY 12996
Number of Video Customers: 450

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Joan Budd
General Counsel
Cable TV of East Alabama (CTV-BEAM)
2400 Sportsman Drive
Phenix City, AL 36867
Number of Video Customers: 11,825

Amber Reineke
Chief Financial Officer
CAP Cable, LLC
920 E 56th St.
Suite B
Kearney, NE 68847
Number of Video Customers: 6,238

Jim Whitefield
Vice President and General Manager
Cap Rock Telephone Cooperative, dba CapRock TV
121 E Third Street
Spur, TX 79370
Number of Video Customers: 1,057

Chad Winters
Vice President
Cass Cable TV, Inc.
100 Redbud Road
Virginia, IL 62691
Number of Video Customers: 7,275

Brian L. Cornelius
President
Citizens Cablevision, Inc.
1905 Walnut St.
Higginsville, MO 64037
Number of Video Customers: 1,600

Denny Lawrence
Vice President/General Manager
Coast Communications Co.
349 Damon Rd. N.E.
Ocean Shores, WA 98569
Number of Video Customers: 2,547

Wade Aucoin
Vice President of Integrated Services
Coastal-Link Communications, LLC
P.O. Box 1570
Brazoria, TX 77422
Number of Video Customers: 1,100

Chris Lovell
General Manager
Coaxial Cable Television Corp.
105 Walker Dr.
Edinboro, PA 16412
Number of Video Customers: 3,100

Randolph (Randy) S. Yeakel
President/CEO
Communications 1 Cablevision, Inc.
105 South Main
Kanawha, IA 50447
Number of Video Customers: 1,022

Phil Shockley
President
Communication Services
4564 Telephone Rd. Suite 805
Ventura, CA 93003
Number of Video Customers: 900

Rob Brooks
President & CEO
ComSouth
99 Broad Street
Hawkinsville, GA 31036
Number of Video Customers: 9,650

Mark N Roach
Chief Financial Officer
Consolidated Telephone Company
1102 Madison Street
Brainerd, MN 56401
Number of Video Customers: 4,350

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Brent Cunningham
Vice President/General Manager
Cunningham Communications, Inc.
P.O. Box 108, 220 W Main St.
Glen Elder, KS 67446
Number of Video Customers: 3,768

J Lyn Findley
President / CEO
enTouch Systems
11011 Richmond Avenue, Suite 400
Houston, TX 77042
Number of Video Customers: 8337

Steve Olson
Service & Operations Manager
Garden Valley Telephone Company
201 Ross Ave.
Erskine, MN 56535
Number of Video Customers: 3200

LeaAnn Quist
Sr. Director of Product Management
Great Plains Communications
1600 Great Plains Center
Blair, NE 68008
Number of Video Customers: 7,900

Jill Fishbaugher
Vice President of Operations
Harmony Telephone Company
35 First Ave NE, P.O. Box 308
Harmony, MN 55939
Number of Video Customers: 286

Mike Oblizalo
General Manager
Hood Canal Communications
P.O. Box 249
Union, WA 98592
Number of Video Customers: 3,560

Emilio Gonzalez
Communications Manager
Decca Cable
10983 SW 89th Avenue
Ocala, FL 34481
Number of Video Customers: 4,315

Kenneth Laursen
General Manager
F&B Communications, Inc.
103 N. Main Street
Wheatland, IA 52777
Number of Video Customers: 748

Daniel Huffman
President
Golden Valley Cable & Communications Inc.
4225 US Highway 68 #A
Golden Valley, AZ 86413
Number of Video Customers: 700

Chad Winters
Vice President
Greene County Partners, Inc.
100 Redbud Road
Virginia, IL 62691
Number of Video Customers: 2,682

Rob Koch
President & General Manager
H&B Cable Service, Inc.
108 N Main St.
Holyrood, KS 67450
Number of Video Customers: 980

Susan Daniel
Vice President
Horizon Cable TV, Inc.
520 Mesa Rd
Point Reyes, CA 94956
Number of Video Customers: 797

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Jonathan Bullock
VP Corporate Development & Gov't
Hotwire Communications
1 Belmont Ave, Suite 1100
Bala Cywnyd, PA 19004
Number of Video Customers: 10,000

Craig Hern
Vice President, Operations
HTC Communications Co.
213 South Main Street
Waterloo, IL 62298
Number of Video Customers: 1900

Jim Hays
President
Irvine Community Television
251 Broadway
Irvine, KY 40336
Number of Video Customers: 2,500

Chris J. Phillips
General Manager
Kalida Telephone Co.
121 E. Main St.
Kalida, OH 45853
Number of Video Customers: 1,120

Mark Arnold
Telecommunications Director
Kutztown Borough
45 Railroad Street
Kutztown, PA 19530
Number of Video Customers: 641

James J. Kail
President & CEO
Laurel Highland Television Company
4157 Main Street
Stahlstown, PA 15687
Number of Video Customers: 3,500

Dave Raak
Owner
HTC Communications
107 2nd Ave. S
Hospers, IA 51238
Number of Video Customers: 2,700

John C. Schmoldt
Vice President
Inter Mountain Cable Inc.
20 Laynesville Road
P.O. Box 159
Harold, KY 41635-0159
Number of Video Customers: 15,019

Benjamin A. Lovins
Sr. Vice President Telecommunications Division
Jackson Energy Authority
250 North Highland Avenue
Jackson, TN 38301
Number of Video Customers: 15,000

Earl W. Kuhn
President
Kuhn Communications, Inc.
301 West Main St.
Walnut Bottom, PA 17266
Number of Video Customers: 2,275

Orlean Smith
President / General Manager
Lakeland Cable TV
194 Telephone Rd
P.O. Box 321
Crowder, OK 74430
Number of Video Customers: 382

Chad Cleveland
General Manager
Laurens Municipal Power & Communications
272 N. Third Street
Laurens, IA 50554
Number of Video Customers: 390

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Steven Mason
General Manager
Lighthouse.Net
2972 W 8th Street
Sault Ste. Marie, MI 49783
Number of Video Customers: 430

Robert Gessner
President
Massillon Cable TV, Inc.
814 Cable Court NW
Massillon, OH 44647
Number of Video Customers: 37,909

John Dunbar
Assistant General Manager
MH Telecom, LLC dba MHTC
200 E Main St.
Mt Horeb, WI 53572
Number of Video Customers: 1,300

Dallas Cox
Manager
MTCC
34 West Union Street
Manti, UT 84642
Number of Video Customers: 602

Elaine Partridge
Vice President of Programming
NewWave Communications
1 Montgomery Plaza
Sikeston, MO 63801
Number of Video Customers: 99,863

Floyd Grocholski
General Manager
Parish Communications
803 W. Midland Road
Auburn, MI 48611
Number of Video Customers: 840

Timothy D. Hohman
General Manager & COO
Litestream
280 Business Park Circle
Suite 412
Saint Augustine, FL 32095
Number of Video Customers: 6000

Bart Olson
President
Merrimac Communications Ltd.
327 Palisade St.
Merrimac, WI 53561
Number of Video Customers: 1,277

Tyler Kilde
General Manager
MLGC
P.O. Box 66
Enderlin, ND 58027
Number of Video Customers: 1,050

Joe Lee McClellan
President and Owner
Nelson County Cablevision Corporation
380 Front Street, P.O. Box 395
Lovingson, VA 22949
Number of Video Customers: 500

Robert Witter
President
Northside TV Corporation
521 Vulcan Street
Iron Mountain, MI 49801
Number of Video Customers: 503

Jason M. Smith
Assistant General Manager
Rainbow Communications
608 Main Street
Everest, KS 66424
Number of Video Customers: 4,800

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Ty Garrett

President

SEMO Communications, Inc.

107 SEMO Lane

Sikeston, MO 63801

Number of Video Customers: 1,400

Earle A. MacKenzie

Executive Vice President & Chief Operating Officer

Shentel Cable

500 Shentel Way

Edinburg, VA 22824

Number of Video Customers: 57,500

Ernie Scialabba

President

Southern Vermont Cable Company

62 Sylvan Ridge Rd.

Bondville, VT 05340

Number of Video Customers: 1,952

Steven Pick

General Manager/CEO

Spencer Municipal Utilities

520 2nd Ave E, STE 1

Spencer, IA 51301

Number of Video Customers: 3,200

Robert G. Watson, Jr.

Vice President

Suburban Cable

1127 Leverette Road

Warner Robins, GA 31088

Number of Video Customers: 160

Dave Steinbach

General Manager

Summner Communications

117 W Harvey Ave

Wellington, KS 67152

Number of Video Customers: 1,700

Robert D Stemler

President

Tele-Media Corporation of Delaware

804 Jacksonville Road, P.O. Box 39

Bellefonte, PA 16823

Number of Video Customers: 2,922

Brooks Derryberry

Vice President

Telapex

1018 Highland Colony Parkway, Suite 700

Ridgeland, MS 39157

Number of Video Customers: 4,000

Brian Skelton

General Manager

Tullahoma Utilities Board

901 S Jackson

Tullahoma, TN 37388

Number of Video Customers: 2,600

Archie Everage

Vice President/General Manager

TV Service Inc.

60 Communications Ln.

Hindman, KY 41822

Number of Video Customers: 8,500

Randy Olson

Assistant General Manager

Venture Communications

218 Commercial Ave. SE

Highmore, SD 57345

Number of Video Customers: 6,300

Donald Hammer

President

Verneau Networks, Inc.

121 Mill Street

Hillsboro, WI 54634

Number of Video Customers: 295

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Jay Barton
Manager
Viola Communications, INC
1106 13th St
P.O. Box 309
Viola, IL 61486
Number of Video Customers: 200

Robert G. Watson, Jr.
Vice President
Watson Cable Company
1127 Leverette Road
Warner Robins, GA 31088
Number of Video Customers: 217

Rick Reed
Director of Video Services
Golden West Cablevision
415 Crown St.
Wall, SD 57790
Number of Video Customers: 11,131

Rolan Honeyman
Director of Business Operations
Consolidated Cable Vision, Inc.
507 South Main Avenue
Dickinson, ND 58601
Number of Video Customers: 10,584

William Bottiggi
General Manager
Braintree Electric Light Department (BELD
Broadband)
150 Potter Road
Braintree, MA 02184
Number of Video Customers: 2,901

Randy Fletcher
General Manager
TVC, Inc.
3095 S. Sheridan Rd.
Lennon, MI 48449
Number of Video Customers: 2,415

Jennifer Gilliam
Programming Coordinator
Volunteer Wireless, LLC
311 N Chancery Street
McMinnville, TN 37110
Number of Video Customers: 12,715

Steve Timcoe
Superintendent – CATV Telecommunications
Wyandotte Cable
3200 Biddle Avenue, Suite 200
Wyandotte, MI 48192
Number of Video Customers: 6,090

Robert Campbell, Jr.
General Manager
Pickwick Cablevision Inc.
P.O. Box 12
Pickwick Dam, TN 38365
Number of Video Customers: 755

George Allen
General Manager-Vice President
Bee Line Cable
131 Lakewood Rd.
Madison, ME 04950
Number of Video Customers: 5000

Brian Skelton
General Manager
Tullahoma Utilities Board
901 S Jackson St.
Tullahoma, TN 37388
Number of Video Customers: 2,600

Richard Arnold
Chief Executive Officer
Conway Corporation
1307 Prairie Street
Conway, AR 72034
Number of Video Customers: 15,980

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Arthur Cooper

President/General Manager

Community Antenna Service, Inc. dba CAS Cable

1525 Dupont Rd.

Parkersburg, WV 26101

Number of Video Customers: 5,479