National Black Chamber of Commerce
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February 1, 2006

Honorable Kevin J. Martin
Honorable Michael Copps
Honorable Jonathan Adelstein
Honorable Deborah Tate
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Public Comment Letter Endorsing Streamlined Franchise Rules, Competition in Broadband Video Services

Dear Commissioners:

The Federal Communications Commissions' Notice of Proposed Rulemaking on video franchise requirements embraces a number of important pro-competitive components, and I am writing on behalf of the National Black Chamber of Commerce, Inc. to urge the Commission to proceed in this fashion.

Two of the areas of American life that have grown more complex in recent decades are those of communications and entertainment, particularly when their paths intersect. Gone are the days when there was one phone company and everyone tuned into Walter Cronkite for the evening news. For all the advances we as Americans have made with the Internet and other forms of communication, we find ourselves still at the mercy of a small group of firms dictating the terms of what we can watch and how much we're going to pay for it. In fact, the market is controlled to such a degree that monthly rates have increased almost three times the rate of inflation over the past 10 years, and there isn't much customers –particularly low income people – can do about it. Blacks, as heavy consumers of cable television, are particularly sensitive to this issue.

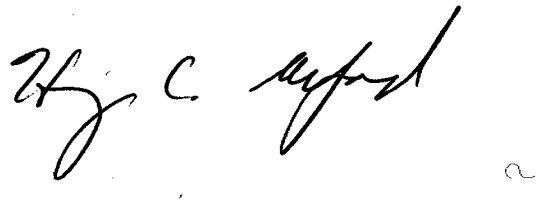
Now, the "precious few" who monopolize this market are fighting to keep outdated regulations because these rules make it difficult for new competitors to enter this market. They first negotiated franchises with municipalities decades ago, when they were small local companies. Now, new entrants face the prospect of negotiating a separate franchise in every town or city in which they want to operate – that's some 33,000 separate agreements across this vast nation – a virtually insurmountable task. In too many cases, towns have come to view the franchising process as an opportunity to line their pockets at the expense of service providers by making demands (for everything from flowerpots for streetlights to emergency communications networks) that are unrelated to the provision of video services.

We at the National Black Chamber of Commerce believe in the fundamental right of all Americans to make a free and fair choice about how they spend their hard-earned money. But without competition consumers don't have a choice. We believe the FCC can and should encourage competition by exercising its authority under Section 621(a) to put a halt to practices that amount to an unreasonable refusal to award a competitive franchise.

By exercising this authority, the FCC can ensure that cities and towns do not make unreasonable demands unrelated to video services, that so-called "level-playing field" and "build-out" provisions are not enforced in such a way to discourage new competition, and that consumers will have more choices in video service providers and broadband market.

We at the NBCC think this is a great opportunity to better the lives of Black Americans and all Americans by providing competitive choice and helping to lower prices while improving quality. We commit to work with the Commission and Congress to pursue a national strategy that will encourage competition and benefit consumers.

Sincerely,



HARRY C. ALFORD
President/CEO