

From: Thomas, Bob [mailto:BThomas@kbcitv.com]
Sent: Thursday, September 06, 2007 11:33 AM
To: Kevin Martin
Subject: Cable TV Viewability Proposal

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

Mr. Chairman:

I write to express support for the Cable TV Viewability Proposal which comes before you on September 11. I am of the opinion that the transition to the digital world will ultimately be seen as a great benefit to the consumer. It is critical, however, that we protect analog cable subscribers from loss of service after February 17, 2009 and that digital signals do not suffer degradation when carried on cable systems.

Thank you for your consideration.

Robert P. Thomas
VP/General Manager

KBCI-TV / KBCI-DT
140 N. 16th Street
Boise, ID 83702

t. 208.489.1211
f. 208.472.2205
bthomas@kbcitv.com



www.2news.tv

From: Erin Lutts [mailto:elutts@midrivers.com]
Sent: Thursday, September 06, 2007 11:49 AM
To: Adam Healy; Jaime Ramsey Graham; Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Robert McDowell; jon_selib@baucus.senate.gov
Cc: aca@americancable.org; dmitchell@ntca.org
Subject: FCC Proposed Triple Carriage Must-Carry Order
Importance: High

September 6, 2007

To the Members of the United States Senate
To the Members of the United States House of Representatives
To the Members of the Federal Communications Commission

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

RE: FCC Proposed Triple Carriage Must-Carry Order

Senators, Representatives, and FCC Commissioners:

As an American Cable Association (ACA) and National Telecommunications Cooperative Association (NTCA) member, Mid-Rivers Cable Television is one of many small and medium-sized cable operators with a long history of providing high-quality, innovative video service to our communities. Mid-Rivers Cable Television serves 19 Eastern and Central Montana communities and one Western North Dakota community, with populations ranging from less than 100 to just over 8,000 people. We are offering digital and high-definition programming and digital video recorder (DVR) services in many of these communities today, and are currently making significant additional investments in facilities to offer these and other advanced services to more communities. By October 1, for example, high-definition programming will be available in the community of Circle, Montana (population 569), and communities that receive high-definition programming from Mid-Rivers today will see five additional HD channels. Mid-Rivers understands that in order to remain competitive, we must offer consumers the robust services they demand today and in the future.

Along with our fellow ACA and NTCA members, however, **Mid-Rivers is gravely concerned about the digital television carriage order.** The draft order would require cable operators to carry one signal of each broadcaster in three different formats – high definition, standard definition and analog – after February 17, 2009, and currently includes no exemptions for small cable systems. **It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation.** The upgrade costs required to comply with this mandate are substantial – upward of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not at all feasible for small cable operators to upgrade our facilities to all-digital and provide set-top boxes to all subscribers. This is especially true in the Mid-Rivers Cable Television service area, which includes several separate cable television systems spread out over more than 30,000 square miles and controlled by a number of separate head ends, many of which are isolated, stand-alone systems often serving less than 100 subscribers.

The triple-carriage requirement would force Mid-Rivers to remove existing channels from our channel lineup, or in some instances reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In certain communities, we may be compelled to shut down the cable systems altogether, removing a vital video competitor and the only local video option from the market.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. Mid-Rivers Cable Television joins with our Associations and their many other community-based members, along with the millions of subscribers they serve, in urging Legislators and Regulators to recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Mid-Rivers

COMMUNICATIONS

Erin M. Lutts
Business Development & Gov't. Affairs Mgr.
211 North Merrill
Glendive, MT 59330
Ph. 406.377.7438
Fx. 406.687.3250
elutts@midrivers.com
www.midrivers.com

From: Dennis Fannin [mailto:d.fannin@osage.net]
Sent: Thursday, September 06, 2007 3:07 PM
To: Michael Copps; Kevin Martin; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: Proposed Triple Carriage Must-Carry Order

September 6, 2007

To the Members of the United States Senate
To the Members of the United States House of Representatives

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Members of the Federal Communications Commission Board:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of

the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

Dennis M. Fannin
General Manager
Osage Municipal Utilities
d.fannin@osage.net
Ph: (641) 832-3731
Fax: (641) 732-3737

FILED/ACCEPTED

SEP - 7 2007

Federal Communications Commission
Office of the Secretary

From: Nicolas, Emilio [mailto:ENicolas@kazh.tv]
Sent: Wednesday, September 05, 2007 5:52 PM
To: Kevin Martin
Subject: DTV Carriage "View ability" Rules

Dear Chairman Martin:

I am the General Manager of Pappas Telecasting's Station KAZH-TV, the TuVision affiliate in Houston, TX.

I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and am writing to express my strong support for the Commission's "view ability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "view ability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Emilio Nicolas
General Manager/GSM
KAZH-TV57 – TuVision
2620 Fountainview Dr., Suite 322
Houston, TX 77057

Ph. (713) 467-5757

Fax: (713) 783-4157

kazh57.com

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SEP - 7 2007

Federal Communications Commission
Office of the Secretary

September 5, 2007

Chairman Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Proposed Triple Carriage Must-Carry Order

The Honorable Kevin J. Martin:

Tacoma Power's Click! Network strongly opposes the proposed triple carriage must-carry order. As a municipal cable operator and member of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA), Click! Network provides true competition in the cities where we offer services. Cable TV and Internet customers in Tacoma, Fircrest, University Place, Lakewood, Fife and Pierce County enjoy video and broadband choices that are rare in this country. Ten years ago Tacoma Power invested in fiber/coax infrastructure primarily for the power company's needs on which Click! Network also offers competitive telecommunication services.

Click! Network and other members of the ACA and NTCA are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per customer in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their customers.

If the triple-carriage requirement is enforced, Click! Network would be forced to remove existing channels from our channel lineup and reduce the amount of bandwidth available for broadband and voice services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their customers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm consumers and the companies that serve them. The Associations and their community-based members, along with the millions of customers they serve, and the 25,000 customers Click! Network serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service our customers enjoy and have come to expect from us.

Sincerely,

Cynthia Wikstrom
General Manager
Click! Network, Tacoma Power

From: Tom Fawbush [mailto:tom@wbna21.com]
Sent: Wednesday, September 05, 2007 6:30 PM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: Please support the CABLETV VIEWABILITY PROPOSAL

I want to encourage the commission to adopt and support the CableTV viewability proposal. We will not be able to service our local viewers properly unless local cable systems pass through our digital television signal, intact, not stripped down. We need action on this desperately as the 2009 DTV switch is just around the corner.

Sincerely,
Tom Fawbush
WBNA TV21

www.wbna21.com
General Manager
Louisville, KY
PH: (502) 964-2121 x17
FX: (502) 966-9692
tom@wbna21.com

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

From: Pfaff, Charlie [mailto:CPfaff@kmpfh.com]
Sent: Wednesday, September 05, 2007 6:57 PM
To: Kevin Martin
Cc: Pappas, Peter
Subject: FW: DTV Carriage "Viewability" Rules

The Honorable Kevin J. Martin
Chairman
Tel: (202) 418-1000
Fax: (202) 418-2801
Email: Kevin.Martin@fcc.gov

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

Dear Chairman Kevin J. Martin:

I am the General Manager of Pappas Telecasting's Station KMPH, the FOX affiliate in Fresno, CA. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and I am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Charles W. Pfaff
Senior Vice President/General Manager

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From: Pfaff, Charlie [mailto:CPfaff@kmpfh.com]
Sent: Wednesday, September 05, 2007 7:28 PM
To: Kevin Martin
Cc: Pappas, Peter
Subject: DTV Carriage "Viewability" Rules

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

The Honorable Kevin J. Martin
Chairman
Tel: (202) 418-1000
Fax: (202) 418-2801
Email: Kevin.Martin@fcc.gov

Dear Chairman Kevin J. Martin:

I am the General Manager of Pappas Telecasting's Station KFRE, the CW affiliate in Fresno, CA. I believe that it is imperative that the Commission put cable subscribers first when it adopts its DTV carriage rules next Tuesday, and I am writing to express my strong support for the Commission's "viewability" proposals.

The FCC must act to ensure that cable subscribers are not disenfranchised by the switch to digital-only broadcasting in February 2009. Therefore, we support the Commission's proposal to require cable operators to choose between (a) downconverting the digital must-carry channels and carrying both the digital and analog signals for these channels and (b) carrying the local must-carry signals in digital only and providing the necessary equipment to ensure that all subscribers can view those signals. The "viewability" proposal outlined above will promote Congress's goal of ensuring that the DTV transition is completed smoothly and in a manner that benefits consumers.

We also support the Commission's pro-consumer extension of the signal degradation rules to digital carriage, and believe that the Commission's proposal in this regard will ensure that every cable customer receives the full benefits of digital television.

Many thanks for all of your efforts to ensure a smooth DTV transition for all television viewers.

Sincerely,

Charles W. Pfaff
Senior Vice President/General Manager

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ALLEN'S TV CABLE SERVICE, INC.

PHONE: 384-8335
611 EVERETT STREET

P. O. BOX 2843
MORGAN CITY, LA. 70381

September 5, 2007

Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

Dear Chairman Martin:

It is my understanding that consideration is being given to a proposal that would require cable providers to carry broadcaster's transmissions on their systems in three (Triple Carriage) formats; Analog, High Definition and Standard Definition. Before this is acted upon, I urge you to consider the consequences of such a requirement.

To a small cable operator, such a requirement would be devastating. Currently we carry thirteen (13) area broadcasters on our system. To give each station, three (3) channels of capacity, would encompass (39) channels or 234 Mhz. Given the fact that they possibly could also multicast their standard digital channels on a 10 to 1 ratio, the usage now jumps to 294 Mhz. Considering the system operates at 720 or 862, virtually 41% would be for broadcasters leaving a little over half of our capacity to carry all other signals on the system, including any new cable channels, broadband or voice products. As it stands today, a number of channels, including some broadcasters, would have to be dropped in order to comply. I do not think our customers would be very happy with such a scenario.

Is it not enough that broadcasters who now offer their analog, digital and high definition signals free over-the-air to their viewers are demanding payment from those same viewers simply because they choose to receive their signals from a cable provider? Our systems have tried for almost two years to obtain permission to carry the HD product of the local CBS affiliate. The answer: "Unless payment is made, NO carriage will be authorized." The dilemma, if we pay one broadcaster, then we will have to pay them all... so the CBS HD product is not offered. We try to maintain rates as low as we can... but unfortunately have already lost customers because of taking this stand. If this proposal is initiated, I contest that the "Triple Carriage" could signal the beginning of the demise of many small to medium operators, such as us. Please TOSS this idea... and I thank you in advance!

Sincerely,

Gregory A. Price, President

Cc: Each local District U.S. Representatives and Senators

September 5, 2007

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

% The Honorable Kevin J. Martin

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

Dear Sir;

Please respectfully consider the Cable TV Viewability Proposal that sits before your Commission.

This proposal really affects every household in America. It is imperative that we guarantee the delivery of the digital signal to every American television viewer. We certainly cannot afford for the television universe to shrink as we have worked so diligently to provide a high quality of news programming, entertainment, and public service announcements.

I am concerned not only about the number of potential viewers but also the quality of the signal that the cable operators deliver into their subscriber's homes and businesses. This proposal will ensure that digital television (DTV) signals will not suffer material degradation when carried on cable systems. We must do everything in our power to make certain that the American viewing public reap the full benefits of HDTV!

Thank you for your consideration of this very important proposal.

Respectfully,

Marc Gilmour
Station Manager
KVII - Amarillo

From: Pauline C Harris [mailto:pharris@hearst.com]
Sent: Thursday, September 06, 2007 9:11 AM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: CableTV Viewability Proposal (From WTAE-TV, Pittsburgh)

On behalf of WTAE-TV in Pittsburgh, I would like to register our support for the **CableTV Viewability Proposal** which I understand will be considered at a September 11, 2007 meeting.

We view this proposal as the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition occurs.

It is our hope and expectation that our TV signal will be protected from material degradation, and that our viewers/consumers will be able to enjoy the full benefits of High Definition Television.

We ask that you vote in support of the **CableTV Viewability Proposal**.

Rick Henry
President and General Manager
WTAE-TV
400 Ardmore Boulevard
Pittsburgh, PA 15221
412-244-4410
rlhenry@hearst.com

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary
September 21, 2007

To the FCC Commissioner's

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Commissioner's:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and eliminating access to any broadband service for some consumers.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,
Andrew M. Randol, GM -Panora Telco

From: Craig Montgomery [mailto:Craig.Montgomery@fidelitycommunications.com]
Sent: Thursday, September 06, 2007 10:23 AM
To: Kevin Martin
Cc: Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: Triple Carriage Order

September 6, 2007

To the Honorable Kevin Martin and FCC Commissioners

Re: FCC's Proposed Triple Carriage Must-Carry Order

Dear Chairman Martin and Commissioners:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand.

In addition, Fidelity Communications and other operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009, to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation.

The upgrade costs required to comply with this mandate are substantial --- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operators would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

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SEP - 7 2007
Federal Communications Commission
Office of the Secretary

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

John E. Colbert
Senior Vice President
Fidelity Communications
64 N. Clark
Sullivan, MO 63080

From: Kim [mailto:kimw@wgtu.com]
Sent: Thursday, September 06, 2007 10:38 AM
To: Kevin Martin; Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell; mmacbride@nab.org
Cc: jeffc@wgtu.com
Subject: FCC Letter

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

September 6, 2007

Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Dear FCC Commissioners:

After reading the CableTV Viewability Proposal, I am writing to you in support of the proposal. This is the only way to guarantee that analog cable subscribers will not be disenfranchised after the DTV transition.

TV signals must be protected from material degradation so that consumers can reap the full benefits of HDTV.

Sincerely,

Mr. Jeff Cash
President,
Max Media of Traverse City, LLC
WGTU-TV & WGTQ-TV

/kw

C: The Honorable Kevin J. Martin, Chairman (via email)
The Honorable Michael J. Copps, Commissioner (via email)
The Honorable Jonathan S. Adelstein, Commissioner (via email)
The Honorable Deborah Taylor Tate, Commissioner (via email)
The Honorable Robert M. McDowell, Commissioner (via email)
Marsha MacBride, Exec. VP, Legal & Regulatory Affairs, NAB
(via email)

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.485 / Virus Database: 269.13.7/992 - Release Date: 9/6/2007
8:36 AM

From: Bruce Opperman [mailto:bao@wllo.com]
Sent: Thursday, September 06, 2007 11:08 AM
To: Kevin Martin
Cc: Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell; mmacbride@nab.org; cwilkins@nab.org
Subject: Cable TV Viewability Proposal

Honorable Chairman Martin & Commissioners,

Things are beginning to move very quickly in the digital transition and February 17, 2009 will be here before we know it. Many local television stations, including NBC Lima, are launching educational efforts aimed at viewers and forming partnerships with digital television dealers in an effort to make this an exciting transition for our industry.

I am asking for your support of the Cable TV Viewability Proposal. There must be a way to guarantee that analog cable subscribers will not be disenfranchised after February 17, 2009. There is a great deal of educating to be done in a very short period of time, certainly representing a daunting task for us all. Television signals must be protected from material degradation so that all consumers can gain the full benefits of HDTV.

It is imperative that in the Lima, Ohio DMA market 185, with a cable penetration of over 74%, cable operators implement one of the two options offered in the proposal for our must-carry signal. It is critical to the American consumer, our viewers, that this Cable TV Viewability Proposal be adopted by the Commission. Thank you,

Bruce A. Opperman
President/General Manager
WLIO-TV/NBC & The CW Network
Lima, Ohio 45805
419-228-8835

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

From: Carl Wilson [mailto:CWilson@pvt.com]
Sent: Thursday, September 06, 2007 11:30 AM
To: Deborah Tate; Kevin Martin; Jonathan Adelstein; Michael Copps; Deborah Tate
Cc: Glenn Lovelace; Pat Olivas
Subject: Proposed

FILED/ACCEPTED
SEP - 7 2007
Federal Communications Commission
Office of the Secretary

September 4, 2007

To the Members of the United States Senate
To the Members of the United States House of Representatives

Re: FCC Chairman Kevin Martin's Proposed Triple Carriage Must-Carry Order

Dear Senators and Representatives:

Members of the American Cable Association (ACA) and the National Telecommunications Cooperative Association (NTCA) are small and medium-sized cable operators with a long history of providing high-quality, innovative video service to their communities. These cable operators who provide service to smaller and rural markets are currently making significant investments in their facilities to offer more services to consumers, including high-definition digital programming and video on demand. In addition, these operators are launching advanced services, such as broadband and voice, providing rural consumers with the much-touted "Triple Play." Small and medium-sized cable operators understand that to remain competitive, they must offer consumers a robust service.

However, the Associations and their members are gravely concerned about the digital television carriage order. The draft order would require cable operators after February 17, 2009 to carry one signal of each broadcaster in three different formats: high definition, standard definition and analog. It is both fiscally and technologically infeasible for all small and medium-sized operators to meet such a burdensome obligation. The upgrade costs required to comply with this mandate are substantial -- upwards of several hundred dollars per subscriber in small markets. Further, many small cable operators simply lack the capacity to offer all broadcast stations in all three formats, and it is not feasible for small cable operators to upgrade their facilities to all-digital and provide set-top boxes to all of their subscribers.

In some cases, the triple-carriage requirement would force operators of small systems to remove existing channels from their channel lineup, or reduce the amount of bandwidth available for broadband and voice services, further broadening the digital divide between urban and rural consumers. In other cases, operator would be compelled to shut down their systems altogether, removing a vital video and voice competitor in the market, and denying access to broadband services.

Rather than mandating triple carriage, the federal government should allow the marketplace to dictate which formats independent cable operators provide to their subscribers and the timetable for small operators to transition into all-digital services, among those that can do so. Letting the market work will ensure that consumers stay connected after the digital transition.

The digital television triple-carriage order must be rejected in order to not harm rural consumers and the companies that serve them. The Associations and their community-based members, along with the millions of subscribers they serve, are hopeful that you and your policymaking colleagues at the FCC recognize the need for sensible regulation that will accomplish the goals of the digital transition without compromising the quality video and broadband service rural consumers enjoy and have come to expect from their providers.

Sincerely,

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