

Dear FCC Commissioners:

My name is Frank Bluestein and I serve as the Executive Director of Germantown Community Television in Germantown, Tennessee. We are a combined public, educational and governmental access channel. We are the only local television or radio outlet that serves our city. Our population is 40,000+. Our studio is located in the local high school and is operated by local high school students. The students receive training in video and the community in turns gets a quality community channel. We are on the air 24/7/365 and produce a wide range of local community-based information and entertainment shows as well as education programs and weekly cablecasting of government meetings. We have many shows hosted by adults throughout the community that range from senior citizen news to government affairs to financial tips to legal issues. Our students produce and host a daily news show, a weekly public interest show and even a cable quiz show. We cablecast classic movies and television shows as well. We have a very diverse line-up.

I am writing to express my concern over two matters regarding channel placement for local access channels. We feel strongly that local access channels should be treated in the same manner as the local broadcast channels. The AT&T U-Verse system places all access channels on one channel (99) and it compresses the signal so that the quality level is below that of regular cable channels. The subscriber has to scroll through an online menu to access the channel. Once that is accomplished it takes a long wait period from the time the subscriber requests the channel to the time it actually shows up on the screen. There is no way to use a DVR (many of our citizens tape the local city council meetings), no closed captioning, and no way to channel surf. We also understand that Comcast in many markets has started to move the access channels to a very high digital tier. Many of our citizens are older and do not get the digital service. We feel strongly that local channels should be placed on the most accessible tier possible so that all subscribers have the ability to view these channels.

When access television was created, the goal was to give local citizens the ability to have a voice and to be involved in their community. It seems that the voice (and the activism that goes along with it) is somewhat pointless if it is extremely difficult for the public to hear or see the message. It would be like a government body allowing protests on public policy, but only if you protest in the middle of the night in a deserted field 10 miles outside of the city limits.

The cable access channel placement situation is similar. It seems to completely thwart the intent of Congress in establishing the idea of access television.

We have a good relationship with both Comcast and AT&T locally. They do many good things for our community and for our station and I commend them in many ways. The channel placement issue is, however, a serious concern that needs to be corrected. I urge consideration of this matter by your body. Thank you for allowing me to speak out on this issue.