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March 23, 2011

VIA ECFS

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

Re: Petition for Declaratory Ruling Regarding Public, Educational and Governmental Programming, MB Docket No. 09-13, CSR-8126

Dear Ms. Dortch:

Yesterday, I met with Holly Saurer, Mary Beth Murphy, Nancy Murphy, and John Norton of the Media Bureau to discuss Cox Communication, Inc.'s ("Cox") recent migration of public, educational, and government access channels ("PEG") from analog to digital service in Macon, Georgia.

Specifically, we discussed the migration of three PEG channels that occurred on October 18, 2010 in Cox's Middle Georgia system. I explained that although the migration of channels from analog to digital service can be disconcerting for customers, it allows service providers, such as Cox, to offer advanced services that customers enjoy, such as increased capacity for OnDemand, new HD channels, and increased Internet speeds. Mindful of the customer's experience, however, Cox attempts to reduce any disruption by: (1) migrating channels with low viewership so as to impact fewer viewers; (2) providing clear notice to local authorities and consumers well in advance of the pending migration; and (3) offering consumers a digital set-top box, courtesy of Cox, through December 2011.

I further explained that for a majority of our customers in Macon, the migration would have had no effect. Specifically, customers with digital service were able to continue viewing the PEG channels at their customary locations. Likewise, customers without digital service but with a digital-ready television set would be able to access PEG channels without added equipment although the channels would be viewable on different channel locations. The only customers who would not be able to continue viewing PEG channels were customers without a digital-ready set and without digital service. For these customers, Cox has offered set-top boxes to allow access to PEG channels for free until January 1, 2012 (when normal rental charges would apply).

We discussed Cox's procedures for notifying consumers before the migration of the PEG channels and for accommodating viewers without digital-ready televisions or digital service. Cox notified the local authorities in late May and notified other public access and educational access producers in July by telephone, by letter, and by notices in the studio. To inform consumers, Cox began running public service announcements ("PSA") and crawls across all channels in July and August. The PSAs continued through January 2011. See Attachment 1. In August, Cox began simulcasting the PEG

Attachment 1

Cross-Channel PSA Script (:30-seconds)

On October 18, Cox's PEG channels located on channels 14, 17 and 18 will move to the Digital Starter package. The transition will be invisible to Advanced TV customers. However, Cox TV Starter or Essential customers with a Digital Tuner Ready TV will need to tune to 88.6 (Public Access), 93.1 (Education) and 94.1 (Government). This analog-to-digital conversion will allow Cox to launch new HD channels plus other advanced products and services. For more information, visit www.CoxMiddleGACommunity.com.¹

¹ Because the Middle Georgia system consolidated with the northern Florida system early this year, the website is no longer available. It was operational while the public service announcements were running from July 2010 through October 18, 2010.

Attachment 2

Legal Notice/Bill Message

On October 18, Cox's Government, Education and Public Access channels will move to Cox's digital starter service. Middle GA Cox customers with a Digital Tuner Ready TV will need to tune to 94.1 for Government Access, 93.1 for Education Access, and 88.6 for Public Access. Current Cox Advanced TV customers can continue to tune to channel 18 (Public Access), 17 (Education) and 14 (Government). For more information, call 784-8000.