

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Annual Assessment of the Status of ) MB Docket No. 12-203  
Competition in the Market for the )  
Delivery of Video Programming )

**COMMENTS OF  
EDUCATION RESOURCE CHANNEL @ MIDDLE TENNESSEE**

The Education Resource Channel @ Middle Tennessee (ERC @MT) submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.” In these comments we address the role of PEG channels in our community and the importance of preventing companies from inhibiting access to these channels.

The Education Resource Channel @ Middle Tennessee is an education access channel in Murfreesboro, Tennessee. The channel serves Rutherford and Cannon Counties, and parts of Smith and Wilson

Counties in Tennessee. Our live education programs are also available in Davidson County, Tennessee, northern Alabama, and southern Kentucky. This live education programming is of unique interest to K-12 schools, both locally, and in the greater Middle Tennessee area. Many of our other programs are also of unique interest to adult learners in our community. Our programming needs to be readily accessible to viewers, not placed in a format which is inferior or less accessible than other channels.

Murfreesboro, TN, has two (2) MVPD providers: Comcast Xfinity and AT&T U-Verse. Comcast provides four (4) PEG channels: Murfreesboro city government access channel on Channel 3, Rutherford County government access channel on Channel 19, ERC @ MT (Middle Tennessee State University, College of Education) education access channel on Channel 9, and MTTV (Middle Tennessee State University, College of Mass Communication student channel) education access channel on Channel 10. AT&T provides access to the PEG channels through its Channel 99.

Comcast provides these PEG channels on all tiers of service. The only extra equipment required is for viewers who need digital to analog converters. AT&T U-Verse provides PEG channels through its Channel 99, which is a gateway through which viewers must navigate to find local PEG programming.

The number of PEG channels available to Murfreesboro, Tennessee, residents has not changed since 2010.

Currently ERC @ MT has had no complaints about the availability or technical quality on AT&T's U-Verse system. However, there are relatively few AT&T U-Verse customers in Murfreesboro. Because of the concerns identified in *ACM et al*, CSR-2186, the channel staff are not encouraged to believe that AT&T U-Verse customers have appropriate ease of access to or a quality technical signal for PEG channels.

ERC @ MT is operated by a state university, so receives neither monetary nor equipment support from Comcast or AT&T. Currently we have not incurred any negative effects from recent changes in Tennessee state law. However, any future changes in state or federal law that

impose additional costs on PEG channels or that compromise access to them will be very detrimental to our local schools and the general public.

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