

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

In the Matter of

Annual Assessment of the Status of
Competition in the Market for the
Delivery of Video Programming

MB Docket No. 12-203

**COMMENTS OF
Manhattan Community Access Corporation
(Manhattan Neighborhood Network “MNN”)**

Manhattan Community Access Corporation (“MNN”) public access Television 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.”

Manhattan Community Access Corporation is an independent non-profit 501(c)(3) organization that runs the community media center for the county of Manhattan, New York. We are dedicated to providing the base necessities for functioning community media – physical space, staff, up-to-date equipment, local governance, broad multimedia training.

1. Time Warner Cable provides four cable channels for use by MNN.
2. These channels are placed on the lowest tier of cable provided. If residents only have analog television sets they require a digital converter box to receive this basic service.
3. RCN and Verizon FiOs are also channel carriers.

4. In a rapidly evolving media landscape, it is critical that protections for the public are solidly put in place to assure responsiveness to local needs and encourage a diversity of information sources and services. MNN four channels are 100% local and serve health, educational, arts, economic development, civic, and other needs

5. We are not in an AT&T U-Verse community.

6. PEG programming has grown in utilization, viewership, relevance, variety, and quality.

We have seen consistent improvements across the board for the last five years. This can be tied directly to a few factors. Firstly, management of the PEG facility is in control of local independent nonprofit Manhattan Neighborhood Network. Second, we are located in a City (New York) that has largely been able to resist the legislative changes that have decimated community media across the nation during a time when it is most needed to grow. Third we have embraced the concept of our PEG center as a community media center. Modern television is not limited to the parameters which defined it only a short time ago. A modern community media center needs to embrace all forms of multimedia production and support for that should be provided by similar revenues to fund this public good as generated by internet providers and traffic over those same public lines.

Daniel Coughlin

Executive Director

Manhattan Community Access Corporation

Manhattan Neighborhood Network Public Access Television

9-10-12