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October 12, 2012

VIA ELECTRONIC FILING

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

Re: Implementation of the Commercial Advertisement Loudness
Mitigation (CALM) Act, MB Docket No. 11-93

**Stowe Cablevision, Inc. Request for Streamlined
Financial Hardship Waiver of CALM Act Requirements**

Dear Ms. Dortch:

Stowe Cablevision, Inc. (FRN: 0003755766), by its attorneys and pursuant to the Federal Communications Commission's December 13, 2011 *Report and Order* in the above-captioned proceeding, hereby submits the attached request for a streamlined financial hardship waiver of the Commercial Advertisement Loudness Mitigation (CALM) Act rules for one year.

Should you have any questions or require additional information, please contact the undersigned.

Respectfully submitted,



Tom W. Davidson

Enclosure

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Implementation of the Commercial)
Advertisement Loudness Mitigation) MB Docket No. 11-93
(CALM) Act)

To: The Secretary
For: Chief, Media Bureau

STREAMLINED FINANCIAL HARDSHIP WAIVER REQUEST

Stowe Cablevision, Inc. (“Stowe Cablevision”), serving Stowe, Vermont, acting pursuant to Section 2(b)(2) of the Commercial Advertisement Loudness Mitigation Act (“CALM Act”) and the Report and Order released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding (the “CALM Rules”),¹ hereby certifies to the Commission that it is in need of a one-year delay for its required compliance with the CALM Rules and seeks such relief pursuant to the streamlined procedures adopted by the Commission. In support thereof, Stowe Cablevision states as follows:

Stowe Cablevision submits that it meets the FCC’s definition of a “small MVPD system” for the purposes of the CALM Act and the CALM Rules. The CALM Rules define a “small MVPD system” eligible for the streamlined waiver process as “one with fewer than 15,000 subscribers (as of December 31, 2011) that is not affiliated with a larger operator serving more than 10 percent of all MVPD subscribers.”² Stowe Cablevision serves approximately 532

¹ *Implementation of the Commercial Advertisement Loudness Mitigation (CALM) Act*, MB Docket No. 11-83, 26 FCC Rcd 17222 (2011).

² *See id.* ¶ 54.

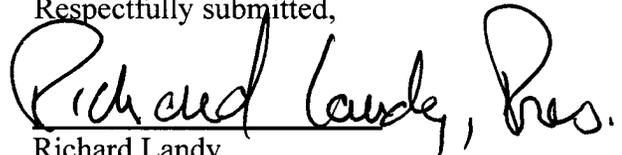
subscribers and is not affiliated with a larger operator. Accordingly, Stowe Cablevision qualifies as a “small MVPD system” for these purposes under the FCC’s rules.

Stowe Cablevision also submits that it needs a one-year delay in obtaining equipment in order to avoid the financial hardship that would be imposed were it required to obtain the equipment, such as the Miranda AXINO, by the December 13, 2012 effective date of the CALM Rules. A one-year delay in having to acquire and operate this equipment represents a meaningful limitation on the financial hardship that the CALM Act imposes on this MVPD system.

Consequently, Stowe Cablevision is entitled to a financial hardship waiver permitting it to receive a one-year delay in its CALM Act and CALM Rules compliance.

The undersigned certifies under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

A handwritten signature in black ink that reads "Richard Landy, Pres." The signature is written in a cursive style with a horizontal line underneath the name.

Richard Landy

President

Stowe Cablevision, Inc.

Executed October 12, 2012

October 5, 2012