

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Applications of Comcast Corporation, Time	)	MB Docket 14-57
Warner Cable, Inc., Charter	)	
Communications, Inc., and Spinco To Assign	)	
and Transfer Control of FCC Licenses and	)	
Other Authorizations	)	
	)	

**MOTION TO ACCEPT REPLY COMMENTS**

The States of California and Nevada Chapter of NATOA (“SCAN”) asks that the attached comments be accepted into the record of this proceeding. While SCAN did not file Comments during the Comment period, the proffered comments support the thoughtful presentations made in this proceeding during the Comment period by similar organizations that represent local governments including NATOA, Alliance for Community Media, American Community Television, Los Angeles County, California; Montgomery County, Maryland; the City of Portland, Oregon; and the Ramsey-Washington Counties (MN) Suburban Cable Communications Commission. No party is prejudiced by SCAN’s endorsement of these previously filed comments and the public interest is served by permitting SCAN to participate in this important proceeding.

Respectfully submitted,

\_\_\_\_\_  
/s/ Jack Chin  
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**COMMENTS FILED BY SCAN NATOA, INC. REGARDING APPLICATIONS OF  
COMCAST CORPORATION, TIME WARNER CABLE, INC., CHARTER  
COMMUNICATIONS, INC., AND SPINCO TO ASSIGN AND TRANSFER  
CONTROL OF FCC LICENSES AND OTHER AUTHORIZATIONS**

**Reply Comments Date: September 23, 2014**

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## **I. INTRODUCTION AND COMMENT**

The States of California and Nevada Chapter of NATOA (“SCAN”) is an association with a history spanning over 20 years representing the interests of over 300 members consisting primarily of local government telecommunications officials and advisors located in California and Nevada. Accordingly, SCAN’s members have a keen interest and stake in this proceeding and its outcome.

SCAN is aware of and in support of filings by similar organizations that represent local governments including NATOA, Alliance for Community Media, American Community Television, Los Angeles County, California; Montgomery County, Maryland; The City of Portland, Oregon; and the Ramsey-Washington Counties (MN) Suburban Cable Communications Commission.

### **PEG and HIGH DEFINITION**

The viewing habits of the public have continued to evolve and High Definition (HD) subscriptions have increased. To maintain the status quo of public information, and the significant migration to HD, it is imperative that Public, Educational, and Government (PEG) channels have the opportunity to be included on this tier of cable television services.

SCAN would like to focus the Commission’s attention to this one area that we believe is of utmost importance with regard to transparency of local government proceedings.

SCAN supports and encourages the Commission to impose a condition to the consent of the transfers that require that PEG channels be included on High Definition (HD) tiers of service provided by any multichannel video service provider; and any future advanced delivery service at no cost to local governments or any organization responsible for the delivery of PEG on a channel by channel basis. SCAN recommends that channel position should be

consistent with the Standard Definition (SD) tier line-up unless both parties agree to the relocation within a reasonable time period such as 60 calendar days. Inclusion of PEG channels on the HD or higher tier of service ensures that the channels are not isolated from subscriber growing viewing habits of HD. Generally, if a viewer routinely watches HD channels, they most likely will never discover PEG channels on SD, and the ability to watch local government proceedings are rarely viewed.

Channel surfing has and continues to be common practice among television viewers. If PEG programming including Board of Supervisors, City Council, and School Board meetings are absent from HD, the opportunity of discovering PEG as well as what is happening in your community through channel surfing becomes highly unlikely. Seeing your local government in action is the hallmark of PEG programming. It is important that PEG channels be treated like all commercial channels including carriage on the HD tier.

Consider the absence of PEG programming in the City of Bell, California. If the City Council would have been carried on PEG, and included on the HD tier, it's possible the community would have been informed of the now infamous misappropriation of public funds. Perhaps, the elected officials would have been reluctant to conduct business on a fraudulent basis.

Many cities no longer have a local newspaper reporting on government activities. Even when there is one present, it may only be regional. This is where PEG becomes even more important to empower the citizenry with information. Transparency in government is vital today, no more so than ever. Ensuring the public has access to government information requires meaningful thought, planning, and vision. To keep the public informed PEG on HD is needed.

## II. CONCLUSION

Therefore, SCAN would be in support of the Applications of Comcast Corporation, Time Warner Cable, Inc., Charter Communications, Inc., and Spinco To Assign and Transfer Control of FCC Licenses and Other Authorizations provided that Public, Educational, and Government (PEG) channels be included on High Definition (HD) tiers of service provided by any multichannel video service provider; any future advanced delivery service; on the same channel position as delivered on the Standard Definition (SD) tiers; and at no cost to local governments or any organization responsible for the delivery of PEG on a channel by channel basis. SCAN also supports filings by similar organizations that represent local governments including NATOA, Alliance for Community Media, American Community Television, Los Angeles County, California; Montgomery County, Maryland; The City of Portland, Oregon; and the Ramsey-Washington Counties (MN) Suburban Cable Communications Commission.

Respectfully submitted,

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