

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

In the Matter of	)	
	)	
Proposed Transfer Of Control Of Time	)	MB Docket 15-149
Warner Cable, Inc. And Charter	)	
Communications Inc. And Proposed	)	
Transfer Of Control Of Bright House	)	
Networks From Advance/Newhouse	)	
Partnership To Charter	)	
Communications Inc.	)	

**COMMENTS FILED BY SCAN NATOA, INC.**

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## **I. INTRODUCTION AND SUMMARY**

The States of California and Nevada Chapter of NATOA (“SCAN”) is a non-profit 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 our friends that represent local governments including Alliance for Community Media (“ACM”), American Community Television (“ACT”), Southeast Association of Telecommunications Officers Advisors (“SEATOA”), and Alliance for Communications Democracy (“ACD”).

### **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 Commissions attention to this one area that we believe is of utmost importance with regard to transparency of local government proceedings. SCAN desires as a condition to consent to the transfers that the Commission 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 consumed.

Channel surfing has and continues to be common practice among television viewers. If PEG programming including Board of Supervisor, City Council, 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 also important that PEG channels be treated like all commercial channels in that, 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 for 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 Proposed Transfer of Control of Time Warner Cable, Inc. and Charter Communications Inc. and Proposed Transfer of Control of Bright House Networks From Advance/Newhouse Partnership to Charter Communications Inc. 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 our friends that represent local governments including Alliance for Community Media (“ACM”), American Community Television (“ACT”), Southeast Association of Telecommunications

Officers Advisors (“SEATOA”), and Alliance for Communications Democracy (“ACD”).

Respectfully submitted,

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