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January 23, 2015

The Honorable Fred Upton
2183 Rayburn House Office Building
Washington, DC 20515

The Honorable Greg Walden
2185 Rayburn House Office Building
Washington, DC 20515

Re: Regulation of the Market for Video Content and Distribution – Response to White Paper #6

Dear Chairman Upton and Chairman Walden:

I am pleased to send you this letter on behalf of the Colorado Communications and Utility Alliance (CCUA), the Washington Association of Telecommunications Officers and Advisors (WATOA), and the Alliance for Community Media - Northwest Region (ACMNWR).

CCUA was formed as a Colorado non-profit corporation in 2012, and is the successor entity to the Greater Metro Telecommunications Consortium.¹ It is the Colorado chapter of the National Association of Telecommunications Officers and Advisors (NATOA). Its members have been working together since 1992 to protect the interests of their communities in all matters related to local telecommunications issues. The CCUA undertakes education and advocacy in areas such as telecommunications law and policy, cable franchising and regulation, zoning of wireless communications facilities, broadband network deployment, public safety communications, rights-of-way management, and operation of government access channels.

WATOA is a professional organization of individuals and organizations serving citizens in the development, regulation, and administration of cable television and other telecommunication systems.² Its purposes include sharing information about cable and telecommunications issues and activities affecting local governments; improving the administration of cable TV franchises; providing technical assistance to members;

¹ The members of CCUA are Adams County, Arapahoe County, Arvada, Aurora, Boulder, Brighton, Broomfield, Castle Rock, Centennial, Cherry Hills Village, Columbine Valley, Commerce City, Dacono, Delta, Denver, Douglas County, Durango, Edgewater, Englewood, Erie, Federal Heights, Frederick, Glendale, Golden, Grand Junction, Greenwood Village, Lafayette, Lakewood, Littleton, Lone Tree, Louisville, Mead, Montrose, Northglenn, Parker, Sheridan, Thornton, Westminster, and Wheat Ridge, Colorado.

² WATOA's local government members are Bellingham, Bremerton, Ellensburg, Everett, Kent, King County, Kirkland, Longview, Pasco, Richland, Seattle, Tacoma, University Place, Vancouver and West Richland, Washington. Its regional and PEG programming members are KLTW – Longview, Pierce County TV – the Rainier Communications Commission, Mid-Valley TV Toppenish, Washington, and the Metropolitan Area Communications Commission (Beaverton, OR).

providing a forum for the open and balanced discussion and debate of telecommunications issues; and communicating with other professional organizations for the overall improvement of telecommunications services to the public. WATOA is the Washington state chapter of NATOA.

ACMNWR represents and advocates on behalf of all media creators and providers including videographers, musicians, graphic designers, Public, Educational and Governmental (PEG) cable TV access organizations, community media centers, and access producers throughout Alaska, Alberta, British Columbia, Idaho, Montana, Oregon, Utah, Washington, and Wyoming. ACMNWR is a region of the national Alliance for Community Media, a nonprofit, national membership organization founded in 1976.

The House Energy and Commerce Committee's latest white paper (number six) focuses on the regulation of the market for video content and distribution and it poses questions and seeks comment from interested parties. This letter will address a number of issues to which CCUA, WATOA and ACMNWR can speak with authority.

PRELIMINARY ISSUES

We would like to first clarify a statement made in the white paper. In discussing potential barriers to competition, the white paper says "Franchising authorities regulate cable rates unless the cable system is subject to effective competition as defined under the law." This is not entirely accurate. If a cable system is not subject to effective competition, a franchising authority does not regulate cable rates unless it chooses to do so. If a franchising authority chooses to regulate rates, it is only permitted by federal law to regulate rates for the basic tier of service, which comprises a small percentage of the cable services offered in our communities. In addition, most jurisdictions are in fact subject to effective competition, since the threshold for finding effective competition is so low. As a result, very few franchising authorities regulate cable rates, and those that do only regulate a very small part of the services provided. We do not mean to advocate for rate regulation – quite the contrary. We only wish to point out that rate regulation is not really a barrier to cable competition, nor does it significantly impact cable service provision where there is no wireline based competitor to the incumbent cable operator, because rate regulation occurs so infrequently. None of our Colorado and Washington jurisdictions regulate basic cable rates.

ADDRESSING SPECIFIC WHITE PAPER QUESTIONS

Our intent is to address those questions directly related to localism and PEG programming. We will respond first to questions 2b and 3, and then provide some suggestions to that part of the Committee's questions in 1d related to actions that can be taken to promote localism. It is important to note that we start from this foundational premise: private sector content providers and communications network owners are most often for-profit entities whose ultimate goal is to generate revenue. There is nothing wrong with this – it is simply a fact. It is also a fact that these entities use public assets in order to run their businesses. Broadcasters and satellite companies use licensed spectrum. Cable operators, telephone companies and other wireline based broadband

providers use public rights-of-way to locate their network infrastructure. There are a variety of federal, state and local legal provisions that provide mechanisms for these entities to provide consideration for these public assets through public interest obligations.

It is appropriate, in an era of convergence, to explore ways to create revised public interest obligations that make sense in a new technological environment. Indeed, in today's environment, one can say that we no longer have "cable companies" and "telephone companies." We have broadband companies, and we see voice, video and data as applications delivered over broadband networks. We discuss one way to address these public interest obligations in our response to question 1d below.

As Congress considers ways to "level the playing field" in addressing how new technologies are governed, it is important that Congress not eliminate public interest benefits to local communities. Doing so would result in a government subsidy to the broadband network operators and content providers, and a dramatic reduction in the important local content that is being produced and provided to Americans today through a variety of media, as a result of the creativity of their local governments, educational institutions, and their community media centers, as well as the private sector partners that help facilitate production of this local content.

White Paper #6, Question 2. Cable services are governed largely by the 1992 Cable Act³, a law passed when cable represented a near monopoly in subscription video.

b. Cable systems are required to provide access to their distribution platform in a variety of ways, including program access, leased access channels, and PEG channels. Are these provisions warranted in the era of the Internet?

Feedback: The partnership between cable operators, franchising authorities and PEG Access organizations enabled by the Cable Acts, beginning in 1984 has led to beneficial and important local access cable programming, as well as allowed for the expansion of such programming into new media, as new technologies have developed. Over the years, many of our jurisdictions have used their access channels on their cable systems to provide programming on a variety of topics – city council meetings, local news shows (especially beneficial in smaller rural communities and suburban communities whose local news is not generally covered by the broadcast networks), magazine style shows addressing local issues (such as arts, parks and recreation, tourism, public health and public safety), educational programming, high school sports, and public affairs programming (including interview programs with state and federal elected officials about issues of importance within their districts).

³ Cable services are actually governed by the Cable Act of 1984, which, as the Committee correctly implies, was amended in 1992. It was further amended in the Telecommunications Act of 1996.

These efforts to enhance and expand PEG programming continue today. Moreover, these efforts are not limited to content on cable channels. Our member jurisdictions and organizations have been actively involved in expanding our programming to include web-streaming and social media.

What follows below is just a sampling of the kinds of important programming that our communities and PEG access organizations are providing for local residents and businesses – both on cable channels and on-line.

- ***Spokane, Washington***

The city of Spokane operates CityCable 5, a local government access channel on Comcast Cable. Its live productions cover City Council, Planning Commission, Park Board, Police Ombudsman Commission and Use of Force Commission. These meetings provide real time unedited information to the citizens of Spokane. In addition the city replays various board meetings that are provided from outside agencies such as the Spokane County Commissioners, Spokane Transit Authority and Spokane Regional Board of Health.

Locally produced programs include a weekly City Media Briefing, Monthly Council Connection (live hour long talk show hosted by Council Members with citizen call in) Spokane Insight (monthly ½ hour city information program), Leaders and Lectures (monthly lecture series), Walk in the Park (bi-monthly City Parks & Recreation program) and Second Alarm (bi-monthly Spokane Fire Department information program).

Spokane is focused on transparency of local government by providing citizens numerous options for obtaining information on what is going on in local government. It provides a live stream all of the City boards and commissions as well as the Council Connection program. All of its locally produced programs are used on the city's nationally recognized YouTube Channel (<http://www.governmentvideo.com/article/government-video-web-channel-salute-spokane-washington/114792>), VIMEO channels or used in short form social media or included in city blogs. Spokane's current You Tube channel has 40,458 total views, 110 subscribers, and 348 videos. The city has 162 videos available through Vimeo.

- ***Durango, Colorado***

The City of Durango provides critically important access television content in Southwest Colorado. Located in La Plata County, this area is an “orphan community,” in that it is not within any Colorado direct market area for broadcast television. Most over the air television and “local” cable broadcast network programming is from Albuquerque. For years Durango's government access television operation has worked to keep local residents up to date on not only local government events (such as city council and other meetings) but also providing local interest programming and exposure

for local entities. Durango reaches city residents via its cable channel on Charter Communications' cable system.

The city's status as an orphan community creates a problem in delivering emergency information to local residents in a timely fashion. It is difficult to rely on Albuquerque media to broadcast information in emergencies unless the emergency is extremely large. Durango has developed a workflow to air information about power and water outages, wildfires and flooding over its cable channel as well as on the web, on its city buses and hopefully soon directly to the homes of all residents in Durango and La Plata County.

In addition to its programming on the cable system, Durango streams the government produced programming 24/7 and promotes the cable channel programming through social media. The city has begun sending some of its programming to monitors on Durango Transit buses. It has entered into an agreement with the Southwest Colorado Television Translator Association to carry Durango's live programming to areas of Southwest La Plata County, Montezuma County and portions of Dolores County that cannot receive the programming over their cable systems (or where no cable system is available). Durango is a regional center of commerce and travel in Southwest Colorado, and its efforts to make local programming available to the broader region are indicative of that fact.

- ***Arvada, Colorado***

The city of Arvada produces thirteen different types of programming:

A-Files - magazine format show takes a closer look at our community, from events to people and places that make this community what it is today.

Artscentric - showcases the creative world of the Arvada Center through Theater, Galleries and Education.

Arvada Insights - hosted by the Mayor of Arvada, the mayor and his guests provide the insights on the latest projects, developments and activities that are taking place in the city.

Arvada Attic - showcases items, places and events in the City of Arvada history.

City Beat - profiles city departments or items of interest within the department.

Council Connection - is hosted by one of our City Council members, highlighting a community event, project or city issue.

Eco Diary - shows you the efforts that the city is undertaking, to make sure that all Arvadans are moving in the right direction to go GREEN!

Jefferson County Insights - Brings you a closer look at what is happening in the county, from your county commissioners to all the programs that are available to county residents (the city produces this for Jefferson County as the county has no cable channel this programming is shared with other cities in the county like Lakewood, Wheat Ridge and Golden)

Making the Grade - showcases the educational world of Arvada through the eyes of staff, students and administrators in Jefferson County Public Schools.

PARK'n IT - find out more about the wonderful city parks and what they have to offer.

Profiles - takes a closer look at City Employees that are making a difference not only at city hall but also in the Arvada community.

Silver Linings - takes a closer look at seniors in the Arvada community and programs like Silver Sneakers that can help them.

Veteran's Voice - takes a look back in time with Arvada's veterans as we sit down with them to hear their story, their voice.

These programs provide a significant amount of valuable information to city residents. In 2014 the city produced 99 original program segments. Production, shooting and editing over 8 segments per month reflects a major commitment of city resources.

In addition to this monthly programming, the city's government channel broadcasts all City Council meetings and Planning Commission meetings live, and replays them throughout the week. The Arvada Chamber of Commerce holds a monthly breakfast meeting that is also covered by the city channel. Each month the Chamber brings in a variety of interesting speakers, like an economist with an outlook on the coming year to the Mayor's "State of the City" speech.

Arvada also provides its content on demand through the city's website and on YouTube. At present, the city has over 850 videos on YouTube with over 2.2 million hits. The city also streams its channel live on the Internet, and has created applications to stream program content to smartphones and tablets.

- ***Rainier Communications Commission (RCC), Pierce County, Washington***

The RCC, through its programming arm, Pierce County TV (PCTV), is unique as a cooperative among the County of Pierce and six major municipalities. PCTV provides coverage of its members' Council meetings and other selected activities. PCTV also produces a weekly newscast focusing on local government programs and activities. In 2014, "Pierce County News" was honored, for a second year, as the nation's top newscast by NATOA.

Quarterly, PCTV produces the magazine program, "Rainier County," focusing on community events, historical topics and unique individuals. Each month, "Pierce County Talks" dips a little deeper into current affairs through stories and interviews with the newsmakers.

PCTV also produces programs from regional activities such as the Tacoma-Pierce County Economic Outlook, Annual Police Memorial, JBLM celebrations, South Sound Regional Council and others. In 2014, PCTV produced a 90-minute special highlighting Washington high school marching bands performing in the "Sunset Festival of Bands" in Sumner, Washington. In 2015, PCTV is a major video partner for coverage of the U.S. Open at Chambers Bay golf course.

In addition to high definition programming on three cable systems, PCTV provides Video On Demand access to all productions on its website and the PCTV mobile app for smart phones and tablets. PCTV maintains a You Tube channel (in excess of one million unique "hits") and utilizes social media. Every story and program is also made available to its members and production partners for use on their individual websites, social media and other promotional platforms.

- ***Thornton, Colorado***

Thornton broadcasts city council meetings, and produces a show called Thornton360 twice a month. Thornton360 recaps the latest council meeting and keeps residents informed about important local news, issues and events happening in the community, much of which is never covered by other local news outlets in Denver.

In addition to airing this program on the City's PEG cable channel, this local programming is available on demand through Thornton's webpage. It is also airs as part of Thornton's 24/7 live stream. To raise awareness of each new episode, the city promotes the link to the programming on its Facebook and Twitter pages.

- ***Greenwood Village, Colorado***

A smaller suburban city with a programming budget of less than \$50,000 per year, Greenwood Village produces approximately thirty original programs annually. Last year Greenwood Village introduced seven new programs that can be viewed on the city's cable channel GVTV 8, its website, and You Tube channel. The following programming is offered:

Village Showcase - Hosted by the Mayor, showcases events and highlights important topics in the community.

Beyond the Green - People, places, and projects related to parks, trails and open space are featured.

Over 50 and Loving It! - introduces issues, events, and people that are taking 50+ to a new level.

Safety Matters in GV - Learn about important safety issues hosted by the Police Department.

GV Business Connections - An inside look at the business community of Greenwood Village.

GV Kids, Ink! News - Hosted by youth news reporters, this program features youth activities and events.

The Village Insider - A glimpse of the employees at City Hall and the Village programs and projects that are making a difference in the lives of citizens.

With a major interstate highway in Greenwood Village, the city also video streams the Greenwood Village traffic camera feeds, as well as some Colorado Department of Transportation traffic camera feeds during the morning and afternoon rush hours.

- **Denver, Colorado**

One example of the crucial role PEG programming plays is in election coverage. Commercial media have primarily a commercial interest in the elections attending to only those who can pay the toll for media access, or pay attention to the highest profile candidates. In Denver, the community has supported access to the ballot and candidates with a PEG effort that provides thorough coverage. Denver Decides is a community effort led by the League of Women Voters and Neighborhood Organizations and supported by Denver's government access entity. Every Denver Election Division certified candidate gets a complimentary 2-minute "Candidate Introduction," where each person makes his or her pitch for office. Candidate forums are also organized for each contested race. They are usually held in the community and recorded for the channel.

Additionally, ballot issues are debated and an overview Ballot Preview program is created that includes all the election process, registration, and balloting information. All videos are made available in the month prior to Election Day as scheduled on the government access channel. They are also made available through the Denver Decides website and organized into all the ballot categories where the videos are accessible on-demand as streaming video. This effort covers all elections including races for Congress, Statewide offices and State House and Senate offices, all Municipal offices, and School Board, depending on the election cycle.

A completely different genre of programming is the government access channel's "Denver Loft Sessions." This program highlights local talent and features local Denver and regional area performing artists. The program supports the local cultural community and fosters economic development. Bands (sometimes poets) performing original material are invited to the Denver TV studio to record a 25-minute set of music. They are also interviewed to let the larger community get to know something about the members and their work. Groups or artists perform for the exposure and promotion. In return, they receive a broadcast quality high definition video of the final edited program as well as links that are used on websites and social media outlets. Denver also posts the programs to the channel website and uses a program Facebook page to share information about the performances and to promote the program. This program is distributed in throughout the Denver metro area and available to PEG channels statewide.

One other example demonstrates how PEG programs are instrumental in informing and promoting the many amenities and rich culture of the community to residents and visitors. Denver's "Dtown" program takes a monthly thematic approach, choosing eight related topics and assembles each into a fun and fast look at an aspect of the community. A host guides viewers through the list as the show's tour progresses. Upon completion, the show as a whole and each separate item is made available to view as a stand-alone program that is shared for local engagement and tourist information. The full program is a scheduled cablecast and the segments are shown interstitially throughout the week's program schedule. The programs and segments are shared online and the program hosts a Facebook page for additional outreach.

- **Northglenn, Colorado**

Local access programming also promotes our nation's heritage and local celebrations, providing unique, local perspectives on how America celebrates. An example is Northglenn's program on its Independence Day celebration, which includes the participation of Northglenn's House member, Hon. Ed Perlmutter. (<https://www.youtube.com/watch?v=xGRryMNovms>).

- **Lafayette, Colorado**

In addition to live broadcasts of city council and planning commission meetings and airing of political debates and issues forums, Lafayette's original programming content includes historical society presentations, library programs, current issues show hosted by the City Administrator, energy conservation and composting, and public safety issues. The city uses its access channel to provide information on municipal employment opportunities and recruitment for city boards and commissions. Lafayette also provides its citizens a vehicle to watch programming from other sources such as the Colorado Department of Transportation, Regional Transportation District, League of Women Voters and Boulder County. The city also video streams its live broadcasts through its website, and makes its video archives available on demand.

It is important to note that none of our existing PEG operations are even close to fully funded by our cable operators or other private entities. In addition to the provision of PEG channels and some capital support for PEG equipment, our jurisdictions spend considerable amounts of general fund revenue each year for PEG equipment and operations. In many communities, it would not be possible to continue our local programming efforts without the support from our partners in the cable industry. Indeed, in states that have adopted state franchise legislation that has eliminated requirements for PEG access support, many public and non-profit programming has been eliminated.

It is easy to refer generally to local barriers or problems that some have reported between the cable industry and local government. In fact, while we certainly do not always agree, our communities have developed and maintain mostly positive and mutually respectful and beneficial relationships with our cable operators. We believe that you will not find cable operators in Washington or Colorado arguing for changes in the law due to widespread problems they experience in our states. Any changes in the law recognizing the delivery of programming over a variety of new technologies must also recognize some mechanism to continue the public interest obligation of the industry to local communities, so that this kind of programming will continue to be available.

One might also suggest that since so many access providers are offering content over the Internet, cable PEG access requirements are no longer necessary. This would be wrong for at least two reasons. First, the ability for localities to provide access over the Internet is based in part, on the ability to leverage to benefits from cable's public interest obligations. Without the PEG support provided by the cable industry, PEG access content could not continue to be provided by jurisdictions and PEG organizations nationwide over the Internet. Indeed, the elimination of PEG obligations through state franchise laws has proved this point. PEG operations in these states have been eliminated or dramatically reduced. Congress should be clear in understanding this point. Any elimination of support for traditional cable PEG access content that is not made up in some other manner, will critically damage the ability of localities to provide local content going forward – over any delivery system, including the Internet.

Second, with the expanding variety of technology and media choices today, government's role is to make our information more available and more transparent to our citizens *in whatever format they choose to access it*. Many people today may prefer to view local programming over the Internet. However, a significant percentage of our communities still watch television regularly and enjoy watching local content on their access channels. This is especially true of our senior citizens. The government should not be in a position of choosing which delivery system is "better." Rather, we should be promoting ways to deliver local content over as many platforms as we possibly can.

White Paper #6, Question 3. Satellite television providers are currently regulated under law and regulation specific to their technology, despite the fact that they compete directly with cable. What changes can be made in the Communications Act (and other statutes) to reduce disparate treatment of competing technologies?

Feedback. While it is true that cable operators often pay franchise fees and satellite providers do not, this different regulatory treatment is neither unreasonable nor unfair. There are different technologies used to deliver similar services, but the costs to use one or the other are based upon commercial choices made by each company. A cable operator may pay a franchise fee as compensation for the use of public rights-of-way, which is one of its many costs of doing business. At the same time, it does not incur satellite related costs necessarily incurred to deliver programming via satellite. When considering government regulations on different delivery systems, one must focus on the basis, justification and reasonableness of the compensation imposed upon a particular kind of network.

Cable operators pay franchise fees in part, as consideration for the use of public property. Cable operators also provide capacity on their networks for public, educational and government access programming – programming which is not available on satellite systems. Yet satellite companies also use public property through the use of licensed spectrum. We are starting to see creative partnerships with satellite companies utilizing over the top capabilities to offer a wider variety of programming options.⁴ In other words, satellite companies are starting to seek ways to deliver their programming in part, over networks that use the same public rights-of-way as cable and wireline broadband network operators. As we discuss below, Congress can promote localism, *and* create a more level playing field, if changes to the law include a requirement that as part of its compensation for the use of licensed spectrum, and its ability to expand its business offerings through the leveraging of wireline networks, satellite companies make available local PEG programming on their delivery systems.

White Paper #6, Question 1. Broadcasters face a host of regulations based on their status as a “public trustee.”

d. What other mechanisms could promote both localism and competition?

Feedback: As mentioned earlier, our communication networks are becoming broadband networks, not “cable,” “telephone,” or other kinds of networks.

NATOA addressed this issue in its “Blueprint for Localism in Communications”:

The convergence of communications technologies led by Internet Protocol and exponential growth of computing power is fundamentally transforming the communications industry. This transformation is taking place at a time of increasing industry consolidation and the concentration of political and economic power in the hands of a few incumbent providers. That in turn has led to deregulatory measures, laws and regulations that have the potential to be harmful to the interests of the public and local communities. At stake is local government’s ability to ensure provision of important public benefits such as local consumer

⁴ <http://about.dish.com/press-release/products-and-services/sling-tv-launch-live-over-top-service-20-month-watch-tvs-tablets>. (Last viewed January 21, 2015).

protection, support for multiple voices in media through Public, Education and Government (“PEG”) programming, and regulation and compensation for the private use of public property, to name just a few.⁵

We believe that the challenge for Congress, and for its constituents, is to develop a new statutory framework for broadband communications, which recognizes that entities using public assets continue to hold public interest obligations. Rather than leveling the playing field by eliminating public interest obligations, Congress should recognize the value and importance of this local programming, the fact that it cannot continue to exist without some level of support from the industries that benefit from the use of public assets to run their business, and must ensure that local programming can continue to be made available, regardless of the delivery platform. Whether a network operator uses public rights-of-way or licensed spectrum to deliver content to end users, each should be required to provide some support dedicated to the delivery of locally produced access-programming content over these networks. Because local needs differ from community to community, it should be left to the local network owners and the local jurisdictions to determine the form of the support – perhaps within a federal framework similar (but not identical) to the framework that creates the federal–local regulatory framework for cable. Just as cable operators do today, satellite providers should be required to provide access on their networks for this same local content, and to participate in a reasonable amount, in the local entities’ costs incurred in the development and delivery of that content.

While the network operators should provide this support, they must also be able to require the content providers that utilize their networks to contribute a fair share of meeting these public interest obligations as well. In this way, localities and public access organizations will continue to shoulder the majority of the costs of providing and delivering local content. We will make great strides however in the promotion of localism, by ensuring that access programming is available on all delivery platforms, and that both network operators and content providers riding on those networks make reasonable contributions to local efforts to develop and deliver this programming.

This will not be a simple task. However, if a foundational feature of any new legislation is the recognition of the value and importance of local programming, that goal can drive the parties to a successful statutory result. The Congress, State and local governments, PEG access providers, broadband network operators, content providers, and the public, must take the time and make the necessary effort to come together, address the hurdles and opportunities, and develop this new partnership for 21st century public interest obligations.

Very truly yours,



Kenneth S. Fellman

⁵<https://www.natoa.org/policyadvocacy/documents/NATOA'S%20Blueprint%20for%20Localism%20in%20Communications%209-15-2013.pdf> (Last viewed January 22, 2015).

cc: Members of Congress (via U.S. Mail)

Hon. Patty Murray	Hon. Michael Bennet
Hon. Maria Cantwell	Hon. Cory Gardner
Hon. Suzan DelBene	Hon. Diana DeGette
Hon. Rick Larsen	Hon. Jared Polis
Hon. Jaime Herrera Beutler	Hon. Scott Tipton
Hon. Dan Newhouse	Hon. Ken Buck
Hon. Cathy McMorris Rodgers	Hon. Doug Lamborn
Hon. Derek Kilmer	Hon. Mike Coffman
Hon. Jim McDermott	Hon. Ed Perlmutter
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