



November 14, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: WC Docket No. 05-311 - *In the Matter of Implementation of Section 621(a) of the Cable Communications Policy Act of 1984 as amended by the Cable Television Consumer Protection and Competition Act of 1992.*

Dear Ms. Dortch:

I am writing to voice my strong opposition to the Second Further Notice of Proposed Rulemaking (FNPRM), which could result in significantly less local control of and resources for public, educational, and government access (PEG) channels. While some of our FCC Commissioners have emphasized a reduced role for local franchise authorities due to what has been described as a “dynamic video marketplace,” this argument fails to recognize the significant role that many PEG access television stations play – as community spaces – that support positive social, community, and educational outcomes for thousands of individuals and families in communities across the U.S.

In this letter, I share findings from my recent study co-authored with Christiana Lynne Urbano Stanton, titled “Developing Media Literacy in Public Libraries: Learning from Community Media Centers” published last month in *Public Library Quarterly*.<sup>1</sup> My goal in sharing this research is to show that many PEG access TV stations are more than just places for local television origination. Rather, many PEG stations are also Community Media Centers (CMCs) where children, youth, and adults from diverse backgrounds can come together to work with and learn from other people in their communities.

Because many public libraries have created new spaces inside their building, including digital media labs, that allow patrons to gain digital and media literacy skills, we saw an opportunity to better understand and share lessons learned from PEG access television over the years. In our study, we interviewed

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<sup>1</sup> Rhinesmith, C., & Stanton, C. L. U. (2018). Developing media literacy in public libraries: Learning from community media centers. *Public Library Quarterly*, 37(4), 420-440.

community media professionals working in a diverse group of CMCs across the country to help us answer our overarching research question: *How might the outcomes of media literacy initiatives in community media centers help to inform similar programs and services in public libraries?*

To answer our research question, we also pursued the following sub-questions: “What are the current goals and activities of community media programs? How can these goals and activities be understood beyond school and library media literacy initiatives? Where might community media organizations and public libraries share experiences and resources? How can these insights be used to bridge the gaps between the literatures of these two fields?” (p. 6).

In our analysis with community media professionals in centers across the U.S., we found that CMCs help local residents develop critical analytical skills, deepen one’s sense of identity, and foster community engagement. More concretely, we found that media literacy programs in many CMCs promote skill building through hands-on equipment training, group media production activities, and co-creating media together with other people in their community. As we stated, “This form of community media pedagogy centers an applied learning framework that seeks to connect media making in support of active public engagement. As a result, this approach both complements and builds upon public libraries’ commitment to information access, lifelong learning, and civic engagement.” (p. 17)

It is clear not only through our research, but in the comments filed here in response to this FNPRM that thousands of individuals and families as well as hundreds of non-profit organizations, local businesses and governments rely on the local franchise fees that support PEG access channels and community media centers across the U.S.

I am happy to share our research findings and full report with the Commission. I hope these findings will be helpful as the FCC re-considers its proposed rulemaking and potentially devastating impacts on PEG access stations.

Thank you for considering my comments.

Sincerely,

*Colin Rhinesmith*

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