



June 1, 2018

Jack Phillips
Director - Government and External Affairs
Frontier Communications
14450 Burnhaven Drive
Burnsville, MN 55306

RE: Franchise §7.1 PEG ACCESS AND I-NET

Dear Jack:

In accordance with §7.1.3.3 of the City of Gresham Cable Services Franchise Agreement, this letter notifies Frontier Communications that the Mt. Hood Cable Regulatory Commission, on behalf of MetroEast Community Media (MetroEast), is requesting activation of the reserve eight (8) additional PEG Access Channels in HD format. Under an intergovernmental agreement to which the City is a party, the City has delegated responsibility to the Mt. Hood Cable Regulatory Commission (MHCRC) for ensuring cable company compliance with PEG Cable Franchise requirements.

In accordance with the activation timeline under §7.1.3.3, all eight (8) Access Channels shall be activated by October 1, 2018.

The following information is provided as confirmation that the conditional criteria for activation of the channels in HD has been met:

Section 7.1.3:

Frontier's Requirement to Reserve Access Channels for HD Activation

Grantee shall reserve eight (8) additional PEG Access Channels, for a total of seventeen (17) PEG Access Channels. Grantee shall activate a reserved PEG Access Channel following a written request from the City or its designee(s).

Section 7.1.3.1: Documentation of Community Need for HD Access Channels

The City or its designee(s) must have identified and documented a community need for additional programming capacity that the City or its designee(s) believe cannot be fulfilled by existing Public, Educational or Governmental Access Channels.

HDTV broadcast channels were implemented on local cable systems starting in 1998 and all local broadcast channels are currently available in HD. HD format has become the required benchmark for commercial channels and televisions are no longer available to purchase that are standard definition only. Comcast has provided HD PEG channels to its subscribers in Gresham and throughout Multnomah County beginning in 2010 and has simulcasted all the local PEG channels in HD since 2016. The current standard definition PEG channels do not fulfill the demonstrated community need for HD channel format local channels.

Section 7.1.3.2: PEG Channel Utilization Requirement

The existing Public, Educational or Governmental Access Channels must be utilized for PEG programming at least eight (8) hours per day, for any four (4) consecutive weeks, which programming

for purposes of this calculation shall not include programming that is more than fifty percent (50%) character generated.

MetroEast Community Media PEG Channel Utilization

Since 2012, MetroEast has been a 100% high-definition production facility. 100% of the content on MetroEast playback servers is available in HD format. In addition, PEG programming is offered on an average of 17 hours per channel, 365 days per year.

MetroEast PEG Character Generated Programming (July 1, 2017 – Dec. 31, 2017)

Total Programming Hours	25,841
Generated by Bulletin Board	35%

Section 7.1.3.3: Rolling Activation Timeline for PEG Channels

...the additional PEG Access Channel shall be made available within one hundred twenty (120) days following the City's written request, provided that, at least thirty (30) days prior to the request for activation, the City, or its designee(s), have provided Grantee with documentation that the criteria have been met.

This letter serves as official notification requesting Frontier Communications activate the reserve eight (8) additional PEG Access Channels in HD format by October 1, 2018.

Section 7.1.3.4: Maintaining PEG Access Channel HD Signals

Grantee shall maintain all PEG Access Channel signals in substantially the form received, at a level of technical quality and reliability that complies with all applicable FCC technical standards and consistent with local television broadcast channels available to all Subscribers in Grantee's Basic Service. Grantee shall use equipment and procedures that minimize the degradation of signals that do not originate with Grantee.

Section 7.2: Designated PEG Access Provider and PEG Connection

The MHCRC has designated MetroEast Community Media located at 829 NE Eighth Street, Gresham, Oregon 97030-5643.

Please contact me with any questions or for further information.

Sincerely,



Scott Ellertson
MHCRC Program Coordinator
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CC: Julie Omelchuck, MHCRC Program Manager
MHCRC
Marty Jones, MetroEast Community Media