

**Summary  
Of  
Proposed  
Cable Television Renewal License  
From Town of Natick  
To  
Comcast Cable Communications Management, LLC**

**Prepared by Special Cable Counsel  
William H. Solomon  
(Date of this Summary: October 16, 2022)**

- # License Term – Ten (10) years. November 1, 2022 – October 31, 2032
- # Comcast Cable Subscribers as of December 31, 2021 – 4,029
- # PEG Access Annual Support – 5.0% of Gross Annual Revenues, the maximum allowed under the federal Cable Act and continued from the current Comcast license. (See Section 6.4 of the Renewal License.) (Currently 5.0%)
- # Capital Support for PEG Access: Three Hundred Fifty Thousand Dollars (\$350,000) paid in ten (10) equal installments of Thirty-Five Thousand (\$35,000), beginning February 1, 2022 and on each one-year anniversary date thereafter for nine (9) additional years. (See Section 6.5 of the Renewal License.)
- # PEG Access Channels - Continuation of three (3) (Standard Definition) PEG Access Channels. The Licensee shall make one (1) High Definition (HD) Access Channel within six (6) months of the Effective Date of this License. The Licensee shall have the right to reclaim a Standard Definition (SD) PEG Access Channel beginning after activation of the HD channel and after consultation with the Issuing Authority with respect to the specific PEG Access Channel.
- # PEG Access Video Origination/Cablecasting (Section 6.3):

In order that the Town and/or its Access Provider can cablecast its PEG Access Programming over the Licensee's downstream PEG Access Channels provided pursuant to Section 6.1 above, all PEG Access Programming originating or aggregated during the term of this Renewal License at the PEG Access Video Return Hub (2 Summer Street, Natick, MA) shall be transmitted to the Licensee-owned Headend or hub-site on a Licensee-provided and owned fiber-based video return line made available by the Licensee without charge to the Town or Access Provider for their use.

The Licensee shall be responsible for all necessary inspections and performance tests of the video return lines in accordance with applicable law and regulation for a Cable System. The Licensee shall provide, maintain, operate and repair all equipment necessary to receive and transmit PEG Access programming and PEG Access Channels as described in Section 6.1 above and this Section 6.3, including necessary transmission, switching and/or processing equipment located at its hub-site and/or Headend in order to switch upstream signals carrying PEG Access Programming from the Video Return Line Hub to the designated Licensee-owned Subscriber Network downstream PEG Access Channel.

The demarcation point between Licensee's equipment and the Town's and/or Access Provider's equipment shall with respect to the PEG Access Channels be at the input of the Licensee owned equipment used for video signal transport. The Licensee shall own, maintain, repair and/or, if necessary, replace said video signal transport equipment.

- # Cable Service To Public Buildings and Schools – No longer specifically addressed in the Cable License. As the Town's Special Cable counsel, I have recommended handling this matter outside of the cable license, rather than, for instance, agreeing to payment a payment methodology in the Renewal License or a separate document. This matter arises as an issue as a result of the Federal Communications Commission's (FCC's) Third Report and Order – MB Docket Number 05-311 (effective September 2019), recently decided by a three (3) judge panel in the 6<sup>th</sup> Circuit United States Court of Appeals, and under further appeal, and potentially subject to further amendment by the FCC going forward). This office will continue to work with the Town on this issue, as may needed going forward, at no charge or cost to the Town.
- # Cable Service Availability - The Licensee shall continue to make its Cable Services available to all residents of the Town provided that the Licensee is able to obtain any necessary easements, permits and/or permission from owners of property and multiple dwelling units.
- # Standard Installation – The “drop distance” for a “standard installation” is 125 feet for both aerial or underground installations.
- # Senior Discount Side Letter – Comcast will continue to voluntarily provide a senior discount to financially eligible seniors. The discount is \$2.00 off Comcast's monthly “Extra” Service Level or that the equivalent Digital Level of Service (or that Digital Level of Service which most closely resembles Digital Starter). While this discount is certainly modest (and

increasingly so with the passage of time), it reflects the senior discount amount provided by Comcast throughout the Commonwealth in those Massachusetts communities that receive senior discounts. (Not all communities receive a senior discount.) Verizon does not offer a Senior Discount. Comcast's Gov't Affairs Manager will be forwarding the Senior Discount letter, in a form requested by this office, for the Board prior to the hearing.

To qualify for the senior discount, Subscribers must be age sixty-five (65) or older, Head(s) of Household and income eligible as set out in the side letter. Please note that the new Burlington Senior Discount will reflect two (2) additional options for financial qualification which are often not included in cable company senior discount letters, more specifically: Massachusetts Fuel Assistance; and 3(b) Property Tax Elderly Asset/Income Abatement Relief under M.G.L. Chapter 59, Section 5.

- # PEG Interactive Program Guide Letter – One of the first of its kind in the Commonwealth of Massachusetts with respect to the level of commitment by Comcast regarding future discussion regarding the use of the Comcast Interactive Program Guide for PEG Access programming:

The purpose of this letter is to outline Comcast's agreement to engage in future discussions with the Issuing Authority relative to public, educational and governmental ("PEG") access programming advancements. In light of PEG access programming discussions during the renewal license negotiation, Comcast will commit to the following:

#### PEG PROGRAMMING ON INTERACTIVE PROGRAMMING GUIDE

Comcast agrees that Comcast representatives will meet with the Issuing Authority or its designee(s) upon written request of the Issuing Authority prior to the sixth (6th) anniversary of the Effective Date of the 2022 Yarmouth Renewal to discuss the economic and technical feasibility and placement of Yarmouth PEG access channel programming schedule information on the Comcast Yarmouth cable television system Interactive Programming Guide.