

**Town of Carlisle**  
**Statement of Reasons for Preliminary Assessment of Denial**

The Carlisle Select Board, statutory Issuing Authority for the Town of Carlisle (the “Issuing Authority” or the “Town”), and Comcast of Massachusetts III, Inc. (“Comcast”) received Comcast’s Formal Renewal Proposal pursuant to 47 U.S.C. § 546(b)(1), dated June 14, 2021. The Issuing Authority voted to issue a preliminary assessment of denial on October 12, 2021. After a number of negotiating sessions, the Issuing Authority and Comcast have been unable to agree on a number of terms for a renewal license. Consequently, the Issuing Authority is hereby issuing this written statement detailing its reasons for this preliminary assessment of denial pursuant to 207 CMR 3.06(3).

First, based on the ascertainment process conducted by the Town of Carlisle, the Issuing Authority’s Needs Assessment Report identified a need and interest in the community that the signal quality and functionality of the Town’s PEG Access channels should be equivalent to that of the highest quality channels offered on the cable system. In its Formal Renewal Proposal, Comcast did not agree that any of the three offered PEG Access channels would be in HD format.

Second, the Issuing Authority’s Needs Assessment Report determined that there is a need to expand cable access to unserved homes in the Town of Carlisle. Comcast’s Formal Renewal Proposal would not enable all unserved homes in the Town to receive Comcast cable service if desired. The Area to be Served proposed in Comcast’s Formal Renewal Proposal is 30 dwelling units per aerial mile and 60 dwelling units per underground mile, which would leave several neighborhoods and homes in the Town without access to cable service.

Third, the Needs Assessment Report determined that there is a need and interest in having the ability to easily transmit live programming from locations throughout the Carlisle license area, requiring Comcast to provide live origination drops or similar technological resources throughout the Town. Comcast’s Formal Renewal Proposal does not offer such capability.

Fourth, the Needs Assessment Report identified a need and interest in ensuring that Comcast includes full program listings for PEG Access programs on its on-screen program guide. Comcast’s Formal Renewal Proposal does not guarantee that PEG Access programming could be listed by title and description on its electronic programming guide.

Fifth, the Needs Assessment Report identified a need and interest in requiring Comcast to prove that it is in compliance with the FCC’s customer service obligations. Comcast’s Formal Renewal Proposal does not require Comcast to prove compliance with FCC standards.

Sixth, the Needs Assessment Report identified a need and interest in Comcast providing adequate capital and operations funding and in-kind resources and support for PEG Access to maintain and expand the existing PEG Access services and resources and enable the PEG provider to meet local needs. Comcast’s Formal Renewal Proposal includes inadequate capital support to meet the PEG Access budget developed for the Needs Assessment Report. The PEG Access budget was developed after an inventory of Minuteman Media Network equipment and

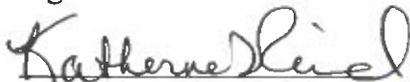
feedback from MMM personnel and the community, and predicts a capital funding need of \$261,700 over ten years. Comcast's Formal Renewal Proposal offers \$9,000 per year, for a total of \$90,000 over ten years. Additionally, Comcast's Formal Renewal proposal only offers 4.8% percent of its Gross Annual Revenues (out of a maximum of 5% allowed by federal law) to the Town for PEG support.

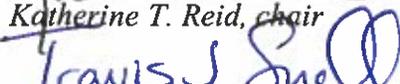
Seventh, the Needs Assessment Report identified a need and interest in ensuring that Comcast has additional capacity available for future PEG Access purposes when programming amounts strain the existing PEG Access capacity. Comcast's Formal Renewal Proposal contains no provisions for activating additional PEG bandwidth beyond the three channels offered.

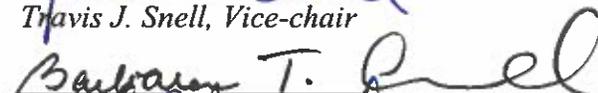
Eighth, the Needs Assessment Report identified a need and interest in ensuring that Carlisle PEG Access channel locations may only be changed if Comcast must do so to comply with FCC requirements or documented technical reasons, and with the Town's approval. Comcast's Formal Renewal Proposal does not prohibit Comcast from freely changing PEG Access channel locations.

Ninth, in its Formal Renewal Proposal, Comcast included language that indicated Comcast would not be required to remove its Cable System if such system was no longer being actively used to deliver/provide services governed by the Cable Act. The Issuing Authority would not agree to such language.

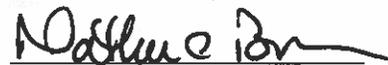
Signed:

  
Katherine T. Reid, chair

  
Travis J. Snell, Vice-chair

  
Barbara T. Arnold, Clerk

  
S. David Model, Member

  
Nathan C. Brown, Member

Carlisle Select Board

Date: 9/12/2023