

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In re)
)
Paul Bunyan Rural Telephone)
Cooperative) CSR-8094-C
)
Good Faith Negotiation and)
Retransmission Consent Complaint)
Concerning KRII(TV), Chisholm,)
Minnesota, KBJR-TV, Superior,)
Wisconsin, and KDLH(TV), Duluth,)
Minnesota)
)
To: Chief, Media Bureau)



BRIEF COMMENTS

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December 29, 2008

The American Cable Association (“ACA”) submits these brief comments urging the Commission to look past the preposterous allegations of “coordination” between ACA and the clients of a certain law firm in the filing of retransmission consent complaints,¹ and focus on the important issues involved in this matter. The complainant’s accusation has no basis in fact. For years, ACA has brought to the Commission’s attention the problems that its independent cable operator members face in their retransmission consent negotiations with broadcasters, and its filing in this matter was no exception.

Respectfully submitted,

AMERICAN CABLE ASSOCIATION



By: _____

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¹ See *In Re Paul Bunyan Rural Telephone Cooperative, Good Faith Negotiation and Retransmission Consent Complaint Concerning KR11(TV), Chisholm, Minnesota, KBJR-TV, Superior, Wisconsin, and KDLH(TV), Duluth, Minnesota*, Joint Complaint (filed Nov. 20, 2008), at 3, 9.

