

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

In the Matter of)
)
Assessment and Collection of Regulatory) MD Docket No. 10-87
Fees for Fiscal Year 2010)
)
To: The Commission)

COMMENTS



I. Introduction and Summary.

The American Cable Association (“ACA”) submits these Comments in response to the Commission’s recognition that a greater effort should have been made last year to inform licensees that they would not receive mailed hardcopy regulatory fee bills.¹ In addition to continuing to issue a public notice that the pre-bill information is available for viewing, ACA recommends that the Commission implement the following changes that will better ensure its contact with small cable companies:

- Provide annual notice via email to CARS and Earth Station licensees when pre-bills are loaded into Fee Filer for viewing; and
- Mail a final hardcopy notice to CARS and Earth Station licensees, outlining how the licensee can log-in to Fee Filer and access the pre-bill.

¹ *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2010*, Notice of Proposed Rulemaking, MD Docket No. 10-87, ¶ 12 (rel. Apr. 13, 2010) (“*NPRM*”).

With these changes, the Commission will promote the timely electronic payment of regulatory fees and decrease the Commission's costs associated with the late collection of regulatory fees.

American Cable Association. ACA represents more than 900 small and medium-sized cable companies serving smaller markets and rural areas throughout the United States. ACA's membership encompasses a wide variety of businesses – family-owned companies serving small towns and villages, multiple system operators serving predominantly rural markets in several states, and hundreds of companies in between. Together, these companies serve more than 7 million households and businesses.

These independent cable operators face unique challenges providing competitive video, broadband, and telephony services to smaller and rural markets. Providing advanced services in smaller and rural markets is a costly and difficult undertaking in low-density markets, as the cost of system builds and upgrades cannot be spread among a large subscriber base. Moreover, for many of ACA's members, keeping up with the numerous filings and fees imposed under the Commission's regulations results in substantial administrative burdens and costs. By adopting the above proposals, the Commission can ease some of the administrative burdens on small cable operators.

Few commenters in this proceeding are better positioned to discuss how best to communicate with small and medium-sized cable operators than ACA. Our association communicates with our entire membership on a regular basis using a variety of methods, including mail, fax, telephone, email, as well as in-person at our conferences. While ACA primarily relies on email to communicate with our members – the preferred method of communication for most of our members and one that is cost effective for our

association – there remains a subset of our members who still respond best to communications when they are sent via regular mail. As a result, ACA often reaches out to our membership using both email and regular mail on important matters, and ensure that our membership is contacted numerous times.

II. The Commission should provide notice via email to CARS and Earth Station licensees when pre-bills are loaded into Fee Filer for viewing.

The Commission seeks comment on how to most efficiently and effectively notify licensees that the Commission will no longer mail hardcopy regulatory fee bills.² In addition to issuing a public notice, ACA again recommends that the Commission annually provide notice by email to each licensee that the pre-bill information is available for viewing, and follow up emails in subsequent weeks to remind licensees that the deadline is approaching and outlining how the licensee can log-in to Fee Filer and access pre-bills.³

Each licensee's FCC Registration Number (FRN) requires an email address. By setting up Fee Filer to automatically email these licensees through their FRN email addresses when pre-bills are available online, the Commission can achieve its goal of significantly lowering its costs without increasing the burden on small providers. This will also serve the public interest by further promoting timely filings and payments.

III. The Commission should mail a hardcopy notice to CARS and Earth Station licensees outlining how the licensee can log-in to Fee Filer and access the pre-bill.

² *NPRM*, ¶ 12.

³ See *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2009*, Notice of Proposed Rulemaking, MD Docket No. 09-65, Comments of the American Cable Association at 4-5 (filed June 4, 2009).

In addition to providing notice by email to each licensee that the pre-bill information is available for viewing, and follow up emails as the deadline to file approaches, ACA recommends that the Commission send a final reminder to CARS and Earth Station licensees via regular mail, reminding licensees that the deadline is approaching and outlining how the licensee can log-in to Fee Filer and access pre-bills.

Implementing this proposal will further the public interest in two important ways. First, a final reminder will permit ACA members who relied on the mailed pre-bills to learn how to log-in and access the pre-bill through Fee Filer. Second, a final reminder will assist the Commission's efforts to recover costs by (i) ensuring timely payment of regulatory fees and (ii) decreasing the costs associated with the late collection of regulatory fees.

IV. Conclusion.

ACA commends the Commission for recognizing that a greater effort should have been made last year to inform licensees that they would not receive mailed hardcopy regulatory fee bills. In response, ACA recommends that the Commission provide annual notice via email to licensees when pre-bills are loaded into Fee Filer for viewing, follow up emails as the filing deadline approaches, and mail a final hardcopy notice to licensees this year, outlining how the licensee can log-in to Fee Filer and access the pre-bill.

Finally, we hope that the Commission will always consider the American Cable Association a partner whenever it seeks to reach out to small and medium-sized cable operators, and know that our organization is always willing to help promote the Commission's outreach to our membership.

Respectfully submitted,

AMERICAN CABLE ASSOCIATION



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May 4, 2010