

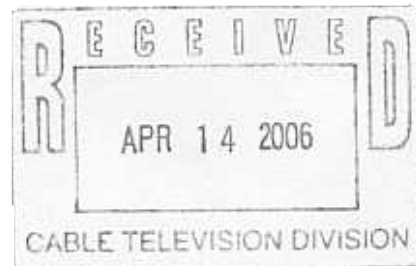


MASSACHUSETTS MUNICIPAL ASSOCIATION

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April 13, 2006

Alicia C. Matthews
Director, Cable Television Division
Department of Telecommunications and Energy
One South Station
Boston, MA 02111



Dear Ms. Matthews,

On behalf of the cities and towns of the Commonwealth, the Local Government Advisory Commission and the Massachusetts Municipal Association wish to record their strong opposition to Verizon's March 16, 2006, rulemaking petition filed with the Cable Division of the Department of Telecommunications and Energy. We are very concerned about this matter, as Verizon's petition proposes extremely unreasonable and unworkable new rules for initial cable licensing.

The proposed rules would require a municipality to hold a public hearing on an initial cable television license application within 60 days of the application filing, and would require only 30 days from the time of the public hearing for the municipality to approve or disapprove the application, and issue the actual license in case of approval.

As local officials will tell you, it is impossible to conclude a proper initial license application review, negotiation, license drafting and issuance within 30 days of the public hearing. Such an initial licensing time frame would be untenable in the best of circumstances, and is particularly untenable now in light of the many questions of first impression and complex issues raised by the non-standard terms and conditions commonly reported to be included in Verizon-proposed cable licenses.

As you know from RCN's initial licensing experience, cable operators willing to negotiate customary and standard cable licenses enjoy reasonable and fast municipal licensing. The existing license timetables have worked well for decades. They should not be changed at the behest of a single proponent. Note that Congress contemplated and provided for a three-year renewal process when it more comprehensively and carefully set forth cable licensing rules in the 1984 Cable Act. This framework worked well for decades and there is no rational basis for casting aside the time tested licensing rules and replacing them with radically abbreviated rules.

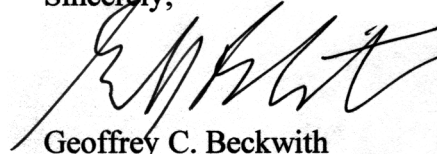
The municipal officials who are responsible for implementing licensing and who are accountable to the public are in opposition to such rules. Municipal officials are concerned that

under the proposed rules they will be boxed into an untenable 30 day post-hearing licensing process, and municipalities will lose the ability to properly review and negotiate Verizon cable proposals. This is not even close to what is reasonably needed for a fair and reasonable licensing process. The Massachusetts Cable Division should exercise its discretion not to issue a Notice of Proposed Rulemaking or Notice of Inquiry in this matter.

In addition, as a follow up to the April 11, 2006 Local Government Advisory Commission meeting with Lieutenant Governor Healey and Chairman Judith Judson, we would like to make formal note of our request for a meeting with you as soon as possible, so that we may discuss these issues further.

On behalf of the Local Government Advisory Commission and the Massachusetts Municipal Association, thank you very much for your attention to this matter. If you have any further questions, please do not hesitate to contact my office at any time.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Beckwith', is written over a faint, circular official seal. The signature is fluid and cursive.

Geoffrey C. Beckwith
Executive Director

cc: The Honorable Clare Higgins, Mayor of Northampton
Chair, Local Government Advisory Commission
President, Massachusetts Municipal Association