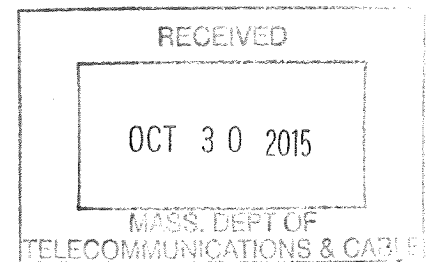




TOWN OF BELMONT
OFFICE OF THE BOARD OF SELECTMEN
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DAVID J. KALE

ASSISTANT TOWN ADMINISTRATOR
PHYLLIS L. MARSHALL

October 23, 2015

Mass. Dept. of Telecommunications and Cable
c/o Sean Carroll, Hearing Officer
1000 Washington Street
Suite 820
Boston, MA 02118-6500

RE: Department Regulatory Review of 207 CMR 2.00 & 207 CMR 10.00

The Town of Belmont Board of Selectmen supports Governor Baker's Executive Order No. 562, and its stated goal to "Reduce Unnecessary Regulatory Burden" and seeking ways to enhance our local economic environment to support and promote small businesses, without causing undue harms or unintended consequences that may negatively affect Belmont residents, organizations, schools or the local government.

With regard to the Massachusetts Department of Telecommunications and Cable's proposed revisions to **CMR 207**, the Board of Selectmen submit the following comments:

Revision to 207 CMR, 2.03 Statutory Report Forms, (3) Complaint Forms: is counterproductive and harms the Town's ability to provide effective oversight and enforce the provisions of any cable TV franchise agreement. Reducing the frequency of submitting complaint forms from quarterly to annually will make it impossible for the Town of Belmont, and likely other municipalities to keep a contemporaneous record or subscriber complaints, and thus lose the ability to track systemic or episodic trends in resident/subscriber complaints. This revision will make it less likely that the Town of Belmont will be able to address resident concerns in a timely manner with the cable provider.

Revision to 207 CMR, 10.08, Security Deposits, (2): harms the cable TV subscriber by reducing interest rate on individual subscriber security deposits to the lowest rate that the cable TV provider can obtain.

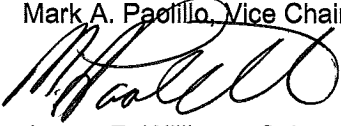
The Town of Belmont respectfully proposes that the Regulation to 207 CMR 10.08 Security Deposits, (2) be modified to provide that the cable operator is required to pay interest to the cable subscriber at a rate of five percent per year, or other such lesser amount of interest as has been received from the bank where the deposit has been held in a segregated account, as long as the interest rate is not below 3%.

Respectfully submitted,

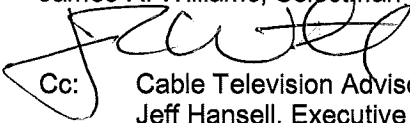


Sami S. Baghdady, Chair

Mark A. Paolillo, Vice Chair



James R. Williams, Selectman



Cc: Cable Television Advisory Committee
Jeff Hansell, Executive Director, Belmont Media Center