



# CITY OF CAMBRIDGE

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OFFICE OF CABLE TELEVISION

TO: City Manager and the Honorable Members of the  
Cambridge City Council

FROM: Joseph G. Sakey  
Commissioner, Cable TV

SUBJECT: New England Cable Television Association Report

A trade organization known as the New England Cable Television Association, and its consultant, a company called Communication Strategies, have filed with us a report which they claim "*neither begins nor ends with the premise that municipal cable ownership is inherently a bad thing*".

The report is supposed to be a complete and critical analysis -- "*a careful look at municipal ownership option*" -- which just happens to be sponsored and paid for by a group that is vehemently opposed to the public ownership of cable systems.

This report was commissioned by an organization that less than two weeks ago stood before our state legislature as the single opponent of the Massachusetts Municipal Association and cities and towns seeking the right to charge the same franchise fee for the privilege of using public rights-of-way that every other community in the country is allowed to charge.

Unfortunately, the report is laden with omissions, inaccuracies, contradictions and very offensive intimations. The document's veneer of objectivity cannot hide the fact that it is ideologically, and indeed, *inherently* opposed to public ownership. As a matter of fact, its author identified himself as an opponent long before he wrote the report; he was quoted in a newspaper last year declaring that "*municipal ownership is bad public policy*".

This industry position paper purports to compare the record of private and public cable ownership. It states that "*privately owned cable television systems provide a large number of public benefits . . . at no risk to taxpayers*".

Was there no risk in Hamilton, Ohio, where the City Manager reported that "*a local studio was promised . . . and we never got one?*" Or in Harris Township, Pa., where the Town Supervisor complains that the cable operator "*isn't community interested; they're interested in making money. If you want anything, you better be prepared to go after it with everything you've got?*"

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Or in the scores of cities and towns where the operator threatened to cut off service if a rate increase weren't granted? Or in Lynn or Swampscott, which are about to file suit against Warner-Amex for breach of contract?

The cable industry report tells us that benefits like public access channels and equipment, local origination programming, and institutional cable networks "have been created by the private sector". Yes, this is true, but only because municipalities have fought for these benefits. And the report does not mention that the Cable Television Association has mounted an all-out lobbying campaign in the U. S. Senate and an effort in the courts to eliminate any obligation to continue to provide these benefits. The industry-backed Goldwater Federal Cable De-Regulation Act (S.66) would effectively limit the First Amendment rights of Cambridge citizens. The bill would:

- . Forbid Cambridge from establishing access requirements;
- . Prohibit us from insuring access to cable channels for Cambridge institutions and businesses;
- . Effectively prevent Cambridge from creating an institutional network primarily for government and educational use;
- . Prohibit Cambridge from establishing rules guaranteeing the non-discriminatory treatment of channel users;
- . Prevent Cambridge from requiring programming for children, Hispanics, Blacks, elderly, and others, and
- . Prohibit Cambridge from requiring any cable facilities, equipment, studios, or number of channels, even if they were proposed by a cable franchise applicant.

How ironic that the report points to the promises of the *Times Mirror Company in Brookline* as an example of the industry's commitment to community interests. It was hardly in the interest of the people of Brookline for that company to be submitting documents certifying its 10-15 year commitment to the community at the very same time that it was secretly negotiating the sale of the Brookline license to another company.

The Communications Strategies report raises questions about the legal issues surrounding municipal ownership, including the First Amendment and anti-trust implications. But the report fails to recognize that those same issues relate to a privately owned cable system. The fundamental factor when considering the appropriateness of any form of ownership of the media is insulation from the control of ideas. What the authors totally ignore is the

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fact that Cambridge has always recommended that control of channels in a municipally owned Cambridge cable system be vested in an independent citizen panel and/or authority.

But really that failure is consistent with the character of this report, which also ignores the fact that the cable industry has repeatedly sought to establish the notion that cable operators are publishers and should be exempt from government regulations to allow access to their systems. The Cable Television Information Center characterized the National Cable Television Association's 1981 position paper, entitled Cable Television, Government Regulation and the First Amendment as "*a thinly disguised attempt on the part of the industry to vacate their franchise commitments to provide access channels*".

Cambridge has always made clear its support of First Amendment rights . . . including the public's right to multiple sources of information. But cable companies which have substituted the movie and entertainment services owned by their parent companies for HBO have hardly adhered to that principle. *Nor does the industry's opposition to non-discriminatory access to cable channels uphold that notion.*

Finally, this industry paper, in its discussion of the organizational structure of a municipally-owned cable system in Cambridge, cites the inefficiencies and political corruption associated with other public services. They compare a potential publicly owned cable system of the 1980's with a public transportation system developed in the 1800's, and with a nationwide public broadcasting system. These are clearly misleading comparisons.

They warn that public officials tend to be corrupt, and cite a single example of *alleged* corruption in a public cable system in Tennessee, but they ignore the *proven* misconduct that the industry itself has brought to the franchising process here in Massachusetts and elsewhere. Perhaps they were unaware of the fact that the president of one of the nation's largest cable companies was sent to federal prison on a bribery conviction connected with franchising . . . Or that another high level official of Warner Amex was recently tried and convicted in New York. Perhaps they did not know that the "*rent-a-citizen*" approach to licensing . . . where prominent citizens are given part of the ownership of a system in return for influence peddling. . . was invented by the industry. But surely they know that in nearby Danvers, a town cable official *worked with the FBI in uncovering the attempt of a cable company lawyer to win a franchise through bribery.*

I find this selective vision on the part of the authors very offensive and insulting. Just as I find their thinly disguised threats of industry lawsuits highly objectionable.

Further errors of fact are apparent in Communication Strategies' assessment of the Kalba Bowen/Stern Communications Construction report. They attempt to point to a number of problems which, they claim, could cost the City millions of dollars. Joseph Stern, a national and international consultant,

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- . Stern points out that Communication Strategies' claim that Cambridge could not purchase an addressable converter for under \$150.00 is in serious error. In fact, addressable converters can now be purchased for under \$105.00, a savings of \$300,000 - \$420,000 over initial estimates.
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3/9/83

M E M O R A N D U M

TO: Joseph Sakey, Office of Cable Television, City of Cambridge  
FROM: Charles J. Beard and Theodore P. Seto  
RE: NECTA Submission entitled "Municipal Ownership of  
Cable Television in Cambridge"

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The New England Cable Television Association, Inc. ("NECTA"), a regional trade organization of private cable television operators, has circulated a volume entitled "Municipal Ownership of Cable Television in Cambridge: How Much Will It Cost And How Will It Operate?", in an effort to persuade the City to drop the idea of municipal ownership of a Cambridge cable television system before bidding commences and any private proposals are received. You have asked for our assessment of the NECTA volume.

Preliminarily, we must note that the NECTA volume is not completely forthright. Generally, it tends to take the law as NECTA would like it to read and claim that that is the true state of the law. In many cases, the law is quite different and, in our view, is unlikely to move in NECTA's direction. Unfortunately, there are also a number of instances in which it seriously miscites authorities upon which it relies, omitting language which inconveniently states the opposite of NECTA's position.

The volume's length makes it somewhat difficult to determine exactly what NECTA's position is. So far as we can ascertain, however, the 315-page tome reduces in essence to four arguments, none of which strikes us as very persuasive.

First, NECTA argues that a municipally owned cable system would be subject to the limitations imposed by the Bill of Rights, while a privately owned system would not. Therefore, NECTA argues, the City should opt for a private system. Apparently, NECTA believes that it is inconvenient for the citizens of Cambridge to have constitutional rights vis-a-vis their cable television system. At best, we think this argument somewhat odd. Alternatively, NECTA suggests that the First Amendment prohibits municipal ownership altogether. Our review of the case law indicates that this argument is frivolous and wrong.

Second, NECTA appears to argue that the antitrust laws absolutely prohibit any Massachusetts city or town from awarding a cable television license to itself. NECTA correctly believes the underlying law in this area to be in a state of flux. In our view, however, there is no basis for NECTA's conclusion that the antitrust laws prohibit the City from operating a CATV system. G.L. c.166A, §20 clearly and specifically authorizes awarding cable TV licenses to cities and towns, and G.L. c.164 clearly authorizes construction and operation of municipally owned systems. Antitrust risks will exist even if the City awards a franchise to a private applicant. We recommend, however, that care be taken to employ a fair process in order to minimize all such risks.

Third, NECTA suggests that the City will not be able to break even unless it achieves a penetration rate of 65%. This, NECTA says, is unrealistic. Therefore, the argument concludes, the City should not submit a bid to the Issuing Authority. We find it

somewhat incredible that private operators would be willing to spend the money to produce a 315-page "report", in addition to two voluminous briefs submitted to the Attorney General's office, merely to reserve for one of its members the right to lose money in Cambridge. If a Cambridge CATV system is likely to be so unprofitable, one wonders, why do they care?

Fourth, under the heading "Legal Expenses and Litigation Risks", NECTA makes a not-so-veiled threat that the City will be sued if the Issuing Authority awards a license to a municipal bidder. But any decision by the Issuing Authority carries with it a risk of suit. The Boston award, for example, resulted in a lawsuit even though Boston licensed a private operator. We are of the view that a fair and procedurally correct decision-making process will minimize, as it did in Boston, the risks of litigation, whether or not the City awards the franchise to itself.

Finally, all of NECTA's arguments are premature. It may be that one or more of NECTA's members will be able to put together a proposal more attractive than the City's. If that happens, presumably the Issuing Authority will award a license to that private operator. On the other hand, the private operator proposals may be drab, conventional and expensive. It is even possible that no serious private proposals will be submitted that meet the Issuing Authority's specifications. In effect, NECTA is asking the City to compare a municipal proposal which has yet to be fully developed with hypothetical private proposals which nobody has yet seen, conclude that the municipal proposal is

worse, and withdraw before the bidding begins. This seems unreasonable.

On the other hand, if the City stays in the running, its competition will force the private cable industry to submit attractive, innovative and competitive bids responsive to the Issuing Authority's RFP. By retaining the option to award itself the franchise, the City ensures that at least one acceptable proposal will be available when it comes time to open the bids. If the City is forced to withdraw from the race, Cambridge will lose much of its leverage and may find itself forced to accept a run-of-the-mill system.

#### DISCUSSION

1. First Amendment arguments.--In a section entitled "First Amendment Issues", NECTA argues that the First Amendment would prevent a municipally-owned system "from censoring or otherwise interfering with the content of speech and press". NECTA at 184. Under a municipally-owned system, NECTA states, "cable television audiences have First Amendment rights of access to the widest possible range of free and diverse programming." NECTA at 185. Moreover, "the First Amendment requires procedural safeguards to ensure that [municipal cable operators] granting requests for access to [the system] do not discriminate against certain applicants on the basis of their views." NECTA at 186.

Then comes the rather startling conclusion:

"A cable system that is privately owned and operated would not encounter similar problems regarding the First Amendment." (NECTA at 186)

To characterize constitutional rights as "problems" requires an unusual and disturbing attitude towards the subscribers Cambridge's system will serve. It may be useful to examine in greater detail some of the ramifications of NECTA's argument. In Columbia Broadcasting System v. Democratic National Committee, 412 U.S. 94 (1973) (a case cited by NECTA in support of its position), for example, the Democratic National Committee and an organization called Business Executives' Move for Vietnam Peace each sought to purchase air time on radio and television stations to present their views to the American public. Each was refused. The Court held that because radio and television stations were privately owned, Democrats and opponents of the Vietnam War had no right of access to the air waves. Here, if Cambridge's private CATV operator were to disagree with a particular group's views, it could deny access to the City's principal communications medium altogether. The City of Cambridge has prided itself on its tradition of full public discussion of important issues. This tradition should be protected.

By contrast, in Board of Education, Island Trees v. Pico, 102 S. Ct. 2799 (1982), also cited by NECTA, the Supreme Court held that municipal officials could not suppress information and ideas with which they did not agree. The Court stated:

"If a Democratic school board, motivated by party affiliation, ordered the removal of all books written by or in favor of Republicans, few would doubt that the order violated the constitutional rights of the students denied access to those books. The same conclusion should surely apply if an all-white school board, motivated by racial animus, decided to remove all books authored by blacks or advocating racial equality and integration.

Our Constitution does not permit the official suppression of ideas."

Having quoted this language, NECTA notes that the same reasoning "would appear perfectly applicable to a municipal cable system". NECTA at 242. According to NECTA, a privately owned cable system would not have to worry about such Constitutional niceties. This, argues NECTA, is an advantage of private ownership.

Indeed, NECTA has historically taken the position that cable television operators are like newspaper publishers, NECTA at 206, which is to say that cable television operators should be utterly beyond the control of the Constitution. As the Court said in the CBS case, id. at 117:

"The power of a privately owned newspaper to advance its own political, social, and economic views is bounded by only two factors: first, the acceptance of a sufficient number of readers--and hence advertisers--to assure financial success; and, second, the journalistic integrity of its editors and publishers."

Apparently, NECTA believes that the City should award to one of NECTA's members a communications monopoly "to advance its own political, social, and economic views".

Nor does NECTA's argument stop with the First Amendment, which protects speech. It extends as well to the Fourth Amendment, which prohibits governments (but not private cable operators) from interfering with subscribers' rights to privacy. A municipally-owned system would be prohibited by the Fourth Amendment from invading the privacy of the citizens of Cambridge. To paraphrase NECTA, "[a] cable system that is privately owned and

operated would not encounter similar problems regarding the [Fourth] Amendment."

We should add that it may be possible, if the City so desires, to structure a municipally-initiated system which is not subject to Constitutional restrictions. As NECTA has correctly noted, the Corporation for Public Broadcasting, federally initiated and totally federally funded, is not so bound. It is not clear, however, that such immunity from constitutional scrutiny is desirable.

Indeed, licensing authorities normally consider access guarantees to be advantageous. If the private cable industry persists in its nation-wide efforts to free private operators from such limitations, the time may come when only a publicly owned system can guarantee the rights of the citizens of the city or town which it serves.

NECTA's worries about editorial discretion are unfounded. It is perfectly permissible for a municipally-owned system to lease one or more channels to each of a number of private channel operators. Each such competing private operator could editorialize and generate local news coverage to his heart's content. The difference would be that no one operator could hold a monopoly on all local news or editorializing. From a First Amendment perspective, such a municipally-owned system is far preferable to the private news monopoly apparently advocated by NECTA.

The rest of NECTA's First Amendment arguments are frivolous. NECTA suggests that "[m]unicipal ownership in itself . . . may

violate the First Amendment." NECTA at 185. This suggestion is bizarre. As NECTA itself notes about 100 pages earlier, some 38 municipally or publicly owned cable systems are already in operation. The one court before which the cable industry has tested this proposition (which private operators would clearly like to establish) concluded that it had no merit. Indeed, in the CBS case, the Supreme Court itself suggested that Congress could have opted for government ownership of radio, instead of for the private system of ownership it chose.

NECTA also suggests that any municipally-owned cable television system will be overrun by religious channels. This is patent nonsense. It is well-settled that religious groups have no greater right to access to a public forum than any "other organizations having social, political, or other ideological messages to proselytize." Heffron v. International Society for Krishna Consciousness, 452 U.S. 640, 652-53 (1981). It is equally clear that a non-discriminatory, first-come first-served policy towards access meets constitutional standards. Id. at 644. Nor is there any requirement that access be provided to religious groups free of charge. Id. We should note, however, that a private cable television operator could permit only a channel sponsored by his religious organization to appear on Cambridge cable television. Neither the citizens of Cambridge nor the City would have any recourse except to threaten to deny him license renewal fifteen years hence (which NECTA would argue would violate the operator's rights under the First Amendment).

In sum, we believe that many will find NECTA's First Amendment arguments more frightening than persuasive. In our view, whether an applicant is subject to constitutional limitations may well be relevant to the Issuing Authority's ultimate decision. The applicability of constitutional protections to a municipally-owned system may well be an advantage, not the disadvantage that NECTA apparently believes it to be.

2. Antitrust arguments.--NECTA's antitrust arguments seem to be intentionally vague. Arguing that a 65% penetration rate is necessary for the City to break even, NECTA appears to agree that Cambridge will not support two cable television systems, at least initially. Why the antitrust laws compel Cambridge to institute a private monopoly rather than a public monopoly is not clear to us. Apparently the crux of NECTA's argument is that "there always will be a suspicion of conspiracy between the municipal bidder and the municipal authority making the final decision." NECTA at 267. On this (or perhaps on some other) basis, NECTA concludes that "Cambridge's grant of an exclusive cable franchise to itself would . . . appear to violate the antitrust laws." NECTA at 260. Whether the City awards the franchise to itself or to some private bidder, NECTA is apparently of the view that Cambridge would have no immunity from antitrust scrutiny under Community Communications Co. v. City of Boulder, 455 U.S. 40 (1982), and will thus be subject to suit.

In support of these arguments, NECTA cites Lafayette v. Louisiana Power & Light Co., 435 U.S. 389 (1978), from which it

quotes at length. It fails, however, to quote the case's conclusion:

"Today's decision does not threaten the legitimate exercise of governmental power, nor does it preclude municipal government from providing services on a monopoly basis."

NECTA also cites the Boulder case, again failing to note identical language. It invokes the authority of "one leading antitrust law expert", NECTA at 257, from whom it quotes in apparent support of its position. It fails to alert the reader, however, to language immediately preceding the quoted section, in which the author states:

"It is also clear enough that a municipality may, without offending against the antitrust laws, take the property of a utility within its borders and substitute a state monopoly for a private one."

We find NECTA's antitrust arguments unpersuasive. In order to establish an antitrust violation by the City, an unsuccessful applicant would first have to demonstrate (1) that the City conspired with someone other than itself, (2) that the conspiracy was intended to reduce competition, (3) that the unsuccessful applicant had submitted a proposal equal to or better than the City's which met the Issuing Authority's reasonable specifications, (4) that the City's decision to undertake construction itself was not a legitimate exercise of governmental authority, and (5) that the City was not immune from antitrust scrutiny under the City of Boulder decision. If the applicant fails to establish any one of these propositions, our initial review suggests that he should lose.

First, it seems unlikely that the City can be deemed to "conspire" with itself. NECTA cannot have it both ways. Either the Issuing Authority and the municipal applicant are independent, in which case the decision will not be the result of a "conspiracy", or they are not, in which case, as a matter of well-established antitrust law, there is no "conspiracy" and therefore no right to sue under §1 of the Sherman Act.

More importantly, we do not understand that an award to the City would be intended to reduce competition. The choice, according to NECTA, does not seem to be between private competition and public monopoly, but rather a choice between a private monopoly and a publicly-run system. If channel space were leased to a number of private channel operators, competition would be increased, not decreased. NECTA would apparently have the City substitute a private monopolist, but offers no assurances that such a private monopolist would share the Cambridge cable market with its private competitors.

Moreover, NECTA's argument that additional considerations should lead Cambridge to withdraw from competition before the bidding begins is an argument for less competition, not more. The question before the City at this time is merely whether the City will be a competitor. Apparently, private cable television operators would prefer to exclude the City as a potential competitor. (We note parenthetically that the City may have a cause of action against NECTA and each of its members under the Sherman Act for treble damages and attorneys fees by reason of this combination to exclude competition.)

NECTA correctly states that:

"The focus of [the antitrust laws] is not so much to protect individual businesses, but rather to protect a process of competition designed to generate low prices, high output, and superior quality. They were thus 'enacted for the protection of competition, not competitors.' Or, as another court has summarized, 'concern for the protection of the consumer is a prime focus of the antitrust laws.'" (NECTA at 255)

But low prices, high output, and superior quality are precisely what Cambridge, as a franchise applicant, hopes to offer. And concern for the protection of the consumers, the citizens of Cambridge, is one of the principal factors that has lead the City to consider submitting its own bid. It is not clear to us that a private monopolist would have any greater motivation to offer low prices, high output and superior quality than would a municipal system. Indeed, the private monopolist would have to answer only to its stockholders, while a public operator would have to answer to the voters.

In any event, a City CATV application will provide important competition to private applicants. If a private applicant offers a proposal superior to the City's, we have confidence that the Issuing Authority will award a license to that applicant. NECTA has conveniently forgotten its own recent statements to the Attorney General on the same question. Responding to an argument that the absence of a municipal candidate might lead Issuing Authorities to bow to pressure to award a franchise to a private Applicant regardless of the applicant's qualifications, NECTA stated:

"This remark should be taken as an affront to the integrity of the individual town officials charged with awarding CATV licenses. Quite obviously, these officials will do their utmost to award the license to the applicant who will best serve the public interest, as required by law."

Reply Memorandum of NECTA, Community Antenna Television Commission  
Request for Advisory Opinion, September 28, 1982, at 10. NECTA  
may now fear that competition from a municipal applicant will  
force its members to offer Cambridge residents lower prices,  
higher output, and higher quality services than they would  
otherwise offer.

We do not know whether the City is immune from antitrust  
liability in awarding cable franchises. We believe that the  
Massachusetts situation is significantly different from that which  
pertained in Colorado in the Boulder case, since a Massachusetts  
statute specifically authorizes award of a cable franchise to a  
municipality and subjects any Issuing Authority decision to full  
review by the Commissioner. This would suggest that a  
Massachusetts city or town awarding a franchise to itself would  
stand a considerably better chance of obtaining immunity than the  
city of Boulder had.

What is critical to note, however, is that the City's  
exposure with respect to immunity is the same whether it awards a  
franchise to itself or to a private applicant. Moreover, as we  
have already stated, a conclusion that the City is not immune from  
suit does not lead, by any means, to an automatic conclusion that  
the City loses the suit. (The Supreme Court, in the Boulder case,  
found no liability; it merely held that the suit could be tried.)

The City operates in a wide variety of areas in which it is not immune from suit.

Finally, we would point out that a special enabling statute from the legislature would eliminate uncertainties in this area.

3. The threat of litigation.--The third "legal issue" identified by NECTA is entitled "legal expenses and litigation risks". Somewhat coyly, NECTA phrases its principal argument as follows:

"Ultimately, a municipally-owned cable system raises such substantial and complex legal issues that it would be difficult for any reasonable person on either side of the public/private sector debate to deny that one or more of those issues will wind up in court." (NECTA at 274)

In other words, unless Cambridge awards the franchise to one of its members, NECTA threatens suit.

This is probably not the first time that a group of applicants has used a threat of suit to try to induce a competitor not to bid on a contract. And it is not the first time that Cambridge has ever been threatened with a lawsuit. The question is whether it is better for Cambridge to buckle under the threat. Specifically, the question here is whether Cambridge is more likely to get a superior cable system if the City itself remains a competitor, or if it pulls out before the competition begins.

It is our view that the risks of litigation can be minimized if appropriate attention is given to procedural considerations. If the City is truly willing to award a franchise to the best applicant, if it gives all applicants a fair and equal hearing, if it makes its decision on the basis of the facts presented to it,

and if it does so under the watchful eye of the Commissioner, a serious lawsuit will be far less likely, whatever the outcome of the franchise process.

NECTA's assertion that litigation might delay the entry of cable television "to 1990 or beyond" is ridiculous. It would be highly unusual for any court to suspend the construction of a cable television system for more than a very short period. More to the point, however, is the fact that lawsuits over questions of law are often completed in a matter of months. (Indeed, the lawsuit arising of the Boston award had no impact whatever on the construction of the Boston system, which is well ahead of schedule.)

4. Conclusions.--We will not separately review NECTA's financial arguments. Suffice it to say that we find NECTA's actions inconsistent with its assertion that Cambridge CATV is going to be a money-losing proposition. A municipal operator can obtain financing at lower interest rates than any private applicant. Nor must a municipal operator exact a profit to distribute to shareholders, as all private operators must. Yet clearly, NECTA's members expect to make major profits in the Cambridge market. NECTA has already expended a very considerable sum to reserve for one of its members the right to run the Cambridge system.

On the whole, we find NECTA's legal arguments unpersuasive. Its apparent belief that the Cambridge system should be privately operated in order to assure that Cambridge citizens will have no constitutional rights vis-a-vis the system strikes us as an

uncompelling argument for private ownership. Its remaining First Amendment arguments are frivolous. Its assertion that antitrust considerations preclude competition by the City seems implausible, and the remainder of its antitrust analysis seems unsupported by the authorities it cites. The threat of suit may or may not be real. In our view, however, a carefully structured process will minimize the risks of litigation whether or not the Issuing Authority ultimately chooses a municipal or a private applicant.

In sum, we see nothing in the NECTA submission to persuade us that the City should withdraw from competition and much that suggests that the City continue to develop proposals for a municipally owned system.



# CITY OF CAMBRIDGE

CAMBRIDGE, MASSACHUSETTS 02139  
Tel. 498-9011

EXECUTIVE DEPARTMENT  
ROBERT W. HEALY  
City Manager

March 14, 1983

To the Honorable, the City Council:

Enclosed please find copy of a report from Joseph G. Sakey and a report from Charles J. Beard and Theodore P. Seto. These reports are in response to the New England Cable Television Association submission entitled "Municipal Ownership of Cable Television in Cambridge".

Additionally, there will be another report, from Jean Rice, available on Monday night.

Very truly yours,

Robert W. Healy  
City Manager

RWH/mbf  
Encs. 2

Re: report of Joseph Sakey, Commissioner  
of Cable T.V. in response to New England  
Cable Television Association's report.

*3/14/83*

*Referred to  
Commissioner #9  
Motion of Councilman  
Walter Sullivan*

In City Council,

March 14, 1983

*3/14/83 - Hold on  
this -  
Referred to the  
Planning Board  
and  
Ordinance Committee  
Henning Report -*