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[redacted]
Chevy Chase, MD 20815
July 21, 2015

Montgomery County
DTS – Cable Office
100 Maryland Ave. Suite # 250
Rockville, MD 20850
(Via email to Marjorie.Williams@montgomerycountymd.gov)

Re: Comcast of Potomac LLC's Application of renewal of a cable franchise

Dear Montgomery County Officials:

I object to the proposed Comcast cable TV franchise renewal agreement because it fails to consider environmental concerns, as it fails to require feasible energy conservation measures by Comcast, and because it fails to require Comcast to offer reasonable packages without expensive and extensive sports programming.

My first concern is environmental, namely energy conservation. The franchise agreement does not require low and reduced consumption of electrical energy by Comcast equipment in customers' (subscribers') homes. A significant amount of residential electrical power is consumed by standby devices. See http://www.energyrating.gov.au/wp-content/uploads/Energy_Rating_Documents/Library/Standby_Power/Standby_Power/E3-2010-Intrusive-Survey-FINAL-Report.pdf (page 14) Home entertainment devices, which include cable TV boxes, are one of the biggest parts of that. Ibid. See also, http://standby.lbl.gov/summary-table.html. Even President George W. Bush recognized the problems with standby power usage. http://www.extremetech.com/extreme/49784-bush-takes-aim-at-wall-warts. Of course, the electrical power for these devices largely originates at coal fired power plants, which contribute to climate change problems.

The following provisions should be provided in the Comcast Franchise agreement:

No later than one year of the date of the renewal of the Comcast Franchise agreement to three years thereafter, all new and refurbished cable TV boxes supplied or made available by Comcast, shall in both "on" and "standby" mode, have a power consumption in watts that is no greater than the best (lowest power consuming) cable TV box supplied or made available in the United States by a cable TV company on the date of the franchise agreement renewal.

No later than three years of the date of the renewal of the Comcast Franchise agreement and thereafter, all new and refurbished cable TV boxes supplied or made available by Comcast, shall in both "on" and "standby" mode, have a power consumption in watts that is no greater than twenty five percent lower than the best (lowest power consuming) cable TV box supplied or

made available in the United States by a cable TV company on the date of the franchise agreement renewal.

Within three years of the date of the renewal of the Comcast Franchise agreement, all cable TV boxes supplied or made available by Comcast shall turn off the associated television, after a warning to the consumer, if the channel or volume has not been changed by use of a Comcast equipment control in the previous 2.5 hours. Following the warning, the consumer shall be able to signal the Comcast cable TV box to keep the TV on for another 2.5 hours, or less if the consumer turns it off.

Cable TV box would have to be defined broadly.

There should be similar power consumption requirements for Comcast Internet modem energy usage.

My second concern is that the cable companies including Comcast now provide a menu of programming that is unnecessarily expensive to subscribers. Comcast should be required to provide a package that is identical to its other packages with the sole exception that it does not include the ESPN suite. The price that Comcast charges to consumers should be the same as same as a package with ESPN minus the amount that Comcast pays ESPN for the ESPN content. This treats ESPN similarly to optional entertainment add-ons such as HBO. There is no good reason that Montgomery County taxpayers should as a practical essentially be forced to pay for ESPN.

I would add that the above should apply to Verizon Fios and to RCN, too.

Very truly yours,

Lloyd [redacted]