

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 19-4845-PET

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Joint petition of Southern Vermont Cable Company (SVCC) and Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC (Comcast) for authority to (1) sell substantially all of SVCC's assets to Comcast, pursuant to 30 V.S.A. § 109; (2) abandon SVCC's cable-television service in Vermont and revoke its Certificate of Public Good, pursuant to 30 V.S.A. § 505; and (3) allow Comcast to own and operate SVCC's cable television system in Vermont, pursuant to 30 V.S.A. §§ 503 and 504	
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Order entered: 05/13/2020

**ORDER APPROVING ACQUISITION AND ISSUING CERTIFICATE OF PUBLIC GOOD**

In this Order, the Vermont Public Utility Commission (“Commission”) adopts the following proposal for decision.

**PROPOSAL FOR DECISION**

**I. INTRODUCTION**

This case involves a joint petition filed with the Public Utility Commission (“Commission”) by Southern Vermont Cable Company (“SVCC”) and Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC (“Comcast”) (collectively, the “Joint Petitioners”) for approval of: (1) the acquisition by Comcast of the cable television system owned and operated by SVCC; (2) revocation of SVCC’s Certificate of Public Good (“CPG”); and (3) issuance of a new CPG to Comcast to serve the towns of Newfane, Putney, Townshend, and Dover.

Based on the findings and subject to conditions, I recommend that the Commission conclude that Comcast’s proposed acquisition of and continued operation of SVCC’s cable television system will promote the general good of the State of Vermont and will satisfy the requirements of 30 V.S.A. §§ 109, 231, 503, 504, and Commission Rule 8.214. I also

recommend that the Commission conclude that the abandonment and revocation of SVCC's CPG is consistent with the public interest and 30 V.S.A. § 505.

## **II. PROCEDURAL HISTORY**

On December 11, 2019, the Joint Petitioners filed the joint petition along with prefiled testimony and exhibits in support of the joint petition.

On January 10, 2020, I held a scheduling teleconference.

On January 21, 2020, Brattleboro Community Television ("BCTV") filed a motion to intervene, which no party opposed.

On February 3, 2020, I held a public hearing, preceded by an information session led by the Department of Public Service ("Department"), at Landmark College in Putney, Vermont.

On February 12, 2020, I granted BCTV's motion to intervene.

On March 3, 2020, Comcast filed a memorandum of understanding between Comcast and BCTV (the "BCTV MOU").

On March 4, 2020, the Department filed prefiled testimony concluding that the transaction would promote the general good of the state and recommending that the Commission approve the joint petition.

On March 19, 2020, the parties filed a letter in support of holding a remote evidentiary hearing.

On March 23, 2020, I held a status conference to discuss options for holding a remote evidentiary hearing.

On March 25, 2020, Comcast filed supplemental prefiled testimony addressing concerns raised by the Department about the migration of SVCC customers to Comcast's network, and Comcast's rates, franchise fees, and service quality plan and reporting requirements for the SVCC system.

On April 3, 2020, I held a remote evidentiary hearing.

On April 10, 2020, the Department and Comcast filed post-hearing briefs.

On April 15, 2020, Comcast filed a letter stating that it would not file a reply to the Department's brief.

No other briefs were filed.

### III. LEGAL STANDARDS

The transactions proposed by the Joint Petitioners require approval from the Commission under 30 V.S.A. §§ 109, 231, 503, 504, 505, and Commission Rule 8.214.

Under 30 V.S.A. §§ 109, a corporation subject to the Commission's jurisdiction shall not sell more than 10% of the corporation's in-state property used for public service operations without a finding by the Commission that the sale will promote the general good of the State. Several factors are considered when evaluating whether an acquisition will promote the general good, including the competence of management, the financial strength of the company, the company's reputation and conduct in dealing with the citizens of Vermont, any expected efficiencies that will benefit the company's customers, and the impact of the acquisition on competition.<sup>1</sup>

Under 30 V.S.A. § 503, the Commission evaluates applications for CPGs to own and operate cable television systems using the procedures and criteria set forth in 30 V.S.A. §§ 231 and 504(b) and (c), as well as the "EMCO criteria" set forth in Commission Rule 8.214.

Section 504(b) requires the Commission to find that an applicant will comply with the Commission's requirements to ensure that the system provides the following:

1. Designation of adequate channel capacity and appropriate facilities for public, educational, or governmental use;
2. Adequate and technically sound facilities and equipment, and signal quality;
3. A reasonably broad range of public, educational, and governmental programming;
4. The prohibition of discrimination among customers of basic service; and
5. Basic service in a competitive market, and if a competitive market does not exist, that the system provides basic service at reasonable rates determined in accordance with 30 V.S.A. § 218.

Pursuant to 30 V.S.A. § 504(c), the Commission must also ensure that a cable system provides or utilizes:

1. A reasonable quality of service for basic, premium, or otherwise, having regard to available technology, subscriber interest, and cost;

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<sup>1</sup> *Joint Petition of Otelco, Inc., et al.*, Docket No. 7735, Order of 9/30/11 at 6-9.

2. Construction, including installation, that conforms to all applicable state and federal laws and regulations and the National Electrical Safety Code;

3. A competent staff sufficient to provide adequate and prompt service and to respond quickly and comprehensively to customer and Department complaints and problems;

4. Unless waived by the Commission, an office that shall be open during usual business hours with a listed toll-free telephone number so that complaints and requests for repairs or adjustments may be received; and

5. Reasonable rules and policies for line extensions, disconnections, customer deposits, and billing practices.

Under Commission Rule 8.214, the Commission must also consider the so-called “EMCO” criteria when determining whether to grant a CPG for a cable system service area including:

1. Financial soundness and stability, both of the applicant generally and the particular proposal;

2. The present proposed service offerings to customers, including the number of channels and the ability and capacity of the system to offer additional varied services in the future, and the ability to provide public access;

3. The commitment to a construction and in-service schedule;

4. The experience and ability of the applicant to run and manage a cable television system;

5. The rates proposed to be charged to customers;

6. Consumer policies, particularly regarding complaints and problems;

7. Availability of service to a maximum number of residences;

8. The quality of the engineering and materials used in the system; and

9. Logical fit with neighboring systems.

Finally, under 30 V.S.A § 505, a cable television company under the Commission’s jurisdiction may not abandon its service or facilities without Commission approval and a finding that the abandonment is consistent with the public interest.

#### IV. SUMMARY OF PUBLIC COMMENTS

The Commission received numerous comments from members of the public, including approximately 13 speakers at the public hearing held on February 3, 2020, and nearly 30 written submissions. The public comments raised concerns about potential changes in television and cable costs and service offerings, changes in customer-service quality, and the continued availability and signal quality for public access channels. Many of the public comments expressed disappointment at losing a local Vermont company and praise for the owner of SVCC. Although most commenters were opposed to the acquisition by Comcast, several supported the acquisition and the anticipated improvements in the network and service offerings that would result from Comcast's ownership.

#### V. FINDINGS

##### A. Company Background

1. SVCC is a Vermont corporation with a CPG to provide cable television service to 11 towns in Vermont, including Brattleboro, Brookline, Dover, Dummerston, Jamaica, Marlboro, Newfane, Putney, Townsend, Wardsboro, and Westminster. Prefiled testimony of Daniel M. Glanville, Comcast ("Glanville") at 6; exh. DMG-3.

2. SVCC serves approximately 2,450 subscribers and has approximately 123 miles of cable plant in the towns of Dummerston, Jamaica, Newfane, Putney, and Townshend. Prefiled testimony of Ernest Scialabba, SVCC ("Scialabba") at 2; Glanville pf. at 8.

3. SVCC is authorized to provide cable television service in the towns of Brattleboro, Brookline, Dover, Marlboro, Wardsboro, and Westminster, but does not currently own assets or serve subscribers in those towns. Scialabba pf. at 2; Glanville pf. at 6.

4. Comcast is a Delaware corporation and has a CPG to serve 197 Vermont towns, including Brattleboro, Brookline, Dummerston, Jamaica, Marlboro, Wardsboro, and Westminster. Comcast is not authorized to serve three of the towns where SVCC has assets: Newfane, Putney, and Townshend. Glanville pf. at 6; exh. DMG-4; DMG-10, ¶11.

**B. The Proposed Transaction**

5. Comcast and SVCC have executed an asset purchase agreement under which SVCC will sell substantially all of its assets to Comcast. SVCC will retain certain vehicles, real property, and other equipment that Comcast does not need. Glanville pf. at 5-6.

6. After Comcast's acquisition of SVCC's cable television system, SVCC will no longer own or operate any cable television systems in Vermont. Scialabba pf. at 3-4.

7. Comcast will maintain and operate the SVCC cable television system in accordance with SVCC's existing CPG conditions and, following the integration of SVCC customers into the Comcast network, in accordance with terms and conditions substantially similar to the CPG conditions governing Comcast's other Vermont cable television systems. Petition at 3-4.

8. The Department recommends that the Commission approve the acquisition and issue a CPG to Comcast because the proposed transaction will promote the general good of the State and satisfies the requirements of 30 V.S.A. § 504 and Commission Rule 8.214. Prefiled testimony of Clay Purvis, Department ("Purvis") at 3-4.

**C. Criteria for Merger and Certificates of Public Good**

**Facilities**

**[30 V.S.A. §§ 109, 231, and 504(b)(2) and (c)(2); and  
Commission Rule 8.214(B)(3), (7), (8), and (9)]**

9. Comcast provides adequate and technically sound facilities, equipment, and signal quality. Glanville pf. at 12; prefiled testimony of Aaron Brassard, Department ("Brassard") at 3.

10. Comcast will integrate the SVCC cable television system into Comcast's national fiber-optic backbone to provide redundancy and reliability. Glanville pf. at 8, 12.

11. Comcast's fiber-optic backbone is monitored and maintained by local, regional, and divisional personnel 24 hours a day. Glanville pf. at 8; Brassard pf. at 4.

12. Comcast continues to invest in its Vermont cable television system to support advanced video services like high-definition television, video-on-demand, and digital video recorder service. Glanville pf. at 12.

13. All work involved in the construction, installation, maintenance, and repair of Comcast's cable television system in Vermont complies with applicable state and federal laws

and regulations, including the National Electrical Safety Code. Comcast uses material of good and durable quality for construction. Glanville pf. at 12, 15; Brassard pf. at 5.

14. The proposed transaction will expand Comcast's existing systems in Vermont and be a logical fit with neighboring systems. SVCC's system is contiguous to Comcast's system in Windham County and a portion of Bennington County. SVCC has already co-located its headend facilities at the Comcast headend serving Comcast's Brattleboro cable television system, and Comcast provides signal processing services to SVCC. Comcast will provide the same level of service to former SVCC customers as is currently received by Comcast's Vermont customers, in full compliance with the terms of Comcast's CPG. Glanville pf at 8, 23; Brassard pf. at 7.

15. Comcast will comply with the terms and conditions of its recently amended CPG, which includes a 350-mile minimum line-extension buildout obligation, and Commission Rule 8.313. Upon issuance of an order and CPG by the Commission, Comcast will file an updated line-extension tariff that includes Dover, Newfane, Putney, and Townsend. Glanville pf. at 22; exh. DMG-4 at ¶33.

16. The migration of SVCC customers to the Comcast system will occur in three phases, including: (1) preparatory work such as strategic planning, making necessary engineering changes to Comcast's facilities to support additional customers, and conducting network and systems testing; (2) upon approval of the joint petition, notification to SVCC customers of the pending sale of the cable television network to Comcast and implementing planned engineering modifications; and (3) migration of SVCC customers to the Comcast network on specific dates. Glanville supp. pf. at 4-5.

17. Comcast will provide a detailed migration plan to the Commission and the Department within 45 days after any order is issued approving the joint petition. Glanville supp. pf. at 3.

**Provision of Service and Service Quality**  
**[30 V.S.A. §§ 109, 231, and 504(b)(5) and (c)(1); and**  
**Commission Rule 8.214(B)(2) and (5)]**

18. Comcast operates in a competitive market for video services in Vermont and offers basic cable service in accordance with federal law. Comcast also offers a variety of

service tiers that customers can choose from to suit their interests and budget. Glanville pf at 13-14, 21; Brassard pf. at 3-4.

19. Comcast's Vermont customers have a choice among several video programming providers, including satellite providers and "over-the-top" services that provide content to consumers over the Internet. Glanville pf. at 20-21; Brassard at 3-4.

20. Comcast has a service quality plan ("SQP") for reporting its quarterly performance related to customer-service benchmarks. Comcast consistently meets or exceeds the benchmarks. Glanville pf. at 15; Glanville pf. supp. at 6; prefiled testimony of Carol Flint, Department ("Flint") at 4.

21. SVCC is not required to maintain an SQP or to file service quality reports. Comcast will include the former SVCC cable television system in its quarterly service quality reporting once the integration of SVCC's system is complete. Comcast will contact the Consumer Affairs and Public Information Division of the Department ("CAPI") within thirty days after the closing of the sale of SVCC to establish a schedule for an updated service quality plan for all areas in the state of Vermont. Glanville pf. at 16; Glanville pf. supp. at 6.

22. The channel-package rates offered by Comcast are not significantly higher than those offered by SVCC. SVCC customers will be considered new customers and will also be eligible for new customer promotions that are available at the time of migration. Prefiled testimony of Scott Wheeler, Department ("Wheeler") at 4; Glanville pf. supp. at 5.

23. Comcast sales representatives will work with customers to find the combination of products and services that best fits the customer's needs, interests, and budget. Glanville supp. pf. at 5.

#### **Customer Experience**

**[30 V.S.A. §§ 231, and 504(b)(4) and (c)(3), (4), and (5); Commission Rule 8.214(B)(6)]**

24. Comcast does not and will not discriminate between customers regarding the type of service they receive. Glanville pf. at 13-14; Flint pf. at 2-3.

25. Comcast's customer service includes customer-care advisors in its call centers and in its nearest local office in Greenfield, Massachusetts, which is open during normal business hours. Glanville pf. at 16-17; Flint pf. at 4.

26. Comcast's customer-care advisors are also available 24 hours a day by calling Comcast's toll-free telephone number or by using the online chat feature on Comcast's website. Glanville pf. at 16-17.

27. Comcast's customer service includes employees who communicate directly with CAPI to quickly respond to and resolve complaints and problems reported to the Department. Glanville pf. at 15-16; Flint pf. at 3.

28. Comcast provides several notices per year to customers informing them of company policies and procedures, including how customers can file complaints. Comcast provides copies of its customer notices to CAPI. Glanville pf. at 22; Flint pf. at 4.

29. Comcast's policies related to line extensions, disconnections, customer deposits, and billing practices are consistent with state law and the conditions specified in Comcast's line-extension tariff. Glanville pf. at 17-18; Brassard pf. at 5; Flint pf. at 4.

**Technical and Managerial Competence**  
**[30 V.S.A. §§ 109 and 231; and Commission Rule 8.214(B)(4)]**

30. Comcast and its predecessor companies have operated and managed cable television systems since 1963. Comcast has approximately 105,500 cable customers in Vermont. The addition of SVCC's customers will increase Comcast's Vermont customers by 2.3%. Glanville pf. at 20-21; Wheeler pf. at 3-4.

31. Comcast will continue to have an experienced and technically proficient staff of technicians in Vermont. Glanville pf. at 21.

**Financial Soundness**  
**[30 V.S.A. §§ 109 and 231; and Commission Rule 8.214(B)(1)]**

32. Comcast provides video, Internet, and voice services to approximately 21.4 million subscribers in 39 states and the District of Columbia. Glanville pf. at 18-19; Wheeler pf. at 2-3.

33. For the year ending December 31, 2019, Comcast generated approximately \$108.9 billion in revenue. Wheeler pf. at 3.

34. Comcast does not need to obtain financing for the proposed transaction. Glanville pf. at 19.

35. Comcast will provide financial support through its subsidiaries as necessary to ensure that its cable systems, including the SVCC system, provide a quality of service that is competitive. Glanville pf. at 19.

**Public Access**

**[30 V.S.A. §§ 504(b)(1) and (3); and Commission Rule 8.214(B)(2)]**

36. Comcast has designated adequate channel capacity and appropriate facilities for public, educational, and governmental (“PEG”) access. Glanville pf. at 11-12, 20; Brassard pf. at 2-3; Flint pf. at 2.

37. Both SVCC and Comcast have contracts with BCTV for PEG access. BCTV’s programming includes concerts, music festivals, art shows, and other cultural programs, as well as local meetings such as town government and educational programs, covering a broad range of topics. Flint pf. at 2; exh. DMG-10, ¶¶1-3.

38. Pursuant to the terms of a March 29, 2010, PEG agreement between Comcast and BCTV, BCTV receives operating funding from Comcast equal to 5.0% and capital funding equal to 0.5% of Comcast’s gross revenue for the serviceable portions of the towns of Brattleboro, Guilford, and Vernon. Exh. DMG-10, ¶2.

39. Pursuant to the terms of a May 15, 2019, agreement between SVCC and BCTV, BCTV currently receives funding from SVCC equal to 2.25% of SVCC’s gross revenue for the serviceable portions of the towns of Dummerston, Jamaica, Newfane, Putney, and Townshend. Glanville pf. supp. at 6; exh. DMG-10, ¶4.

40. Comcast will comply with the terms of the PEG agreement between SVCC and BCTV and will continue to provide the same channel capacity to BCTV. Pursuant to the BCTV MOU, Comcast will gradually increase the franchise fee paid to BCTV for SVCC’s service area from SVCC’s current level of 2.25% to 5.0%. Glanville pf. at 11-12, 20; Glanville pf. supp. at 5-6; Brassard pf. at 2-3; Flint pf. at 2; exh. DMG-10, ¶6.

41. On or before January 1, 2021, Comcast will extend the capability for BCTV to have program listings and information on Comcast’s interactive program guide and on other Comcast program guides to include the towns of Dummerston, Jamaica, Newfane, Putney, and Townshend. Exh. DMG-10, ¶6.

42. Comcast has agreed to the following upgrades at no cost to BCTV to resolve and improve signal quality and equipment issues:

- a. Installation of a Ciena 3916 switch in the BCTV studio.
- b. Installation of an Ericsson X2 dual encoder in the BCTV studio.
- c. Construction of an additional fiber pair to the BCTV studio.
- d. Installation of a fiber jumper from the new fiber-pair patch location to the Ciena/Ericsson switch locations.

Exh. DMG-10, ¶18.

**Commitment to Act as a Fair Partner in Business Transactions with Vermont Citizens**  
**[30 V.S.A. §§ 109 and 231]**

43. After completion of the proposed transaction, Comcast will own and operate SVCC's cable television system in accordance with all of SVCC's existing CPG conditions. Petition at 4.

44. Following integration of the SVCC cable system with Comcast's other cable systems in Vermont, Comcast will own and operate the assets in accordance with terms and conditions substantially similar to the CPG conditions governing Comcast's ownership and operation of other Vermont cable television systems. Petition at 4.

**Benefits to Customers**  
**[30 V.S.A. §§ 109 and 231]**

45. The sale of SVCC assets to Comcast will increase the technical and operational resources currently available to SVCC customers with support available 24 hours a day, 365 days a year. Scialabba pf. at 4; Glanville pf. at 9.

46. Comcast will provide SVCC customers with the same services and products currently offered in Comcast's Windham County system, which will increase programming and service options for SVCC customers. Glanville pf. at 9; Scialabba pf. at 3-4.

**Effect on Competition**  
**[30 V.S.A. § 109]**

47. The acquisition will have no effect on competition because SVCC and Comcast do not compete in the provision of cable television service or the provision of any other product or service. Brassard pf. at 3-4; exh. DPS-AJB-1.

**Abandonment of Service****[30 V.S.A. § 505]**

48. SVCC's abandonment of service and facilities due to the sale of SVCC's assets to Comcast is in the public interest because it will increase the technical, operational, and financial resources available to support the system and will allow SVCC customers to receive continued service and additional offerings. Scialabba pf. at 3-4.

**VI. DISCUSSION AND CONCLUSION**

There are no remaining disputes between the parties. Comcast and BCTV have reached an agreement regarding BCTV's continued provision of PEG programming on the former SVCC cable television system following Comcast's acquisition as reflected in the BCTV MOU. The Department agrees that the acquisition of SVCC's cable television system will promote the general good of the state, that Comcast has met the statutory and regulatory requirements of 30 V.S.A. § 504 and Commission Rule 8.214, and recommends that the Commission approve the acquisition, issue a certificate of consent and CPG to Comcast, and revoke SVCC's CPG. Comcast has submitted a revised proposed CPG incorporating the conditions requested by the Department. Although the parties have not reached a stipulated resolution, the parties declined all cross-examination at the evidentiary hearing and did not file replies after submitting their post-hearing briefing.

Based on the evidence presented, as set forth in the above findings, I recommend that the Commission find that Comcast's acquisition of substantially all of SVCC's cable television system assets will promote the general good of the State of Vermont, that Comcast satisfies the criteria of 30 V.S.A. § 504 and Commission Rule 8.214, and that SVCC's abandonment of its cable television service and facilities is in the public interest.

This Proposal for Decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because it is not adverse to any party.

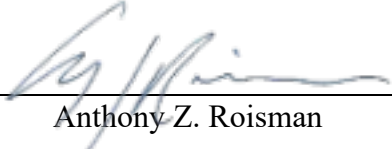
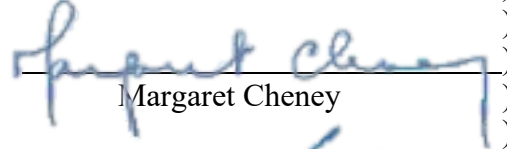
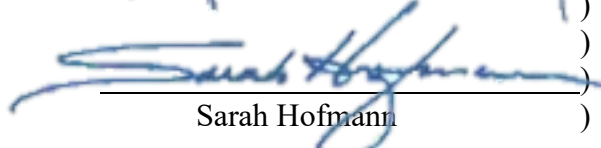
  
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Micah Howe  
Hearing Officer

**VII. ORDER**

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission (“Commission”) of the State of Vermont that:

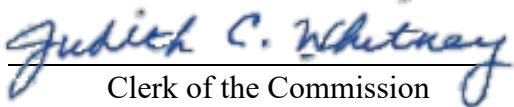
1. The findings and conclusions of the hearing officer are adopted.
2. The acquisition of the cable television system owned and operated by Southern Vermont Cable Company (“SVCC”) by Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC (“Comcast”) will promote the general good of the State as required by 30 V.S.A. § 109 and is approved.
3. The Commission authorizes the issuance of a certificate of consent pursuant to 30 V.S.A. § 109 and Comcast shall file the certificate of consent with the Vermont Secretary of State as required.
4. A certificate of public good is issued to Comcast under 30 V.S.A. §§ 503 and 504 to own and operate a cable television system in the towns of Newfane, Putney, Townshend, and Dover.
5. Within 45 days of the issuance of this Order, Comcast shall file an updated line extension tariff that includes Dover, Newfane, Putney, and Townsend.
6. As a condition of this Order, Comcast shall comply with all terms and conditions set out in the CPG issued in conjunction with this Order.
7. As a condition of this Order, Comcast shall abide by all conditions contained in the memorandum of understanding between Comcast and Brattleboro Community Television, dated March 3, 2020, and included in the evidentiary record as exhibit DMG-10.
8. Effective upon completion of Comcast’s acquisition of the SVCC cable television system assets, SVCC’s certificate of public good is revoked.

Dated at Montpelier, Vermont, this 13th day of May, 2020.

 _____) )	PUBLIC UTILITY
Anthony Z. Roisman )	
_____) )	
 _____) )	COMMISSION
Margaret Cheney )	
_____) )	
 _____) )	OF VERMONT
Sarah Hofmann )	
_____) )	

OFFICE OF THE CLERK

Filed: May 13, 2020

Attest:   
Clerk of the Commission

*Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov))*

*Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.*

PUC Case No. 19-4845-PET - SERVICE LIST

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