

**STATEMENT OF
COMMISSIONER GEOFFREY STARKS,
CONCURRING**

Re: *Amendment of Commission Rule Requiring Records of Cable Operator Interests in Video Programming*, MB Docket No. 20-35; *Modernization of Media Regulation Initiative*, MB Docket No. 17-105.

I won't repeat all the reasons articulated in my statement to the NPRM why proposing to eliminate this rule without fully addressing its statutory purpose was a bad idea. In the name of modernization—which to be meaningful, must entail more than just getting rid of rules—we again eliminate a rule established to fulfill a statutory obligation while leaving the underlying statute unaddressed and the statutory obligation unmet. The Cable Television Consumer Protection and Competition Act of 1992 requires the Commission to establish limits on the number of channels a cable operator may devote to video programming from affiliated channels. The rule established to implement that requirement has long been repealed, but the statutory obligation still exists and the mere passage of time has not, by itself, rendered that statutory provision meaningless. We should have at least acknowledged as much before just taking the rule off the books with no plan to revisit cable operator channel limits. I therefore (again) concur.

Thank you to the Media Bureau staff for their work on this item.