

DENNIS C. LINKEN | Partner  
dlinken@sh-law.com  
Phone: 201-806-3426 | Direct Fax: 201-806-3454

June 18, 2018

Via Electronic Mail ([aida.camacho@bpu.nj.gov](mailto:aida.camacho@bpu.nj.gov)) and Hand Delivery

Aida Camacho-Welch, Secretary  
Board of Public Utilities  
44 South Clinton Avenue  
3rd Floor, Suite 314  
Trenton, NJ 08625

Re: In the Matter of the Petition of Time Warner Cable Inc., Charter Communications, Inc. and Time Warner Cable New York City LLC, for Approval of the Transfer of Control of Time Warner Cable New York, LLC and Approval of Transaction Financing Docket No. CM15070770; and

In the Matter of the Petition of Charter Communications, Inc., and Time Warner Cable Inc., for Approval of the Transfer of Control of Time Warner Cable Information Services (New Jersey), LLC and the Petition of Time Warner Cable Information Services (New Jersey), LLC for Approval of Transaction Financing Docket No. TM15070772

Public Benefits Report

Dear Secretary Camacho-Welch:

Please be advised that our office represents Joint Petitioners Charter Communications, Inc. ("Charter"), Time Warner Cable Inc., Time Warner Cable New York City LLC and Time Warner Cable Information Services (New Jersey), LLC, in the above-captioned matters.

Pursuant to § B.1.h. on page 12 of the Board's Order Approving Stipulation of Settlement dated March 31, 2016, enclosed herewith, on behalf of Charter, please find its Public Benefits Report.

Case mgmt  
list copied

Law  
June 29, 2018

RECEIVED  
MAIL ROOM

JUN 18 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

RECEIVED  
CASE MANAGEMENT

JUN 18 2018

BOARD OF PUBLIC UTILITIES  
TRENTON, NJ

Aida Camacho-Welch, Secretary  
June 18, 2018  
Page 2

It would be appreciated if you would kindly date stamp the extra copy of this submission and return same in the self-addressed, stamped envelope provided herein.

Very truly yours,

*Dennis C. Linken (en)*

Dennis C. Linken  
For the Firm

DCL/dp

enc.

cc: Stefanie A. Brand, Director (sbrand@rpa.state.nj.us)  
Maria T. Novas-Ruiz, Assistant Deputy Rate Counsel (mnovas-ruiz@rpa.state.nj.us)  
Alex Moreau, Deputy Attorney General (alex.moreau@law.njoag.gov)  
Lawanda R. Gilbert, Director (lawanda.gilbert@bpu.state.nj.us)  
Carol Ann Entenza-Artale, Legal Specialist (carol.artale@bpu.state.nj.us)  
William H. Furlong, Bureau Chief (william.furlong@bpu.state.nj.us)  
Rocco Della Serra, Administrative Analyst II (rocco.della-serra@bpu.state.nj.us)  
Harold Bond, Chief, Engineering and Rates (harold.bond@bpu.state.nj.us)

STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

---

In the Matter of the Petition of  
**TIME WARNER CABLE INC.,**  
**CHARTER COMMUNICATIONS, INC.**  
and  
**TIME WARNER CABLE NEW YORK CITY  
LLC**  
for Approval of the Transfer of Control of Time  
Warner Cable New York, LLC and Approval of  
Transaction Financing

---

Docket No. CM15070770

---

In the Matter of the Verified Petition of  
**CHARTER COMMUNICATIONS, INC.,**  
and  
**TIME WARNER CABLE INC.**  
For Approval of the Transfer of Control of Time  
Warner Cable Information Services (New  
Jersey), LLC  
and the Petition of  
**TIME WARNER CABLE INFORMATION  
SERVICES (NEW JERSEY), LLC,**  
For Approval of Transaction Financing For  
Approval of Transaction Financing

---

Docket No. TM15070772

**PUBLIC BENEFITS REPORT**

Pursuant to § B.1.h on p. 12 of the Order Approving Stipulation of Settlement dated March 31, 2016 (“Order”), issued by the Board of Public Utilities (the “Board”) in the above-captioned matters, Charter Communications, Inc. (“Charter”) hereby submits this Annual Public Benefits Report (“Report”). This Report identifies public benefits that Charter has implemented since the

closing of the transaction described in further detail in the Order (the "Transaction").<sup>1</sup> Charter is committed to full compliance with the conditions in the Order and in working with the Board to fulfill the goal of bringing advanced, innovative services to the residents of its Bergen County,<sup>2</sup> New Jersey, System.<sup>3</sup> Since the close of the Transaction, Charter has continued to make significant investments in its customer operations as required by the Order, which includes opening a Spanish speaking call center (outside of New Jersey that supports customers in the State), improvements in customer communication, and customer-facing tools as well as in network operations and reliability enhancements. Other significant investments have been made in equipment, network facilities, and field operations to support greater customer service. These major initiatives and investments have served to enhance Charter's operations and services, benefitting our customers in New Jersey. In each of the sections below, this Report specifically addresses the manner in which Charter is meeting its obligations to provide public benefits pursuant to the terms of the Board's merger conditions.

---

<sup>1</sup> See *BPU Order* § B.1.h ("Within 30 days of implementing transaction related public benefits asserted by Charter in its filings at the Board and the FCC (MB Docket No. 15-49), New Charter will file an initial report with the Board, and shall thereafter provide a status and progress report to the Board annually for four (4) years. . . .").

<sup>2</sup> The Bergen County System is comprised of Cliffside Park, Edgewater, Englewood, Englewood Cliffs, Fairview, Fort Lee, Leonia, Little Ferry, Moonachie, Palisades Park, Ridgefield, Ridgefield Park and Teterboro in Bergen County, and Guttenberg in Hudson County.

<sup>3</sup> Certain subjects discussed in this filing pertain to non-jurisdictional products and services. Discussion of non-jurisdictional products and services is not intended as a waiver or concession of the Board's jurisdiction beyond the scope of Charter's regulated telecommunications and cable video services. Charter respectfully reserves all rights relating to the inclusion of or reference to such information, including without limitation Charter's legal and equitable rights relating to jurisdiction, compliance, filing, disclosure, relevancy, due process, review, and appeal. The inclusion of or reference to non-jurisdictional information or to the ordering clauses or other requirements of the Order as obligations or commitments to provide non-jurisdictional services shall not be construed as a waiver of any rights or objections otherwise available to Charter in this or any other proceeding, and may not be deemed an admission of relevancy, materiality, or admissibility generally.

### **A. No Data Caps**

Consistent with the benefits asserted in filings made at the Board, Charter continues its consumer-friendly pricing policies across the company's expanded footprint.<sup>4</sup> As described in its previous 2017 Annual Report, Charter is offering its New Jersey customers broadband services without imposing data caps. In addition, Charter currently includes information about its practices as part of its marketing materials, including on its website.<sup>5</sup>

### **B. Settlement-Free Interconnection**

Charter currently offers settlement-free interconnection to all qualifying interconnection partners on non-discriminatory terms.<sup>6</sup> Charter does so on a nationwide basis, including in New Jersey, and will continue to do so as required.<sup>7</sup> Charter has posted the terms of its interconnection offer on its website.<sup>8</sup>

### **C. Customer Service Office**

Charter continued to maintain Time Warner Cable's customer service office within the geographical area of its New Jersey operations as required by the Order. This office delivers

<sup>4</sup> See *In re Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership For Consent to Assign or Transfer Control of Licenses and Authorizations*, Public Interest Statement, MB Docket No. 15-149, at 2-3, 18-19 (June 25, 2015) ("FCC Application").

<sup>5</sup> See, e.g., <https://www.charter.com/browse/content/internet>.

<sup>6</sup> See FCC Application at 19; see also *In re Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership For Consent to Assign or Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, MB Docket No. 15-149, at App'x B, § IV.2 (2016) ("FCC Approval Order") FCC Approval Order Appendix B, § III.

<sup>7</sup> See FCC Approval Order, App'x B, § III.2.

<sup>8</sup> See

[https://www.charter.com/browse/static/pdfs/160525\\_Attachment\\_1\\_Charter\\_Communications\\_IP\\_Interconnect\\_Offer\\_and\\_Requirements.pdf](https://www.charter.com/browse/static/pdfs/160525_Attachment_1_Charter_Communications_IP_Interconnect_Offer_and_Requirements.pdf).

high-quality customer care and support to our subscribers.

#### **D. Legacy Time Warner Cable Plans**

Charter supports Time Warner standalone and bundled broadband customers' legacy plans, and will continue to do so in New Jersey until at least May 18, 2019. This includes customers subscribing to the Everyday Low Price service.

#### **E. Low Income Broadband Offer**

On March 15, 2017 Charter launched its \$14.99 low income broadband service, called Spectrum Internet Assist ("SIA"), across its footprint in New Jersey. SIA was rolled out more than 5 months ahead of the schedule required in the Order. SIA is a low-priced, high speed 30/4 Mbps broadband product that includes all standard internet features including security suite and mailboxes. SIA includes a modem or customers may use their own Charter-approved modem. Since SIA's launch, Charter has maintained a dedicated phone number for prospective participants to call in order to verify eligibility and register for the program, if eligible. There is also a link on Charter's internet home page directing customers to a webpage that describes SIA and provides prospective customers with the ability to check on SIA's availability in their area. In addition, Charter has taken a number of other steps to market the SIA product, including training its customer service representatives (both telephone and in-store) to inform customers about SIA's availability and actively marketing the SIA product through direct mail, email, telephone, in-store sales, and community outreach events.

Eligibility requirements for the program comport with the Board's Order.<sup>9</sup>

---

<sup>9</sup> See *BPU Order* at 12.

**F. Broadband Speed Levels**

In addition to the broadband speed increase commitments that have been met since its last annual report, Charter is now offering gigabit service with download speeds up to 940 Mbps in the state, a customer benefit that significantly exceeds the terms of the Board's Order.

BY: Dennis C. Linken (un)  
Dennis C. Linken  
Scarinci & Hollenbeck, LLC  
1100 Valley Brook Avenue  
Lyndhurst, New Jersey 07071-0790  
Phone: (201) 896-4100  
Email: dlinken@sh-law.com

Dated: June 18, 2018