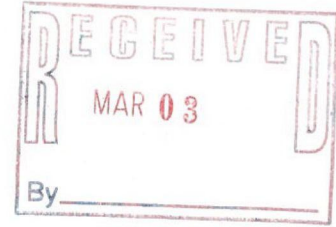




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BOARD OF PUBLIC UTILITIES
TRENTON, NJ

STEFANIE A. BRAND
Director

February 27, 2020

Via Regular Mail & Email

Ms. Aida Camacho-Welsh, Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue, 9th Fl.
P.O. Box 350
Trenton, New Jersey 08625-0350



Re: I/M/O the Petition of Charter Communications, Inc., for Relief Pursuant
to *N.J.A.C.* §14:18-16.7. **BPU Docket No.: CO19101329**

Dear Secretary Camacho-Welsh:

The New Jersey Division of Rate Counsel (“Rate Counsel”) submits the following amended comments for consideration by the New Jersey Board of Public Utilities (“Board”) on the waiver requests filed on behalf of Charter Communications, Inc. (“Charter”) in the above referenced matter.¹ Charter requests relief from the obligations under six regulatory requirements pursuant to *N.J.A.C.* §14:18-16.7. Rate Counsel opposes a Board grant of Charter’s relief requests based on this filing. Notwithstanding, should the Board determine that waiver relief is warranted, Rate Counsel respectfully recommends certain conditions that may provide additional consumer protection.

Introduction

The regulations at issue in Charter’s filing fall under the umbrella of consumer protections (not rate regulations) which do not disappear merely due to the recognition of competition in the cable industry. Indeed, the need to assure that cable companies provide safe, adequate and proper service, equipment and facilities is as important now as ever in light of the

¹ Amendments to Rate Counsel comments are discussed at p.7, *fn* 11, p.10, *fn* 17 and p. 13, *fn* 22.

Case Mgmt
Aida Camacho-Welsh

deregulation of cable service providers under the Federal Communications Commission's ("FCC") Order adopting a presumption of effective competition.² The FCC's determination on the competitive designation of a cable service provider applies only to a local franchising authority's or a State's authority to regulate rates but does not preempt a State's authority to enforce its own consumer protection regulations.³ Questions concerning consumer safety and quality of service remain subject to both federal and state jurisdiction despite a carrier's competitive designation. *N.J.S.A.* §48:5A-10 and §48:5A-36 *et seq.* For example, 47 U.S.C. § 544 (h)(1), and 47 CFR § 76.1603, continue to require that cable carriers notify customers in writing of any changes in rates, programming services or channel positions at least 30 days in advance of the change. Likewise, 47 C.F.R. § 76.1601, consistent with 47 U.S. C. § 534, requires that the cable carrier "...shall provide written notice to any broadcast television station at least 30 days prior to either deleting from carriage or repositioning that station. Such notification shall also be provided to subscribers of the cable system." Additionally, 47 U.S.C. § 522(c) requires written notice of service and rate changes to subscribers.

Rate Counsel recognizes that the Board has previously granted waivers to Verizon and Cablevision, over Rate Counsel's objections.⁴ However, Rate Counsel continues to maintain that the public interest requires that state utility regulations that protect consumer interests such

² Petition, p. 2 and at *fns.* 4,5 and 6 re *In the Matter of Amendment to the Commission's Rules Concerning Effective Competition Implementation of Section 111 of the STELA Reauthorization Act*, MB Docket No. 15-53, Report and Order (Rel. June 3, 2015) ("2015 Effective Competition Preemption Order").

³ *Storer Cable Communications v. City of Montgomery*, 806 F. Supp. 1518, 1531-1532.

⁴ *I/M/O of Verizon New Jersey, Inc., for Relief of Compliance with Certain Provisions of N.J.A.C. 14:18 Pursuant to N.J.A.C. 14:18-16.7*, BPU Docket No.: CO10040249, Order (March 30, 2011) ("Verizon Relief Order") and *I/M/O the Petition of Cablevision Systems Corporation for Relief Pursuant to N.J.A.C. 14:18-16.7*, BPU Docket No.: CO11050279, Order (September 21 2011) ("Cablevision Relief Order").

Board Secretary-Ltr.
Re: Charter Communications, Inc.
BPU Docket No.: CO19101329
February 27, 2020
Page 3 of 15

as the six regulations requested for waiver in this filing, not be waived by the Board absent factual and evidentiary proof that support and warrant the Board's grant of regulatory waiver relief.

Rate Counsel notes that Charter provided confidential responses to Board staff's nine information requests on January 8, 2020. The Company provided updated confidential responses on January 21, 2020, (2018 and 2019 telephone systems reports). Rate Counsel submits that the information provided does not justify approval of the waiver relief requested by Charter in its filing. The granting of regulatory forbearance cannot be solely based on the existence of Board precedent where the Petitioner has refused or has been unable to provide evidence showing that the regulation has detrimentally impacted its ability to effectively compete in the market thus supporting the need for the relief requested. See Charter Confidential responses OCTV&T3, OCTV&T4, OCTV&T5, OCTV&T6, and OCTV&T7.

Given the lack of information provided by Charter in support of its filing, Rate Counsel opposes a Board grant of the relief requested by Charter. In an effort to develop the record, Rate Counsel respectfully recommends that the Board conduct a thorough review of Charter customer complaints filed within the last three years in connection with the regulations where waiver relief has been requested. In addition, Rate Counsel recommends that the Board deny waiver relief where customer complaints confirm that issues exist with the subject matter of the requested waiver at this time. A review of customer complaints is a reasonable course of action (given the lack of supporting information provided by Charter in its filing and subsequent data request responses) and will assist in the Board's assessment on whether a denial or a grant of the

Board Secretary-Ltr.
Re: Charter Communications, Inc.
BPU Docket No.: CO19101329
February 27, 2020
Page 4 of 15

requested waiver relief is warranted and would not be contrary to the public interest or detrimental to Charter customers.

Notwithstanding the above recommendations and conditions, should the Board determine that waiver relief is warranted Rate Counsel respectfully requests that the Board's Order confirm consumers' continuing right to file complaints with the Board with respect to all service offerings and Charter's adherence to the terms and conditions of service and specify that the granting of Charter's requested relief does not relieve Charter's obligation to maintain records on promotional services for a period of three years, as required under N.J.A.C. §14:18-3.15(c).

DISCUSSION

A) *N.J.A.C. §14:18-3.15*, Trial and promotional services

N.J.A.C. §14:18-3.15(b), requires that Charter maintain records of all trial services for inspection for three years clearly outlining the terms and scope of the offering. As noted by Charter "trial services" are limited by *N.J.A.C. §14:18-1.2* to six months, after which the service is either introduced as a standard offering or discontinued and the Board has previously provided relief of this regulation to Cablevision and Verizon.⁵

In support of its waiver request Charter notes that it is at a "significant competitive disadvantage" to competitors that have been granted a waiver of this regulation because the regulation creates "record-keeping costs and burdens" which "Charter's competitors are not subject to" that hinder "Charter's ability to experiment with new trial products and

⁵ *I/M/O of Verizon New Jersey, Inc., for Relief of Compliance with Certain Provisions of N.J.A.C. 14:18 Pursuant to N.J.A.C. 14:18-16.7*, BPU Docket No.: CO10040249, Order (March 30, 2011) ("Verizon Relief Order") and *I/M/O the Petition of Cablevision Systems Corporation for Relief Pursuant to N.J.A.C. 14:18-16.7*, BPU Docket No.: CO11050279, Order (September 21 2011) ("Cablevision Relief Order").

services” which “Charter is continuously developing in order to compete.”⁶ The assertions presented by Charter as a basis for granting a waiver are not supported by the record. In its filing Charter provided no information on the number of trial services they offered during the past one, two or three years nor provided any information on the costs associated with the “requirement to keep “detailed records of these services” which Charter alleges are burdensome.⁷ Likewise, Charter provided no information in connection with Board Staff’s information request **OCTV&T-2** for information on the number of pre-notifications of trial products or services during 2017, 2018 and 2019. Additionally, information was not provided in connection with Board Staff’s information request **OCTV&T-3** requesting a detailed explanation of costs incurred during the last three years to comply with the regulations. Lastly, the empirical evidence requested by Board Staff in **OCTV&T-5** to support Charter’s assertions that “all consumers ... benefit when cable operators offer discounts without prior notice or approval” and that “prior notice requirements delay the benefits of discount programs...” was likewise not provided by Charter.⁸

The facts and supporting evidence herein do not demonstrate the hardship claimed by Charter to warrant waiver of this regulation and Board precedent alone is insufficient for a finding that waiver relief is warranted. By Charter’s own admission “Charter is continuously developing new trial products and service options in order to compete.”⁹ If that is the case,

⁶ Petition, pp. 6-7.

⁷ Id.

⁸ See confidential responses to Board Staff information requests provided by Charter dated January 8, 2020.

⁹ Petition, p. 6.

maintaining records of those trial products and services should actually assist the Company with improving future offerings, without imposing a substantial burden.

While Rate Counsel maintains that Charter has failed to establish a sufficient basis to warrant a waiver of *N.J.A.C.* §14:18-3.15, if the Board determines that a waiver is warranted, not detrimental to Charter customers and is in the public interest, Rate Counsel respectfully requests that the Board's Order confirm its ongoing regulatory jurisdiction and consumers' continuing right to file complaints with the Board with respect to all service offerings. The Board should make clear that Charter must adhere to the terms and conditions of service and specify that the granting of Charter's requested relief does not relieve Charter's obligation to maintain records on promotional services for a period of three years, as required under *N.J.A.C.* §14:18-3.15(c). The Board has recognized that maintenance of records regarding trial and promotional programs is necessary noting that "...multi-year records have been needed to resolve significant customer disputes involving promotional agreements."¹⁰

B) *N.J.A.C.* §14:18-3.17, Notice of alteration in channel allocation

The regulation requires cable operators to provide 30 day notice to customers and the Board's Office of Cable Television ("Office" and/or "OCTV&T") of all programming deletions and programming cutbacks. Notification must also be provided to municipalities at least 30 days in advance of a change in channel location or a deletion of public, educational and/or governmental ("PEG") access channels. Cable companies also must notify the Office of any new channel additions; a similar requirement mandates notice to municipalities of new additions

¹⁰ 39 *N.J.R.* 1776(a), comment 50 at 25-26 (May 7, 2007).

of PEG access channels. In addition, the rule requires cable operators to file a channel list with the OCTV&T on a yearly basis.¹¹

Charter's filing provides no information as to the number of notices (channel allocation sheets) filed in connection with channel alterations within the past three years in support of its allegation that the regulation imposed undue administrative burdens and cost. Charter asserts that it has over 500 channels in its lineup and that it is in the best position to determine the best way to notify its customers of its lineup. Charter asserts that it has a competitive incentive to notify customers in the most effective way. In addition, Charter notes that the FCC allows "operators to maintain a link to channel lineups on their own websites," and that the Board has granted waiver relief for this regulation to its competitors Verizon and Cablevision.¹² Charter confirms that consistent with the Board's Verizon and Cablevision waiver orders it agrees to:

- Continue to provide 30-day notice to OCTV&T and customers of any channel deletion within its control in a manner reasonably calculated to provide such information;
- Notify OCTV&T via electronic notice no later than *ten days* after the addition of a new channel; and
- File updated channel allocation sheets upon request of Board staff.¹³

Rate Counsel opposes a waiver of this regulation as Charter has failed to demonstrate any detrimental competitive impact. Notification of channel deletions and repositioning is paramount to consumer protection. The Communications Act of 1934, as amended, recognized this when it required cable carriers to provide notice of service and rate changes. Channel

¹¹ Rate Counsel February 6, 2020 comments noted semi-annual notice.

¹² Verizon Relief Order, pp. 4-5 and Cablevision Relief Order, pp. 8-9.

¹³ Petition, p. 9.

Board Secretary-Ltr.
Re: Charter Communications, Inc.
BPU Docket No.: CO19101329
February 27, 2020
Page 8 of 15

deletion and repositioning are changes in service. Charter should not be exempted from providing such notice.

Consistent with 47 U.S.C. § 544 (h)(1), 47 CFR § 76.1603, requires that cable carriers notify customers in writing of any changes in rates, programming services or channel positions at least 30 days in advance of the change. And, 47 C.F.R. § 76.1601, consistent with 47 U.S. C. § 534, requires that the cable carrier "... provide written notice to any broadcast television station at least 30 days prior to either deleting from carriage or repositioning that station. Such notification shall also be provided to subscribers of the cable system." Additionally, 47 U.S.C. § 522(c) requires written notice of service and rate changes to subscribers. Since Charter must provide such notice under federal law, the state requirement does not provide an undue additional burden. The rule preserves the right of customers to know when channel changes are forthcoming. Charter has not demonstrated how the grant of this waiver provides any customer benefits. Charter has not demonstrated that the burden of this rule outweighs the benefits and thus has offered inadequate support for this waiver. The requirement for notice of channel changes and other service changes should remain in place.

If the Board determines that partial waiver relief of *N.J.A.C. §14:18-3.17* is prudent and warranted, Rate Counsel requests that the Board mirror the partial and conditional relief ordered in the Verizon and Cablevision matters granting conditional relief subject to the same conditions enumerated by the Board in the Verizon and Cablevision waiver orders that include but are not limited to post-notification of channel additions to its customers and Board staff; the filing of

updated channel allocation sheets upon request of Board staff and retaining the notice requirement to the OCTV and to customers of channel deletions.¹⁴

C) *N.J.A.C. §14:18-3.20(a)(2) and (3), Notice of Discounts for Senior and Disabled Citizens*

N.J.A.C. §14:18-3.20, at paragraph (a) 2 and 3 require the cable provider to notify each customer and municipality served before the effective date of a senior and/or disabled citizen discount offering. The service provider must also notify the OCTV&T before offering such discounts and provide the Office with a revised schedule of prices, rates, terms and conditions showing any such changes.

Charter asserts that it should be permitted flexibility to offer such discounts without the prior notice and approval which may in some circumstances (although none are stated as examples) delay or reduce the frequency of the discount offering.¹⁵

This rule provides a substantial consumer benefit to a discrete but vulnerable segment of the population that may have limited economic, physical and technological resources at their disposal. In New Jersey 2017 numbers show that 8.4% of persons 65 and older live below the official poverty threshold of \$11,511 and roughly 25% of adults living in New Jersey have some type of disability.¹⁶ The regulation requiring notification before the effective date of the discount

¹⁴ See Board discussion of condition imposed at, Verizon Relief Order, pp. 4-5 and Cablevision Relief Order, pp. 8-9.

¹⁵ Petition, p. 10. See also Charter responses provided to Board Staff's information requests: OCTV&T-2, OCTV&T-3, OCTV&T-4 and OCTV&T-5 dated January 8, 2020.

¹⁶ United States Census Bureau, in 2017 noted that 8.4% of adults ages 65 and over were deemed to be living at or below the official poverty threshold of \$11,511 in New Jersey.
https://www.americashealthrankings.org/explore/senior/measure/poverty_sr/state/NJ. The Centers for Disease Control and Prevention, based on Disability and Health US State profile data released states that roughly twenty-five

ensures that these vulnerable classes of customers receive timely notice of needed cost saving opportunities for service. Charter's filing does not provide information on how keeping this requirement causes an undue administrative hardship or costly burden on the company. See Charter confidential response to Board staff's **OCTV&T-4** asking the company to provide all notices of discounts for senior and disabled citizens.

As noted by Charter, the Board has previously waived this requirement observing that "senior/disabled discounts are voluntary, it is in the best interest of the cable television company to notify its customers of the discount"... and ... "cable television companies are required under *N.J.A.C.* §14:18-3.18 to provide notice to customers on a quarterly basis of the availability of a senior and/or disabled discount." Rate Counsel opposes a waiver of this regulation as Charter has failed to show any detrimental impact or how elimination of this regulation is beneficial to customers. Notwithstanding, if the Board decides to grant Charter relief from this regulation, Rate Counsel respectfully requests that the Board's Order confirm that the granting of Charter's requested relief does not relieve Charter from providing notice to customers of the availability of a senior and/or disabled discount, pursuant to *N.J.A.C.* §14:18-3.18.¹⁷

D) *N.J.A.C.* §14:18-3.22, notice of planned interruptions

The regulation requires notice of all planned service interruptions regardless of duration or limited effect on consumers. This requirement ensures service quality which the Board has an absolute right to monitor in order to ensure safe, proper and adequate service. Customers are

percent (24.6%), approximately one-fourth of adults living in New Jersey have some type of disability. <https://www.cdc.gov/ncbddd/disabilityandhealth/impacts/new-jersey.html> .

¹⁷ Rate Counsel February 6, 2020 filing noted "quarterly" notice.

entitled to notice when the carrier plans to interrupt service. In support of rule relaxation, Charter states that “[C]able companies have no incentive to inconvenience customers or interrupt their service in unexpected ways, since such a practice is detrimental to winning and retaining subscribers in a competitive marketplace, as customers can switch to another wireline, DBS, or online video programming contributor.”¹⁸ However, the mere fact that alternatives may exist on the national or state platform does not mean that the alternatives are viable service alternatives for New Jersey Charter customers, who may be restricted by service territories where other forms of video service may not be available or viable given the customer’s geographic location. Furthermore, many customers may be subject to early termination fees or penalties, which service providers do not waive when customers seek to “vote with their feet” if dissatisfied with a service provider’s cable service. Hence, the reality of a customer’s ability to change service providers may be overstated by Charter and should not be the basis for waiver of the regulation to provide customers with notice of planned service interruptions. In addition, Charter notes that there is no “benefit to providing customers with notification of every scheduled network maintenance that could result in a brief disruption to only a small segment of customers ... [that] ... may not even notice at all.”¹⁹ Charter provided no evidentiary support for this allegation and its confidential answer to Board staff’s information request **OCTV&T-6** seeking the number of notices, including copies of such notices of planned service interruptions made under *N.J.A.C. 14:18-3.22*, does not support waiver of the regulation.

¹⁸ Petition, p. 11.

¹⁹ *Id.*

Notice of planned service interruptions is a core service quality protection that should not be summarily eliminated without a firm evidentiary basis that supports waiver relief. Charter's allegation of the existence of other service providers serving as a check on ensuring high quality service by Charter to its customers is unsupported and should not be the overriding reason behind a grant of waiver relief. This is particularly true in service areas where no real viable service alternatives exist for captive customers.

Therefore, Rate Counsel respectfully recommends that as part of the Board's evaluation of Charter's filing the Board review customer service complaints filed within the last three years in connection with planned service interruptions and general service. If review of customer complaints reveal service issues, the Board should condition waiver relief on Board approval of a company plan that remedies the service quality issues discovered in review. This measure will ensure that safe and adequate service is provided to Charter's captive customers.

Notwithstanding, Rate Counsel opposes waiver of this regulation which concerns terms of service and service quality that the Board still has a right to regulate under Title VI of the Communications Act of 1934.²⁰ However, because the Board has previously granted a waiver of this regulation,²¹ if the Board decides to grant Charter similar waiver relief without the benefit of review of customer complaints, Rate Counsel respectfully requests that the Board order require that Charter maintain records of all service interruptions for a period of three years and make the books available to Board staff upon request. This would ensure that records exist if customer complaints are filed in connection with interruption issues.

²⁰ 47 U.S.C. § 522(c) and (d) (1) and (2).

²¹ Verizon Relief Order, pp. 5-6 and Cablevision Relief Order, pp. 9-10.

E) N.J.A.C. §14:18-7.4, notification of system rebuilds, upgrades, hub and headend relocations

The regulation ensures the provision of safe and adequate service and requires a cable service provider to provide notice of a system rebuild, upgrade, hub or headend relocation or other significant change in the system as designed as well as providing information as to how the system will perform once the work has been performed.²² Charter seeks waiver of this requirement and supports its request by asserting that “the innovative and complex services that run over cable television networks require near-constant upgrades and updates to the network” and “[t]he more quickly Charter can modify its system” . . . “the more consumers benefit.”²³ Charter asserts the notification requirement curtails its ability to effectively compete and requests the same waiver the board provided to Verizon and Cablevision.²⁴ Charter’s allegations are not supported by the record. See Charter’s confidential response to Board staff’s information request **OCTV&T-7**. A waiver request that is unsupported by the record, solely based on the fact that other service providers were granted such relief previously cannot support a finding that waiver relief is prudent, appropriate and warranted. Rate Counsel respectfully recommends that as part of the Board’s evaluation of Charter’s filing the Board review customer service complaints filed within the last three years in connection with the provision of their general cable service and if service issues are detected that are attributable to the maintenance of the infrastructure and the general provision of safe and adequate service, that the Board condition waiver relief on Board approval of a company plan that remedies the service quality issues detected by the Board.

²² Rate Counsel February 6, 2020 filing noted 30-day notice.

²³ Verizon Relief Order, p.12-13 and Cablevision Relief Order, p. 10.

²⁴ Petition, pp. 12-13.

Board Secretary-Ltr.
Re: Charter Communications, Inc.
BPU Docket No.: CO19101329
February 27, 2020
Page 14 of 15

Notwithstanding, Rate Counsel does not oppose a Board grant of this waiver relief if the Board is satisfied that the rule relaxation is not detrimental to Charter customers and is in the public interest.

F) *N.J.A.C.* §14:18-7.6, telephone system information

N.J.A.C. §14:18-7.6 concerns the operation of the cable television company's telephone system that serves as the means for customer service operations. Rate Counsel agrees with Charter that it is in Charter's best interest to have a functioning telephone system for its business operations. Additionally, Rate Counsel notes that Charter has provided a copy of the company's telephone system's performance information reports requested by Board staff under OCTV&T-8 and OCTV&T-9 covering 2017, 2018 and 2019. Rate Counsel does not oppose a Board grant of this waiver relief request.

Conclusion

Rate Counsel is cognizant that the Board has previously granted waivers in connection with the regulations for which Charter has requested relief herein. However, Charter has a responsibility to provide support that justifies its request for regulatory relief, just as the Board has an overarching responsibility to protect the public by ensuring the adequate and safe provision of services. Regulations that were enacted to protect customers should not be idly waived on the mere basis of Board precedent absent sufficient basis that demonstrates regulatory relaxation is prudent, not detrimental to customers, is in the public interest and therefore warranted. The recommendations and conditions discussed by Rate Counsel herein are provided to assist the Board in light of a filing and record which provides scant information to support and

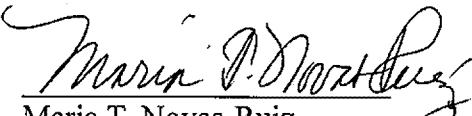
Board Secretary-Ltr.
Re: Charter Communications, Inc.
BPU Docket No.: CO19101329
February 27, 2020
Page 15 of 15

justify the waiver relief sought. It is Rate Counsel's opinion that Charter has failed to make a showing that competition has eliminated the need for these important consumer protections or that the burden on the company is sufficient to justify a waiver and as such opposes a Board grant of certain waivers as discussed herein. Rate Counsel is hopeful that adoption of the recommendations and conditions discussed herein will assist the Board in its evaluation and protect vital consumer protections for Charter customers should the Board grant the relief sought by Charter in this matter.

Thank you for the opportunity to comment and for your attention and consideration of Rate Counsel's recommendations on this matter.

Respectfully,

STEFANIE A. BRAND,
DIRECTOR
NJ DIVISION OF RATE COUNSEL


Maria T. Novas-Ruiz,
Assistant Deputy Rate Counsel

MNR/td

cc: Service List

**I/M/O Petition of Charter
Communications, Inc. for relief
Pursuant to N.J.A.C. 14:18-16.7**

**BPU Docket No. CO19101329
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