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October 5, 2023

Stan Barrett, Esq.  
Scarinci Hollenbeck, LLC  
One River Centre  
331 Newman Springs Road  
Building 3, Suite #310  
Red Bank, NJ, 07701-5692

Re: In the Matter of the Petition of Comcast of Monmouth County, LLC for a Renewal Certificate of Approval to Continue to Construct, Operate and Maintain a Cable Television System in and for the Borough of Highlands, County of Monmouth, State of New Jersey - Docket No. CE23080581

Dear Mr. Barrett:

The Office of Cable Television and Telecommunications ("OCTV&T") is in receipt of the above captioned Petition for a Certificate of Approval ("COA") and attached application for the Borough of Highlands ("Borough"). The following is a request for additional information the OCTV&T would like the company to furnish prior to the completion of our review:

1. **Section IV. System Design Subsections 3 and 4:** Subsection 3 requires, in part, the company to provide information as to the number, cable channel designation, type of access channels and their manner of operation and channel sharing. Subsection 4 also requires the company to list the type of channels, proposed inception, and cable channel designation that has been agreed upon between the municipality and company. The current Certificate of Approval ("COA") issued by the Board of Public Utilities in Docket No. CE08060456 at Section 11 states in part, "the Petitioner shall continue to maintain a system-wide municipal access channel." The ordinance states, "The Company shall continue to make available to the Borough one system-wide public access channel. However, these Subsections of the application do not indicate that there is a system-wide municipal access channel available to the Borough, only a public access channel. Please review the application and submit appropriate information to accurately reflect the channels.
2. **Section VI. System Plant Subsection 4:** This section of the application requires a Map of the entire Municipality be attached as an appendix. In this case, the OCTV&T did not receive a map with the application filed for the Borough. Staff notes that the OCTV&T requires a current map that includes a Map Legend, Municipality Borders, all streets which are to receive services under the designated Primary Service Area, phases of construction, and all streets which will be served under a "Line Extension Policy" ("LEP").

**Please submit a map for the entire municipality that is legible and meets all of the following criteria;**

1. Map Legend including company, system name, municipality name, and county
  2. Municipal Borders
  3. All of the streets should be labeled and note which are to receive service as the Primary Service Area and the Area Designated for LEP
  4. Phases of construction
  5. Aerial and underground
3. **Section IX. Line Extension Policy:** The ordinance at Section 20-7 EXTENSION OF SERVICE indicates that the Company will provide service to all areas of the Borough, and does not state that a Line Extension Policy is applicable. The ordinance states, "Comcast will provide service to all areas of the municipality by installation of standard, or if the service drop is unusually long, at non-standard installation rates. These rates shall be in accordance with the rates set forth in the Company's Application." However the application states, "While service is currently available to the entirety of the municipality, Comcast will apply the Office of Cable Television's (OCTV) Line Extension Policy (LEP) should any future situations warrant. Comcast adopts the OCTV's LEP as attached with a density threshold of 35 homes per mile (HPM)." Kindly revised this Section of the application to remove the information about a LEP being applicable.
4. **Section Index to Appendices, Subsection F:** The subject for this Appendix is Bonding and Insurance. However, no Certificate of Insurance was attached to the application for Highlands Borough. Please provide the Certificate of Insurance to include with Appendix F of the application.
5. **Section Index to Appendices, Subsection G:** The subject for this Appendix is Line Extension Policy. However, since the LEP is not applicable as indicated above, please revised the application to remove this Section from the Index to Appendices.

Please respond to this correspondence by October 20, 2023. If you should have any questions, please contact me at (609) 341-9170 or email [nancy.wolf@bpu.nj.gov](mailto:nancy.wolf@bpu.nj.gov).

Sincerely,



Nancy J. Wolf  
Administrative Analyst 4

NJW/sk

- c: Nancy Tran, Borough Clerk  
Michael Muscillo, Borough Administrator  
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