



State of New Jersey  
DIVISION OF RATE COUNSEL  
140 EAST FRONT STREET, 4<sup>TH</sup> FL.  
P.O. Box 003  
TRENTON, NEW JERSEY 08625

PHIL MURPHY  
*Governor*

TAHESHA L. WAY  
*Lt. Governor*

BRIAN O. LIPMAN  
*Director*

September 30, 2024

**Via Electronic Mail Only**

Ms. Sherri Golden, Board Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
P.O. Box 350  
Trenton, New Jersey 08625-0350

**Re: In the Matter of the Application For Renewal of a System-Wide  
Franchise for Cablevision of Patterson, LLC  
BPU Docket No. CE24080618**

Dear Board Secretary:

The New Jersey Division of Rate Counsel (“Rate Counsel”) files the comments below on Cablevision of Patterson, LLC’s (“Altice” or the “Company”) application for a system-wide cable television franchise (“SWF Renewal Application”) for the New Jersey Board of Public Utilities’ (“Board”) consideration. The filing is provided electronically only. **Please kindly acknowledge electronic filing for Rate Counsel’s record.** For the reasons that follow, Rate Counsel does not oppose Board approval of Altice’s SWF Renewal Application.

Altice filed its SWF Renewal Application on August 20, 2024. The franchise renewal will only impact one town, the City of Paterson in Passaic County.<sup>1</sup> Public hearings were held and no objections to Altice’s SWF Renewal Application were presented at the public hearings.<sup>2</sup>

---

<sup>1</sup> SWF Renewal Application at pp. 1-2.

<sup>2</sup> Public Hearings on September 23, 2024.

In making its determination, the Board, pursuant to N.J.A.C. 14:18-14.2, must examine nine factors which include but are not limited to: the Company's technical expertise and experience, services to be provided, the Company's financial ability to provide services, and statutory commitments as required under N.J.S.A. 48:5A-28(d), (f), and (h) through (n). If approved, the term of the franchise will be seven years as per N.J.A.C. 14:18-14.11(a)(2).

Rate Counsel's review of the SWF Renewal Application and supporting documentation provided by Altice confirm the Company's current and continued service offerings and commitments which include a completely two-way capable system, consisting of digitized channels accessible through the use of a digital converter with a remote unit leased by the Company, an approved third-party device, or the Optimum video app.<sup>3</sup> In addition, Altice will continue to provide three channels on its system dedicated to the City of Paterson for non-commercial (public access, educational access and governmental access) PEG programming.<sup>4</sup> Although PEG channel location may be subject to change, the channels are currently located on channel 75, 76, and 77.<sup>5</sup> The filing notes that Altice has previously constructed a system subject to the minimal line extension obligations prescribed by the Board pursuant to N.J.S.A. 48:5A-28(h) through its conversion of its local franchise to the system-wide franchise<sup>6</sup> and that no rebuild or upgrade is required but extensions may occur to support new customers.<sup>7</sup> Last, among its commitments, Altice will continue to provide:<sup>8</sup>

---

<sup>3</sup> SWF Renewal Application at p. 9.

<sup>4</sup> Ascertainment Report (May 22, 2024) at p. 7; Altice Initial Comments (March 19, 2024) at p. 8.

<sup>5</sup> SWF Renewal Application at p. 9.

<sup>6</sup> Altice Initial Comments (March 19, 2024) at p. 8.

<sup>7</sup> SWF Renewal Application at p. 9.

<sup>8</sup> Id. at pp. 9-10.

1. A public access studio in Newark, New Jersey available for access users upon advance request, which includes, at a minimum, television cameras, microphones, lighting and recording equipment. Altice will continue to make training available upon request pursuant to N.J.S.A. 48:5A-28(l); and
2. Provide free basic service and free Internet service to municipal buildings and provide return feeds to the municipality to distribute PEG programming where requested.

Rate Counsel is satisfied that Altice's SWF Renewal Application satisfies the statutory and regulatory requirements under N.J.S.A. 48:5A-28, et seq. and N.J.A.C. 14:18-14.1, et seq. and supports approval of Altice's SWF Renewal Application for a renewal of a system-wide cable television franchise throughout the City of Paterson. Accordingly, Rate Counsel does not oppose Board approval of Altice's SWF Renewal Application.

Thank you for your consideration of Rate Counsel's comments on this matter.

Respectfully submitted,

BRIAN O. LIPMAN, ESQ.  
DIRECTOR  
NJ DIVISION OF RATE COUNSEL

*/s/ Robert Glover*

Robert Glover, Esq.,  
Assistant Deputy Rate Counsel