



John E. Fogarty
Vice President and Assistant Chief Counsel - Regulatory
Legal

October 9, 2015

Via Federal Express and Email

Ms. Sara Clark
Department Secretary
Commonwealth of Massachusetts
Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: D.T.C. 14-7

Dear Ms. Clark:

Attached are Time Warner Cable's responses to the Record Requests made at the Public and Evidentiary Hearing held in Boston on September 24, 2015.

Sincerely,

A handwritten signature in blue ink, appearing to read "John E. Fogarty", written over a circular stamp.

John E. Fogarty

JEF/srh
Attachment

D.T.C. 14-7

Petition of Time Warner Cable for Review of FCC Forms 1240 and Form 1205 for the Great Barrington, North Adams, and Pittsfield Systems

TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #1:

Provide the number of regulated subscribers at the end of Fiscal Years 2013 and 2014.

Response #1:

1,316,012 regulated subscribers at the end of Fiscal Year 2013.

783,269 regulated subscribers at the end of Fiscal Year 2014.

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Request #2:

How many units of each particular piece of customer premises equipment were retired and how many were not written off and how many were added during Fiscal Year 2014?

Response #2:

Time Warner Cable is still working on compiling this information and expects to be able to provide it within a week.

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TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #3:

Provide the information submitted in Exhibit 3, D.T.C. IR 1-5 for years 2012 and 2013.

Response #3:

See Exhibit 1, D.T.C. Record Request #3.

October 9, 2015

Exhibit 1.

D.T.C. Record Request #3

SCHEDULE C: CAPITAL COSTS OF LEASED CUSTOMER EQUIPMENT

2013 (for 2014 rates) REVISED

TOTAL CPE						
	(LINE D)		(LINE E)		(LINE J)	
GROSS BOOK	ADJUSTED GBV	ACCUMULATED DEPRECIATION	ADJUSTED ACCUM DEPRECIATION	TOTAL CURRENT DEPRECIATION	ADJUSTED CURR DEPRECIATION	
REMOTES 1	50,269,362	7,963,186	24,395,090	3,703,301	14,559,693	2,365,207
CONVERTOR 1 (NON-ADDRESSABLE)	2,553,029	1,218,238	2,553,029	1,218,238	-	-
CONVERTOR 2 (ADDRESSABLE)	2,786,939,125	465,062,167	2,233,645,070	368,768,475	402,213,010	57,483,542
CONVERTOR 3 (DTA)	93,494,216	10,555,677	52,722,080	4,087,976	37,045,119	2,989,444
OTHER EQUIPMENT (CABLE CARDS)	14,001,431	2,099,348	12,863,257	1,926,473	2,255,946	294,389
TOTAL	2,947,257,164	486,898,616	2,326,178,526	379,704,462	456,073,768	63,132,583

2012 (for 2013 rates) REVISED

TOTAL CPE						
	(LINE D)		(LINE E)		(LINE J)	
GROSS BOOK	ADJUSTED GBV	ACCUMULATED DEPRECIATION	ADJUSTED ACCUM DEPRECIATION	TOTAL CURRENT DEPRECIATION	ADJUSTED CURR DEPRECIATION	
REMOTES 1	52,791,511	8,949,703	27,701,534	4,727,866	15,519,102	2,634,777
CONVERTOR 1 (NON-ADDRESSABLE)	2,555,446	1,254,241	2,555,446	1,254,241	-	-
CONVERTOR 2 (ADDRESSABLE)	2,822,657,083	481,691,863	2,106,955,394	367,919,933	437,249,037	68,061,770
CONVERTOR 3 (DTA)	53,783,086	6,853,681	16,834,542	2,081,734	18,343,568	2,266,830
OTHER EQUIPMENT (CABLE CARDS)	14,151,170	2,303,165	15,880,963	2,376,632	3,120,235	421,389
TOTAL	2,945,938,296	501,052,653	2,169,927,879	378,360,406	474,231,942	73,384,766

The majority of Time Warner Cable's customer premise equipment (CPE) is booked to specific geographic regions. Each geographic region's regulated percentage is applied to each region's CPE to arrive at the adjusted numbers for Schedule C. Some CPE cost items, primarily acquisition purchase price adjustments are booked at the company level. The companywide regulated percentage is applied to the company CPE amounts to arrive at the adjusted numbers for Schedule C. The adjusted numbers above are the sum of all the geographic region regulated subscriber-adjusted numbers and the companywide regulated subscriber adjusted numbers.

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TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #4:

Provide the previous year's Form 1205 with corrected depreciation.

Response #4:

Form 1205 for the previous year reflecting revisions matching those in the revised Form 1205 for this year is attached as Exhibit 2, D.T.C. Record Request #4.

Exhibit 2.

D.T.C. Record Request #4

FORM 1205
DETERMINING REGULATED EQUIPMENT AND INSTALLATION COSTS
"EQUIPMENT FORM"

Community Unit Identifier (CUI) of cable system		Date of Form Submission	
See attached list			
Name of Cable Operator			
TIME WARNER CABLE INC.			
Mailing Address of Cable Operator			
7800 Crescent Executive Drive			
City	State	ZIP Code	
Charlotte	NC	28217	
Name and Title of person completing this form:			
Telephone number		Fax Number	
Name of Local Franchising Authority			
Multiple			
Mailing Address of Local Franchising Authority			
City	State	ZIP Code	

1. This form is being filed: [Enter an "x" in the appropriate box]

In conjunction with FCC Form 1200, FCC Form 1220, or FCC Form 1225.
 Attach the completed FCC Form 1200, FCC Form 1220, or FCC Form 1225 to the front of this form.
 OR

In order to fulfill FCC rules requiring an annual filing of this form
 Enter the date on which you last filed this form (mm/dd/yy)

Note: This should be the date on which the rates last justified, by using either FCC Form 393 or the prior filing of this form, were in effect.

2. Enter the date on which you closed your books for the fiscal year reflected in this form:

(mm/dd/yy)

Note: This will indicate the end of the 12-month fiscal year for which you are filing this form.

3. Indicate the corporate status of your cable system [Enter an "x" in the correct box]

<input checked="" type="checkbox"/>	C-Corporation
<input type="checkbox"/>	Subchapter S corporation
<input type="checkbox"/>	Partnership
<input type="checkbox"/>	Sole Proprietorship
<input type="checkbox"/>	Other [Please explain below]

SCHEDULE A: CAPITAL COSTS OF SERVICE INSTALLATION AND MAINTENANCE OF EQUIPMENT AND PLANT						
A	Equipment and Plant	Vehicles	Tools	Maintenance Facilities	Other 1. (Specify below)	Other 2. (Specify below)
B	Gross Book Value	11,618,773	4,768,301	62,506,960	445,493,589	-
C	Accumulated Depreciation	9,092,597	2,991,972	32,572,834	246,557,677	-
D	Deferred Taxes	568,117	482,948	(604,668)	55,054,255	-
E	Net Book Value [B-(C+D)]	1,958,059	1,293,381	30,538,794	143,881,657	-
F	Rate of Return	0.1125				
G	Calculation of Gross-up Rate					
G1	Federal Income Tax Rate	0.3500				
G2	State Income Tax Rate	0.06x4				
G3	Net Total Income Tax Rate [(G1+G2)-(G1 x G2)]	0.3944				
G4	Adjustment to Reflect Interest Deductibility					
G4a	Actual Interest Amount	1,606,000,000				
G4b	Total Net Assets	34,258,049,471				
G4c	Base Return on Investment Amount [G4a/G4c]	3,854,030,565				
G4d	Interest Deductibility Factor [G4a/G4c]	0.4167				
G5	Effective Tax Rate [G3 x (1-G4d)] [C-Corps skip to G7]	0.2301				
G6	Adjustments for Non-C Corporations					
G6a	Base Return on Investment Amount [G4c]	n/a				
G6b	Distributions	n/a				
G6c	Contributions (may not exceed G6b)	n/a				
G6d	Returns Subject to Income Tax [G6a-G6b+G6c]	n/a				
G6e	Returns Percentage Subject to Income Tax [G6d/G6a]	n/a				
G7	Gross-Up Rate [C-Corps: 1/(1-G5) Other: 1/(1-(G5 x G6e))]	1.2988				
H	Grossed-Up Rate of Return [F x G7]	0.1461				
I	Return on Investment Grossed-Up for Taxes [E x H]	286,112	188,989	4,462,335	21,024,016	-
J	Current Provision for Depreciation	976,502	598,558	7,232,194	35,154,813	-
K	Annual Capital Costs [I+J]	1,262,614	787,548	11,694,529	56,178,829	-
L	GRAND TOTAL [sum of Line K entries]	69,923,520				

Box 1.

Specify: Other 1. Software, Computers and Office Equipment

Specify: Other 2. _____

SCHEDULE B: ANNUAL OPERATING EXPENSES FOR SERVICE INSTALLATION AND MAINTENANCE OF EQUIPMENT							
A		Salaries & Benefits	Supplies	Utilities	Other Taxes	Other 1. (Specify below)	Other 2. (Specify below)
A	Annual Op. Expenses for Svc. Install. and Maint. of Equip.	64,612,999	6,484,799	3,752,237	2,804,122	37,562,805	-
B	GRAND TOTAL [sum of Line A entries]	115,216,963					

Box 2.

Specify: Other 1. General Administrative and Other Technically Related Expenses

Specify: Other 2. _____

SCHEDULE C: CAPITAL COSTS OF LEASED CUSTOMER EQUIPMENT								
A	Equipment	Remote 1	Remote 2	Remote 3	Converter 1	Converter 2	Converter 3	Other Equip.
B	Total Maintenance/Service Hours (Attach Explanation)	43,156	-	-	-	700,644	5,997	449
C	Total # of Units in Service	1,742,826	-	-	26,688	1,562,194	153,944	6,986
D	Gross Book Value	7,963,186	-	-	1,218,238	465,062,167	10,555,677	2,099,348
E	Accumulated Depreciation	3,703,301	-	-	1,218,238	368,768,475	4,087,976	1,926,473
F	Deferred Taxes	401,183	-	-	-	15,157,063	(404,867)	79,472
G	Net Book Value (D-(E+F))	3,858,702	-	-	-	81,136,629	6,872,568	93,403
H	Grossed-Up Rate of Return (From Sched. A, Line H)	0.1461						
I	Return on Investment Grossed-Up for Taxes (G x H)	563,834	-	-	-	11,855,700	1,004,221	13,648
J	Current Provision for Depreciation	2,365,207	-	-	-	57,483,542	2,989,444	294,389
K	Annual Capital Costs (I + J)	2,929,042	-	-	-	69,339,242	3,993,665	308,037
L	GRAND TOTAL (sum of Line K entries)	76,569,987						

Box 3.

SCHEDULE D: AVERAGE HOURS PER INSTALLATION		
A.	Average Hours per Unwired Home Installation (attach an explanation)	1,0400
B.	Average Hours per Pre-Wired Home Installation (attach an explanation)	0,8300
C.	Average Hours per Additional Connection Installation at Time of Initial Installation (attach an explanation)	0,3308
D.	Average Hours per Additional Connection Installation Requiring Separate Installation (attach an explanation)	0,8308
E.	Other Installation (by Item Type):	
	Item 1. (Specify):	
	Average Hours per Installation (attach an explanation)	-
	Item 2. (Specify):	
	Average Hours per Installation (attach an explanation)	-
	Item 3. (Specify):	
	Average Hours per Installation (attach an explanation)	-

WORKSHEET FOR CALCULATING PERMITTED EQUIPMENT AND INSTALLATION CHARGES		
STEP A. Hourly Service Charge		
1.	Total Capital Costs of Installation and Maintenance [Schedule A, Box 1]	69,923,520
2.	Total Annual Operating Expenses for Installation and Maintenance [Schedule B, Box 2]	115,216,963
3.	Total Capital Costs and Operating Expenses for Installation and Maintenance [Line 1 + Line 2]	185,140,483
4.	Customer Equipment and Installation Percentage (attach an explanation).	100%
5.	Annual Customer Equipment Maintenance and Installation Costs, Excluding Costs of Leased Equipment [Line 3 x Line 4]	185,140,483
6.	Total Labor Hours for Maintenance and Installation of Customer Equipment and Services (attach explanation)	1,836,841
7.	Hourly Service Charge (HSC) (Line 5/Line 6)	100.79

METHOD OF BILLING FOR INSTALLATIONS (place an "x" in the appropriate box)	
<input type="checkbox"/>	Installations billed by the hour based on the HSC calculated in Line 7.
<input checked="" type="checkbox"/>	Installations billed as a standard charge.

STEP B. Installation Charge		
8.	Uniform HSC for all installations (From Step A, line 7)	n/a
OR		
9.	Average Charge for Installation Types	
a. Unwired Home Installation		
a1.	HSC [Line 7]	100.79
a2.	Average Hours per Unwired Home Installation (Schedule D, Line A)	1.04
a3.	Charge per Unwired Home Installation [a1 x a2]	104.82
b. Pre-wired Home Installation		
b1.	HSC [Line 7]	100.79
b2.	Average Hours per Pre-wired Home Installation (Schedule D, Line B)	0.83
b3.	Charge per Pre-wired Home Installation [b1 x b2]	83.66
c. Additional Connection Installation at Time of Initial Installation		
c1.	HSC [Line 7]	100.79
c2.	Average Hours per Additional Connection Installation at Time of Init. Install. [Schedule D, Line C]	0.33
c3.	Charge per Additional Connection Installation at Time of Initial Installation [c1 x c2]	33.34
d. Additional Connection Installation Requiring Separate Installation		
d1.	HSC [Line 7]	100.79
d2.	Avg. Hours per Additional Connection Installation Req. Sep. Install. [Schedule D, Line D]	0.83
d3.	Charge per Additional Connection Installation Requiring Separate Installation [d1 x d2]	83.74
e. Other Installations (As specified in Schedule D, Line E):		
e1.	HSC [Line 7]	100.79
e2.	Average Hours per Installation of Item 1 [Schedule D, Line E, Item 1]	-
e3.	Charge per Installation of Item 1 [e1 x e2]	-
e4.	HSC [Line 7]	100.79
e5.	Average Hours per Installation of Item 2 [Schedule D, Line E, Item 2]	-
e6.	Charge per Installation of Item 2 [e4 x e5]	-
e7.	HSC [Line 7]	100.79
e8.	Average Hours per Installation of Item 3 [Schedule D, Line E, Item 3]	-
e9.	Charge per Installation of Item 3 [e7 x e8]	-

STEP C. Charges for leased Remotes (Calculate separately for each significantly different type)			
	a	b	c
	Remote 1	Remote 2	Remote 3
10. Total Maintenance/Service Hours [Corresponding column from Schedule C, Line B]	43,156	-	-
11. HSC [Line 7]	100.79	100.79	100.79
12. Total Maintenance/Service Cost [Line 10 x Line 11]	4,349,783	-	-
13. Annual Capital Costs [Corresponding column from Schedule C, Line K]	2,929,042	-	-
14. Total Cost of Remote [Line 12 + Line 13]	7,278,825	-	-
15. Number of Units in Service [Corresponding column from Schedule C, Line C]	1,742,826	-	-
16. Unit Cost [Line 14/Line 15]	4.18	-	-
17. Rate per Month [Line 16/(12)]	0.35	-	-

STEP D. Charges for leased Converter Boxes (Calculate separately for each significantly different type)			
	a	b	c
	Converter 1	Converter 2	Converter 3
18. Total Maintenance/Service Hours [Corresponding column from Schedule C, Line B]	-	700,644	5,997
19. HSC [Line 7]	100.79	100.79	100.79
20. Total Maintenance/Service Cost [Line 18 x 19]	-	70,619,930	604,455
21. Annual Capital Costs [Corresponding column from Schedule C, Line K]	-	69,339,242	3,993,665
22. Total Cost of Converter [Line 20+ Line 21]	-	139,959,172	4,598,120
23. Number of Units in Service [Corresponding column from Schedule C, Line C]	26,688	1,562,194	153,944
24. Unit Cost [Line 22/Line 23]	-	89.59	29.87
25. Rate per Month [Line 24/(12)]	-	7.47	2.49

STEP E. Charges for Other Leased Equipment	
26. Total Maintenance/Service Hours [Corresponding column from Schedule C, Line B]	449.00
27. HSC [Line 7]	100.79
28. Total Maintenance/Service Cost [Line 26 x Line 27]	45,256.01
29. Annual Capital Costs [Corresponding column from Schedule C, Line K]	308.037
30. Total Cost of Equipment [Line 28+Line 29]	353,293
31. Number of Units in Service [Corresponding column from Schedule C, Line C]	6,986
32. Unit Cost [Line 30/Line 31]	50.57
33. Rate per Month [Line 32/(12)]	4.21

METHOD OF BILLING FOR CHANGING SERVICE TIERS OR EQUIPMENT (place an "x" in the appropriate box)	
<input checked="" type="checkbox"/>	as a Nominal Charge (Enter the nominal charge in Line 34)
<input type="checkbox"/>	as a Uniform Hourly Service Charge
<input type="checkbox"/>	as an Average Charge (Enter the Average Hours for Changing Service Tiers in Line 36b.)

STEP F. Charges for Changing Service Tiers or Equipment	
34. Nominal Charge for Changing Service Tiers	2.00
If you use an escalating scale of charges, place an "x" in the box at the right.	
OR	
35. Uniform Hourly Service Charge	n/a
OR	
36. Average Charge for Changing Service Tiers	
36a. HSC [Line 7]	100.79
36b. Average Hours to Change Service Tiers	
36c. Average Charge for Changing Service Tiers [Line 36a x Line 36b]	n/a

WORKSHEET FOR CALCULATING TOTAL EQUIPMENT AND INSTALLATION COSTS		
1.	Total Capital Costs of Installation and Maintenance [Schedule A, Box 1]	69,923,520
2.	Total Annual Operating Expenses for Installation and Maintenance [Schedule B, Box 2]	115,216,963
3.	Total Annual Capital Costs of Installation and Maintenance [Line 1 + Line 2]	185,140,483
4.	Customer Equipment and Installation Percentage (attach explanation).	100%
5.	Annual Customer Equipment Maintenance and Installation Costs, Excluding Costs of Leased Equipment [Line 3 x Line 4]	185,140,483
6.	Total Capital Costs of Leased Customer Equipment [Schedule C, Box 3]	76,569,987
7.	Annual Customer Equipment and Installation Costs [Line 5 + Line 6]	261,710,470
8.	Percentage Allocation to Franchise Area (see instructions)	100%
9.	Allocated Annual Equipment and Installation Cost [Line 7 x Line 8]	261,710,469.54
10.	Monthly Equipment and Installation Cost [Line 9 / (12)]	21,809,205.80
11.	Number of Basic Subscribers in Franchise	1,194,885
12.	Monthly Equipment and Installation Cost per Subscriber [Line 10 / Line 11]	18.25
13.	Inflation Adjustment Factor [See Instructions]	100%
14.	Adjusted Monthly Equipment and Installation Cost per Subscriber [Line 12 x Line 13]	18.25

SUMMARY SCHEDULE

Current Equipment and Installation Rates	Permitted	Actual
1. Charges for Cable Service Installations		
a. Hourly Rate [Step A, Line 7]	n/a	
b. Average Installation Charges:		
1. Installation of Unwired Homes [Step B, Line 9a3]	104.82	104.82
2. Installation of Prewired Homes [Step B, Line 9b3]	83.66	83.66
3. Installation of Additional Connections at Time of Initial Installation [Step B, Line 9c3]	33.34	33.34
4. Installation of Additional Connections Requiring Separate Install [Step B, Line 9d3]	83.74	83.74
5. Other Installations (specify) [Step B, Lines 9e3, 9e6, 9e9]		
a.	-	-
b.	-	-
c.	-	-
2. Monthly Charge for Lease of Remote Controls [Step C, Line 17, columns a-c]		
Remote Control Type 1:	0.35	0.35
Remote Control Type 2:	-	-
Remote Control Type 3:	-	-
3. Monthly Charge for Lease of Converter Boxes [Step D, Line 25, columns a-c]		
Converter Box Type 1:	-	-
Converter Box Type 2:	7.47	7.47
Converter Box Type 3:	2.49	2.49
4. Monthly Charge for Lease of Other Equipment [Step E, Line 33]		
Other Equipment (Specify)	4.21	4.21
5. Charge for Changing Tiers (if any) [Step F, Line 34, 35 or 36c]		
	2.00	2.00

LABOR COST AND POLICY CHANGES

Indicate your answer to the following three questions by placing an "x" in the appropriate box

1. Have you included the labor costs associated with subscriber cable drops in your charges for initial installation?

<input type="checkbox"/>	YES
<input checked="" type="checkbox"/>	NO

2. Have you capitalized the labor costs associated with subscriber cable drops?

<input checked="" type="checkbox"/>	YES
<input type="checkbox"/>	NO

3. If you have filed this form before, have you changed any policy, e.g., cost accounting or cost allocation that causes an increase in the costs included in the computation of equipment and installations charges?

<input type="checkbox"/>	YES (You must attach a full explanation)
<input checked="" type="checkbox"/>	NO

CERTIFICATION STATEMENT

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE TITLE 18, SECTION 1001), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements made in this form are true and correct to the best of my knowledge and belief, and are made in good faith.

Name of the Cable Operator	Signature
TIME WARNER CABLE	
Date	Title
	Senior Director, Accounting

D.T.C. 14-7

Petition of Time Warner Cable for Review of FCC Forms 1240 and Form 1205 for the Great Barrington, North Adams, and Pittsfield Systems

TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #5A:

Provide the number of franchise areas receiving Time Warner Cable's initial Form 1205 for 2014.

Response #5A:

Time Warner Cable distributed to local franchising authorities 131 copies of the initial Form 1205 for 2014. In some instances, one Form 1205 was filed with a local franchising authority that regulates on behalf of multiple franchise areas (e.g., the D.T.C.); in some instances, a single local franchising authority that regulates on behalf of multiple franchise areas received multiple copies of the Form 1205 (e.g., the New York Public Service Commission, which received 73 copies of the Form 1205).

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TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #5B:

Provide the number of local franchising areas receiving Time Warner Cable's revised Form 1205 for 2014.

Response #5B:

Time Warner Cable distributed the revised Form 1205 for 2014 to one local franchising authority (the D.T.C.).

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TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #6:

Is The Guide listed on the current rate card the same software as the Navigator listed on last year's rate card and is the price the same?

Response #6:

The Guide listed on the current rate card is the same software, providing the same services, as the Navigator listed on last year's rate card. The price has not changed.

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TIME WARNER CABLE'S RESPONSE TO RECORD REQUESTS BY THE DEPARTMENT OF TELECOMMUNICATIONS AND CABLE MADE AT PUBLIC AND EVIDENTIARY HEARING ON SEPTEMBER 24, 2015.

Request #7:

Is The A/O Service charge listed on the current rate card the same service and price as the A/O Service charge listed on last year's rate card?

Response #7:

The A/O Service charge listed on the current rate card is the same service, provided at the same rate, as the A/O Service charge listed on last year's rate card.