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June 3, 2024

VIA ELECTRONIC FILING - dtc.efiling@mass.gov

Ms. Shonda D. Green
Department Secretary
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500

Re: **D.T.C. 13-4** – Investigation by the Department on its Own Motion into the
Implementation in Massachusetts of the Federal Communications Commission’s
Order Reforming the Lifeline Program

Dear Ms. Green:

Enclosed please find Time Warner Cable Information Services (Massachusetts), LLC’s
 (“TWCIS”) Reply Comments in connection with the above-referenced proceeding.

Please feel free to contact the undersigned or Sophia Browning of this office (202-218-
3904) should you have any questions regarding this submission.

Very truly yours,



David W. Bogan

DWB/
Enclosure

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE

Investigation by the Department on its Own
Motion into the Implementation in
Massachusetts of the Federal
Communications Commission's Order
Reforming the Lifeline Program

D.T.C. 13-4

REPLY COMMENTS OF
TIME WARNER CABLE INFORMATION SYSTEMS (MASSACHUSETTS), LLC

Time Warner Cable Information Systems (Massachusetts), LLC ("TWCIS") files these reply comments in support of those comments it filed on May 3, 2024 and in light of the initial comments filed by other stakeholders.

In its initial comments, TWCIS made three primary points in response to the Department's proposed updates to its Lifeline requirements for eligible telecommunications carriers:

1. The proposed definition of "complaint" is too broad for effective reporting.
2. The scope of adverse events that triggers the reporting requirements is also too broad and should be revised.
3. The Commission should rely on ETCs' posting of changes to customer information privacy policies on their websites, in place of additional reporting requirements.

Initial comments were also filed by several other communications providers: Verizon; Assurance Wireless USA, L.P.; and, collectively, Telrite Corporation, TruConnect Communications Inc., and Global Connection Inc.

Although the comments filed by the other communications providers differ in some of their details, at a high level they are, with respect to TWCIS's first two points, entirely consistent. The commenters all agree that the proposed reporting requirements are too broad and should be narrowed. With respect to the third point, the other commenters are silent, but there is nothing in the other comments that is inconsistent with TWCIS's proposed revisions.

In short, there is a high degree of agreement among the communications industry, and that consensus is consistent with TWCIS's suggestions.

In light of this, TWCIS respectfully suggests that the Department adopt the proposed revisions to the Department's revised rules found in Exhibit A to TWCIS's initial comments.

Dated: June 3, 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. W. Bogan", with a long horizontal flourish extending to the right.

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