



April 11, 2018

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

RE: Comcast Cable Communications, LLC
Docket No. D.T.C. 17-4
FCC Forms 1240 and 1205
Record Request Responses

Dear Ms. Green:

Enclosed are an original and three (3) copies of Comcast's response to D.T.C. Record Requests 1 through 4, from the Department's March 28, 2018 hearing regarding Comcast Cable Communications, LLC's FCC Form 1205 and FCC Form 1240s submitted on October 1, 2017.

As noted in Comcast's response to D.T.C. Record Request 3, we anticipate submitting an additional substantive response by April 27, 2018.

If you have any questions regarding this information, please contact me at 610-665-2536.

Sincerely,

James G. Gray
Senior Director of Regulatory Accounting
Comcast Cable Communications, LLC

/enclosures

**DTC Rate Hearing
RECORD REQUESTS
March 28, 2018**

Record Request #1:

How long has the voice remote been in service in Massachusetts?

Response:

The voice remote was made available to Comcast's Massachusetts subscribers in May 2015.

**DTC Rate Hearing
RECORD REQUESTS
March 28, 2018**

Record Request #2:

- 1) Please confirm that all commissions are removed from Step A: Line 5. 2) In addition, please verify that the correct boxes are checked in the Labor Cost and Policy Changes section of the FCC Form 1205.

Response:

- 1) To comply with the mandate in the Massachusetts Department of Telecommunications and Energy's final ruling in CTV 04-3 / 04-4 (the "2004 Rate Order"), the FCC Form 1205 originally filed in this proceeding was modified to remove technical commissions from Line 5 in Step A. In particular, both Greater Boston and Western New England operating regions' total commission expense was adjusted in their separate workbooks to remove technical commissions. The regions' aggregate revised costs were then used in the newly calculated "Annual Customer Equipment Maintenance and Installation Costs of Leased Equipment" entered on Line 5 in Step A of FCC Form 1205.

It may be helpful to remember that when the initial 2004 rate order was issued, Comcast's first attempt to comply with the commission removal from Schedule B requirement caused the Hourly Service Charge to increase. This was due to the fact that, even though all commissions were included in the total costs in Schedule B of Comcast's Form 1205, all commissions (except technical commissions) were factored into the Schedule B percentage at 0%. Consequently, when all commissions were removed under the initial 2004 rate order, it caused the Schedule B percentage to increase because we had removed costs that were factored in at 0%. When we submitted the compliance FCC Form 1205 with an increased Hourly Service Charge, the Department rejected the filing and specifically ordered, in its 2004 Order on Petition for Reconsideration and on Compliance Filing (i.e., the "2004 Rate Order,"), that "Comcast file a revised FCC Form 1205 that removes commissions from Step A, Line 5, while leaving these costs in Schedule B, Operating Expenses". The methodology described above, specifically removing only technical commissions from Step A, Line 5 resulted in a decreased Hourly Service Charge. This methodology was discussed with Department staff and accepted by the Department.

**DTC Rate Hearing
RECORD REQUESTS
March 28, 2018**

(Cont'd)

The agreed-upon methodology to comply with the 2004 Rate Order has been consistently followed since the 2004 Rate Order was issued and has been applied in the same manner in this FCC Form 1205 at issue in this proceeding. Please note that a similar explanation was provided in response to Record Request Comcast 4 from the August 3, 2011 hearing in Docket No. DTC 10-8 and also from Record Request 4 from the June 21, 2017 hearing in Docket No. DTC 16-3.

- 2) The correct boxes have now been updated and properly checked in the Labor Cost and Policy Changes section of the FCC Form 1205. Please see the revised page 7 of the FCC Form 1205 attached hereto.

Comcast

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]	\$48.59	*
2. Installation of Wired Homes [Step B, Line 9b3]	\$46.08	*
3. Installation of Additional Connections at Time of Initial Installation [Step B, Line 9c3]	\$22.62	*
4. Installation of Additional Connections Requiring Separate Install [Step B, Line 9d3]	\$45.24	*
5. Other Installations (specify) [Step B, Lines 9e3, 9e6, 9e9]		
a. Upgrade Non-Addressable	\$40.21	*
b. Downgrade Non-Addressable	\$18.85	*
2. Monthly Charge for Lease of Remote Controls [Step C, Line 17, columns a-e]		
Remote Control Type 1: All Units	\$0.36	*
Remote Control Type 2:	\$0.00	
Remote Control Type 3: CableCARD	\$0.67	*
3. Monthly Charge for Lease of Converter Boxes [Step D, Line 25, columns a-e]		
Converter Box Type 1: (Basic Only Units)	\$1.84	*
Converter Box Type 2: (All Others Excluding Basic Only and DTA)	\$3.21	*
Converter Box Type 3: (DTA)	\$1.19	*
4. Monthly Charge for Lease of Other Equipment [Step E, Line 33]		
Other Equipment	\$0.00	*
5. Charge for Changing Tiers (if any) [Step F, Line 34, 35 or 36c]	\$40.21	*

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?

☐ YES
☒ NO

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

☒ YES
☐ 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?

☐ YES (You must attach a full explanation)
☒ 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
Comcast Cable Communications, LLC	
Date	Title
10/01/17	Executive Director, Regulatory Affairs

*See 2018 Equipment and Installation Rates Sheet.

**DTC Rate Hearing
RECORD REQUESTS
March 28, 2018**

Record Request #3:

Please advise whether it is feasible to provide a pro forma FCC Form 1205 for Fiscal Year 2015 which only includes the Greater Boston and Western New England regions. If it is feasible, please advise when the pro forma version could be provided to the Department. If it is not feasible, please identify and provide an alternate submission that might assist the Department in evaluating the submitted Form 1205 for Fiscal Year 2016 and the change to regional preparation.

Response:

Comcast believes that preparation of the requested pro forma FCC Form 1205 for fiscal year 2015 is feasible and will attempt to submit the document by April 27, 2018.

**DTC Rate Hearing
RECORD REQUESTS
March 28, 2018**

Record Request #4:

When determining the amount of hours and salary costs attributable to regulated activities, please advise of how the proportion was determined.

Response:

Comcast's allocation of hours and associated salaries to regulated activities is accomplished by comparing an employee's regulated activity hours to total activity hours. In simplest terms, if 60% of an employee's time is engaged in regulated activities, then 60% of the employee's hours and 60% of the employee's compensation would be allocated to regulated activities.

Comcast's allocation is performed by specific job classification – with a distinct allocation to regulated activities for installer, technician, dispatch, and warehouse employees.

In fact, Comcast, in conducting this exercise, actually considers only an employee's "productive" hours, with the compensation costs associated with "non-productive" hours "loaded" into the employees "productive" hours. For example, if 20% of the employee's hours are spent on "non-productive" activities (e.g., training), the employee's entire salary is allocated to productive activities, and that entire salary cost is then allocated to regulated activities based on a comparison of regulated productive hours to total productive hours. By proceeding in this fashion, Comcast properly ensures that full salary costs (rather than just 80%) are assigned to productive activities, with the recovery from regulated activities dependent on the relative productive engagement in regulated versus unregulated activities.