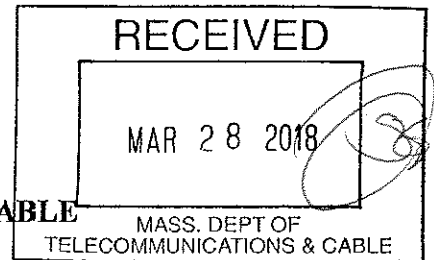


COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE



Petition of Comcast Cable Communications , LLC to)
Establish and Adjust The Basic Service Tier Programming,)
Installation Rate for the Communities in Massachusetts)
Served By Comcast Cable Communications, LLC that are)
Currently Subject to Rate Regulation)

D.T.C. 17-4

COMMENTS ON BEHALF OF THE TOWN OF BARNSTABLE

On behalf of the Town of Barnstable (hereinafter also referred to as the "Town" or "Barnstable"), a municipal corporation established pursuant to the laws of the Commonwealth of Massachusetts, I submit the following comments in the above captioned rate proceeding on the Petition of Comcast Cable Communications, LLC ("Comcast"). I do so as the Town's counsel for cable matters and as authorized by the Town Counsel for the Town in consultation with the Town Manager.

I hereby request that the Department of Telecommunications and Cable ("Department"), as is its practice, very carefully review Comcast's calculation of its "Maximum Permitted Rate" for the Projected Period (\$29.4475), which serves as the basis for the "Operator Selected Rate For Projected Period" of **\$29.44**.¹ While the "Current Maximum Permitted Rate, as set out by Comcast in Part I: Preliminary Information, Line A1, is \$27.2113, the current "Operated Selected Rate" is **\$19.51**. This is an increase in the Operator Selected Rate of **\$9.94** or **51%**. (See also Exhibit II referenced in Footnote 1.)² This is an unreasonably high increase in the rate


¹ "Basic - \$20.45; Broadcast TV Fee - \$8.99 and FRC [Franchise Related Cost] of \$0.01 for a total "Proposed OSR of \$29.45. (See "Comcast Cable Communications, LLC Barnstable, MA Exhibit II Additional Information Requested For Expedited Processing of FCC Form 1240.)

² In Comcast's "Exhibit 1-2" of its Responses to First Set of Information Requests by the Department, the company lists the "Current Rate Charged" for Barnstable as "Rate \$13.00, BTV Fee \$8.00, FRC 0.01, Total 21.01. The basis for charging more than the previously Operated Selected Rate should be review by the Department.

for Basic Service, which is a lifeline for many Barnstable cable subscribers, particularly those on fixed incomes, as well as other subscribers who have selected Basic Service to meet their cable needs in an affordable manner.

Additionally, it is requested that Comcast choose an Operator Selected Rate with an increase in line with actual cost increases for Basic Service. As Comcast is aware, the vast majority of cost increases that the company is subject to are not in within the cost structure of Basic Service, and as such, the company should not use its basic service as a vehicle for capturing revenue to meet costs from other tiers of cable service. Comcast having, to its credit, maintained a reasonable Basic Rate, should not disproportionately raise its Basic Rate to an artificially high Maximum Permitted Rate cause by it reasonable actions to date.

Respectfully Submitted,
Town of Barnstable
By its attorney,



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CERTIFICATE OF SERVICE

I, William H. Solomon, hereby certify that on this 28th day of March, 2018, I served a copy of the foregoing Comments on Behalf of The Town of Barnstable to:

Department of Telecommunications and Cable, Commonwealth of Massachusetts -
dte.efiling@mass.gov.

Sandra E. Merrick, Presiding Officer, Department of Telecommunications and Cable,
Commonwealth of Massachusetts via e-mail – SandraE.Merrick@mass.gov.

Shonda D. Green, Executive Administrative Coordinator, Department of
Telecommunications and Cable, Commonwealth of Massachusetts via e-mail:
Shonda.green@mass.gov.

Joseph Lance, Executive Director of Regulatory Accounting, Comcast Cable
Communications, LLC – Fax No. (610) 665-2753.



William H. Solomon