

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE**

Petition of Charter Communications to  
Establish and Adjust the Basic Service  
Tier Programming, Equipment, and  
Installation Rates for the Communities in  
Massachusetts Served by Charter  
Communications That Are Subject to  
Rate Regulation

D.T.C. 17-5



**OFFICE OF THE ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS**

INSTRUCTIONS

1. These Document and Information Requests ("Requests") call for all information, including information contained in documents, that relates to the subject matter of the Requests and that is known or available to Charter Communications (the "Company"), or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These Requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each Request to "Please produce all documents . . ." or similar phrases includes a request to "identify" all such documents. The term "identify" with respect to documents means to state the nature of the document, the date on which it was prepared, the subject matter, the titles and the names and positions of each person who participated in the preparation of the document, the addressee(s), and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
6. The term "identify" with respect to persons means to give, to the extent known, the person's full name, present or last known address, and when referring to a natural person, the present or last known place of employment. Once a person has been identified in

accordance with this definition, only the name of that person need be listed in response to subsequent Requests.

7. Each Request calling upon the Company to "state the basis" of or for a particular claim, assertion, allegation, contention, or proposition requires the Company to provide the following:
  - a. identify each and every document (and, where pertinent, the section, article, or subparagraph thereof) that forms any part of the source of the party's information regarding the alleged facts or legal conclusions referred to by the Request;
  - b. identify each and every communication that forms any part of the source of the party's information regarding the alleged facts or legal conclusions referred to by the Request;
  - c. state separately the acts or omissions to act on the part of any person (identifying the acts or omissions to act by stating their nature, time, and place and identifying the persons involved) that form the part of the party's information regarding the alleged facts or legal conclusions referred to in the Request; and,
  - d. state separately any and all other facts that form the basis of the party's information regarding the alleged facts or conclusions referred to in the Request.
8. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data that constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the databases utilized, and the programming to obtain the output.
9. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
10. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
11. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using to respond to the Request.



12. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
13. Provide copies of all requested documents. A response that does not provide the Attorney General with the responsive documents and that requests the Attorney General to inspect documents at any location is not responsive.
14. If you refuse to respond to any Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
15. Each request for information includes a request for all documents that support the response provided.
16. Provide a copy of each response both electronically and on three-hole punched paper.
17. If the response contains attachments with confidential materials and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.
18. The term “document” refers to documents or electronically stored information—including writings, drawings, graphs, charts, photographs, sound recordings, images and other data or data compilations—stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form.
19. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
20. The term “concerning” means referring to, describing, offering evidence of, or constituting.
21. The term “BST” means basic service tier.
22. The term “BST-only cable customer” means a customer within the Commonwealth of Massachusetts that subscribes only to BST programming packages for his or her cable television services. The term is entirely independent of any Internet or telephone services the customer may also obtain from the Company. For example, a BST-only customer may be a customer that has broadband Internet service through the Company, in addition to having BST cable programming service through the Company.
23. The term “Company” refers to Charter Communications and, unless the Request specifically states otherwise, includes all witnesses, representatives, employees, agents, and legal counsel of Charter Communications.

24. The terms “Standard Converter,” “HD/DVR Converter,” and “Cable Card” refer to those terms as they are used in *Petition of Charter Communications*, D.T.C. 16-4, Att. 1 (2017).
25. Please submit responses within ten (10) business days of receiving this request.

## REQUESTS

- AG-1-1 Please state the current number of the Company's BST-only cable customers.
- AG-1-2 Referring to Request AG-1-1, please state the current number of BST-only cable customers for each community that is subject to rate regulation.
- AG-1-3 Referring to Request AG-1-1, please state the current number of BST-only cable customers that are being charged for the rental of a Standard Converter.
- AG-1-4 Referring to Request AG-1-1, please state the current number of BST-only cable customers that are being charged for the rental of an HD/DVR Converter.
- AG-1-5 Referring to Request AG-1-1, please state the current number of BST-only cable customers that are being charged for the rental of a Cable Card.
- AG-1-6 Referring to Request AG-1-1, please produce an example of the monthly bill sent to the same BST-only cable customer for each of the following months: December 2017; January 2018; February 2018; and March 2018. For this request, please redact the name and street address of the individual but do not redact the town/city name or ZIP code.
- AG-1-7 Referring to Request AG-1-1, please produce any and all communications to BST-only cable customers from the Company concerning the Company's recent conversion to all-digital systems.
- AG-1-8 Please state whether the reduction in federal corporate income tax on January 1, 2018, changes any of the data reported in the Company's petition in this proceeding. If it does change any of the data reported in the Company's petition, please state in detail (1) which data have changed and (2) what effect these changes have, if any, on the calculation of any of the Company's maximum permitted rates.

DATED: May 16, 2018