



COMMONWEALTH OF MASSACHUSETTS

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July 19, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Notice of Ex Parte -- Filed Via ECFS

Modernization of Media Regulation Initiative, MB Docket No. 17-105
Revisions to Cable Television Rate Regulations, MB Docket No. 02-144
Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation, MM Docket No. 92-266, MM Docket No. 93-215
Adoption of a Uniform Accounting System for the Provision of Regulated Cable Service, CS Docket No. 94-28
Cable Pricing Flexibility, CS Docket No. 96-157
Comcast Cable Communications, LLC Petition for Determination of Effective Competition in Templeton, Massachusetts (MA0127), MB Docket No. 13-172

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") rules, the Massachusetts Department of Telecommunications and Cable ("MDTC") hereby provides notice that on July 17, 2018, Michael Mael, Senior Rate Analyst for the MDTC, and I met with Holly Saurer, Nancy Murphy, Martha Heller, Steven Broeckert, Brendan Murray, and Katie Costello of the FCC's Media Bureau, and Susan Aaron of the FCC's Office of the General Counsel.

We discussed the current state of cable rate regulation in Massachusetts and potential ways that the federal regulatory regime could be modernized. Consistent with our comments in many of the above-captioned proceedings, we reiterated the importance of reasonable basic service tier ("BST") cable rates. We stressed that we are not opposed to a change in the federal regulatory framework, so long as the protections that traditional rate regulations currently afford to BST-only subscribers remain, as the high price of cable rates remains the most frequent complaint that the MDTC receives.

We stated that, according to our analysis, BST rates in effective competition communities are, on average, consistently higher than BST rates in communities not subject to effective competition.

We noted that one of the reasons for this could be the link between cable services and terrestrial broadband provided by cable operators. Given this link, we question whether BST prices in effective competition communities accurately represent competitive rates. In addition, we noted that cable operators in regulated Massachusetts communities often charge less than the maximum rate permitted by regulation.

We also discussed a rate proposal recently filed in these proceedings by NCTA. We stated that more information is needed to fully form an opinion on the proposal, but that with the information provided, there may be policy concerns and legal impediments that prevent its implementation.

Finally, I inquired into the status of the MDTC's unopposed Petition for Reconsideration in MB Docket No. 13-172 and INBOX-76.910 with respect to the Town of Templeton, MA.

In sum, we reiterated our commitment to protecting BST subscribers from unreasonable rates, and our continued willingness to provide input to the FCC and work with Massachusetts cable operators to ease any burden they face while continuing to facilitate meaningful consumer protections.

Pursuant to Section 1.1206 of the FCC's rules, this notice is being filed electronically via ECFS with your office. Please do not hesitate to contact me should you have any questions.

Respectfully,

/s/ Sean M. Carroll

Sean M. Carroll

Deputy General Counsel

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cc: Holly Saurer
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