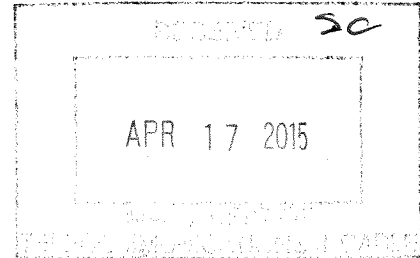




April 17, 2015

Sara Clark, Secretary
Cable Television Division
Department of Telecommunications & Cable
1000 Washington Street, Suite 820
Boston, MA 02118-6500



Re: Charter Communications

First Set of Information Requests: Docket DTC 14-6

Dear Ms. Williams:

Enclosed please find Charter Communications ("Charter") response to the First Set of Information Requests concerning the FCC Form 1240 and 1205 filings currently under review for 2015 rates.

If you have any further questions or comments please feel free to contact me at (817) 298-3689.

Respectfully yours,

A handwritten signature in cursive script that reads 'Melissa Robinson'.

Melissa Robinson
Senior Regulatory Analyst

Enclosures

Cc: Vicki DeSantis
Tom Cohan
Lindsay DeRoche
Sean Carroll
Karlen Reed
Armine Simonyan
Michael Mael
Joslyn Day
Corey Pilz

**Massachusetts Department of Telecommunications and Cable
Cable Television Division
First Set of Information Requests
Charter Communications Docket No. DTC 14-6**

FCC Form 1240

D.T.C. 1-1 On Worksheet 1 of Charter's FCC Forms 1240, revise Lines 101, 104, and 107 (October 2013, January 2014, and April 2014) to reflect the correct inflation factors for these months, and revise the average inflation factor (Line 113) accordingly.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

See attached updated FCC Form 1240's.

**Massachusetts Department of Telecommunications and Cable
Cable Television Division
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Charter Communications Docket No. DTC 14-6**

FCC Form 1240

D.T.C. 1-2 Revise Line C5 on Charter's FCC Forms 1240 to reflect the correct Current FCC Inflation Factor. Submit revised Forms 1240 to reflect these changes and the changes resulting from D.T.C. 1-1.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

See attached updated FCC Form 1240's.

Massachusetts Department of Telecommunications and Cable
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FCC Form 1205

D.T.C. 1-3 Explain the increase in the Total Capital Costs of Service, Installation, and Maintenance of Equipment and Plant (Schedule A, Line L) from the previous year's FCC Form 1205 to this year's FCC Form 1205.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

The increase in the Total Capital Costs of Service, Installation, and Maintenance of Equipment and Plant (Schedule A, Line L) from the previous year's FCC Form 1205 to this year's FCC Form 1205 is a result of the acquisition of Optimum West in July 2013, Charter's all digital transition that began in 2013, more expensive installation materials being utilized (HDMI cables for HD set tops), and increased purchases of testing equipment for the new quality assurance groups.

Massachusetts Department of Telecommunications and Cable
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FCC Form 1205

D.T.C. 1-4 Explain the increase in the Gross Book Value of Vehicles (Schedule A, Line B) from the previous year's FCC Form 1205 to this year's FCC Form 1205.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

The increase in the Gross Book Value of Vehicles (Schedule A, Line B) from the previous year's FCC Form 1205 to this year's FCC Form 1205 is a result of Charter having made significant investments in vehicles to replace older units as well as support the increase in headcount.

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FCC Form 1205

D.T.C. 1-5 Explain the increase in the Total Annual Operating Expenses for Service Installation and Maintenance of Equipment (Schedule B, Line B) from the previous year's FCC Form 1205 to this year's FCC Form 1205.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

The increase in the Total Annual Operating Expenses for Service Installation and Maintenance of Equipment (Schedule B, Line B) from the previous year's FCC Form 1205 to this year's FCC Form 1205 is largely related to employee related expenses - approximately half the increase was driven by the acquisition of the Optimum West systems from Cablevision, while the other half relates to Charter internalizing more of its workforce and increasing the company's quality assurance and audit teams to improve operational metrics.

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FCC Form 1205

D.T.C. 1-6 Provide detailed documentation of Charter's calculation in Line 4 of Step A (Hourly Service Charge) on the Worksheet for Calculating Permitted Equipment and Installation Charges. In addition, explain the increase in this calculation from the previous year's FCC Form 1205 to this year's FCC Form 1205.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

Line 4, Step A is the Percentage of Time Allocated to the Residential Cable Service from Ground Block to Activity Inside Customer Premises. Line 4, Step A for the current year filing represents a small percentage increase (1.48%) over prior year. A few things that impacted this percentage are an increase in headcount and small percentage increases for "In-House Installation/Reconnect/Repair/Service Technicians" and "Contract Installation/Repair Technicians". Charter calculated the percentage using a weighted average calculation for these two columns. See chart below.

YE2013		
Personnel	Service Dept (921) Headcount	% of Time Allocated To Residential Cable Service from Ground Block to Activity Inside Customer Premises
In-House Installation/Reconnect/Repair/Service Technicians	3,929	60%
In-House Warehouse Personnel	253.5	27%
In-House Converter Personnel	257	78%
In-House "All Other" Technical	5,255.0	5%
Contract Installation/Repair Technicians	4,041	64%
Contract Converter Maintenance/Repair	139	100%
Total	13,874.0	40.46%

Step A, Line 4

Massachusetts Department of Telecommunications and Cable
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FCC Form 1205

D.T.C. 1-7 Provide detailed documentation of Charter's calculation in Line 6 of Step A (Hourly Service Charge) on the Worksheet for Calculating Permitted Equipment and Installation Charges. In addition, explain the increase in this calculation from the previous year's FCC Form 1205 to this year's FCC Form 1205.

Response: *Person providing the response: Melissa Robinson, Senior Regulatory Analyst*

Line 6 Step A is the Total Labor Hours for Maintenance and Installation of Customer Equipment and Services. The Labor Hours is calculated by multiplying Step A, Line 4 times the annual hours that the employee is available to work on each activity. The increase in this calculation is based on the employee headcount increased by 9.9% for the addition of Optimum West employees, with a small percentage increases for "In-House Installation/Reconnect/Repair/Service Technicians" and "Contract Installation/Repair Technicians".

YE2013		% of Time Allocated To Residential Cable Service from Ground Block to		
Personnel	Service Dept (921)	Activity Inside	Annual Hours	Labor Hours
	Headcount	Customer Premises		
In-House Installation/Reconnect/Repair/Service Technicians	3,929	60%	1,653	3,896,782
In-House Warehouse Personnel	253.5	27%	1,653	n/a
In-House Converter Personnel	257	78%	1,653	330,716
In-House "All Other" Technical	5,255.0	5%	1,653	n/a
Contract Installation/Repair Technicians	4,041	64%	2,080	5,379,379
Contract Converter Maintenance/Repair	139	100%	2,080	289,857
Total	13,874.0	40.46%		9,896,734

Step A, Line 4

Step A,
Line 6