



May 16, 2013

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

Re: Charter Communications: Second Set of Record Requests Docket DTC 12-7

Dear Ms. Williams:

Enclosed please find Charter Communications ("Charter") response to the Second Set of Record Requests concerning the FCC Form 1205 filing currently under review for 2013 rates.

If you have any further questions or comments please feel free to contact me at (972) 938-9288 x4.

Respectfully yours,

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

Melissa Bennett
Senior Regulatory Analyst

Enclosures

Cc: Vicki DeSantis
Tom Cohan
Lindsay DeRoche
Naureen Farooqui
Paul Abbott
Betsy Whittey
Karlen Reed
Benedict Dobbs
Armine Simonyan
Michael Mael

Massachusetts Department of Telecommunications and Cable
Cable Television Division
Second Set of Record Requests
Charter Communications Docket No. DTC 12-7

FCC Form 1205

D.T.C. – RR - 2-1

Refer to Charter's rate cards provided in its response to D.T.C.- RR-1-1. In August 2012 Charter reduced the cost of the standard digital receiver and remote from \$1.40 to \$0.00 and increased the cost of interactive guide services from \$3.60 to \$5.00. In February 2013 Charter further increased the cost of interactive guide services from \$5.00 to \$5.99:

- a. Indicate the charge for basic-only subscribers to lease a standard digital receiver and remote;
- b. Indicate whether basic-only subscribers also lease interactive guide services;
- c. Explain the basis for shifting charges for the regulated standard digital receiver and the unregulated interactive guide services;
- d. Indicate whether Charter has a separate charge for interactive guide services corresponding to a HD or DVR digital receiver and remote;
- e. Explain why Charter did not charge for a standard digital receiver and remote despite including a rate for the same on its most recent FCC Form 1205; and
- f. Explain why the amount of the decrease in the cost of the standard digital receiver and remote are equivalent to the amount of the increase in the cost of interactive guide services.

Response:

Person providing the response: Melissa Bennett, Senior Regulatory Analyst

- a. A basic-only subscriber can lease a standard digital receiver and remote for \$0.
- b. A basic-only subscriber can subscribe to interactive guide services for \$5.99.
- c. The current Form 1205 under review included a maximum permitted rate for the standard digital receiver of \$1.01; however we listed \$0 under the operator selected rate column. The IGS is an unregulated service and Charter decided to standardize the rate at \$5.99 in February 2013. We elected to decrease the standard digital receiver rate below the maximum permitted rate to simplify our marketing and to minimize the rate increase impact on our customers.
- d. Interactive Guide Services are available on standard, HD or DVR receivers. Charter has one Interactive Guide Services price/rate card listing that does not vary depending on whether the customer leases a standard, HD or DVR receiver.
- e. The Form 1205 included a maximum permitted rate for the standard digital receiver; however we listed \$0 under the operator selected rate column. As noted above, this change simplified our marketing and minimized the rate increase impact on our customers. As the actual charge is below the maximum permitted rate, this approach is consistent with the governing regulatory regime.

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D.T.C. – RR - 2-1 (Continued)

Response: f. Over the time period in question (Aug 2012-Feb 2013), the change is not equivalent. The interactive guide service rate increased \$2.39 in total while the standard digital receiver rate decreased \$1.40.

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FCC Form 1205

D.T.C. - RR - 2-2: Refer to Schedule C in Charter's FCC Form 1205 in which Charter states there were 2,688,958 standard digital receiver units in service. From these units, indicate the number that also leased interactive guide services.

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

We believe all current customers in MA subscribe to the IGS based on the fact that it is an attractive feature. As the rate card points out, these features include access to the electronic program guide - to receive program information, perform efficient channel surfing, use parental controls and access to order Pay-Per-View & On Demand.

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FCC Form 1205

D.T.C. - RR - 2-3: Provide an amended FCC Form 1205 to justify the rate for the standard digital receiver and remote and the interactive guide services. Include the interactive guide services as either part of the overall cost for the standard digital receiver and remote or as a stand-alone item in Schedule C.

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

We have not included an amended FCC Form 1205 as Charter's interactive guide service is a software-based service and is not a component of equipment subject to the Form 1205.