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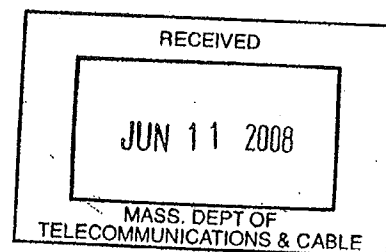


THE CITY OF SPRINGFIELD, MASSACHUSETTS

June 10, 2008

By Fedex Overnight Mail

Mr. Warren Fitting
Director of Rate Regulation
Comcast Cable Communications, LLC
One Comcast Center, 48th Floor
Philadelphia, Pennsylvania 19103



RE: City of Springfield, MA Rate Interrogatories

Dear Mr. Fitting:

On behalf of Springfield Mayor Domenic J. Sarno, Issuing Authority for the City of Springfield, Mass., I am attaching the City of Springfield's Rate Interrogatories to Comcast in relation to DTC 07-6. Would you kindly copy Peter J. Epstein, Esquire and myself on Comcast's responses to the City's interrogatories.

Kindly deliver Comcast's responses, under oath, on or before June 24, 2008. Thank-you.

Sincerely,

Kathleen T. Breck
Deputy City Solicitor

cc: Alejandra K. Hung, Esquire
Hearing Officer, Cable Division

Peter J. Epstein, Esquire
Epstein & August, LLP
101 Arch Street, Suite 900
Boston, Massachusetts 02110

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City of Springfield Interrogatories to Comcast in DTC 07-6

The City of Springfield Issuing Authority's Interrogatories to Comcast - DTC 07-6

The following interrogatories are sent to Comcast in connection with rate proceeding DTC 07-6, in accordance with 801 C.M.R. 1.01(8). Comcast is requested to deliver its responses, under oath, to the Issuing Authority no later than June 24, 2008.

Interrogatory #1: Regarding Attachment 6 to the 2007 Form 1240, a line-item on the FRC Sheet refers to "I-Net Construction capped @ 1.6M". It is in the "Payment Amount" of \$1,366,667.00. The monthly per subscriber charge is \$.40. Please answer the following questions:

- (a) What does the \$1,600,000.00 refer to?
- (b) Identify the specific document, date and section number(s) requiring the \$1,600,000.00 payment.
- (c) What was the original date of the \$1,600,000.00 payment?
- (d) Comcast indicates 121 months of pass-through. Please explain how 121 months was arrived at.
- (e) Section 8.1(d) of the Springfield Renewal License, dated January 29, 2000, specifies the following:

The Issuing Authority and the Licensee, in consideration of the mutual promises and undertakings reflected in this Renewal License, agree that the cost of PEG [public, educational and governmental] Access and license requirements contained in Sections 3.5 (Construction of an Advanced Institutional Network), Section 6.1 (PEG Access/Local Origination Channels and Support), Section 6.2 (Community Studio and Equipment), Section 6.3 (Operation of Community Studio; Staff and Support), Section 6.4 (Funding for Telecommunications and Economic Development Fund) and Section 8.2 (Senior Discount) will not be passed through as external franchise related costs to Subscribers so long as this Renewal License remains in force and effect, notwithstanding any provision of law, as may be amended, to the contrary.

Given the fact that Comcast has clearly passed the cost of I-Net construction through to Springfield subscribers under the current Renewal License, please explain why Comcast has not violated the terms of Section 8.1(d)?

- (f) Identify the specific law(s), with citation (s), that Comcast maintains requires or allows it to pass such costs through to Springfield subscribers, notwithstanding its commitment in Section 8.1(d) not to do so?

City of Springfield Interrogatories to Comcast in DTC 07-6

Interrogatory #2: Regarding Attachment 6 to the 2007 Form 1240, a line-item on the FRC Sheet refers to "Prior Operating (includes \$75K for WGBY-57)". It is in the "Payment Amount" of \$475,000.00. The monthly per subscriber charge is \$1.00. Please answer the following questions:

- (a) What does the \$475,000.00 payment amount refer to?
- (b) Identify explicitly the document, date and section number(s) requiring the \$475,000.00 payment.
- (c) What does "Prior Operating" mean?
- (d) What was the original date of such a \$475,000.00 payment?
- (e) Is Comcast still required to provide these payments?
 - (i) If so, identify the specific document or other authority containing this requirement.
- (f) Is Comcast, in fact, still providing these payments?
- (g) If Comcast is not currently providing these payments, what was the last date on which such payments were made?
- (h) If such payments were ended, please explain why the payments were ended.
- (i) Identify the exact date that payment of \$75,000.00 was made to WGBY-57.
- (j) Explain why Comcast is amortizing the \$475,000.00 over the 10-year period from January 29, 2000 until January 28, 2010 under the current Renewal License?
- (k) What is the total amount that Comcast has charged and collected in regard to this specific \$475,000.00 payment since inception (ie-since the date of the Springfield Cable Television Final License-April 29, 1982)?
- (l) Provide the amounts charged to Springfield subscribers on an annual basis in regard to this \$475,000.00 payment, either as an embedded cost and/or a line-itemed cost; that is, please list annual charges going back to 1982.
- (m) What is the specific legal basis for Comcast continuing to charge each of its Springfield subscribers this \$1.00 per month?

City of Springfield Interrogatories to Comcast in DTC 07-6

Interrogatory #3: Regarding Attachment 6 to the 2007 Form 1240, a line-item on the FRC Sheet refers to "Prior I-Net Maintenance 87 miles @ \$815.98." It is in the "Payment Amount" of \$70,990.00. The monthly per subscriber charge is \$.15 Please answer the following questions:

- (a) What does the \$70,990.00 cost refer to?
- (b) Explain what "prior I-Net maintenance" refers to.
 - (i) Prior to what?
- (c) Why do prior I-Net maintenance costs carry a January 29, 2000 "date of payment"?
- (d) Why are prior I-Net maintenance costs still passed-through to subscribers in 2008?
- (e) Identify the existence and current location of such an I-Net in Springfield.
- (f) Describe the technical details of the I-Net
- (g) Explain the 87 miles that constitutes the I-Net.
- (h) Identify the buildings connected to the I-Net.
- (i) What is the total distance of the I-Net?
- (j) Explain how the figure of \$815.98 per mile for maintenance was computed?
- (k) List the most recent explicit dates on which the I-Net was maintained?
- (l) When did Comcast (or its predecessor) begin including this cost in the rate for Springfield subscribers?
- (m) How much money has Comcast collected for this item since it first started including this cost in its rate for Springfield subscribers?

Interrogatory #4: Regarding Attachment 6 to the 2007 Form 1240, a line-item on the FRC Sheet refers to "Prior Capital". It is in the "Payment Amount" of \$533,333.00. The monthly per subscriber charge is \$.11. Please answer the following questions:

- (a) What does the \$533,333.00 payment amount refer to and what was its purpose?
- (b) Identify explicitly the document, date and section number(s) requiring the \$533,333.00 payment.
- (c) What was the original date of such a \$533,333.00 payment?

City of Springfield Interrogatories to Comcast in DTC 07-6

(d) Is Comcast still required to provide these payments?

(i) If so, identify the document or other authority containing this requirement.

(e) Is Comcast, in fact, still providing these payments?

(f) If Comcast is not currently providing these payments, what was the last date on which such payments were made?

(g) If such payments were ended, please explain why the payments were ended.

(h) Why is Comcast amortizing \$533,333.00 over the 10-year period from January 29, 2000 until January 28, 2010 when there is no reference to this charge in the current Renewal License?

(i) What is the total amount that Comcast (or its predecessor) has charged and collected in regard to this specific \$533,333.00 payment since inception (ie-since the date of the Springfield Cable Television Final License-April 29, 1982)?

(j) Provide the amounts charged to Springfield subscribers on an annual basis in regard to this \$533,333.00 payment, either as an embedded cost and/or a line-itemed cost; that is, please list annual charges going back to 1982.

(k) What is the specific legal basis for Comcast continuing to charge each of its Springfield subscribers this \$.11 per month?

Interrogatory #5: Regarding Attachment 6 to the 2007 Form 1240, a line-item on the FRC Sheet refers to "Operating Budget (\$300,000.00 annually)." There is a Date of Payment of January 29, 2000. There is no Payment Amount or FRC. Please answer the following questions:

(a) What does the \$300,000.00 cost refer to?

(b) Identify the specific document, date and section number(s) requiring the \$300,000.00 payments.

(c) Are these annual payments?

(d) If these are annual payments, provide the exact amounts paid, and the exact dates paid, in Years (i) 2000; (ii) 2001; (iii) 2002; (iv) 2003; (v) 2004; (vi) 2005; (vii) 2006; (viii) 2007; and (ix) 2008.

(e) If \$300,000.00 was not paid annually in each of the Years above, explain why.

(f) Is Comcast still required to provide these payments?

City of Springfield Interrogatories to Comcast in DTC 07-6

(g) Section 8.1(d) of the current Renewal License prohibits enumerated costs from being passed-through to Springfield subscribers as external *FRC*'s, including annual studio funding. Given the fact that Comcast has listed the \$300,000.00 as an external *FRC*, please explain why Comcast has not violated the terms of Section 8.1(d)?

(h) Identify the specific law(s) that Comcast maintains requires or allows it to pass such costs through to Springfield subscribers, notwithstanding its commitment in Section 8.1(d) not to do so?

Interrogatory #6: Regarding Attachment 6 to the 2007 Form 1240, a line-item on the *FRC* Sheet refers to "I-Net Maintenance 87 miles @ \$482-\$41,934". The Date of Payment is January 1, 2001 and appears to be payable annually. There is no *FRC* identified. Please answer the following questions:

(a) What does the \$41,934.00 cost refer to?

(b) How is this I-Net maintenance cost different from the Prior Maintenance Costs discussed in Interrogatory #3 above?

(c) Do these costs refer to a different I-Net than the I-Net referred to in Interrogatory #3?

(d) If it is a different I-Net, describe such I-Net.

(e) Describe the technical details of this I-Net

(f) Explain the 87 miles that constitutes this I-Net.

(g) Identify the buildings connected to this I-Net.

(h) What is the total distance of this I-Net?

(i) Explain how the figure of \$482 per mile for maintenance for this I-Net was computed?

(j) List the most recent specific dates on which this I-Net was maintained?

(k) Why do these I-Net maintenance costs carry a January 1, 2001 "date of payment"?

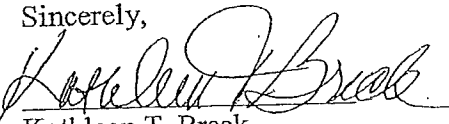
Interrogatory #7: The Renewal License was amended in 2002. As part of that Amendment, Comcast was allowed to "decommission" the existing I-Net but required to construct and maintain a video return line that connected only three (3) buildings: (1) City Hall; (2) the Van

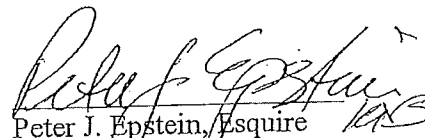
City of Springfield Interrogatories to Comcast in DTC 07-6

Sickle School; and (3) the Springfield Library and Museum. Please answer the following questions:

- (a) Describe the video return line network.
- (b) What is the total distance of the video return line network in miles?
- (c) When was the video return line network completed?
- (d) What was the final construction cost to complete the video return line network?
- (e) When did Comcast begin including the cost of the video return line network in its rate to Springfield subscribers?
- (d) What are the annual costs to maintain the video return line network?
- (e) List the most recent dates on which this video return line network was maintained?

Sincerely,


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John T. Liebel, Esq., Chief of Litigation
Edward M. Pikula, Esq., City Solicitor
Stephen P. Lisauskas, Executive Director
Springfield Finance Control Board