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January 6, 2021

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Petition of Time Warner Cable Information Services (Pennsylvania), LLC For
Designation as an Eligible Telecommunications Carrier
Docket No. P- _____
Expedited Treatment Requested

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of Time Warner Cable Information Services (Pennsylvania), LLC. ("TWCIS") for designation as an Eligible Telecommunications Carrier ("ETC") in the Commonwealth of Pennsylvania.

TWCIS is seeking ETC designation because it was awarded funds under the FCC's Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction"). Pursuant to the RDOF rules, The FCC's deadline for TWCIS to submit appropriate documentation of the ETC designation is June 7, 2021. In order for TWCIS to have sufficient time to plan its RDOF construction and deployment schedule and meet the FCC's RDOF deadline, **TWCIS respectfully requests that the Commission grant TWCIS's ETC designation on an expedited basis by no later than April 15, 2021.**

Copies of the Petition have been served in accordance with the attached Certificate of Service. Should you have any questions, please feel free to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosure

cc: Certificate of Service

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Exhibit A (“RDOF Census Blocks”). A map illustrating the RDOF Census Blocks is attached at **Exhibit B**. TWCIS’s receipt of RDOF Auction funding and building to these unserved areas, however, is conditioned upon TWCIS obtaining designation as an ETC in those RDOF Census Blocks.⁵ Accordingly, TWCIS seeks ETC designation in the RDOF Census Blocks in Pennsylvania for which TWCIS was assigned CCO Holdings’ winning bids in the RDOF Auction.

Section 214(e)(2) of the Act authorizes the Commission to designate a company that meets the requirements of 47 U.S.C. § 214(e)(1), such as TWCIS, as an ETC. As demonstrated in this Petition, TWCIS meets all requirements for ETC designation. Further, as shown by the descriptions herein, designating TWCIS as an ETC in the RDOF Census Blocks would allow TWCIS, either directly or through its affiliates,⁶ to bring high-quality, innovative voice and broadband Internet access services to consumers in unserved portions of Pennsylvania, advance the goals of universal service, and serve the public interest.

Ensuring that high-speed broadband service is available to those without access to it in the Commonwealth has been a major priority of the Governor. By granting this Petition, the Commission has the potential to bring significant public and private investment to Pennsylvania and to advance the Commonwealth’s goals in making sure that more of its citizens have access to high speed broadband Internet access services. The FCC estimates that Pennsylvania has more than 184,505 unserved residential and small business locations,⁷ and granting this Petition will help to lower that number substantially. While TWCIS, through other Charter affiliates, has

⁵ See *Auction 904 Results Notice*, at ¶ 36.

⁶ While the entity seeking ETC designation will directly provide the supported Lifeline voice services, different Charter affiliated entities may directly provide the broadband Internet access services and non-Lifeline voice services in the RDOF Census Blocks.

⁷ See *Auction 904 Results Notice*, at Attachment B, p. 3. The FCC defines “locations” as “housing units” and “small businesses” that receive “consumer-grade broadband service.” See *Wireline Competition Bureau Provides Guidance to Carriers Receiving Connect America Fund Support Regarding Their Broadband Location Reporting Obligations*, Public Notice, WC Docket No. 10-90, DA 16-1363 (2016).

participated in state programs to advance broadband buildout in Pennsylvania, participation through RDOF presents a unique opportunity for Pennsylvania to do substantially more to bridge the digital divide in unserved areas. **For the reasons set forth below, TWCIS respectfully requests that the Commission approve this Petition on an expedited basis no later than April 15, 2021.**

In support of its Petition, TWCIS states as follows:

I. OVERVIEW OF TWCIS AND CHARTER

TWCIS. TWCIS is a Delaware limited liability company with a place of business at 12405 Powerscourt Drive, St. Louis, Missouri 63131. TWCIS is a majority owned and wholly controlled subsidiary of Charter Communications, Inc. (“Charter”), which is headquartered at 400 Atlantic Street, Stamford, Connecticut 06901. CCO Holdings and TWCIS are both subsidiaries of Charter. A copy of TWCIS’s registration with the Pennsylvania Secretary of the Commonwealth is attached as **Exhibit C**. TWCIS is certificated by the Commission to provide local exchange telecommunications services in Pennsylvania. A copy of TWCIS’s Certificate of Public Convenience is attached as **Exhibit D**.

Charter. Charter is a leading broadband connectivity company, serving more than 30 million customers nationwide. Under the brand name Spectrum, the company offers a suite of advanced communications services, including broadband Internet access, cable video, voice, and mobile services.⁸ Through its subsidiaries, Charter provides these services in 41 states, including to approximately 125,000 customers in Pennsylvania.

⁸ Certain of the subjects and benefits discussed in this filing pertain to non-jurisdictional products and services. While those items are included herein in order to provide a comprehensive view of the public interest benefits of designating TWCIS as an ETC, TWCIS respectfully reserves all rights relating to the inclusion of or reference to such information, including without limitation TWCIS’s legal and equitable rights relating to jurisdiction, filing, disclosure, relevancy, due process, review, and appeal.

Helping to drive Charter's rapid growth is Charter's strong network investment which has significantly enhanced Charter's broadband Internet access service and allowed Charter to better serve its customers in both urban and rural communities across the United States. In 2018-2019, Charter extended its network to more than 1.5 million unserved homes and businesses, 30% of which were in rural areas. And, from 2015 to 2019, Charter invested nearly \$40 billion in infrastructure and technology to expand the reach of its network.

Charter's customers directly benefit from Charter's commitment to and investment in its network. The FCC recently reported that Charter had one of the fastest, most consistent broadband Internet download speeds in the industry, including at peak times of the day when customer Internet usage is the highest.⁹ Additionally, recognizing Charter's experience and commitment to its customers, its network, and its products, *Multichannel News* recently awarded Charter as its "Operator of the Year for 2020."¹⁰ With millions working and learning from home due to the COVID-19 pandemic, access to dependable, high-speed broadband Internet access services and reliable voice services has never been more important, especially in the unserved areas comprising the RDOF Census Blocks. Further, Charter's network investment has spurred the development of products such as Charter's Spectrum Mobile service, which relies on the use of the Verizon

⁹ See *Ninth Measuring Broadband America Fixed Broadband Report, A Report on Consumer Fixed Broadband Performance in the United States*, FCC Office of Engineering and Technology (Aug. 3, 2020), pp. 15-16.

¹⁰ See *Cover Story: Charter's 'Giffen Good,'* MultiChannel News (Sept. 28, 2020), <https://www.nexttv.com/features/cover-story-charters-giffen-good#:~:text=Charter%2C%20the%20Multichannel%20News%20Operator%20of%20the%20Year,it%20completed%20the%20purchase%20of%20Time%20Warner%20Cable> (last visited Dec. 13, 2020) (stating that Charter "has managed record broadband and positive video subscriber growth during the pandemic by sticking to its game plan, initiated more than four years ago ... [including setting] out to make Charter's plant across its 41-state footprint fully digital (achieved in 2018), to roll out DOCSIS 3.1 (completed in 2018), to uniformly align products and packaging across all markets (as of Q4 2019, 85% of its customers were in Spectrum pricing and packaging) and to raise broadband speeds (in 2019, it raised the minimum speed to 200 Megabits per second for 60% of the footprint and that rate continues to grow; the remaining 40% are at 100 Mbps).").

Wireless mobile network and Charter's own broadband network infrastructure to provide fast, reliable broadband and voice services from customers' mobile phones.

Charter is committed to being part of a comprehensive solution to close the digital divide throughout the United States. With more than \$1.2 billion in RDOF funding awarded to the company across the country, Charter plans to continue its efforts as a leader in rural broadband deployment, bringing innovative, high-quality voice and broadband Internet access service offerings to unserved communities, including in Pennsylvania. In fact, according to the FCC, it assigned Charter the most locations of any provider that participated in the RDOF Auction.

A. RDOF Support Assigned to TWCIS Will Enable Charter to Extend Voice Services to the RDOF Census Blocks

Charter provides voice communications services to over 9.3 million residential customers throughout its 41-state footprint using interconnected Voice over Internet Protocol technology.¹¹ Charter's voice service offering includes unlimited long distance calling in the United States, Canada, Puerto Rico, the US Virgin Islands, and Guam. Calling features include voicemail, call waiting, caller ID, call forwarding, and other features, at no additional charge. In addition, the E911 feature automatically provides the emergency service operator with a caller's phone number and location. With respect to its residential voice services, Charter offers customers a simplified pricing structure with plans that include all applicable fees¹² – thus permitting such customers to

¹¹ See Press Release, Charter Communications, Inc., *Charter Announces Third Quarter 2020 Results* (Oct. 30, 2020), <https://corporate.charter.com/newsroom/charter-announces-third-quarter-2020-results>.

¹² The rates, terms and conditions of Charter's voice service plans are subject to change in accordance with applicable federal and state regulations.

know their total costs in advance of choosing Charter's services, rather than facing a variety of complicated surcharges after they receive their first billing statement.¹³

The RDOF support assigned to TWCIS will help enable it to extend and maintain Charter's voice services to and within the RDOF Census Blocks.

B. RDOF Support Assigned to TWCIS Will Enable Charter to Extend Broadband Internet Access Services to the RDOF Census Blocks

Charter's broadband Internet access services deliver industry-leading speeds to the vast majority of its 26.8 million residential broadband Internet customers.¹⁴ Charter now offers minimum download speeds of at least 200 Mbps in 60% of Charter's national footprint, and 100 Mbps everywhere else in the footprint—including households and small businesses in rural areas. On December 17, 2020, Charter announced that it plans to double Charter's broadband Internet access service starting speeds in additional markets, making 200 Mbps the starting flagship speed in 75% of Charter's communities. These speed enhancements will be available to new customers in these markets immediately. Existing customers will receive these speed increases with new Charter broadband Internet access service packages during the first quarter of 2021.¹⁵

Charter also offers a 1 Gbps connection with maximum download speeds of up to 940 Mbps to the vast majority of those same households, as well as to small and medium-sized businesses.¹⁶ Additionally, recognizing the need for fast, reliable broadband service for

¹³ TWCIS remits fees, such as federal or state universal service fund fees or E911 fees, to the appropriate regulatory agencies, where required, and in accordance with law, but does not generally collect them as separate line items on the bill, in addition to the monthly rate that residential customers pay for TWCIS's voice service. All such fees are described in TWCIS's invoices for voice service in accordance with applicable federal and state billing requirements.

¹⁴ See *supra* note 11.

¹⁵ See Press Release, Charter Communications, Inc., *Spectrum Doubles Spectrum Internet Starting Speed to 200 Mbps in 17 Markets* (Dec. 17, 2020), <https://corporate.charter.com/newsroom/spectrum-doubles-internet-starting-speed-to-200-mbps>.

¹⁶ *Id.*

community anchor institutions, Charter offers 10 Gbps symmetrical speed broadband Internet connections to schools, libraries, hospitals, and other important community institutions.

The RDOF support assigned to TWCIS will enable it to extend Charter's broadband Internet access services to the RDOF Census Blocks in Pennsylvania. The terms of the support assigned to TWCIS will require it to offer Charter's 1 Gbps connections in the RDOF Census Blocks. According to the FCC, these areas are currently unserved by any broadband provider offering service at or above 25/3 Mbps. Granting this Petition will help extend broadband and unleash tremendous benefits to the communities within these RDOF Census Blocks. Charter's broadband deployment demonstrates its commitment to developing and deploying innovative broadband technology and services in unserved and/or rural areas.

Additionally, Charter's services will provide new and innovative services to previously unserved customers in the RDOF Census blocks, including by providing relief to customers struggling as a result of the COVID-19 pandemic. It will allow students and households to get or stay connected and expand broadband Internet access and adoption among low-income households.

As part of its current broadband Internet access service plans, Charter offers *Spectrum Internet Assist*, a program for low-income households, which is available in its service area in Pennsylvania and elsewhere.¹⁷ Charter does not require customers to sign long-term contracts for

¹⁷ See *Spectrum Internet Assist*, Spectrum, <https://www.spectrum.com/browse/content/spectrum-internet-assist> (last visited Nov. 24, 2020). The rates, terms and conditions of Charter's *Spectrum Internet Assist* program are subject to change.

its services nor does the company impose early termination fees for failing to fulfill them.¹⁸

Charter maintains a focus on ensuring that the broadband user experience is a positive one.¹⁹

II. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices or other correspondence and communications regarding this Petition should be provided to:

Daniel Gonzalez
Group VP – State Regulatory Affairs
Charter Communications, Inc.
601 Massachusetts Ave.
Suite 400 West
Washington, DC 20001
Tel: (202) 370-4282
Email: Dan.Gonzalez@charter.com

and

Michael R. Moore
Group VP Law – Telephone Regulatory
Charter Communications, Inc.
12405 Powerscourt Drive
St. Louis, Missouri 63131
Tel: (314) 394-9007
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With copies to:

Michael Gruin
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17 N. 2nd Street, 16th Floor
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¹⁸ The rates, terms and conditions of Charter's Internet services are subject to change.

¹⁹ In the years ahead, cable providers will deploy revolutionary 10 Gbps networks within their footprints. See Press Release, NCTA, *Introducing 10G: The Next Great Leap for Broadband* (Jan. 7, 2019), <https://www.ncta.com/media/mediar-room/introducing-10g>. Successful 10 Gbps field tests by cable providers in residential settings have already occurred, and CableLabs has released specifications for DOCSIS 4.0, a new technical standard, to bring 10 Gbps speed capabilities to consumers. 10 Gbps will deliver to customers broadband speeds 10 times faster than what is delivered by today's networks and will have the speed and capacity to change the way we live.

and

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III. CHARTER'S PARTICIPATION IN THE RDOF AUCTION

A. Background on the RDOF Auction

On February 7, 2020, the FCC issued a Report and Order establishing the Rural Digital Opportunity Fund, in which service providers would compete to receive up to \$20.4 billion to offer voice and broadband services in unserved high-cost areas.²⁰ Under this program the FCC will disburse federal universal service funds on a technology neutral basis to providers—including competitive local exchange carriers, cable operators, fixed wireless ISPs, satellite broadband providers, electric co-ops and electric utilities—for deploying voice and broadband-capable networks in these unserved areas.

B. CCO Holdings' Selection as a Winning Bidder and Assignment to TWCIS

The FCC's December 7, 2020 *Auction 904 Results Notice* announced that CCO Holdings was among the winners of the recently concluded RDOF Auction.²¹ Specifically, the FCC announced CCO Holdings as a winning bidder in 499 Census Blocks in Pennsylvania. In accordance with the FCC's procedures allowing winning bidders to divide and assign their bids to affiliated operating companies within the relevant state,²² CCO Holdings assigned its winning bids

²⁰ *Rural Digital Opportunity Fund*, Report and Order, 35 FCC Rcd 686 (2020) ("RDOF Order").

²¹ See *Auction 904 Results Notice*, at Attachment A, p. 4.

²² See *Auction 904 Procedures Public Notice*, at ¶ 43.

in Pennsylvania to TWCIS. TWCIS must demonstrate to the FCC that it has been designated as an ETC in the RDOF Census Blocks where CCO Holdings was the winning bidder in Pennsylvania. The FCC's deadline for TWCIS to submit appropriate documentation of the ETC designation is June 7, 2021.²³

C. Need for Expedited ETC Designation

As noted, CCO Holdings has been selected as a winning bidder in the RDOF Auction for 499 Census Blocks in Pennsylvania. The timeframe for TWCIS to obtain ETC designation is short and so that TWCIS may plan its RDOF construction and deployment schedule, TWCIS respectfully requests that the Commission grant TWCIS ETC designation on an expedited basis by no later than April 15, 2021. This proposed timeline provides a reasonable amount of time for the Petition to be published, for the receipt of comments, and for Commission Staff to undertake a thorough review of the Petition. Granting this Petition on an expedited basis will benefit the citizens of Pennsylvania by allowing TWCIS to meet its RDOF deployment milestones for voice and broadband Internet services in the RDOF Census Blocks and by allowing customers the opportunity to reap the benefits of Charter's broadband services, including by participating in telemedicine, remote work and remote education. Expedited Commission action would serve the public interest and advance the goals of universal service by expediting the deployment of high-quality, innovative voice and broadband Internet services in these unserved portions of Pennsylvania.

IV. TWCIS'S FINANCIAL AND TECHNICAL QUALIFICATIONS

Charter is one of the nation's leading providers of broadband Internet access services and voice services, and Charter has played a significant role in expanding the availability of these

²³ See *Auction 904 Results Notice*, at ¶ 36.

services—especially broadband Internet access services—across the United States. Indeed, TWCIS and its affiliates currently provide high-quality voice and broadband services to approximately 26.8 million residential Internet access service customers and 9.3 million residential voice service customers in 41 states, including many in rural and “high cost” areas.

TWCIS is highly qualified to meet the FCC’s RDOF service obligations given Charter’s proven track record of financial, managerial, technical and commercial success operating as an existing provider of broadband Internet and voice services. In 2019, Charter generated over \$45 billion in revenue from the provision of all of Charter’s services, along with approximately \$6.5 billion in income from its operations.²⁴ TWCIS will draw upon Charter’s financial capability and extensive teams of experienced engineers with expertise in the fields of communications technology, hardware design, software development, data analytics, and networking to construct and/or install the networks and infrastructure necessary to provide the required services in the RDOF Census Blocks. Additionally, TWCIS will leverage the significant operational, managerial and technical expertise of Charter to perform all billing, installation, customer service, and other matters related to providing its services in Pennsylvania. The Charter corporate family has extensive experience managing the technical and customer service-related issues associated with the provision of mass-market consumer voice and broadband Internet access (as well as other communications services). Charter monitors its network performance on a 24/7/365 basis and has implemented procedures to leverage its extensive engineering resources quickly and effectively to install, modify, repair, and/or restore services, as necessary.

²⁴ See *2019 Annual Report*, Charter Communications, Inc., <https://ir.charter.com/financial-information/annual-reports> (last visited Dec. 28, 2020).

This expertise made it possible for CCO Holdings to confidently participate in the RDOF auction with the certainty that TWCIS will be able to fulfill its RDOF network and service obligations.

V. **TWCIS MEETS ALL FEDERAL AND COMMONWEALTH STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION**

The Commission has authority to designate ETCs under 47 U.S.C. § 214(e), which provides, in part, that “[a] State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission.”²⁵ The Commission has exercised its jurisdiction to designate carriers as ETCs in Pennsylvania.²⁶

The Commission’s regulations provide that ETC petitions in the Commonwealth are to be evaluated under 47 U.S.C. § 214(e) and the relevant rules and Orders of the FCC. The Commission’s regulations also provide that petitions for ETC designation seeking low-income support from Lifeline and Link-up America programs must satisfy the minimum standards established in 66 Pa.C.S. § 3019(f) and comply with the Commission’s Lifeline and Link-Up Order, *In Re: Lifeline and Link-Up Programs*, Docket No. M-00051871, Final Order, May 23, 2005 (“*PA Lifeline Order*”).²⁷ The Commission’s *Final Policy Statement on Commonwealth of Pennsylvania Guidelines for Designation and Annual Recertification as an Eligible Telecommunications Carrier (ETC) for Purposes of Federal Universal Service Support*, Docket No. M-2010-2164741, (Aug. 2, 2010) outlines the minimum standards that must be satisfied to be

²⁵ 47 U.S.C. § 214(e)(2).

²⁶ See, e.g., 52 PA. CODE § 69.2501.

²⁷ 52 PA. CODE § 69.2501.

designated as an ETC in the Commonwealth, and the specific elements that must be included in an ETC petition.

TWCIS meets all applicable federal and Commonwealth requirements for designation as an ETC in Pennsylvania, including 47 U.S.C. § 214(e), 47 C.F.R. §§ 54.201 *et seq.*, 66 Pa. C.S. § 3019(f), 52 Pa. Code § 69.2501, and the Commission's orders setting requirements for ETCs and the provision of Lifeline service.

A. TWCIS Meets All Federal Requirements for ETC Designation

TWCIS meets all criteria for designation as an ETC under federal law, as follows.

1) For purposes of its ETC designation, TWCIS will operate as a common carrier and offer interstate and intrastate communications on a common carrier basis in the RDOF Census Blocks. Designation as an ETC is a predicate to TWCIS's eligibility to receive RDOF support to provide voice and broadband Internet services in the RDOF Census Blocks (47 U.S.C. § 214(e)(1); 47 C.F.R. § 9.3; 47 C.F.R. § 54.201(d)).

2) Charter is a facilities-based broadband Internet access and voice service provider, with its own network, gateways, switching facilities, and other associated facilities. TWCIS will offer the RDOF supported services using its own facilities within the meaning of the FCC's rules or a combination of its own facilities and resale of another carrier's services (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)) within the RDOF Census Blocks.

3) As required by 47 C.F.R. § 54.101, TWCIS, either directly or through an affiliate, will offer voice services and broadband Internet access services supported by federal universal

service support mechanisms, including the following capabilities within the RDOF Census Blocks:²⁸

Voice Grade Access to the Public Switched Telephone Network – TWCIS meets this requirement through the provision of a competitive voice service that includes minutes of use for local service provided at no charge to end users and access to emergency services via 911 or E911, wherever available from local government or public safety organizations.²⁹ Toll limitation services will also be offered to qualifying low income consumers as provided in the FCC’s rules (47 C.F.R. § 54.101(a)(1)) in the RDOF Census Blocks.

Broadband Internet Access Service – Charter’s broadband Internet access service provides the capability to transmit data to, and receive data from, all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service (47 C.F.R. § 54.101(a)(2)) in the RDOF Census Blocks.

TWCIS commits that these services will be provided consistent with applicable high-cost universal service support rules (47 C.F.R. § 54.101(c)) in the RDOF Census Blocks. TWCIS will also ensure that Lifeline voice and broadband Internet services are offered in accordance with the FCC’s rules in all Census Blocks where TWCIS has been assigned RDOF support (47 C.F.R. § 54.101(d)). Moreover, for its Lifeline voice service offering, TWCIS will offer to Lifeline-eligible customers a Charter voice service plan, as described above, at the discounted Lifeline voice service rate in the RDOF Census Blocks. This voice service plan is comparable (if not superior) to the Lifeline voice service offerings of other Lifeline providers in Pennsylvania.

²⁸ Charter’s broadband Internet access and voice services are provided through subsidiaries controlled and majority owned by Charter. While the entity seeking ETC designation will directly provide the supported Lifeline voice services, different Charter affiliated entities may directly provide the broadband Internet access services and non-Lifeline voice services in the RDOF Census Blocks.

²⁹ See Section I(A) of this Petition for a detailed description of Charter’s voice service.

4) TWCIS will offer its voice service as a standalone service and at rates that are reasonably comparable to urban rates (47 U.S.C. § 254(b)(3); 47 C.F.R. § 54.313(a)(3)) in the RDOF Census Blocks.³⁰

5) In the RDOF Census Blocks, TWCIS will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)), and in a manner reasonably designed to reach those likely to qualify for the service (47 C.F.R. § 54.405(b)).

6) TWCIS will provide the supported services throughout the designated RDOF Auction assigned Census Blocks where it has customers (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)).

7) TWCIS certifies that, in accordance with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7(a), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the universal service support is intended.

8) TWCIS further certifies that it meets all applicable requirements for designation as an ETC under 47 C.F.R. § 54.202 as follows:

Compliance with Applicable Service Requirements. TWCIS certifies that it will comply with the service requirements applicable to the support that it receives,³¹ including the requirements of the RDOF Auction.

Ability to Remain Functional in Emergency Situations. Charter has been providing voice and broadband Internet access services to customers on a 24/7/365 basis for almost twenty years. As part of providing these services, it is necessary to have in place contingency plans for

³⁰ See RDOF Order, at ¶ 42.

³¹ 47 C.F.R. § 54.202(a)(1)(i).

emergency situations for each of Charter's major network hubs and/or facilities that are geographically distributed across the United States. These plans contain activation, staffing, escalation, and communication procedures to identify and respond to such emergencies. Additionally, all switching facilities are equipped with independent power generators and sufficient fuel to operate for several days to mitigate commercial power outages. The design of these facilities contains multiple levels of redundancy and autonomy that also mitigate the need for dedicated human interaction. TWCIS will apply this successful model to its RDOF services in the RDOF Census Blocks.

In addition, TWCIS will comply with any applicable annual reporting requirements for High Cost Recipients pursuant to 47 C.F.R. § 54.313 and 54.316. Furthermore, TWCIS certifies that its proposed voice and broadband offerings in the RDOF Census Blocks in Pennsylvania for which it was assigned funding from the RDOF Auction will comply with the FCC's applicable Lifeline requirements set forth in 47 C.F.R. § 54.400, et. seq.

B. TWCIS Meets All Commonwealth Requirements for ETC Designation

TWCIS meets all requirements under Pennsylvania statutory law and the Commission orders for designation as an ETC and for provision of Lifeline services in the RDOF Census Blocks in Pennsylvania, as follows.

i. Section 3019(f) Requirements

Section 3019(f) of the Pennsylvania Public Utility Code (Code), 66 Pa. C.S. § 3019(f), and the Commission's *PA Lifeline Order* set forth the minimum Pennsylvania requirements for ETCs seeking low income support from the federal Lifeline Program. Section 3019(f) includes the following requirements for ETCs:

- 1) All eligible telecommunications carriers certificated to provide local exchange telecommunications service shall provide Lifeline service to all eligible telecommunications customers who subscribe to such service.

TWCIS will provide Lifeline service to all qualifying customers who reside in the RDOF Census Blocks and wish to subscribe to its Lifeline service in Pennsylvania.

- 2) All eligible telecommunications customers who subscribe to Lifeline service shall be permitted to subscribe to any number of other eligible telecommunications carrier telecommunications services at the tariffed rates for such services.

TWCIS will permit qualifying Lifeline subscribers residing in the RDOF Census Blocks to subscribe to all other non-Lifeline services offered by TWCIS in the RDOF Census Blocks at the standard rates for such services in Pennsylvania.

- 3) Whenever a prospective customer seeks to subscribe to local exchange telecommunications service from an eligible telecommunications carrier, the carrier shall explicitly advise the customer of the availability of Lifeline service and shall make reasonable efforts where appropriate to determine whether the customer qualifies for such service and, if so, whether the customer wishes to subscribe to the service.

TWCIS will advise prospective customers of the availability of Lifeline service within its Pennsylvania RDOF Census Blocks and will establish protocols for determining whether such customers residing in the Pennsylvania RDOF Census Blocks qualify for and wish to receive Lifeline service.

- 4) Eligible telecommunications carriers shall inform existing customers of the availability of Lifeline services twice annually by bill insert or message. The notice shall be conspicuous and shall provide appropriate eligibility, benefits and contact information for customers who wish to learn of the Lifeline service subscription requirements.

TWCIS will inform existing customers who reside in the RDOF Census Blocks of the availability of Lifeline services at least twice annually by bill insert or other message. TWCIS's notice to those customers will be conspicuous and provide eligibility, benefit, and contact information for customers who wish to learn of the Lifeline service subscription requirements.

- 5) Eligible telecommunications carriers shall provide the department of public welfare with Lifeline service descriptions and subscription forms, contact telephone numbers, and a listing of the geographic area or areas they serve, for use by the department of public welfare in providing the notifications required by this paragraph.

TWCIS will provide to the Pennsylvania department of public welfare its Lifeline service descriptions and subscription forms, contact telephone numbers, and a listing of RDOF Census Blocks that TWCIS serves.

- 6) No eligible telecommunications carrier shall be required to provide after the effective date of this section any new Lifeline service discount that is not fully subsidized by the federal universal service fund.

TWCIS acknowledges that it shall not be required to provide any Lifeline service discount that is not fully subsidized by the federal universal service fund.

ii. Other Pennsylvania Requirements and Relevant Reporting Requirements

TWCIS agrees to comply with the following Pennsylvania specific requirements with respect to its provision of Lifeline and other RDOF supported services in the RDOF Census Blocks:

- 1) TWCIS agrees to use the National Verifier when helping consumers in the RDOF Census Blocks apply for the Lifeline program;
- 2) TWCIS agrees to include a public education component as part of its Pennsylvania Lifeline outreach program to ensure that consumers in the RDOF Census Blocks are aware of, and can participate in, the eligibility determination from the National Verifier;
- 3) TWCIS agrees to comply with the FCC's reverification process that must occur to determine the continued eligibility of existing Pennsylvania Lifeline subscribers in the RDOF Census Blocks;

4) TWCIS agrees to ensure all of its Pennsylvania Lifeline subscribers in the RDOF Census Blocks are recertified either automatically through the National Verifier's state/federal data sources or a recertification request from USAC.

5) TWCIS agrees to report to the Commission annual changes in its Pennsylvania Lifeline enrollment in the RDOF Census Blocks;

6) TWCIS agrees to provide the Commission's Bureau of Consumer Services ("BCS") a copy of its annual Pennsylvania Lifeline verification results that is filed with USAC each year (Form 555), as well as the FCC Form 497 Pennsylvania Lifeline customer reporting worksheet (or any successor form) filed quarterly with USAC with respect to TWCIS's offering of Lifeline services in the RDOF Census Blocks;

7) TWCIS will offer operator services, directory assistance and interexchange access (long distance) to Pennsylvania Lifeline subscribers in the RDOF Census Blocks;

8) TWCIS agrees to comply with the standards and billing practices set forth in Commission regulations at 52 Pa. Code §§ 64.1-64.213 with respect to its provision of RDOF supported services in the RDOF Census Blocks;

9) TWCIS agrees to work with BCS to resolve informal complaints and to submit to the jurisdiction of the Commission for any formal complaints filed by TWCIS's Pennsylvania Lifeline customers regarding Lifeline issues, including (1) eligibility disputes, (2) program offering issues, and (3) limited equipment related issues;

10) TWCIS agrees to provide BCS with copies of all Pennsylvania Lifeline program advertising, promotional materials, and general customer notices and communications on an annual basis or upon request;

11) TWCIS will engage in advertising that is directed at promoting the availability of Lifeline to qualifying customers in the RDOF Census Blocks; and

12) TWCIS agrees that in the event of a change of or transfer of corporate control, as defined in Pennsylvania statutory law, case law, and 52 Pa Code § 63.322, TWCIS will petition the Commission for a renewal of its ETC status.

VI. DESIGNATION OF TWCIS AS AN ETC IS IN THE PUBLIC INTEREST

As a winning bidder in the RDOF Auction, TWCIS is eligible to receive funding to bring high-quality, innovative voice and broadband Internet access services to consumers in unserved portions of Pennsylvania. The RDOF funding assigned to TWCIS will help enable it to “[b]ring digital opportunity to Americans living on the wrong side of the digital divide,”³² and thereby advance the goals of universal service. Expedited Commission action on this Petition serves the public interest by accelerating the deployment of high-quality, innovative voice and broadband Internet access services in unserved portions of Pennsylvania that TWCIS and its affiliates will serve in the RDOF Census Blocks.

A. Broadband Deployment Will Promote New Investment, Job Growth and Opportunities in Pennsylvania

Bringing broadband to unserved areas of the Pennsylvania has been a major priority of the Governor. Governor Tom Wolf recently declared that “An investment in broadband internet connectivity is an investment in our Commonwealth’s future and prosperity.”³³ Granting this Petition will serve the Commonwealth’s goals and the public interest through the deployment of

³² *RDOF Order*, at ¶ 1.

³³ See Press Release, Office of the Governor, *Gov. Wolf Leads Bipartisan Effort in Calling on President, Congressional Leaders to Invest in Broadband Internet Access* (June 25, 2020), <https://www.governor.pa.gov/newsroom/gov-wolf-leads-bipartisan-effort-in-calling-on-president-congressional-leaders-to-invest-in-broadband-internet-access/>.

broadband Internet and voice services to unserved high-cost areas in Pennsylvania. Deployment of those services will spur investment in facilities and equipment and promote new economic opportunities and job growth in Pennsylvania.

Designating TWCIS as an ETC will permit it to receive RDOF Auction funds for 499 Census Blocks in Pennsylvania, directly advancing the goals of the RDOF Auction and universal service in those RDOF Census Blocks. Charter's deployments will bring expanded voice and broadband connectivity to these areas, which will help close the digital divide for residents of Pennsylvania and expand economic opportunity and job growth in communities that will benefit from increased connectivity. Governor Wolf is also calling for more access to broadband in rural areas like the vast majority of those associated with the RDOF Census Blocks: "Now, as Pennsylvania focuses on our economic recovery, it's critical that broadband internet access becomes a reality for every community, and especially our rural areas."³⁴ Because granting this Petition will allow TWCIS to use the RDOF funds as intended to expand voice and broadband Internet access services in the RDOF Census Blocks in Pennsylvania, designating TWCIS as an ETC is in the public interest.

B. Access to Broadband Will Transform Rural and Unserved Areas

The availability of Charter's RDOF supported broadband Internet access services and voice services will have a transformative effect on the unserved and/or rural areas in the RDOF Census Blocks. Charter is committed to expanding access to this life-changing connectivity that will enable consumers to use new technologies, such as distance education, telemedicine, live streaming video, or interactive programming (e.g., a Zoom call). These technologies will create new opportunities for consumers in education, healthcare, business, and civic engagement

³⁴ *Id.*

activities. For example, with access to an online network made available through a Charter broadband Internet connection, an individual may start their own business or take online classes in pursuit of an education. Similarly, local businesses, through use of Charter's broadband Internet and voice services, may connect to vendors and employees, grow their sales, and create new jobs. In short, Charter's broadband Internet access and voice services will enhance the opportunities available to the consumers served by TWCIS and its affiliates in the RDOF Census Blocks.

C. The Public Will Benefit from Charter's Experience as a Lifeline Voice Service Provider

Charter and its subsidiaries have substantial experience in providing Lifeline voice services to low income consumers and communities, which provides TWCIS with important familiarity with the FCC's Lifeline program and with the interactions necessary with the Universal Service Administrative Company, the National Lifeline Accountability Database, and other third party Lifeline administrators. These experiences will facilitate TWCIS's swift offering of Lifeline voice services for qualifying low-income customers in the Census Blocks where TWCIS receives RDOF support in Pennsylvania.

D. The Public Will Benefit from Charter's Customer-Oriented Policies, Such as Those During the COVID-19 Pandemic

At the onset of the COVID-19 pandemic, Charter joined other telecommunications providers in the Keep Americans Connected Pledge. As part of that effort, Charter voluntarily committed to suspend collections and not charge late fees or terminate service for residential or small business customers who informed Charter that they were experiencing COVID-related economic challenges. Charter extended its commitment through June 30th. During that time, Charter kept connected approximately 700,000 customers who had difficulties meeting bills

because of COVID-related economic hardship. Charter has also forgiven approximately \$85 million in customer overdue balances.

Additionally, as schools across the country began to transition to remote learning in March, Charter took action to benefit students, faculty and families. Charter committed to offering broadband Internet service up to 200 Mbps for free for sixty days, including in-home Wi-Fi and a self-installation kit, to households with K-12 and/or college students or educators who did not already have a Charter broadband Internet service subscription for sixty days. Charter extended this offer through June 30th and, by the end of the 2020 school year, Charter was able to help nearly 450,000 students and teachers nationally continue schooling through remote learning. To help ease the strain for families and teachers who still lacked broadband, Charter relaunched its Remote Education Offer beginning on September 21, 2020.

Furthermore, for schools and school districts seeking to establish a centralized purchasing arrangement for the benefit of both students and teachers to support remote learning, Charter currently offers Stay Connected K-12 throughout the Charter footprint. Under Stay Connected K-12, Charter contracts directly with schools and school districts to assist them in offering high-speed broadband Internet access to students, educators and staff in their homes. Charter's Stay Connected K-12 is designed as a single-payer option for communities to allow payment by a school or school district, based upon the number of connections purchased. This partnership between Charter and the school or school district helps to ensure that learning, teaching, and working are uninterrupted by giving schools and school districts the flexibility to add students to the program, when needed, and to provide much needed in-home broadband Internet connectivity.

Lastly, recognizing the importance of digital skills during this time of unprecedented volume in distance learning and remote working, Charter has doubled the amount of funds

available for its Spectrum Digital Education Grants for 2020-21.³⁵ These customer-oriented policies, along with others that Charter implements from time to time, will enhance the choices and capabilities available to the consumers served by TWCIS and its affiliates in the RDOF Census Blocks.

E. The Public Will Benefit from TWCIS’s Advanced Service Offerings

Designating TWCIS as an ETC in the RDOF Census Blocks will promote the deployment of advanced voice and broadband Internet services in these areas. Charter is widely recognized as a premier provider of voice and broadband Internet offerings that relies on advanced systems, technologies, and infrastructure. Charter provides voice and broadband Internet services to approximately 26.8 million residential Internet access service customers and 9.3 million residential voice service customers in 41 states. Its investments have enabled it to offer minimum download speeds of at least 200 Mbps in 60% of Charter’s national footprint, and 100 Mbps everywhere else in the footprint—including households and small businesses in rural areas. On December 17, 2020, Charter announced that it plans to double Charter’s broadband Internet access service starting speeds in 17 U.S. markets, making 200 Mbps the starting flagship speed in 75% of Charter’s communities. These speed enhancements will be available to new customers immediately. Existing customers will receive these speed increases with new Charter broadband Internet access service packages during the first quarter of 2021.³⁶

Charter also offers a 1 Gbps connection with maximum download speeds of up to 940 Mbps to the vast majority of those same households, as well as to small and medium-sized businesses. Charter’s broadband Internet service offerings enable customers “to use tomorrow’s

³⁵ See *Spectrum Digital Education Grant*, Spectrum, <https://corporate.charter.com/digital-education/grants> (last visited Dec. 13, 2020).

³⁶ See *supra* note 15.

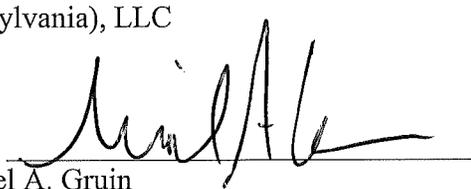
Internet applications as well as today's."³⁷ These levels of service will be made available to consumers in TWCIS's RDOF Census Blocks, as well.

VII. CONCLUSION

For the reasons stated herein, TWCIS respectfully requests that the Commission designate TWCIS as an ETC in the RDOF Census Blocks identified in Exhibit A by no later than April 15, 2021 and order such other relief as may be appropriate.

Respectfully submitted,

Time Warner Cable Information Services
(Pennsylvania), LLC

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³⁷ RDOF Order, at ¶ 2.

LIST OF EXHIBITS

Verification

Exhibit A – List of Census Blocks Where Time Warner Cable Information Services (Pennsylvania), LLC was Assigned RDOF Auction Support

Exhibit B – Map of Census Blocks Where Time Warner Cable Information Services (Pennsylvania), LLC was Assigned RDOF Auction Support

Exhibit C – Copy of Time Warner Cable Information Services (Pennsylvania), LLC's Pennsylvania Secretary of the Commonwealth Registration

Exhibit D – Copy of Time Warner Cable Information Services (Pennsylvania), LLC's Certificate of Public Convenience to Provide Competitive Local Exchange Services in Pennsylvania

EXHIBIT A

Exhibit A – List of Census Blocks Where Time Warner Cable Information Services (Pennsylvania), LLC was Assigned RDOF Auction Support

TIME WARNER CABLE INFORMATION SERVICES (PENNSYLVANIA), LLC

CENSUS BLOCKS¹

420391119001002	420490101011053	420490101031024	420490112023006
420391119001003	420490101011054	420490101031030	420490112023014
420391119001008	420490101011056	420490101031048	420490112023018
420391119001009	420490101011059	420490101031052	420490112023019
420391119001017	420490101011060	420490101031070	420490112023021
420391119001018	420490101011061	420490101031071	420490115071001
420391119001019	420490101011063	420490101042003	420490115071002
420391119001035	420490101011065	420490101042004	420490115073001
420391119001053	420490101011066	420490101042016	420490115073002
420391119001054	420490101011071	420490101042017	420490115073003
420391119001058	420490101011073	420490101042025	420490115073011
420391119001059	420490101011075	420490101042037	420490117021020
420391119001060	420490101011076	420490102021003	420490117021021
420391119001061	420490101011077	420490102021017	420490117021024
420391119001062	420490101011079	420490102021022	420490117021030
420391119001063	420490101011080	420490102021028	420490117021039
420391119001067	420490101011085	420490102021029	420490117023007
420391119001069	420490101011086	420490102021054	420490117023009
420391119001070	420490101011087	420490102021057	420490117023015
420391119001073	420490101011088	420490102021084	420490117023016
420391119001074	420490101011089	420490102021085	420490117023019
420391119001075	420490101011096	420490102024017	420490117023023
420391119001077	420490101011097	420490102024018	420490117023026
420391119001078	420490101011098	420490112013022	420490117023031
420391119001079	420490101011099	420490112013023	420490117023032
420391119001081	420490101011101	420490112014001	420490117023042
420391119001084	420490101011108	420490112014016	420490117023046
420391119001086	420490101031000	420490112014018	420490117023052
420391119001087	420490101031002	420490112014029	420490117023053
420391119001098	420490101031003	420490112014032	420490117023056
420391119001100	420490101031004	420490112014038	420490117023057
420490101011003	420490101031008	420490112014044	420490117023059
420490101011004	420490101031009	420490112022003	420490117023075
420490101011028	420490101031012	420490112022079	420490117023077
420490101011048	420490101031013	420490112023002	420490117023078
420490101011049	420490101031014	420490112023003	420490117023079
420490101011050	420490101031022	420490112023005	420490117024008

¹ This **Exhibit A** is intended to be a full and complete list of the RDOF Census Blocks assigned to CCO Holdings, LLC in Pennsylvania. To the extent there is any inconsistency between the list of RDOF Census Blocks on this **Exhibit A** and the list at the FCC's RDOF Dashboard (<https://auctiondata.fcc.gov/public/projects/auction904>), the list at the FCC's RDOF Dashboard shall control.

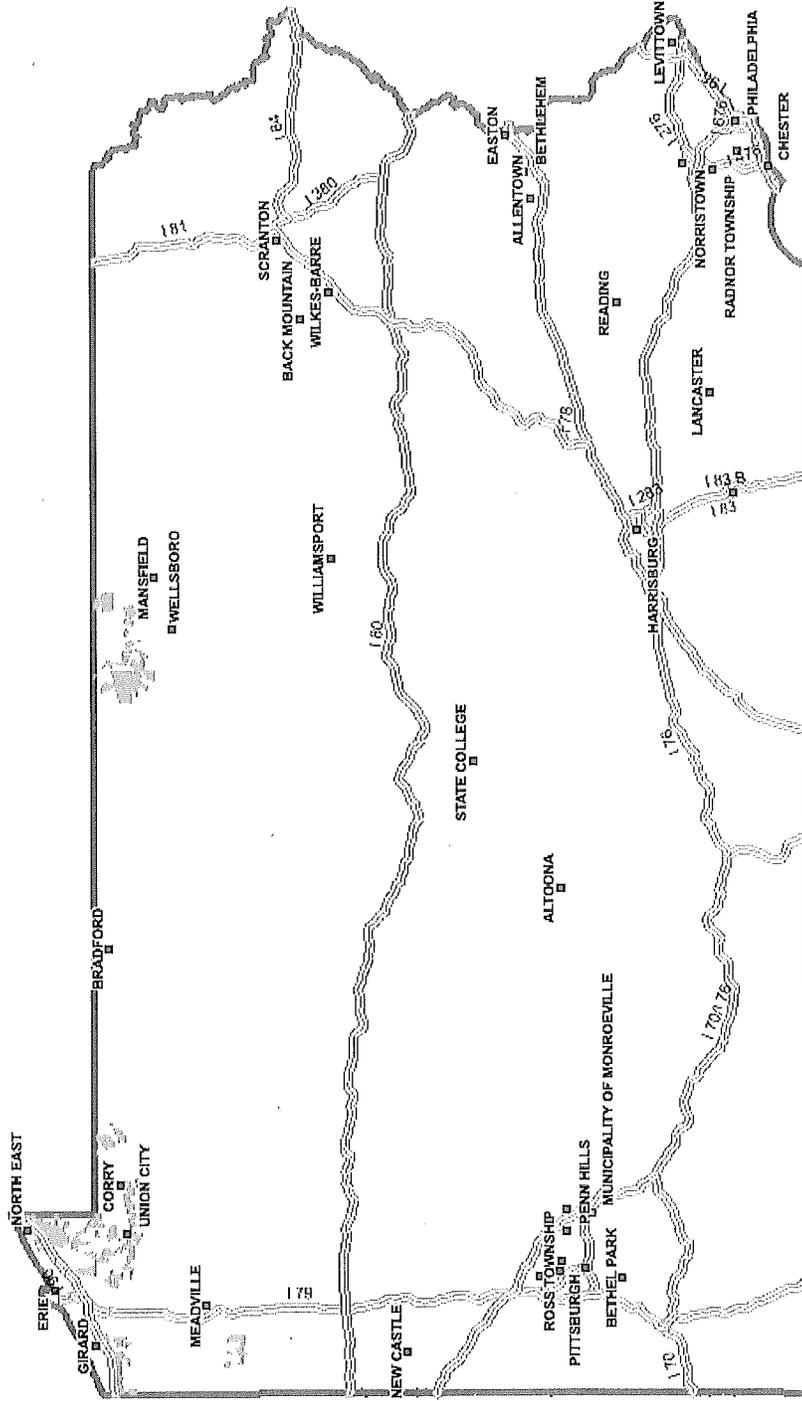
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420490117024031	420490118021027	420490120013037	420490121004057
420490117024032	420490118021029	420490120013040	420490121004059
420490117024035	420490118021035	420490120013045	420490121004060
420490117024036	420490118021036	420490120013049	420490121004061
420490117024043	420490118021040	420490120013050	420490121004066
420490117024045	420490118021047	420490120013051	420490121004069
420490117025001	420490118021054	420490120013057	420490121004070
420490117025004	420490118021060	420490121001012	420490121004074
420490117025012	420490118021071	420490121001022	420490121004086
420490117025014	420490118021080	420490121001027	420490121004087
420490117025020	420490118021089	420490121001029	420490121004088
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420490118011026	420490118021107	420490121001053	421179501003068
420490118011027	420490118021108	420490121001054	421179501003070
420490118011028	420490118022017	420490121001058	421179501003130
420490118011029	420490118022046	420490121001059	421179501003131
420490118011031	420490118022047	420490121001060	421179501003132
420490118011032	420490118022073	420490121001063	421179501003133
420490118011037	420490120011000	420490121002005	421179501003135
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420490118012013	420490120011031	420490121002012	421179501003139
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421179503001011	421179503001067	421179503004045	421179504004126
421179503001012	421179503001068	421179503004067	421179504004130
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421179503001023	421179503002007	421179504004013	421239703003012
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421179503001037	421179503003004	421179504004082	421239703003065
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421179503001065	421179503004007	421179504004123	
421179503001066	421179503004043	421179504004124	

EXHIBIT B

Exhibit B – Map of Census Blocks Where Time Warner Cable Information Services (Pennsylvania), LLC was Assigned RDOF Auction Support

PENNSYLVANIA: ASSIGNED RDOF CENSUS BLOCKS



Legend:
 - TIME WARNER CABLE INFORMATION SERVICES (PENNSYLVANIA), LLC

EXHIBIT C

Exhibit C – Copy of Time Warner Cable Information Services (Pennsylvania), LLC's
Pennsylvania Secretary of the Commonwealth Registration

PENNSYLVANIA DEPARTMENT OF STATE
CORPORATION BUREAU

Application for Registration - Foreign

(15 Pa.C.S.)

Entity Number

3198000

- Registered Limited Liability General Partnership (§ 8211)
- Registered Limited Liability Limited Partnership (§ 8211)
- Limited Partnership (§ 8582)
- Limited Liability Company (§ 8981)

Name

Address

City

State

Zip Code

CT CORP-COUNTER

Document will be returned to the name and address you enter to the left.



Fee: \$180

Filed in the Department of State on

FEB - 4 2004

Pedro A. Santos

Secretary of the Commonwealth

In compliance with the requirements of the applicable provisions (relating to registration), the undersigned, desiring to register to do business in this Commonwealth, hereby states that:

1. The name to be registered is:

Time Warner Cable Information Services (Pennsylvania), LLC

2. (If the name set forth in paragraph 1 is not available for use in this Commonwealth, complete the following):

The name under which the limited liability company/limited liability partnership/limited partnership proposes to register and do business in this Commonwealth is:

N/A

3. The name of the jurisdiction under the laws of which it was organized and the date of its formation:

Jurisdiction: Delaware Date of Formation: 1/12/04

4. The (a) address of its initial registered office in this Commonwealth or (b) name of its commercial registered office provider and the county of venue is:

(a) Number and street City State Zip County

(b) Name of Commercial Registered Office Provider
c/o CT CORPORATION SYSTEM

County
Philadelphia

DSCB:15-8981/8211/8582-2

5. Check and complete one of the following:

The address of the office required to be maintained by it in the jurisdiction of its organization by the laws of that jurisdiction is:

1209 Orange Street	Wilmington	DE	19801
Number and street	City	State	Zip

It is not required by the laws of its jurisdiction of organization to maintain an office therein and the address of its principal office is:

Number and street	City	State	Zip
-------------------	------	-------	-----

6. For Restricted Professional Limited Liability Company Only. Strike out if Inapplicable: The company is a restricted professional company organized to render the following professional service(s):

N/A

Limited Liability Partnership and Limited Partnership: Complete paragraphs 7 and 8

7. The name and business address of each general partner.

Name	Business Address

8. The address of the office at which is kept a list of the names and addresses of the limited partners and their capital contribution is:

Number and street	City	State	Zip	County
-------------------	------	-------	-----	--------

The registered partnership hereby undertakes to keep those records until its registration to do business in the Commonwealth is canceled or withdrawn.

IN TESTIMONY WHEREOF, the undersigned has caused this Application for Registration to be signed by a duly authorized officer/member or manager thereof of this

8th day of January, 2004

Time Warner Cable Information Services (Pennsylvania), LLC

Name of Partnership/Company

Gerald D. Campbell

Signature

Gerald D. Campbell, SVP

Title

Docketing Statement DSCB:15-134A (Rev 2001)
Departments of State and Revenue

One (1) copy required

BUREAU USE ONLY:
 Dept. of State Entity # _____
 Dept. of Rev. Box # _____
 Filing Period _____ Date 3 4 5 _____
 SIC/NAICS _____ Report Code _____

Check proper box:

Pennsylvania Entities

business stock
 business non-stock
 professional
 nonprofit stock
 nonprofit non-stock
 statutory close
 management
 cooperative
 insurance
 limited liability company
 restricted professional
 limited liability company
 business trust

Foreign Entities

State/Country BE Date 1/12/04

business
 nonprofit
 limited liability company
 restricted professional
 limited liability company
 business trust

Other

domestication
 division
 consolidation

1. Entity Name:
Time Warner Cable Information Services (Pennsylvania), LLC

2. Individual name and mailing address responsible for initial tax reports:
Riina Tohver
 Income Tax Dept. 7910 Crescent Executive Dr. Charlotte NC 28217
 Name Number and street City State Zip

3. Description of business activity:
Providing telecommunications services

4. Specified effective date, if any:

 month/day/year hour, if any

5. EIN (Employee Identification Number), if any:

6. Fiscal Year End:
December 31

7. Fictitious Name (only if foreign corporation is transacting business in PA under a fictitious name):

PA008 - 10/17/2001 C T System Center

EXHIBIT D

Exhibit D – Copy of Time Warner Cable Information Services (Pennsylvania), LLC's Certificate of Public Convenience to Provide Competitive Local Exchange Services in Pennsylvania

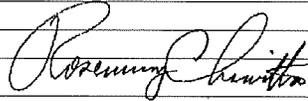
**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

IN THE MATTER OF THE APPLICATIONS OF: A-2009-2137838, A-2009-2137845, A-2009-2137846, A-2009-2137922, A-2009-2138058,
A-2009-2138060, and A-2009-2138083

Application of Time Warner Cable Information Services (Pennsylvania), LLC, d/b/a Time Warner Cable for approval to offer, render, furnish or supply telecommunication services as a Competitive Local Exchange Carrier to the public in the Commonwealth of Pennsylvania in the non-rural service of Verizon Pennsylvania Inc., and Verizon North Inc.; and in the rural service territories of: Citizens Telecommunications Company of New York, Inc., Frontier Communications – Commonwealth Telephone Company, LLC, Frontier Communications – Oswayo River, LLC, Pymatuning Independent Telephone Company, and Windstream Pennsylvania, LLC

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing, it has, by its report and order made and entered, found and determined that the granting of the application is necessary or proper for the service, accommodation, convenience and safety of the public and hereby issues to the applicant this **CERTIFICATE OF PUBLIC CONVENIENCE** evidencing the Commission's approval.

In Witness Whereof, The PENNSYLVANIA PUBLIC UTILITY COMMISSION
has caused these presents to be signed and sealed, and duly attested by its secretary
at its office in the city of Harrisburg this 14th day of July, 2010.



VERIFICATION

I, Adam E. Falk, holding the position of Senior Vice President, Government Affairs at Charter Communications, Inc. ("Charter"), the ultimate parent company of Time Warner Cable Information Services (Pennsylvania), LLC, verify that the information provided in the foregoing Petition for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services is true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsifications to authorities.



Adam E. Falk
Senior Vice President, Government Affairs
Charter Communications, Inc.

Date: 1/5/21

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2021 copies of the foregoing Petition for Eligible Telecommunications Carrier Designation have been served upon the persons listed below in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Via Electronic Mail and First Class U.S. Mail

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1921

Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Pennsylvania Public Utility Commission
Law Bureau
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Via First Class U.S. Mail only

Honorable Gladys Brown, Chairman
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Honorable David W. Sweet Vice-Chairman
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Honorable Ralph Yanora, Commissioner
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Honorable John F. Coleman, Jr., Commissioner
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
3rd Floor
400 North Street
Harrisburg, PA 17120

Office of Attorney General
Office of Consumer Protection
Strawberry Square
Harrisburg, PA 17120



Michael A. Gruin, Esq.