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June 21, 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-2021-3023594

Dear Secretary Chiavetta:

Enclosed please find the verified responses of Time Warner Cable Information Services (Pennsylvania), LLC (“TWCIS”) to the Bureau of Consumer Services Data Requests – Set II issued in the above-captioned matter.

Should you have any questions or concerns, please do not hesitate to contact me.

Best Regards,

STEVENS & LEE



Michael A. Gruin

Enclosures

cc: Christian McDewell (via email)
Theresa Mingarelli (BCS) (via email)

**RESPONSE OF TIME WARNER CABLE INFORMATION
SERVICES (PENNSYLVANIA), LLC¹ TO BCS SET II DATA REQUESTS**

As stated herein, “TWCIS” or the “Company” refers to the applicant in this docket, and “Charter” refers to TWCIS, similarly situated affiliates, and other subsidiaries wholly controlled by Charter Communications, Inc. “Application” refers to TWCIS’s Petition for Designation as an Eligible Telecommunications Carrier to Receive Rural Digital Opportunity Fund (Auction 904) Support for Voice and Broadband Services and Request for Action on or before April 15, 2021. “RDOF” refers to the Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund Auction (Auction 904), and “RDOF Census Blocks” refers to the census blocks where TWCIS will receive RDOF support.

¹ Certain of the subjects and benefits discussed in this Response pertain to non-jurisdictional products and services. While those items are voluntarily included herein in order to provide a comprehensive view of the public interest benefits of designating TWCIS as an eligible telecommunications carrier (“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.

- 1. Per 47 C.F.R. § 54.405(d), all material describing Lifeline must disclose the name of the ETC, in this case TWCIS. Will TWCIS's dedicated Lifeline landing page on Charter's website identify TWCIS as the Lifeline provider? To avoid confusion, will Charter's customer service representatives identify as TWCIS company representatives?**

Response: Yes. TWCIS's Pennsylvania Lifeline materials, including its Lifeline website page, will identify "Time Warner Cable Information Services (Pennsylvania), LLC" in accordance with applicable federal requirements.

Additionally, as mentioned in its Application, TWCIS is a subsidiary of Charter, and Charter uses the brand name "Spectrum" to market its communications services, including broadband Internet access, cable video, voice, and mobile services. The brand name Spectrum is currently used with these services offered by Charter's subsidiaries in 41 states, including with respect to TWCIS's approximately 125,000 customers in Pennsylvania. Accordingly, certain of Charter's processes and communications, including those used by Charter's customer service representatives, will also rely on the use of the Spectrum brand name.

2. Will TWCIS consult with the Commission's Bureau of Consumer Services prior to publication of TWCIS's Pennsylvania Lifeline landing page?

Response: Yes. TWCIS will consult with the Commission's Bureau of Consumer Services prior to publication of TWCIS's Pennsylvania Lifeline landing page.

3. Will TWCIS incorporate the following into customer service training? *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. 66 Pa.C.S. §3019(f)(3).*

Response: Yes. TWCIS's customers residing in the RDOF Census Blocks will be informed of the availability of Lifeline service. TWCIS expects to inform its customers of Lifeline via multiple methods, including when customers call into customer support and through dedicated Lifeline webpages and notices in annual bill messages.

- **Please provide contact information for TWCIS staff who are responsible for preparing and submitting reports to the PUC.**

Response: The contact information for TWCIS's representative responsible for preparing and submitting reports to the PUC is:

Betty J. Sanders
Vice President – Telephone Regulatory
Charter Communications, Inc.
12405 Powerscourt Drive
St. Louis, Missouri 63131
Tel: (314) 394-9876
Email: betty.sanders@charter.com

- 4. Access to 911 emergency services while voice service is suspended has been a long-standing practice among voice providers. Some providers continue this practice. How does TWCIS inform customers that access to 911 emergency services is unavailable while voice service is suspended?**

Response: TWCIS continues to provide customers with access to 911 emergency services during periods of service suspension. Accordingly, TWCIS does not provide notice to customers informing them that 911 emergency service is not available during such periods. TWCIS provides 911 emergency services to all customers until their service is disconnected.

5. To adapt the state of New York Department of Public Service brochure for use in Pennsylvania, Lifeline marketing material is to be specific to TWCIS. Please submit a mockup of marketing material that includes:
- That Lifeline is a government assistance program.
 - That service is not transferrable to another person.
 - Name TWCIS as the ETC
 - That the Lifeline discount can be applied to qualifying TWCIS voice or broadband service
 - That consumers can contact TWCIS (phone #) or USAC at 1 (800) 234-9473 to obtain a mailed application, or apply directly to <https://www.lifelinesupport.org/>
 - That *Consumers can contact the PA PUC Bureau of Consumer Services for help with unresolved questions or complaints at 1-800-692-7380.*

Response: Examples of advertisements that TWCIS and its affiliates may use to promote their Lifeline voice and broadband Internet offerings in the RDOF Census Blocks in Pennsylvania are attached hereto at **Exhibit 1**. These sample advertisements are subject to change.

6. Will TWCIS provide a copy of USAC’s Spanish language application, recertification and household worksheet when requested by a consumer? Is TWCIS’s backup power customer notification disclosure available in Spanish?

Response: For Spanish speaking customers requesting assistance with their Lifeline application, certification, and/or household worksheet, Charter’s customer service representatives will provide assistance, as needed, including referring such customers to the Spanish language version of USAC’s National Verifier website. As discussed previously, TWCIS and its affiliates utilize the Lifeline National Eligibility Verifier (“National Verifier”), which is a centralized system managed by USAC, for verification and certification of customer eligibility to receive Lifeline service in the RDOF Census Blocks.

For all Spanish speaking customers, Charter also offers a Spanish language website that may be accessed at www.spectrum.com by clicking on “Spectrum en Español” at the bottom of the page. Charter’s terms of service for voice and broadband Internet services, including its backup power customer notification, are available in Spanish on Charter’s Spanish language website. Additionally, Charter provides an annual bill insert with its backup power customer notification, in English and Spanish, to all of its Pennsylvania customers.

7. Will TWCIS charge a service deposit for broadband access service?

Response: Charter reserves the right in its Terms of Service to collect a security deposit from its customers. Any security deposit required of a customer would be due and payable at the time of the customer's first monthly billing statement. Additionally, any security deposit would be returned to the customer within sixty (60) days of termination of the customer's service so long as payment has been made for all amounts due on the customer's account and the customer has returned any Charter equipment undamaged.

Charter does not plan to request security deposits from customers purchasing Lifeline broadband service.

- 8. Biannual bill message. Because the bill message is to inform customers *who wish to learn about Lifeline*, add eligibility, benefit, and ETC contact information. Name TWCIS as the ETC rather than state that Spectrum participated in the Federal Lifeline Program. A potential statement may be: as an eligible telecommunications provider in Pennsylvania, TWCIS offers Spectrum service. Consider adding that consumers can contact TWCIS or USAC to have an application mailed. Please revise and resubmit.**

Response: TWCIS will include a conspicuous bill message twice per year on the invoices sent to customers residing in the RDOF Census Blocks informing them of the availability of Lifeline service. A revised bill message is as follows (Note: “Spectrum” is the brand name for Charter’s services):

In certain areas, Time Warner Cable Information Services (Pennsylvania), LLC, participates in the Federal Lifeline Program, which currently provides a monthly discount on home phone service with unlimited nationwide calling and other free features, or Internet service to eligible low-income consumers. Customers may qualify for Lifeline if household income level is at or below 135% of Federal Poverty Income Guidelines; or if a member of the customer’s household receives benefits from either SSI, SNAP, or Federal Public Housing Assistance, Veteran’s Pension or Survivor’s Pension Benefit, with annual recertification required. Lifeline benefit amounts are set by the FCC and are subject to change. Lifeline service is limited to one service per qualified customer or household and is not transferable. Additional information regarding the Lifeline Program is available from the Universal Service Administrative Company (USAC), which administers Lifeline for the FCC by calling 888.641.8722 or by accessing their website at www.LifelineSupport.org. Additional information about how to enroll in Lifeline is also available at [Charter PHONE] or [CharterWEBPAGE].

9. How does TWCIS notify subscribers by conspicuous means and prior to initiation of service, if E911 service may be limited or not available?

Response: All customers of Charter voice service must complete a 911 Acknowledgement form during the service ordering and initiation process, which informs them of any limitations with respect to Charter's E911 service. The 911 Acknowledgement provides as follows:

Spectrum™ Voice E911 Services Acknowledgment

By providing your electronic signature below, you are confirming your understanding of Charter Communications' Spectrum Voice E911 service.²

Spectrum Voice service does not have its own power supply. If there is a power outage or a disruption to the cable network, Spectrum Voice service will not work. In such cases it will not be possible to place or receive calls and your modem will not work.

The emergency provider handling the 911 call, and the address the emergency provider will see, are linked to your service address on file with Charter. Charter phone equipment must not be moved to a new address without first contacting us with the new location. If it is relocated, and you dial 911, you will need to provide your address to the 911 operator or 911 calls may be misdirected to the wrong location or wrong emergency provider. During the first 72 hours after initiating service or advising us of an address change, if you dial 911, you must relay the new service address to the emergency operator. This is necessary to ensure emergency services are dispatched to your new service address because the emergency operator may not have the new service address in their records.

In some locations, depending on the equipment used by local governments to provide 911 service, you will always need to convey the 911 service location information to the emergency operator.

By clicking on "Accept" below, you acknowledge that you have received and understand this information. [] **I agree**

² Charter Communications provides Spectrum Voice through its affiliated voice entities in your area.

10. To clarify, Pennsylvania is an “NLAD state,” meaning that Lifeline applications and recertifications are managed by USAC. Consumers will work with NLAD to complete the eligibility/recertifications process. As an ETC, TWCIS would verify eligibility via the NLAD prior to enrolling eligible consumers in TWCIS’s Lifeline service. The Pennsylvania PUC Bureau of Consumer Services assists Lifeline consumers with unresolved Lifeline disputes.

Response: TWCIS and its affiliates will utilize both the Lifeline National Eligibility Verifier (“National Verifier”) and the National Lifeline Accountability Database (“NLAD”) for verification and certification of customer eligibility to receive Lifeline service in the RDOF Census Blocks. After a customer qualifies for the Lifeline program through the National Verifier, TWCIS and its affiliates will use NLAD to enroll the customer in the Lifeline program and to make changes to the customer’s Lifeline eligibility status.

Spectrum Residential General Terms and Conditions

11. Will TWCIS be identified as an affiliate of Spectrum in the Spectrum Residential General Terms and Conditions?

Response: As mentioned in its Application, TWCIS is a subsidiary of Charter Communications, Inc. Charter uses the brand name “Spectrum” to market its communications services, including broadband Internet access, cable video, voice, and mobile services, in Pennsylvania and throughout its 41-state footprint. The brand name Spectrum is used throughout Charter’s Residential General Terms and Conditions (the “Terms of Service”) to refer to all of Charter’s subsidiaries. In the first paragraph of the Terms of Service, customers are informed that the term “Spectrum” is used to refer to the Charter entity (including TWCIS) that will provide the services that they are purchasing.

12. How do potential Lifeline consumers know to access and review the general terms and conditions prior to ordering service?

Response: Charter's service ordering process will require Lifeline customers in the RDOF Census Blocks to acknowledge and agree to certain terms and policies, including Charter's Residential General Terms and Conditions of Service. The customer will be presented with a website link to Charter's Residential General Terms and Conditions of Service, where the customer may review the terms in advance of ordering service, and the customer must acknowledge and agree to such terms prior to completing their order for service.

Spectrum Residential Internet Service Agreement

13. Will TWCIS be identified as an affiliate of Spectrum in the Spectrum Residential Internet Service Agreement?

Response: As mentioned in its Application, TWCIS is a subsidiary of Charter, and Charter uses the brand name “Spectrum” to market its communications services, including broadband Internet access, cable video, voice, and mobile services, in Pennsylvania and throughout its 41-state footprint. The brand name Spectrum is used in Charter’s Residential Internet Services Agreement (the “Internet Terms”). In the second sentence of the Internet Terms, customers are informed that the term “Spectrum” is used to refer to the Charter entity (including TWCIS) that will provide the services that they are purchasing.

14. Provide a link to TWCIS's/Charter's publicly accessible ISP disclosure under 47 CFR § 8.1.

Response: Charter's broadband Network Management Practices may be accessed at the following website: <https://www.spectrum.com/policies/network-management-practices>.

Spectrum Residential Voice Services Agreement

15. Will TWCIS be identified as an affiliate of Spectrum in the Spectrum Residential Voice Service Agreement?

Response: As mentioned in its Application, TWCIS is a subsidiary of Charter, and Charter uses the brand name “Spectrum” to market its communications services, including broadband Internet access, cable video, voice, and mobile services, in Pennsylvania and throughout its 41-state footprint. The brand name Spectrum is used in Charter’s Residential Voice Services Agreement (the “Voice Terms”). In the second sentence of the Voice Terms, customers are informed that the term “Spectrum” is used to refer to the Charter entity (including TWCIS) that will provide the services that they are purchasing.

16. How do potential Lifeline consumers know to access and review the Residential Voice Service Agreement?

Response: Charter's service ordering process will require Lifeline customers in the RDOF Census Blocks to acknowledge and agree to certain terms and policies, including Charter's Residential General Terms and Conditions of Service. These Residential General Terms and Conditions of Service incorporate the terms of Charter's broadband Internet access, cable video, voice, and mobile services. The customer will be presented with a website link to Charter's Residential General Terms and Conditions of Service, where the customer may review the terms in advance of ordering service, and the customer must acknowledge and agree to such terms prior to completing their order for service.

17. Regarding Item 4.d. Voice Service Limitations, Equipment. Per the following statement, please clarify whether Lifeline consumers are or are not able to port their telephone number to and from TWCIS? “*Telephone numbers assigned to Subscriber by Spectrum are portable and transferable with Subscriber at the same location*”

Response: Yes. Lifeline customers in the RDOF Census Blocks will be permitted to port their telephone numbers to and/or from TWCIS in accordance with applicable law.

EXHIBIT 1

SAMPLE LIFELINE ADVERTISEMENTS



Struggling to pay your home phone or internet bill?



Spectrum customers in Pennsylvania may be eligible for Lifeline telephone or internet service discounts if they meet the eligibility requirements.

Spectrum* offers monthly discounts on home phone or internet service to eligible low-income consumers through its participation in the federal Lifeline program. You may use the National Verifier application portal at <https://nationalverifier.servicenow.com/lifeline> to see if you are eligible.

Spectrum provides Lifeline discounts to qualified customers of its wireline voice service or internet service. Lifeline discounts are NOT available for Spectrum wireless service.

*In Pennsylvania Lifeline service is available in select areas served by Time Warner Cable Information Services (Pennsylvania), LLC. The Lifeline program is a government assistance program and the discounts under the program are not transferable. Only eligible consumers may enroll in the program and only one discount is permitted per household. Additional questions or information, such as applications to the Lifeline program, can be found by contacting the FCC Lifeline Administrator at www.usac.org or 1 (800) 234-9473 or visit www.spectrum.net/support or call Spectrum at 833-267-6094. You can contact the Pennsylvania PUC Bureau of Consumer Services for help with unresolved questions or complaints at 1-800-692-7380. If you have any additional questions please visit www.spectrum.net/support or call Spectrum at 833-267-6094. © 2021 Charter Communications. All rights reserved.



STRUGGLING TO PAY YOUR HOME PHONE OR INTERNET BILL?

Spectrum customers in Pennsylvania may be eligible for Lifeline telephone or internet service discounts if they meet the eligibility requirements.

Spectrum* offers monthly discounts on home phone or internet service to eligible low-income consumers through its participation in the federal Lifeline program. You may use the National Verifier application portal at <https://nationalverifier.servicenowservices.com/lifeline> to see if you are eligible.

Spectrum provides Lifeline discounts to qualified customers of its wireline voice service or internet service. Lifeline discounts are NOT available for Spectrum wireless service.

*In Pennsylvania Lifeline service is available in select areas served by Time Warner Cable Information Services (Pennsylvania), LLC. The Lifeline program is a government assistance program and the discounts under the program are not transferable. Only eligible consumers may enroll in the program and only one discount is permitted per household. Additional questions or information, such as applications to the Lifeline program, can be found by contacting the FCC Lifeline Administrator at www.usac.org or 1 (800) 234-9473 or visit www.spectrum.net/support or call Spectrum at 833-267-6094. You can contact the Pennsylvania PUC Bureau of Consumer Services for help with unresolved questions or complaints at 1-800-692-7380. If you have any additional questions please visit www.spectrum.net/support or call Spectrum at 833-267-6094. © 2021 Charter Communications. All rights reserved.

VERIFICATION

I, Michael A. Chowaniec, holding the position of Vice President- State Government Affairs with Time Warner Cable Information Systems (Pennsylvania), LLC verify that the information provided in the foregoing responses to data requests 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.



Name: Michael A. Chowaniec
Title: Vice President- State Government Affairs

Date: June 21, 2021