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March 26, 2018

VIA Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: **Docket No. 00-257: Notification of Acquisition of Customers**

Dear Ms. Dortch:

Charter Fiberlink - Missouri, LLC (“Charter Fiberlink”) hereby notifies the Commission of its intent to acquire a portion of the customer base of SEMO Communications, Inc. (“SEMO”) as described more fully below. Charter Fiberlink does not believe that Section 64.1120(e) of the Commission’s Rules, 47 CFR § 64.1120(e), applies to the acquisition because, although Charter Fiberlink is a telecommunications carrier, SEMO provides interconnected Voice over Internet Protocol (“VoIP”) service to the customers being acquired by Charter Fiberlink. Additionally, following the acquisition, Charter Fiberlink will provide interconnected VoIP service to those customers. The Commission has not determined whether interconnected VoIP services are telecommunications services, nor has it yet ruled that its carrier change rules apply to interconnected VoIP services.¹ Both the Wireline Competition Bureau and the International Bureau Policy Divisions Staff have previously advised Charter Fiberlink and its affiliates in the context of similar transactions that the Commission’s consent pursuant to Section 214 of the Communications Act is not required for the acquisition of interconnected VoIP customers and/or assets related thereto.² Nonetheless, Charter Fiberlink has complied with the customer notification requirements set forth in Section 64.1120(e) out of an abundance of caution.

¹ See *In the Matter of Mediacom Complaint Regarding Unauthorized Change of Subscriber’s Telecommunications Carrier*, IC No. 08-S0294769, Order on Reconsideration, DA 09-1093, 24 FCC Rcd 5697 (Adopted May 18, 2009, Released May 19, 2009) (citing generally 47 C.F.R. §§ 64.1100(b), (d) and citing *In the Matter of IP-Enabled Services*, WC Docket No. 04-36, Notice of Proposed Rulemaking, 19 FCC Rcd 4863, 4910-11, paras. 71-72 (2004), in which the Commission has sought comment on whether it is necessary to extend slamming regulations to VoIP or other IP-enabled service providers.).

² See *Application of Charter Communications Entertainment II, LLC, CCO Fiberlink, LLC, Charter Fiberlink CA-CCO, LLC, WaveDivision VI, LLC and Wave Broadband, LLC for Authority to Transfer Certain Assets*, WC Docket No. 07-179, Letter from Charles V. Gerkin, Jr., Friend, Hudak & Harris, LLP to Marlene H. Dortch, Secretary,

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Names of the Parties to the Transaction: The parties to the transaction include SEMO Communications, Inc., the transferor, and Charter Fiberlink - Missouri, LLC, the transferee.

Types of Telecommunications Services Provided to Affected Customers: SEMO provides interconnected VoIP services to customers in Missouri. SEMO will transfer a portion of its customer base located in southeastern Missouri to Charter Fiberlink.

Date of Transfer: The parties anticipate that the affected customers will be transferred to Charter Fiberlink during the period between April 30, 2018, and June 6, 2018. Each customer will be informed of their actual transfer date.

Certification of Compliance: Charter Fiberlink certifies that it has complied with the Commission's requirement to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

Copy of Notice Sent to Affected Subscribers: Filed herewith are samples of the customer notification letters that were mailed on or about March 26, 2018.

Please direct any questions concerning this notification to the undersigned.

Very truly yours,



Charles A. Hudak
Counsel for Charter Fiberlink - Missouri, LLC

Enclosures

cc: Michael R. Moore, Group VP Law – Telephone Regulatory
Charter Communications, Inc.

Federal Communications Commission (filed Aug. 24, 2007); *Application of Charter Communications Entertainment II, LLC, CCO Fiberlink, LLC, Charter Fiberlink CA-CCO, LLC, WaveDivision VI, LLC and Wave Broadband, LLC for Authority to Transfer Certain Assets*, WC Docket No. 07-179, Notice Of Termination Of Domestic Section 214 Application Proceeding, DA 07-3788, 22 FCC Rcd 16205 (August 29, 2007); *see also Application of Charter Fiberlink – Georgia, LLC and James Cable, LLC for Authority to Transfer Certain Assets*, WC Docket No. 00-257, Letter from Charles A. Hudak, Friend, Hudak & Harris, LLP to Marlene H. Dortch, Secretary, Federal Communications Commission (filed Mar. 20, 2012).

EXHIBIT A

CERTIFICATION

On behalf of Charter Fiberlink - Missouri, LLC ("Charter Fiberlink"), and in accordance with Section 64.1120(e) of the Commission's Rules, 47 CFR § 64.1120(e), I hereby certify under penalty of perjury that I have read the foregoing notification and that the statements contained therein are true, complete and correct to the best of my knowledge, information and belief. I further certify that, with respect to the transfer to Charter Fiberlink of the affected customers of SEMO Communications, Inc., Charter Fiberlink has complied with the Commission's requirements to provide advance customer notice in accordance with Section 64.1120(e)(3) and with the obligations specified in that notice.

By: _____

Michael R. Moore

Title: Group VP Law – Telephone Regulatory

Date: _____

3-26-18

EXHIBIT B

CUSTOMER NOTIFICATION LETTERS



ACTION REQUIRED
Call 1-833-542-9899 before 4/30/18

March 28, 2018

Dear :

Great news! Charter Communications has completed the transaction with SEMO Communications, and your home will soon have access to Spectrum's advanced TV, Internet and Voice services.

With more than 24 million customers from coast to coast, we are proud to be America's fastest-growing TV, Internet and Voice provider. Our 90,000+ employees are committed to delivering the best-in-class products and customer service, all at a better value.

As part of our effort to transition you, **we are proactively switching your services over on 4/30/18.**

What You Need to Do

- **On or after 4/30/18, the existing equipment in your home must be replaced with Spectrum equipment, including a Spectrum-issued receiver on each TV in your home.**
 - *Please note, until your SEMO services are migrated to Spectrum services on 4/30/18, you will need to keep your existing equipment. This way you do not lose access to your current services.*

Call 1-833-542-9899 today to schedule an appointment with a technician to replace your existing equipment.

Important Service Changes

- **Internet Service**
 - Get ready to surf faster as your download speeds will increase from 5Mbps up to 100 Mbps.
 - If you currently have a Cablerocket.com or Semo.com email account, on <August 31, 2018> your email account will be discontinued. We will be sending you additional information that will detail the next steps to set up your new Spectrum.net account.
 - You will lose any saved email. We recommend you **make a note of important messages** and secure them on a physical drive before the transition.
- **Phone/Voice Service**
 - For your convenience, your current telephone number will be transferred to your new Spectrum Voice service.
 - You will experience a phone service interruption on the cutover day until your service has migrated to Spectrum Voice. **During this transition, you will not have the ability to dial 911 in the event of an emergency.** Please make alternative arrangements during this time, such as making sure your cell phone is charged.
 - You will lose your saved voicemails. We recommend you go through your voicemail and **make a note or recording of important messages.** You will also need to rerecord your voicemail greeting after the migration to Spectrum services is complete.

Important Billing Changes

You will be receiving a new account number. Your new account number can be found in the upper left corner of your next monthly billing statement. Please keep your new account number handy for future reference and don't forget to update your new account number with your financial institution to ensure payment processing.

Effective with your next billing statement, your new monthly rate will be:

\$44.99 for Spectrum Internet™, \$19.99 for Spectrum Voice™ plus applicable taxes and fees. Standard rates apply after year 1 for all services.

Other Changes to Your Service

Wire Guard

- We will discontinue your Wire Guard service and remove the applicable rate of \$X.XX from your monthly statement.

New Security Code

- Your Security Code is necessary for privacy and is randomly generated. This appears in the upper left corner of your statement each month.

Credit Card Information

- If SEMO currently has your credit card on file, this information is no longer valid. Please watch your mail as we will be sending you a monthly statement with payment instructions.

Username

- You will need to register for a new Username. You can visit Spectrum.net/newaccount and follow the on screen instructions. The process should only take a few minutes.

If you have any questions about these changes or your new services, call a Spectrum Specialist at 1-833-542-9899. To see all that your new Spectrum services have to offer, please visit Spectrum.com.

Please be on the lookout for additional communications as we continue to improve your service.

Sincerely,



Kathleen Griffin
VP, Marketing Communications



Important Information about your Phone Service

If SEMO Communications, Inc. ("SEMO") currently provides your telephone service, this letter is to inform you that Charter Fiberlink - Missouri, LLC and Charter Advanced Services (MO), LLC (collectively, "Charter") have agreed to acquire assets of SEMO in southeastern Missouri. Accordingly, Charter will begin providing telephone service to customers currently being served by SEMO.

Subject to obtaining any state and federal regulatory approvals that may be required, **we anticipate that the transition to Charter will occur on or about 4/30/2018.** Unless you have begun using a service provider other than SEMO prior to this date, SEMO will transition your current telephone service to Spectrum Voice service.

The terms and conditions for the Spectrum Voice service to which your current telephone service will be transitioned will remain the same at the time of this change, and your rates for the Spectrum Voice service will be less than or equal to your current telephone service rates. Notice of any future changes in rates, terms and conditions of Spectrum Voice service will be provided to you as required by law.

You have the right to subscribe to telephone service from any service provider that you wish. This decision is entirely up to you, and you may choose to switch to another provider either before or after the transfer to Charter occurs. You will not be charged any fees for the transfer to Charter, and Charter will be responsible for any carrier change fees that might apply as a result of such transfer. However, selecting a provider other than Charter may result in a charge being imposed for which Charter will not be responsible.

If you have placed a preferred carrier "freeze" on your telephone services to prevent their unauthorized transfer to another service provider, FCC rules require that the freeze be lifted at the time of the transfer to Charter. At your request, Spectrum Voice can reestablish preferred carrier "freeze" protection for your account after the transfer; just give us a call at 1-844-794-5263. If you do not have a "freeze" on your account, no action is required. Charter values your continued business and will gladly respond to any questions you may have about Spectrum Voice service either prior to or during the change.

Until the actual transfer date, SEMO will continue to be responsible for all customer service and billing issues. You should contact SEMO with any questions, complaints or other customer service inquiries you may have prior to the transfer. After the transfer date, you should refer your questions to Charter.

If you have any questions regarding the transfer to Charter, please contact a Spectrum Specialist at 1-844-794-5263.

Charter Fiberlink - Missouri, LLC
Charter Advanced Services (MO), LLC
SEMO Communications, Inc.



March 28, 2018

Dear Valued Customer:

Great news! Charter Communications has completed the transaction with SEMO Communications, and your business will soon have access to Spectrum Business’s advanced TV, Internet and Voice services.

With more than 24 million customers from coast to coast, we are proud to be America’s fastest-growing TV, Internet and Voice provider. Our 90,000+ employees are committed to delivering the best-in-class products and customer service, all at a better value.

As part of our effort to transition you, **we are proactively switching your services over to Spectrum Business on 4/30/18.**

What You Need to Do

- **On or after 4/30/18, the existing equipment in your business must be replaced with Spectrum Business equipment, including a Spectrum-issued receiver on each TV in your business.**
 - *Please note, until your SEMO services are migrated to Spectrum Business services on 4/30/18, you will need to keep your existing equipment. This way you do not lose access to your current services.*

Call 1-888-681-8943 today to schedule an appointment with a technician to replace your existing equipment.

Important Service Changes

- **Internet Service**
 - Get ready to increase your business’s productivity as your download speeds will increase from 25 Mbps up to 100 Mbps.
 - If you have a Cablerocket.com or SEMO.com email account, on August 31, 2018 your email account will be discontinued. We will be sending you additional information that will detail the next steps to set up your new SpectrumBusiness.net account.
 - You will lose any saved email. We recommend you **make a note of important messages** and secure them on a physical drive before the transition.
- **Phone/Voice Service**
 - For your convenience, your current telephone number will be transferred to your new Spectrum Business Voice service.
 - You will experience a phone service interruption on the cutover day until your service has migrated to Spectrum Business Voice. **During this transition, you will not have the ability to dial 911 in the event of an emergency.** Please make alternative arrangements during this time, such as making sure your cell phone is charged and available.
 - You will lose your saved voicemails. We recommend you go through your voicemail and **make a note or recording of important messages.** You will also need to rerecord your voicemail greeting after the migration to Spectrum Business services is complete.

Important Billing Changes

You will be receiving a new account number for your Spectrum Business services. Your new account number can be found in the upper left corner of your next monthly billing statement. Please keep your new account number handy for future reference and don’t forget to update your new account number with your financial institution to ensure payment processing.

Effective with your next billing statement, your new monthly rate will be:

\$44.99 for Spectrum Business Internet, \$29.99 for Spectrum Business Voice plus applicable taxes and fees.
Standard rates apply after year 1 for all services.

Other Changes to Your Service

New Security Code

- Your Security Code is necessary for privacy and is randomly generated. This appears in the upper left corner of your statement each month.

Credit Card Information

- If SEMO currently has your credit card on file, this information is no longer valid. Please watch your mail as we will be sending you a monthly statement with payment instructions.

If you have any questions about these changes or your new services, you can contact a Spectrum Business Specialist at 1-888-681-8943 24 hours a day, seven days a week. To see all that your new Spectrum Business services have to offer, please visit Business.Spectrum.com.

Please be on the lookout for additional communications as we continue to improve your service.

Sincerely,



Kathleen Griffin
VP, Marketing Communications



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The terms and conditions for the Spectrum Business Voice service to which your current telephone service will be transitioned will remain the same at the time of this change, and your rates for the Spectrum Business Voice service will be less than or equal to your current telephone service rates. Notice of any future changes in rates, terms and conditions of Spectrum Business Voice service will be provided to you as required by law.

You have the right to subscribe to telephone service from any service provider that you wish. This decision is entirely up to you, and you may choose to switch to another provider either before or after the transfer to Charter occurs. You will not be charged any fees for the transfer to Charter, and Charter will be responsible for any carrier change fees that might apply as a result of such transfer. However, selecting a provider other than Charter may result in a charge being imposed for which Charter will not be responsible.

If you have placed a preferred carrier "freeze" on your telephone services to prevent their unauthorized transfer to another service provider, FCC rules require that the freeze be lifted at the time of the transfer to Charter. At your request, Spectrum Business Voice can reestablish preferred carrier "freeze" protection for your account after the transfer; just contact us at 1-800-314-7195. If you do not have a "freeze" on your account, no action is required. Charter values your continued business and will gladly respond to any questions you may have about Spectrum Business Voice service either prior to or during the change.

Until the actual transfer date, SEMO will continue to be responsible for all customer service and billing issues. You should contact SEMO with any questions, complaints or other customer service inquiries you may have prior to the transfer. After the transfer date, you should refer your questions to Charter.

If you have any questions regarding the transfer to Charter, please contact a Spectrum Business representative at 1-800-314-7195.

Charter Fiberlink - Missouri, LLC
Charter Advanced Services (MO), LLC
SEMO Communications, Inc.