

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)))))
Telecommunications Carriers Eligible to)))))
Receive Universal Service Support)))))

WC Docket No. 09-197

**REPLY COMMENTS OF BRIGHT HOUSE NETWORKS INFORMATION SERVICES
(ALABAMA), LLC; CHARTER FIBERLINK – ALABAMA, LLC; CHARTER
FIBERLINK – TENNESSEE, LLC; TIME WARNER CABLE INFORMATION
SERVICES (ALABAMA), LLC; TIME WARNER CABLE INFORMATION SERVICES
(NEW HAMPSHIRE), LLC; AND TIME WARNER CABLE INFORMATION
SERVICES (TENNESSEE), LLC**

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EXECUTIVE SUMMARY

The petition for designation as eligible telecommunications carriers (“ETCs”) filed by Bright House Networks Information Services (Alabama), LLC; Charter Fiberlink – Alabama, LLC; Charter Fiberlink – Tennessee, LLC; Time Warner Cable Information Services (Alabama), LLC; Time Warner Cable Information Services (New Hampshire), LLC; and Time Warner Cable Information Services (Tennessee), LLC, (collectively, “Petitioners”), each wholly controlled and majority owned subsidiaries of Charter Communications, Inc. (“Charter”), shows that each petitioner satisfies all of the applicable requirements for designation as an ETC and that they are each unquestionably qualified to meet the Federal Communications Commission’s Rural Digital Opportunity Fund public interest obligations. No commenter disputes that Charter—the second largest broadband connectivity company in the country with affiliates offering broadband, cable, mobile, and voice services in 41 states to over 31 million customers, including approximately 28 million broadband customers and 10 million voice customers—has extensive experience building high-speed broadband networks and providing high quality service to consumers. Charter is more than capable of meeting the relevant ETC requirements.

The only party that submitted comments in response to Charter’s Petition, the Ensuring RDOF Integrity Coalition (“ERIC”), focuses on issues outside the scope of the petition, prognosticating without any evidence about Charter’s intentions. ERIC’s objections to the Charter petition should be dismissed as irrelevant, speculative, and, with respect to some issues, untimely. Granting Petitioners’ ETC designations so that they are eligible to receive RDOF support and move forward with their buildouts in Alabama, New Hampshire, and Tennessee is clearly in the public interest, and the Commission should grant the petition without delay.

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Bright House Networks Information Services (Alabama), LLC; Charter Fiberlink – Alabama, LLC; Charter Fiberlink – Tennessee, LLC; Time Warner Cable Information Services (Alabama), LLC; Time Warner Cable Information Services (New Hampshire), LLC; and Time Warner Cable Information Services (Tennessee), LLC, each wholly controlled and majority owned subsidiaries of Charter, hereby submit these reply comments in support of their petition for designation as ETCs pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), and Section 54.202 of the Commission’s rules.¹ Petitioners respectfully request that the Commission grant the Petition so that Charter can bring gigabit broadband service to unserved areas where it was the winning bidder in the RDOF auction.

INTRODUCTION

Charter’s Petition clearly demonstrates that Petitioners satisfy all of the applicable requirements for designation as ETCs. No commenter disputes that Charter—the second largest

¹ Petition for ETC Designation, Bright House Networks Information Services (Alabama), LLC et al., WC Docket No. 09-197 (Jan. 6, 2021) (“Petition”).

broadband connectivity company in the country with affiliates offering broadband, cable, mobile, and voice services in 41 states to over 31 million customers, including approximately 28 million broadband customers and 10 million voice customers—has extensive experience building high-speed broadband networks and providing high quality service to consumers and is capable of meeting the ETC requirements.

Charter’s network passes 53 million homes and business locations. Over the past three years, Charter has extended its network to reach an additional 2.5 million homes and small businesses, about a third in rural areas. Charter has also announced an initiative that will invest approximately \$5 billion, including the over \$1 billion in support Charter won from the Rural Digital Opportunity Fund (“RDOF”) auction, to expand Charter’s network to lower-density, mostly rural communities that do not currently have access to broadband service with speeds of at least 25/3 Mbps.²

Preparation for this buildout has already begun. Charter will add even more resources to its construction department to help with the addition of nearly 115,000 miles of new network infrastructure to its existing network of more than 750,000 miles. Toward that end, Charter expects to hire more than 2,000 employees and contractors nationwide who will join Charter’s 96,000 employees, all of whom earn at least two times the federal minimum wage today.³

Charter’s deployment in these unserved areas will offer gigabit high-speed broadband access, enabling consumers to engage in remote learning, work, telemedicine and other

² See Press Release, Charter Communications, Inc., *Charter Communications Launches New Multiyear, Multibillion-Dollar Initiative To Expand Broadband Availability To Over 1 Million New Customer Locations* (Feb. 1, 2021), <https://corporate.spectrum.com/newsroom/charter-communications-launches-new-multiyear-multibillion-dollar-initiative-to-expand-broadband-availability-to-over-1-million-new-customer-locations> (“Charter Press Release”).

³ Press Release, Charter Communications, Inc., *Charter Communications Reaches \$18 Milestone on Path to \$20 Minimum Starting Wage in 2022* (Mar. 9, 2021), <https://corporate.charter.com/newsroom/charter-communications-reaches-18-milestone-on-path-to-20-minimum-starting-wage-in-2022>.

applications that require high-bandwidth, low-latency connectivity. Charter currently offers gigabit speeds across virtually its entire network. The Commission's most recent Measuring Broadband Report highlighted that Charter is outperforming benchmarks and delivering superior services to its customers, exceeding 100% of its advertised speeds during peak times on all speeds measured: three downstream speeds and two upstream speeds.⁴ Charter also maintains 99.9% network reliability.⁵

These newly served areas also will benefit from Charter's high-value Spectrum pricing and packaging structure, including its Spectrum Mobile™, Spectrum TV, and Spectrum Voice offerings. In addition to meeting the RDOF public interest requirements, Charter will continue to apply its existing customer-friendly policies in newly served regions, including no data caps, modem fees, or annual contracts.

Charter's resilient network has performed exceptionally well during the COVID-19 crisis, with both downstream and upstream performance remaining consistent despite significantly higher demand.⁶ Charter also quickly and proudly supported the Commission's Keep Americans Connected Pledge to ensure that consumers would stay connected during a time of significant disruption.⁷ Charter went above and beyond the Commission's pledge, ensuring that

⁴ Federal Communications Commission Office of Engineering and Technology, *Tenth Measuring Broadband America Fixed Broadband Report* at 15-16 (Jan. 4, 2021), <https://data.fcc.gov/download/measuring-broadband-america/2020/2020-Fixed-Measuring-Broadband-America-Report.pdf>.

⁵ See *99.9% Network Reliability*, Spectrum, <https://www.spectrum.com/internet/network-reliability> (last visited Apr. 20, 2021).

⁶ See *How Charter is Meeting Higher Demand for Reliable Internet During COVID-19 Crisis*, Charter Communications, Inc. (Apr. 13, 2020), <https://corporate.charter.com/newsroom/chief-technology-officer-how-charter-is-meeting-higher-demand-for-reliable-internet-during-covid-19-crisis>.

⁷ See Press Release, FCC, *Chairman Pai Launches the Keep Americans Connected Pledge* (Mar. 13, 2020), <https://docs.fcc.gov/public/attachments/DOC-363033A1.pdf>.

approximately 450,000 students and teachers and their families were able to receive free internet and in-home WiFi for 60 days to help them continue schooling through remote learning.⁸

As the foregoing demonstrates, Petitioners are fully capable of delivering advanced communications services to their RDOF areas consistent with the program's public interest requirements. As subsidiaries of Charter, Petitioners will be able to apply the combined capabilities of the Charter corporate family to satisfying their RDOF obligations. Only one party, ERIC, submitted comments in response to the Petition.⁹ ERIC focuses on issues outside the scope of the Petition, prognosticating without any evidence about Charter's intentions. ERIC's objections to the Petition should be dismissed as irrelevant, speculative, and, with respect to some issues, untimely. Granting Petitioners' ETC designations so that they are eligible to receive RDOF support and move forward with their buildouts in Alabama, New Hampshire, and Tennessee is clearly in the public interest, and the Commission should grant the Petition without delay.

⁸ Press Release, Charter Communications, Inc., *Charter to Offer Free Access to Spectrum Broadband and Wi-Fi For 60 Days For New K-12 and College Student Households and More* (Mar. 13, 2020), <https://corporate.charter.com/newsroom/charter-to-offer-free-access-to-spectrum-broadband-and-wifi-for-60-days-for-new-K12-and-college-student-households-and-more>; *see also Companies Have Gone Above and Beyond the Call to Keep Americans Connected During Pandemic*, FCC (updated Jan. 25, 2021), <https://www.fcc.gov/companies-have-gone-above-and-beyond-call-keep-americans-connected-during-pandemic>.

⁹ Ensuring RDOF Integrity Coalition Comments on Petition for ETC Designation of Bright House Networks Information Services (Alabama), LLC et al., WC Docket No. 09-197 (Apr. 7, 2021) ("ERIC Comments"). Beyond the substantive deficiencies of ERIC's opposition, the Commission should take ERIC's objections with a grain of salt given the interest of its members in preventing broadband from being deployed to areas Charter won in the auction. ERIC asserts that its members include "rural broadband providers, rural Americans, and local government officials . . ." ERIC Comments at 1 n.1; *but see* Letter from Alexi Maltas, Senior Vice President & General Counsel, Competitive Carriers Association to Marlene H. Dortch, Secretary, Federal Communications Commission, AU Docket No. 20-34 et al. (Mar. 1, 2021) (clarifying that Competitive Carriers Association did not endorse or join an ERIC filing). Its Comments suggest that the purpose of its opposition to Petitioners' ETC designations is to prevent areas that Charter won in the auction from receiving RDOF support so that those areas can be preserved as unserved future markets for ERIC's members, if and when they decide to seek other subsidies to expand service there. *See* ERIC Comments at 4 (referencing "rural carriers who could have [with the benefit of larger subsidies] piggybacked off nearby facilities to extend coverage in those rural locations using existing fiber networks the rural carriers own . . .").

I. The Petition Demonstrates that Petitioners Meet All Federal Requirements for ETC Designation and Petitioners Are Unquestionably Qualified to Meet the Commission’s RDOF Public Interest Obligations.

The Petition explains how each petitioner will meet each of the statutory and regulatory requirements for ETC designation. This includes providing service as a common carrier in the relevant RDOF census blocks, offering the service supported by the federal universal service support mechanism, providing service using its own facilities and throughout the designated service areas, advertising the availability of the services and charges using media of general distribution, and meeting the additional requirements for designation.¹⁰

Charter unquestionably has the technical experience, managerial capability, and financial resources to satisfy these requirements. Charter already operates extensively in the three states where Petitioners seek ETC designations from the Commission. In Alabama, Charter has 1,078 employees and provides service to over 624,000 customers; in New Hampshire, Charter has 85 employees and provides service to 76,000 customers; and in Tennessee, Charter has 821 employees and provides service to 508,000 customers. Moreover, each petitioner operates as a certificated and authorized competitive local exchange carrier in its respective state.¹¹ Charter has

¹⁰ See Petition at 6-9.

¹¹ NTCA’s comments—which relate to the generalized need for the Commission to carefully evaluate each ETC petition to ensure, *inter alia*, that each long-form applicant is a common carrier—are not pertinent to Petitioners’ requests for ETC designation. See Comments of NTCA - The Rural Broadband Association, WC Docket No. 09-197 (Apr. 7, 2021). Each petitioner is a competitive local exchange carrier (“CLEC”) affiliate of Charter, has obtained authorization as a common carrier from the relevant state public utilities commission, and has been operating as a common carrier in Alabama, New Hampshire, and Tennessee for many years. See Telecommunications Companies, Alabama Public Service Commission, <http://psc.alabama.gov/Telecom/TelcodbsrvForm3.asp> (click “View Competitive Local Exchange Carriers” and “Submit”) (last visited Apr. 21, 2021) (listing Bright House Networks Information Services (BHN), Charter Fiberlink – Alabama, LLC, and Time Warner Cable Information Services (Alabama), LLC, as CLECs); *Petition for Authority to Provide Facilities Based Local Telecommunications Services*, Order Nisi Granting Authorization, DT 04-091, Order No. 24,356 (N.H. Pub. Utils. Comm’n July 27, 2004), <https://www.puc.nh.gov/%5C/Regulatory/Orders/2004orders/24356t.pdf> (authorizing Time Warner Cable Information Services (New Hampshire), LLC, to operate as a CLEC); *Tennessee Public Utility Commission List of Approved CLECs*, Tennessee Public Utility Commission (Feb. 25, 2021), <https://www.tn.gov/content/dam/tn/publicutility/documents/utilitydivdocs/listofapprovedclecs.pdf> (listing Charter Fiberlink – Tennessee, LLC, and Time Warner Cable Information Services (Tennessee), LLC, as CLECs). Petitioners have also filed both interconnection

a well-established history of delivering to its customers a suite of advanced communications services, including broadband internet access, video, voice, and mobile services. Charter affiliates have also operated for years as ETCs in New York and California,¹² and other affiliates were recently designated as ETCs by the Missouri Public Service Commission and the Vermont Public Utility Commission in connection with RDOF winning bids in that state.¹³

Given Charter's vast network and expertise deploying and offering broadband and voice services, there is no doubt that Petitioners meet, and are capable of satisfying, each of the statutory and regulatory criteria for ETC designation.

II. ERIC's Objections to Petitioners' ETC Designations Are Irrelevant, Speculative, and Late-Filed Attacks on the RDOF Rules.

Notwithstanding Petitioners' demonstration that they readily satisfy all requirements for ETC designation, ERIC requests that, rather than approving Petitioners' ETC designations, the Commission grant ERIC access to Petitioners' long-form applications so that ERIC can undertake

agreements and tariffs for intrastate access services, local exchange services, and/or interexchange tariffs with the relevant state public utility commissions during this time. *See Telephone Tariffs and Guides for Charter, Bright House Networks, Time Warner Cable® and Bresnan Broadband Companies*, Spectrum, <https://www.spectrum.com/policies/telephone-tariff> (last visited Apr. 15, 2021).

¹² *See Petition of Time Warner Cable Information Services (New York), LLC for Modification of Its Existing Eligible Telecommunications Carrier Designation*, Order Approving Designation as a Lifeline-Only Eligible Telecommunications Carrier, Case 12-C-0510 (N.Y. Pub. Serv. Comm'n Mar. 18, 2013), <http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={5667A04D-7CA6-43B6-A352-0927793BFE20}>; *Application of Time Warner Cable Information Services (California), LLC (U6874C) for Designation as an Eligible Telecommunications Carrier*, A.13-10-019, Decision Granting Request for Eligible Telecommunications Carrier Status, D.14-03-038 (Cal. Pub. Utils. Comm'n Mar. 27, 2014), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M089/K405/89405205.PDF>.

¹³ *See In re Joint Application of Charter Fiberlink-Missouri, LLC and Time Warner Cable Information Systems (Missouri) LLC d/b/a Time Warner Cable (TWCIS) for Designation as Eligible Telecommunications Carriers to Receive Rural Digital Opportunity Fund Action (Auction 904) Support for Voice and Broadband Services*, Order Granting Designation as an Eligible Telecommunications Carrier, File No. TA-2021-0204 (Mo. Pub. Serv. Comm'n Apr. 7, 2021), <https://www.efis.psc.mo.gov/mpsc/commoncomponents/viewdocument.asp?DocId=936346522> (designating Charter affiliates in Missouri as ETCs); *In re Petition of Charter Fiberlink VT-CCO, LLC for designation as an Eligible Telecommunications Carrier to receive Rural Digital Opportunity Fund Auction (Auction 904) support for voice and broadband services*, Order Granting Eligible Telecommunications Carrier Designation, Case No. 21-0041-PET (Vt. Pub. Util. Comm'n, Apr. 21, 2021), <https://epuc.vermont.gov/?q=downloadfile/485186/155106> (designating a Charter affiliate in Vermont as an ETC).

a fishing expedition to potentially challenge Charter's plans to satisfy the RDOF requirements. Both this demand, and the objection on which it is based, are unrelated to the Commission's ETC designation process, lack evidentiary support, and seek to untimely revisit decisions the Commission has already made about the treatment of RDOF long form applications. The Commission should not credit ERIC's inappropriate attempt to shoehorn its generalized complaints about the auction results into the ETC designation process, and should summarily reject ERIC's objections and grant the Petition.

ERIC's central claim is that Charter has committed to build its network in some RDOF areas for less support than ERIC believes is necessary for Charter "to make a business case" to fulfill its RDOF obligations,¹⁴ and therefore speculates that Charter "will not fulfill" those obligations.¹⁵ This objection is not only unsupported, it is inapposite to whether Petitioners meet the qualifications for ETC designation. The ETC designation process is intended to qualify Petitioners to receive universal service support and to confirm their ability to meet the statutory ETC requirements, which Petitioners undoubtedly do. Winning bidders' ability to satisfy the RDOF performance obligations, including the specifics of their deployment plans and financing, are already being separately evaluated by the Commission through the long-form application process; the ETC designation process is not the mechanism through which the Commission assesses those applications. The ETC designation process is a threshold requirement to obtaining any high cost or Lifeline support, and is not limited to RDOF. It is inappropriate for ERIC to attempt to redo the auction and penalize (indeed, disqualify entirely) winning bidders based on unsubstantiated speculation.

¹⁴ ERIC Comments at 3-4.

¹⁵ ERIC Comments at 4.

Over the past five years alone, Charter has invested nearly \$40 billion in infrastructure and technology. The company is well aware of the expenses of building a network in rural areas, as well as the business opportunities presented by such a build. ERIC’s related implication that Charter has not disclosed to investors the cost of the buildout is similarly lacking in support.¹⁶ Charter has already announced to the market an estimated \$5 billion initiative that will match each RDOF dollar with nearly four dollars in private investment to reach an estimated more than one million unserved American homes and businesses.¹⁷

Although ERIC makes vague references to alleged “research it has conducted, and the experiences of ERIC members” as a basis for demanding access to Petitioners’ long-form applications, ERIC identifies neither the “research” nor the “experiences” underlying its objections. Nor does ERIC offer any other support for this request.¹⁸ Whether the unnamed members of ERIC believe that they could profitably serve some areas that Charter won in the auction is irrelevant to both the Petition and Charter’s ability to do so.¹⁹

ERIC’s speculation also ignores the fact that the Commission specifically established enforcement mechanisms for the RDOF program to address potential shortfalls by an awardee in meeting its deployment obligations. To the extent ERIC believes that those measures are insufficient,²⁰ its comments are untimely. It should have raised those concerns by seeking

¹⁶ See ERIC Comments at 3-4.

¹⁷ See Charter Press Release.

¹⁸ ERIC Comments at 3.

¹⁹ See ERIC Comments at 3.

²⁰ The Commission increased by three times the maximum total base forfeiture from the CAF Phase II auction, concluding that doing so would “ensure serious participation, without being overly burdensome and punitive to defaulters.” *In re Rural Digital Opportunity Fund*, Report and Order, 35 FCC Rcd 686, 736 ¶ 117 (2020) (“*RDOF Order*”).

reconsideration of the *RDOF Order*,²¹ where the Commission already considered the enforcement regime extensively.²² If Petitioners or any RDOF support recipient fail to meet any particular public interest obligations, the Commission has ample tools at its disposal to review the specifics of any such incident and take appropriate steps to enforce its rules and impose tailored remedies.²³

Lacking any evidence to support its objections to Petitioners' ETC designations, ERIC asks the Commission for a roving authorization to look for such evidence, repeating its request that it be allowed to review Petitioners' confidential project funding description and detailed technology and system design description filed as part of their RDOF long-form applications.²⁴ This request should be denied for numerous reasons. First, as with most of ERIC's comments, this request has nothing to do with Petitioners' eligibility, *i.e.*, whether they meet the requirements to be designated as ETCs. And second, it is an untimely request to reconsider a decision the Commission made in 2020—that these components of a long-form applicant's submission will be treated as confidential by default—when the Commission rejected requests to adopt a protective order that would allow for access to long-form applications.²⁵ The opportunity for ERIC to object to that decision has long since lapsed and the Commission should not entertain ERIC's objections here.

Indeed, the sole objection ERIC raises that is even arguably relevant to Petitioners' eligibility for ETC designation is a throwaway line at the very end of its comments, which alleges

²¹ *RDOF Order*, 35 FCC Rcd at 725 ¶ 86 n.248.

²² See *RDOF Order*, 35 FCC Rcd at 713-16 ¶¶ 58-64 (non-compliance measures); *id.* at 735-36 ¶¶ 114-117 (defaults).

²³ See, e.g., *In re Total Highspeed, LLC*, Notice of Apparent Liability for Forfeiture, 34 FCC Rcd 10013 (EB 2019) (proposing a \$30,000 forfeiture against Total Highspeed, LLC for defaulting on its bid in the Connect America Fund Phase II auction).

²⁴ See Informal Request for Commission Action of Ensuring RDOF Integrity Coalition, AU Docket Nos. 20-34 et al. (Feb. 25, 2021); ERIC Comments at 4-5.

²⁵ *RDOF Order*, 35 FCC Rcd at 725 ¶ 86 n.248 (“We are not persuaded that we should allow outside parties to review confidential information in the winning bidders' applications.”).

that the Petition is inadequate because it “contains no . . . demonstration” that Petitioners “will satisfy applicable consumer protection and service quality standards.”²⁶ This meritless argument hardly deserves mention. As explained in detail above, Charter is one of the largest consumer internet service providers and voice providers in the country, with extensive experience in designing, delivering, and upgrading its services in accordance with—and in many cases going above and beyond—a host of national, state, and municipal customer service and consumer protection requirements across countless jurisdictions.

As the Petition clearly explains, “[t]he 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 services (as well as other communications services),”²⁷ and Petitioners will utilize Charter’s “significant operational, managerial, and technical expertise . . . to perform all billing, installation, customer service, and other matters”²⁸ in complying with their obligations. Petitioners also certified that they meet “all applicable requirements for designation as ETCs,” including a certification from a corporate officer that Petitioners “will meet all of the Commission’s requirements for designation as an ETC.”²⁹ This comfortably demonstrates how Petitioners will comply with Section 54.203(a)(3).

CONCLUSION

For the foregoing reasons, Petitioners respectfully request that the Commission designate Petitioners as ETCs in the RDOF Census Blocks for which Petitioners are applying for RDOF support.

²⁶ ERIC Comments at 6 (internal quotation marks omitted).

²⁷ Petition at 4.

²⁸ Petition at 4.

²⁹ Petition at 9; Petition at Decl. of Thomas E. Adams ¶ 5.

Dated: April 22, 2021

Respectfully submitted,

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