September 27, 2018

VIA ECFS

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street SW

Washington, DC 20554

**RE: *In re Modernizing the FCC Form 477 Data Program*, WC Docket No. 11-10**

**Notice of Ex Parte Presentation**

Dear Ms. Dortch:

On September 25, 2018, Christianna Barnhart and Suzanne Curtis of Charter Communications, Inc. (“Charter”) met with Steven Rosenberg, Rodger Woock, Suzanne Yelen, Ying Ke, Suzanne Mendez, John Emmett, and Kenneth Lynch from the Wireline Competition Bureau to discuss the above-referenced proceeding. On September 27, 2018, Christianna Barnhart met with Jay Schwarz in Chairman Pai’s office to discuss the same.

During the meetings, Charter representatives explained that Charter is one of the largest residential voice and cable operators in the US, with over 26 million subscribers in 41 states. Charter has also invested more than $27 billion in its infrastructure and technology since 2014, and, in 2017 alone, invested in and extended our network to additional 860,000 homes. They also explained that Charter also provides some of the fastest speeds in the country; Charter offers starting broadband speeds of 200 Mbps in approximately 40% of its footprint and 100 Mbps nearly everywhere else. Charter also offers Spectrum Internet Gig service, which delivers a 1 Gbps connection, with plans to roll out this service to virtually its entire national footprint by the end of the year. Moreover, recognizing the importance of community institutions, Charter offers 10 Gbps to business, schools, and libraries throughout its footprint.

As a major provider of broadband and voice services, Charter welcomes the Commission’s efforts to amend the Form 477 to improve its utility and reduce unnecessary reporting obligations. Accordingly, during these meetings Charter representatives suggested that the Commission consider amending the data collection to include census-block level serviceability information, which would provide consumers as well as policymakers with more specificity about the services that are available to them in a manner that does not overly burden providers. The company also suggested that the Commission switch from a semi-annual to an annual filing of the Form 477 and discontinue the collection of contractual or guaranteed throughput rates for business/enterprise/government services. Charter representatives also discussed that any new obligations that would require providers to report its deployment via sub-census block geolocation information would be extremely burdensome, and possibly cost providers hundreds of millions of dollars to implement—dollars that could be used instead for the deployment and buildout of providers’ networks.

Please contact me if you have any questions regarding these matters.

Sincerely,

/s/ *Christianna Barnhart*

Christianna Barnhart

cc: John Emmett

Ying Ke

Kenneth Lynch

Suzanne Mendez

Steven Rosenberg

Jay Schwarz

Rodger Woock

Suzanne Yelen