



DOCKET FILE COPY ORIGINAL

CITY OF SOMERVILLE, MASSACHUSETTS  
EXECUTIVE DEPARTMENT

MICHAEL E. CAPUANO  
MAYOR

RECEIVED

JAN 26 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

January 25, 1993

RECEIVED

JAN 26 1993

FCC - MAIL ROOM

BY OVERNIGHT MAIL

Donna R. Searcy  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

RE: Regulation of Cable Television Rates

Dear Ms. Searcy:

Please find enclosed one original and four (4) copies of the Comments of the Mayor of the City of Somerville, Massachusetts regarding the Notice of Proposed Rulemaking, MM Docket No. 92-266.

Very truly yours,

*Michael E. Capuano*  
Michael E. Capuano

MEC/

Enclosures (5)

cc: Paul C. Trane, Director  
Office of Communications  
Peter Epstein, Esquire

No. of Copies rec'd 0+4  
List A B C D E

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C.

10-1-92  
10-26-92  
10-27-92

In The Matter Of )  
 )  
CABLE TELEVISION )  
RATE REGULATION )

MM Docket No. 92-266

COMMENTS OF THE MAYOR  
OF THE CITY OF SOMERVILLE

The Mayor of the City of Somerville, Massachusetts (the "City"), hereby submits these comments to the Federal Communications Commission's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. The Mayor, as statutory Issuing Authority under Massachusetts General Laws Chapter 166A, has the authority and responsibility for establishing, overseeing and regulating the installation and operation of any cable communications system(s) within the City's corporate limits.

The Mayor issued a ten-year cable television renewal license to Warner Cable Communications Inc. ("Warner Cable") on August 19, 1992. The cable system serves approximately 18,000 subscribers throughout the City.

The Mayor applauds Congress for having passed the Cable Television Consumer Protection and Competition Act of 1992 (the "1992 Cable Act") last October. In its NPRM, the Federal Communications Commission (the "FCC") has clearly taken much time, effort and thought to suggest various ways to implement the 1992 Cable Act. Nothing is more important in the 1992 Cable Act to subscribers in the City of Somerville than the various rate regulatory-related provisions.

The City is home to many lower and fixed income and elderly residents who have come to depend upon the cable system for clear reception and access to programming of interest to minorities and other diverse groups. Unfortunately, many of these residents are having an increasingly difficult time paying for cable service, particularly given the frequent rate increases imposed by Warner Cable, the latest having just taken effect on January 1, 1993. Commencing in November, 1992, Warner Cable also began to include detailed line-items on its subscriber bills. While the City understands Warner Cable's legal right to include such line-items, the City disagrees with Warner Cable on a number of line-item related issues.

Finally, during the recent negotiations leading up to the renewal of its license to operate in the City, City representatives voiced concern to Warner Cable about the high rates charged subscribers for subscriber equipment, particularly the monthly charge for remote-control devices ("remotes"). For this reason, and those enumerated above, the Mayor believes that it is important for the City to file comments in this NRPM regarding i) Basic Service and higher "tier" rate regulation, ii) regulation of rates for the installation and use of subscriber equipment, iii) other rate regulation-related provisions and iv) subscriber bill line itemization.

**I) RATE REGULATION {Section 623, as amended}**

**A} Introduction**

As is the case in most cable systems in this country, Warner Cable holds a *de facto* monopoly for the provision of cable television services in the City. Many residents question why another cable television system cannot be brought into the City to provide competition to Warner Cable and, as a result, provide better, more responsive cable service at more affordable rates. Despite the fact that the previous and current cable licenses are non-

exclusive, Warner Cable nonetheless holds the only cable television license in the City. Given the reality of cable franchising in this country, Congress was striving to bring about fairness and common sense in enacting the rate regulatory provisions in the 1992 Cable Act. The Mayor supports a number of specific rate regulatory provisions discussed in the NRPM as explained below.

#### B} Effective Competition

The Mayor believes that the FCC should focus its efforts on the Effective Competition standard on the definition of "multichannel video programming distributor." The Mayor believes that such a distributor should be unaffiliated with, and completely independent of, the incumbent cable operator. The Mayor believes: i) that each multichannel video programming distributor should actually make its service available to at least fifty percent (50%) of the households in the community; ii) that "comparable programming" should correspond to video programming similar to that produced by broadcast television stations {ie-the definition of "video programming" in the Cable Communications Policy Act of 1984 (the "1984 Cable Act")}; iii) that competing multichannel video programming distributors should have to *provide* and actually *program* a minimum number of channels of video programming; and iv) that persons utilizing leased access capacity and/or public, educational and governmental ("PEG") access channels on the existing cable should **not** be deemed to be multichannel video programming distributors.

Competition is truly about choice. The fact is that Somerville cable consumers, like those throughout this country, want a choice in what company they choose to provide cable television service. To these millions and millions of cable subscribers, that choice is only available if there is another multichannel video programming distributor in the community *competing directly* against the incumbent cable television operator.

### C} Basic Service

The Mayor believes that the rate regulatory provisions of the 1992 Cable Act are crucial to the thousands and thousands of cable subscribers who increasingly have difficulty affording cable service. Ensuring a Basic Service that is affordable and available to as many residents as possible is an important goal of the Mayor.

To this end, the Mayor supports the FCC's proposed rate regulation procedures. Specifically, the Mayor believes that the certification process for municipalities should be as simple as possible: a standard form developed by the FCC is the most efficient process to follow for *both* the municipality *and* the FCC. The Mayor also believes that the FCC has the authority to grant certification to municipalities to regulate Basic Service in states that may prohibit rate regulation. This is a crucial issue for the FCC to confront directly. Because the 1992 Cable Act permits rate regulation by municipalities, states should not be able to thwart this federal directive in any manner. The FCC should specify that its certification granted to a municipality effectively allows that municipality to regulate rates pursuant to Section 623 of the 1992 Cable Act, notwithstanding any state laws or regulations to the contrary. *The rate regulatory provisions of the 1992 Cable Act, and the FCC's corresponding regulations, must preempt any and all inconsistent state and local laws.*

### D} Regulation Of Other Programming Services

Congress understood the importance of providing a mechanism for franchising authorities, subscribers and other governmental entities to file complaints with the FCC concerning rates for other programming services that are considered to be "unreasonable." While assuring that a Basic Service is available to as many residents as possible for the lowest cost, the Mayor is also concerned that rates for higher tiers of services be reasonably

priced as well. Clearly, many residents of Somerville and other communities are interested in subscribing to these expanded tiers to receive some of the satellite services such as CNN, ESPN, C-SPAN, etc. While rates for such expanded tiers will clearly be higher than the costs for Basic Service, the FCC should nonetheless ensure that cable operators do not simply raise those costs to somehow recoup for what they may perceive as Basic Service "loses." The cost of the Standard Service Tier in Somerville now costs \$20.88 per month.

The Mayor believes that, procedurally, a complaint should be served upon the FCC, the Franchising Authority and the operator, with the operator having an opportunity to respond to the complainant. At that point, the FCC would determine whether it needed to examine the complaint further. If so, the burden would then be placed upon the operator to prove that the complaint was without merit and should be dismissed by the FCC.

#### E} Regulation of Rates for Equipment, Etc.

The Mayor believes that this is one of the crucial sections of the rate regulatory provisions in the 1992 Cable Act. Cable television subscribers have been forced to rent certain equipment from the operator for many years at rates which have little, if any, relevance to their actual cost. The most striking example of this is the requirement that subscribers rent remote control devices ("remotes") from the operator on a monthly basis.

In Somerville, the *monthly* charge for renting remotes is \$3.95, which comes to \$47.40 annually. It is doubtful that remotes cost anywhere near that amount to manufacture and distribute, yet the operator steadfastly refuses to either lower the monthly charge or simply allow subscribers to purchase such remotes. Therefore, the Mayor believes that rates for remotes and converters used by subscribers to receive cable service, including installation or equipment used for expanded tiers of service, should be based on the actual costs for

supplying such equipment and/or installation. The Mayor is concerned that if the FCC "breaks-out" these equipment rates separately into those for Basic Service and those for expanded tiers, thousands of subscribers of those higher tiers will be forced to pay rates that do not correspond to actual costs. Just as millions of owners of stereo, television and other equipment benefit today as the costs of their electronic equipment decreases, so too should cable television subscribers benefit from increasingly lower cost converters, remotes, etc.

#### F} Customer Changes

Many subscribers undoubtedly either downgrade or upgrade their cable service at different times. The FCC should ensure that this process is indeed based on the actual cost of such downgrades or upgrades to the operator. The process should apply to *any* changes in service requested by the subscriber even after installation of cable service. The charges for any such downgrades or upgrades should be quite nominal, based on the actual cost, because many systems now use computers to make those changes. Several other points are relevant here as well. First, any regulations regarding changes in service promulgated by the FCC should *preempt* existing state laws or regulations on the matter. Second, if subscribers downgrade a particular service as a result of a rate increase, there should be **no** charge at all to the subscriber for a finite period of time from the effective date of the rate increase, such as thirty (30) days.

#### G} Tier Buy-Through Prohibitions

While the FCC has issued a separate NPRM regarding tier buy-through prohibitions {MM Docket No. 92-262}, the Mayor notes that these prohibitions are contained in Section 623 of the 1992 Cable Act, many provisions of which are the subject of the instant NPRM.

The Mayor strongly supports the FCC's attempts to prohibit discrimination between subscribers to different tiers of cable service. It is particularly important that cable operators do not charge *different* rates for premium and/or pay-per-view services for subscribers to expanded tiers of service beyond the Basic Service and subscribers who only take the Basic Service. The City's concern is that subscribers are not forced to pay for programming that they do not wish to view simply in order to get specific programming that they do wish to view.

#### H} Miscellaneous Rate Provisions

Finally, the Mayor has comments concerning the following rate regulation-related provisions.

First, regarding discounts for senior citizens and other "economically disadvantaged groups," the Mayor believes that the FCC should ensure that any such discounts promised to the community can be legally enforced by the franchising authority and that the operator does not make it burdensome for the elderly and other groups to verify their eligibility to receive such discounts. In Somerville, for example, while the cable operator did agree to a nominal discount for senior citizens, many of those senior citizens have called the City to complain that the operator is making it very difficult for those elderly residents to verify their eligibility, thus discouraging many of them from proceeding further to qualify for the discount. This obviously defeats the purpose of offering such a discount in the first place and the City's attempts to help its senior citizens. Additionally, the FCC must also develop an explicit definition of, and criteria for identifying, "economically disadvantaged groups" in a fair and open manner.

Second, the FCC should require that operators provide adequate financial information, *based on the system's operation in that municipality only*, to allow the municipality to administer and enforce the FCC's rate regulations in a fair and effective manner. Any such requirements should *preempt* state laws or regulations that would restrict the availability of such financial information to the municipality.

Third, the FCC should promulgate regulations requiring the operator to have a uniform rate structure throughout a regional system based upon the provision of standard cable services throughout the region. Clearly, any special costs that are specific to any one community can be reflected as a separate line-item. However, it is important for municipalities and subscribers to understand that the provision of cable services is subject to regulation and that rates for the same services will not vary from community to community.

## II) **SUBSCRIBER BILL ITEMIZATION** {Section 622, as amended}

This is an important issue, which requires a detailed response. While the 1992 Cable Act does allow cable operators to itemize franchise fees and any amounts required by the cable license or franchise to support PEG access channels, many operators, unfortunately, use the threat of such line items in an attempt to lessen contractual obligations. While the FCC cannot undo what Congress has done in Section 622(c), it can ensure that line-items, when used, are accurate and fair.

To this end, first and foremost, the FCC should promulgate regulations instructing operators exactly *how* to compute each line-item. While it may appear to be a simple matter, the reality is that many operators now compute line-items using their own formulas and cost calculations. The result is that very often neither subscribers nor the franchising authority

can understand, let alone verify the accuracy of, those line-items. For example, over what period of time can an operator depreciate assets for purposes of line-items? Can operators compute line-item amounts for items that were provided years before and have already been fully depreciated? How can a municipality verify that specific amounts are not being inappropriately line-itemed? To this end, the FCC should promulgate a set of simple and clear instructions explaining exactly how an operator can compute each line-item. A franchising authority should be authorized to challenge the accuracy of any such line-item amount to the FCC, which should have the authority to order the operator to list the accurate amount.

In addition, the FCC should ensure that the line-items are accurately captioned or described. For example, under a PEG access line-item, there should be only PEG access-related costs, not costs related to Institutional Networks, drops to public buildings, etc. {See Exhibit 1 attached hereto, the November 3, 1992 Warner Cable letter to Somerville Mayor Michael Capuano, page 2, in which Warner Cable includes I-Net costs and the costs of providing free drops and service to public buildings under the "PEG Access Fee" caption.} If the operator chooses to list such other costs, if allowable pursuant to Section 622(c), *separate* line-items for *each* should be listed.

The FCC should also define and clarify the language in Section 622(c)(3) regarding "The amount of any such fee, tax, assessment, or charge of any kind imposed by any other governmental authority on the transaction between the operator and the subscriber." What exactly does this mean? What exactly can an operator place as a line-item? For example, if a state requires free drops to public buildings, can an operator subsequently line-item such costs despite the requirement that the drops are free? {Again, see Exhibit 1 for example of this practice.} Can copyright fees paid to the Copyright Royalty Tribunal be placed on

subscriber bills as separate line-items?

Finally, while Section 622(c) discusses line-item amounts attributable to some governmental action, it does not appear to be inappropriate that the operator place line-items on its bills that more accurately detail *its* costs and expenses to subscribers. The object should be to more accurately inform the cable subscriber of *all* the component costs and expenses that comprise their bill for cable service. This sort of disclosure necessitates costs and expenses attributable to both the operator and the franchising authority being separately listed as a line-item.

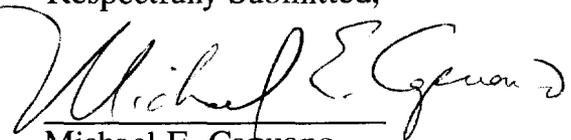
## CONCLUSION

By submitting these comments, the Mayor hopes to provide the FCC with accurate information, albeit necessarily limited in scope, regarding rate regulation on the local level. These comments are provided in a spirit of fairness and balance, in order to provide cable subscribers with fair and accurate bills and to allow franchising authorities to exercise rate regulation to protect subscribers and ensure that a Basic Service is available to subscribers at an affordable rate. As discussed herein, the Mayor believes that only a second cable television system or another multichannel video programming distributor in the community can realistically offer competition to an incumbent cable television system.

Cable regulation has evolved over the past years and will likely continue to do so. Hopefully, in the future, because of i) current efforts to increase competition to incumbent cable operators and ii) rapidly developing new technologies, subscribers, municipalities and their operators will have reached a point where regulation, if necessary at all, will be limited.

In the meantime, the Mayor believes that the FCC has made a comprehensive and effective start in its efforts to implement the rate-regulatory provisions of the 1992 Cable Act. These efforts should continue until the millions of cable television subscribers throughout this nation are guaranteed the right to receive cable service at affordable rates.

Respectfully Submitted,



Michael E. Capuano  
Mayor  
City of Somerville, MA

Dated: January 25, 1993

**EXHIBIT 1**

**NOVEMBER 3, 1992 LETTER TO MAYOR MICHAEL E. CAPUANO**

{See Attached}



**Warner Cable  
Communications Inc.**

300 Commercial St., 12 Riverview Business Park, Malden, Massachusetts 02148  
617/397-2650

Nick Leuci  
Vice President

November 3, 1992

The Honorable Michael Capuano  
Mayor, City of Somerville  
Somerville City Hall  
93 Highland Avenue  
Somerville, Ma 02143

Dear Mayor Capuano,

In accordance with Massachusetts General Law, 207 CMR, Section 10.02, and the Somerville renewal license, I would like to take this opportunity to discuss several important changes in cable services, programming and rates in the City of Somerville.

- . Billing Itemization Changes - November 12, 1992
- . New Programming - Channel Changes - December 16, 1992
- . Senior Discount - January 1, 1993
- . New Rates on Cable Programming/Services - January 1, 1993

Billing Itemization Changes - November 12, 1992

Effective November 12, 1992, below are listed the changes in the way customer statements are itemized. These changes will provide our customers with a clearer understanding of the charges associated with their cable service which is comprised of Basic Service or Basic Service and the Expanded Tier or Basic Service, the Expanded Tier and the Standard Tier. For your information, I have attached the cable bill notice sent to all of our customers called "Understanding your Cable Bill."

Basic Service consists of channels 2-17, a total of sixteen (16) channels.

\*Expanded Tier consists of channels 18-22, a total of five (5) channels.

\*Standard Tier consists of channels 23-55, excluding all premium and Pay-Per-View channels, a total of twenty-one (21) channels.

Basic Service, Expanded Tier and Standard Tier charges include costs associated with the day to day operation of the cable system. This includes the cost of the programming received from local broadcasters, superstations such as WTBS, as well as other satellite delivered programs.

\*Expanded Tier and Standard Tier must be purchased with Basic Service, they cannot be purchased separately.

\* P.E.G. Access Fee (formerly "Community Service") refers to the portion of the cable bill paid to cover the costs of public, educational and governmental access equipment grants, the institutional network, free cable service to over 300 public community, municipal locations and other access related obligations.

In September of this year, the city received a total of \$715,000.00 in access grants. These monies are to be used for video equipment purchases for public, educational and governmental access programming. This money is allocated to each customer and appears on the "P.E.G. Access" (formerly "Community Service") line item on the customer's bill.

Franchise Fees are collected by Warner and paid to the City of Somerville to partially support the Office of Communications and operate public, educational and government access programming. These fees are also paid to the Commonwealth of Massachusetts as well. Warner Cable is now required to pay the city 5% of the total amount that each customer pays for cable services each month.

The franchise fee will be equivalent to 5% of the customer's total cable bill excluding the P.E.G. Access Fee -- but including Basic Service, Expanded Tier, Standard Tier, premium services, additional outlets, remote controls, pay-per-view movies, and all other charges. This fee is located at the bottom of the itemized portion of the customer's bill, rather than listed as a component of Basic or Cable Service.

#### Programming Additions - December 16, 1992

We are pleased to announce the addition of two new program services to the Somerville channel line up:

- . **Bravo:** offers a wide assortment of award-winning, critically acclaimed American and foreign films, theater, jazz and dance, and a weekly children's showcase, all commercial-free. In many communities in Massachusetts, this service is offered as a premium service and customers actually pay \$8.00 to \$9.00 per month.

Bravo is broadcast Monday through Friday, from 8:00 pm to 5:00 am, and Saturday and Sunday, from 5:00 pm to 6:00 am on Channel 53.

- . **Viewer's Choice,** a pay-per-view service, together with our other Warner Home Theater services offers more top movies, sports exclusives and special events on Channel 41.



Channel Assignment Changes - Effective December 16, 1992

	<u>From</u>	<u>To</u>
Black Entertainment	20	18
ESPN	18	20
Home Shopping Network	39	44
The Movie Channel	44	39
Warner's North Shore Exchange	41	40
Comedy Central	42	54
*RAY (M-F; 6:00 pm-8:00 pm)	31	53
TSN (Saturday; 9:30 am-11:30 am)	31	46
 *RAY - Weekend Schedule as follows:		
Saturday; 2:00 pm - 5:00 pm	--	46
Sunday; 8:00 am - 2:00 pm	--	46

We are pleased to say that CNBC will be carried as a full time service on Channel 31 as a result of these channel assignment changes.

Senior Discount - January 1, 1993

As you are aware, we will be introducing a discount of \$1.15 per month on Standard Service, to qualified seniors effective January 1, 1993. The following is a list of the types of information Warner will require to determine eligibility for this discount:

1. Proof of age 65+ (drivers license, birth certificate, of passport)  
AND
2. Head of household (lease, deed, or tax bill)  
AND
3. Income eligibility (recipients of fuel assistance, SSI, or Medicaid).

New Rates - January 1, 1993

<u>BASIC SERVICE</u>	<u>P.E.G. Access Fee</u>	<u>Franchise Fee</u>	<u>Total</u>
OLD RATE: \$8.60	\$.80	\$.28	\$9.68
NEW RATE: \$8.60	\$.63	*	\$9.23
<hr/>			
<u>CABLE SERVICE: (INCLUDES BASIC SERVICE &amp; EXPANDED TIER)</u>	<u>P.E.G Access Fee</u>	<u>Franchise Fee</u>	<u>Total</u>
OLD RATE: \$10.29	\$.81	\$.33	\$11.43
NEW RATE: \$10.29	\$.63	*	\$10.92

(Standard Tier continued on following page)



**CABLE SERVICE:**  
 (INCLUDES BASIC SERVICE  
 EXPANDED TIER & STANDARD  
 TIER)

	<u>P.E.G</u> <u>Access Fee</u>	<u>Franchise</u> <u>Fee</u>	<u>Total</u>
OLD RATE: \$20.25	\$ .81	\$ .63	\$21.69
NEW RATE: \$20.25	\$ .63	*	\$20.88

\* Franchise Fees are calculated on 5% of the total amount each customer pays for monthly cable services and are not included in the itemization chart.

<u>Monthly Charges</u>	<u>1992 Rate</u>	<u>1/1/93 Rate</u>
TV Guide	\$2.99	\$3.15
Additional Outlet	5.25	5.50
Standard Plus without remote	3.50	3.70
Standard Plus with remote	4.50	4.75
<b>Premium Services</b>		
HBO	\$11.95	\$12.55
Showtime	10.95	11.50
Disney	9.95	10.45
Cinemax	11.95	12.55
Playboy	12.95	13.60
The Movie Channel	10.95	11.50
SportsChannel	10.95	11.50
NESN	10.95	11.50
<b>Premium Packages</b>		
2 Pay Premium	\$21.95	\$23.05
2 Pay with Sports	17.95	18.85
3 Pay Premium	30.95	32.50
3 Pay with Sports	27.95	29.35
4 Pay Premium	36.95	38.80
4 Pay with Sports	34.95	36.70
5 Pay Premium	43.95	46.15
5 Pay with Sports	41.95	44.05
6 Pay Premium	50.95	53.50
6 Pay with Sports	48.95	51.40
7 Pay Premium	57.95	60.85
7 Pay with Sports	55.95	58.75
8 Pay Premium	61.95	65.05

\*Sports = SportsChannel & NESN



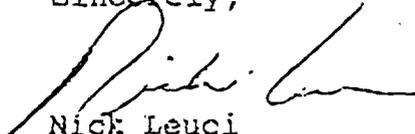
Upgrade of the Somerville Cable System

Over the next few months, we will be assembling a fiber optic link between our transmission/receiver site in Malden and Somerville. It's a change that will mean better picture quality, and fewer service interruptions for our customers. Since the signal is carried by light - not electricity - the effects of rain, electrical storms and interference are minimized.

During the Spring of 1993, we will begin construction to further upgrade the cable system, that will allow us to expand the channel line-up even more. During the upgrade period, I will provide you with monthly progress reports. Our customers will also receive detailed information about the upgrade via the mail and local newspapers

Please be advised our customers will receive the required notification regarding the new rates, services and upgrade project in addition to a new channel line up card.

Sincerely,



Nick Leuci  
Vice President  
Government & Community Relations

NL/lm

cc: John Urban, Commissioner, Mass Cable Television Commission  
Paul Trane, Director, Office of Communications

# UNDERSTANDING YOUR CABLE BILL

①  
**WARNER CABLE COMMUNICATIONS**  
 300 COMMERCIAL STREET  
 12 RIVERVIEW BUSINESS PARK  
 MALDEN, MA 02148  
 FORWARD AND ADDRESS CORRECTION

②  
 DATE DUE  
 01/10/83  
 \*\*\*\*\*  
 \* THANK YOU \*  
 \* FOR YOUR \*  
 \* PROMPT \*  
 \* PAYMENT \*  
 \*\*\*\*\*

③ AMOUNT DUE  
 XX.XX

PLEASE RETURN THIS TOP PORTION ONLY, WITH REMITTANCE TO **THANK YOU**

PLEASE INDICATE AMOUNT ENCLOSED ④

\*\*\*1 CP 3.18862.2SR\*\*CR 88  
 YOUR NAME  
 YOUR ADDRESS  
 YOUR TOWN, MA XXXXX-XXXX ⑤

\*000-10-80-A-C

⑥  
**WARNER CABLE COMMUNICATIONS**  
 \*\*WINTERHILL\*\*  
 P.O. BOX 0108  
 SOMERVILLE, MA  
 02148-0108

01948 000008 04 8 000000 04 3 02154

WARNER CABLE OF MALDEN ⑦	ACCOUNT NUMBER ⑧	BILLED FROM	BILLED TO	DATE DUE	INCLUDES PAYMENTS RECEIVED BY ⑨
	01948-XXXXXX-XX-X	01/01/83	01/31/83	01/10/83	12/17/82
12/01	⑩ BEGINNING BALANCE				***** "IMPORTANT NOTICE" ***** YOU WILL NOTICE A NEW AND IMPROVED APPEARANCE WITH THIS MONTH'S CABLE STATEMENT. PLEASE REFER TO THE ENCLOSED BILL HELPER FOR AN EXPLANATION OF OUR NEW BILL FORMAT. SHOULD YOU HAVE ANY QUESTIONS REGARDING THIS NEW AND IMPROVED FORMAT PLEASE CALL US AT 397-8400.  THANK YOU FOR PAYING YOUR CABLE BILL PROMPTLY.  FOR ACCOUNT BALANCE INFORMATION PLEASE CALL 397-8600.
12/07	⑪ PAYMENT-THANK YOU				
01/01-01/31	⑫ CABLE SERVICE INCLUDES...				
	⑬ BASIC SERVICE...				
	⑭ EXPANDED TIER				
	⑮ STANDARD TIER				
	⑯ P.E.G. ACCESS FEE...				
01/01-01/31	⑰ REMOTE CONTROL				
01/01-01/31	⑱ ADDITIONAL OUTLET				
	⑲ FRANCHISE FEE...				
01/01	BALANCE DUE				

JAN 01 THRU JAN 31, 1983

① LOCAL WARNER OFFICE ADDRESS. DO NOT MAIL REMITTANCE TO THIS ADDRESS. USE THE ADDRESS INDICATED IN ④

② FULL PAYMENT IS DUE ON THIS DATE

③ THE TOTAL AMOUNT DUE FOR SERVICE THROUGH THE PERIOD INDICATED IN ④

④ INDICATE THE AMOUNT YOU ARE REMITTING WITH THIS STATEMENT.

⑤ YOUR NAME AND ADDRESS.

⑥ REMITTANCE ADDRESS.

⑦ YOUR ACCOUNT NUMBER.

⑧ INDICATES THE PERIOD FOR WHICH YOU ARE BEING BILLED. IF THIS IS YOUR FIRST BILL, IT COVERS A PERIOD LONGER THAN ONE MONTH BECAUSE YOU ARE BEING PLACED ON A REGULAR BILLING CYCLE AND AN ADJUSTMENT PERIOD IS REQUIRED.

⑨ THIS STATEMENT INCLUDES ALL PAYMENTS RECEIVED BY THE DATE SHOWN, PAYMENTS OR CREDIT RECEIVED AFTER THIS DATE WILL APPEAR ON YOUR NEXT STATEMENT.

⑩ THE BALANCE DUE ON YOUR LAST BILL.

⑪ THE AMOUNT RECEIVED, INCLUDING FEES COLLECTED BY A WARNER REPRESENTATIVE OR INSTALLER, BY THE DATE IN ⑧

⑫ MONTHLY CHARGE FOR CABLE SERVICE, INCLUDING COSTS FOR BASIC SERVICE, TIERS, P.E.G. ACCESS FEES AND FRANCHISE FEES.

⑬ BASIC SERVICE CONSISTS OF SIXTEEN (16) CHANNELS, 2-17.

⑭ EXPANDED TIER CONSISTS OF FIVE (5) CHANNELS, 18-22.

⑮ STANDARD TIER CONSISTS OF TWENTY-ONE (21) CHANNELS, 23-44, EXCLUDING ALL PREMIUM AND PAY-PER-VIEW CHANNELS.

⑯ P.E.G. ACCESS FEE REFERS TO THE PORTION OF YOUR CABLE BILL PAID TO COVER THE COSTS OF SUPPORTING PUBLIC, EDUCATIONAL, AND GOVERNMENTAL ACCESS EQUIPMENT GRANTS, INSTITUTIONAL NETWORKS, FREE CABLE SERVICE TO PUBLIC, COMMUNITY AND MUNICIPAL LOCATIONS AND OTHER ACCESS RELATED OBLIGATIONS.

⑰ MONTHLY CHARGE FOR SERVICES RECEIVED IN ADDITION TO CABLE SERVICE.

⑱ FRANCHISE FEES ARE COLLECTED BY WARNER AND PAID TO A SPECIFIC COMMUNITY TO OFFSET THE EXPENSE OF ADMINISTERING CABLE TELEVISION OPERATIONS AND OTHER ACTIVITIES.

⑲ WATCH THIS SPACE FOR SPECIAL MESSAGES AND ANNOUNCEMENTS.