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November 14, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Re: *In the Matter of Charter Communications, Inc. Petition for Determination of Effective Competition in 32 Massachusetts Communities*, Docket No. MB 18-283; CSR 8965-E

Dear Secretary Dortch:

I am writing on behalf of Worcester Community Cable Access, Inc. (WCCA) in opposition to the above-referenced petition filed by Charter Communications, Inc. (Charter) to seek Federal Communications Commission (Commission) deregulation of basic cable service rates in Worcester, the second most populous City in Massachusetts.

It is the poorest among us who subscribe to the basic tier of service Charter seeks to deregulate. Regulation of basic service rates helps prevent large, unregulated, basic service rate hikes which take on onerous proportions when imposed on the many basic subscribers who are least able to pay, and thus basic rate regulation protects the indigent from both undue hardship and even the total loss of service. Accordingly, WCCA urges that the Commission give close and careful scrutiny to Charter's deregulation petition and give due weight to the many arguments against rate deregulation as set forth in detail in the opposition comments filed by the Massachusetts Department of Telecommunications and Cable (DTC) in the above docket. Please accept this letter as a request to grant leave, if required, for late filing of formal comments¹, or in the alternative, please accept this letter as correspondence and informal comments for the Commission's consideration.

¹ Any lateness here is minimal and for good cause as WCCA only recently learned of the Mass. DTC's recent October 25, 2018 opposition filing and the grounds therefore. Limited resources were available for filing comments and were promptly assigned to review the filing and prepare this comment letter.

WCCA supports the Massachusetts Department of Telecommunications and Cable (DTC) October 25, 2018 Comments filed in opposition to the rate deregulation petition. The Massachusetts DTC has extensive experience and recognized expertise in cable rate regulation matters. The DTC's opposition Comments provide in depth and detailed analysis of how the Worcester community in reality lacks the degree of 'effective competition to cable' warranting rate deregulation in Worcester. As explained by the Massachusetts DTC in its expert Comments, Charter points to and relies on competition from DIRECTTV NOW Service as evidence of effective competition to cable in Worcester. However, the DTC advances multiple compelling arguments to show that DIRECTTV NOW Service is not physically present or effectively offered in the service area to the extent called for under applicable regulations, according to the DTC Comments. Further, the Mass. DTC Comments make the important point that the high cost of DIRECTTV NOW (as detailed by DTC) combined with the lack of broadband in many affected households in the area result in a de facto lack of effective competition removing the very basis for the requested rate deregulation. WCCA also urges that the Commission should note that there are few if any entry level, economy packages comparable to basic service, thus we face a situation where the indigent most impacted by basic rate deregulation do not benefit from the so-called effective competition that may exist for customers purchasing higher level tiers of service.

The comments we encounter from ordinary Worcester residents support the more technical DTC arguments detailing the absence of effective competition to cable in the Worcester market. We frequently hear members of the public express concerns about the lack of real competition to cable and that experience by ordinary citizens should be given due weight as grounds for close Commission scrutiny of the Charter petition. Worcester remains a community served by only a single cable operator and the many citizens seeking cable service are therefore left with no choice of operators, and that means lack of meaningful competition. Given the fact that basic service is often purchased by residents facing severe economic challenges, we urge the Commission to give close scrutiny to this proceeding and to any petition to deregulate basic service rates.

Please be so kind as to enter these Comments in the above-captioned proceeding, or as informal comments for Commission consideration in the event that the formal docket is no longer open. As always, please do not hesitate to contact me should you require any further information about this matter. Thank you for your consideration of these comments.

Very truly yours,

Mauro DePasquale
Executive Director, WCCA

Cc: Shonda D. Green, Executive Administrator Coordinator, D.T.C.
Edward M. Augustus, Jr., City Manager, City of Worcester

Worcester City Council
Ana Lucey, Government Relations, Charter Communications, Inc.