

**REDACTED – FOR PUBLIC INSPECTION**

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

In the Matter of:

Applications of CHARTER COMMUNICATIONS,  
INC., TIME WARNER CABLE INC., and  
BRIGHT HOUSE NETWORKS, LLC for Consent To  
Assign or Transfer Control of Licenses and  
Authorizations

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WC Dkt. No. 16-197

**INDEPENDENT COMPLIANCE OFFICER'S REPORT ON CHARTER'S  
INTERCONNECTION PARTIES AND DATA FILING FOR THIRD QUARTER 2017**

**DECEMBER 12, 2017**

Hon. Barbara S. Jones (Ret.)  
BRACEWELL LLP  
1251 Avenue of the Americas  
New York, NY 10020

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### **INTRODUCTION**

The Independent Compliance Officer (“ICO”) hereby submits this report pursuant to the Settlement-Free Interconnection Condition (the “Interconnection Condition”) of the order (the “Merger Order”) issued on May 10, 2016 by the Federal Communications Commission (“FCC” or “Commission”) approving the merger of Charter Communications, Inc. (“Legacy Charter”), Time Warner Cable Inc. (“Legacy TWC”), and Advance/Newhouse Partnership (“Legacy Bright House”) (as a combined entity, “Charter” or the “Company”). This report addresses Charter’s October 13, 2017 quarterly interconnection report (the “Q3 2017 Report”). *See* Mem. Op. & Order, MB Dkt. No. 15-149, FCC 16-59, May 10, 2016; App’x B § IX(3)(e).

### **EXECUTIVE SUMMARY**

For the reasons set forth below, the ICO believes that the Q3 2017 Report complies with the terms of the Interconnection Condition.

### **OBSERVATIONS**

Charter has maintained the system for generating quarterly interconnection reports detailed in the ICO’s previous interconnection reports. As part of her monitoring duties, the ICO again interviewed Charter personnel responsible for generating the quarterly reports. The ICO’s observations and assessment of the Q3 2017 Report are set forth below.

#### **I. Description of the Q3 2017 Report**

The Q3 2017 Report includes all the information required by the Interconnection Condition. *See* App’x B § III(3)(a), (b), and (c). The counterparties corresponding to each Interconnect Exchange Point are listed on both the “Summary” and “Utilization” sheets of the Q3 2017 Report. “Aggregate link capacity between the Company and each Interconnection Party at that Interconnect Exchange Point” is listed next to the name of each Interconnection

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Party on the Summary sheet. The Summary sheet also provides the aggregate traffic exchanged in each direction (upstream and downstream), measured by the 95th percentile method. Finally, the Utilization sheet displays the percentage of time within the reporting period that each port was over 75% capacity in the dominant direction.

**II. Assessment of the Q3 2017 Report**

**A. Reliability of the Process**

The ICO remains confident in the process used to generate the Q3 2017 Report. First, as set forth in prior ICO reports, the data and software program used to generate the Q3 2017 Report is the same data and software the Circuit Operations Group uses every day to monitor the Company's networks. The accuracy of such data is necessary for Charter to properly maintain and manage the health of its network. Second, **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

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**B. The Data**

**[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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<sup>1</sup> **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

[END HIGHLY CONFIDENTIAL INFORMATION]

RECOMMENDATIONS

The ICO recommends that with each quarterly interconnection report, Charter provide the ICO with a list of any anomalies or variances of which Charter became aware and corrected as part of its quality control process.