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LATHAM & WATKINS LLP

September 25, 2014

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Supplemental Response of Time Warner Cable Inc. to the Commission's Information and Data Request, *Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Transfer Control of Licenses and Authorizations*, MB Docket No. 14-57

REDACTED FOR PUBLIC INSPECTION

Dear Ms. Dortch,

Time Warner Cable Inc. ("TWC" or the "Company") hereby submits its third supplement to its response filed on September 11, 2014, to the Commission's Information and Data Request, dated August 21, 2014 (the "Request"). Pursuant to the Joint Protective Order,¹ the contents of this supplemental response have been redacted for public inspection. A Highly Confidential version of this document production is being filed simultaneously under separate cover and will be made available for inspection pursuant to the terms of the Protective Order.

In addition, TWC hereby provides a supplement to its previously submitted Exhibit 71-1. While the data previously provided by Company for Exhibit 71-1 remains accurate, the previous submission lacked the data requested by the Commission regarding the Internet Protocol version applicable to each interconnection. TWC does not maintain historical records of the IP version used. However, Exhibit 71-1a attached here provides a current snapshot of the peering partners for which IPv6 is used.

¹ *Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-57, Joint Protective Order, 29 FCC Rcd. 2688 (Apr. 4, 2014).



TWC has made diligent efforts to ensure that none of the documents it is submitting herewith are privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. TWC requests that any privileged documents inadvertently produced be returned to TWC as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ Matthew A. Brill

Matthew A. Brill
of LATHAM & WATKINS LLP
Counsel for Time Warner Cable Inc.

Attachments

cc: Hillary Burchuk

**THIRD SUPPLEMENTAL RESPONSE OF TIME WARNER CABLE INC.
TO THE INFORMATION AND DATA REQUEST ISSUED TO
TIME WARNER CABLE INC. ON AUGUST 21, 2014 BY THE
FEDERAL COMMUNICATIONS COMMISSION**

SPECIFICATION 21(c)

For each non-broadcast programming network identified in response to Request 20, state separately, and produce in CSV or Excel format, for each month from January, 2009, to the present:

(c) the average gross advertising revenue per subscriber and the average net advertising revenue per subscriber and an explanation of how these values were calculated;

Response to Specification 21(c):

See Exhibit 21-2.

SPECIFICATION 48

Provide a list of each PEG channel on the cable systems to be acquired pursuant to the proposed TWC transaction and proposed divestiture transactions, and the tier(s) (including analog and digital tiers) on which each of those channels appears. Identify, by cable system being acquired, any PEG programming carried on Video on Demand or an online platform.

Response to Specification 48:

See Exhibit 48.

SPECIFICATION 71

Provide the Company's data as specified in Attachment A, which seeks data relating: to active and potential business service addresses; internet traffic exchange and interconnection; subscriber and plan data; daily data on the capacity and use of IP points of presence; and, for Comcast, Charter and SpinCo after the consummation of the proposed divestiture transactions, monthly data for cable service on subscribers and locations served.

Response to Specification 71:

See Exhibits 71-2 and 71-3.

Exhibit 71-2 responds to the Commission's request provided as spreadsheet "CTWC Cable Services."

Exhibit 71-2 provides data from June 30, 2013, January 1, 2014, and June 30, 2014. TWC is unable to provide any historical data beyond this point.

Please note that there is a discrepancy between the figures provided on the "nationwide" tab and the sum of the figures provided by census block. In order to provide the requested data on a census block basis, TWC's service locations must be geocoded. Some of TWC's service locations are unable to be geocoded and cannot be properly plotted to a specific location. As a result, in some instances, particularly where TWC only serves a small portion of a census block, many locations may be reported which are not geocoded to a location within TWC's serviceable area. In some instances, these locations could be corrected and included in the figures.

However, where insufficient information was available, these locations were dropped from the counts. By contrast, the nationwide data provided is based on a separate data source within TWC, from which similar adjustments were not made. In addition, please note that locations were assumed to be residential or non-residential based on the dwelling type (and not the service that is provided).

In the data provided on residential Internet access services, the number of residential subscribers could not be broken down by the different bandwidth services offered in each census block. Therefore, each bandwidth tier sold within each census block reflects the total number of residential subscribers subscribing to any level of Internet access service within that census block.

Exhibit 71-3 responds to the Commission's request provided as spreadsheet "TWC Subscriber."

Due to the extremely large number of service plans that TWC maintains for customers receiving service pursuant to legacy promotions, TWC has categorized all customers into the approximately 200 possible service combinations offered by the Company. TWC does not maintain records of the number of video channels by zip code, and thus is unable to provide this information (identified as column F in the Plan Data template provided by the Commission). In addition, in response to the Commission's request for the acquisition cost in column AJ, TWC has provided a nationwide subscriber acquisition cost finance metric that is calculated on a quarterly basis.

Exhibit 21-2

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Exhibit 48

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Exhibit 71-1a

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Exhibit 71-2

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Exhibit 71-3

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