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**LATHAM & WATKINS** LLP

February 5, 2015

**VIA ECFS**

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

**Re: *Applications of Comcast Corp., Time Warner Cable Inc., Charter Communications, Inc., and SpinCo for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-57***

**REDACTED – FOR PUBLIC INSPECTION**

Dear Ms. Dortch,

Time Warner Cable Inc. (“TWC”) hereby submits its response to the Commission’s Second Information and Data Request, dated January 15, 2015 (the “Request”).

Pursuant to the Second Amended Modified Joint Protective Order (the “Protective Order”),<sup>1</sup> TWC hereby submits for public inspection the attached redacted responses. One copy of the Highly Confidential version of this filing, which also contains Video Programming Confidential Information (“VPCI”), has been filed simultaneously via hand delivery. The Highly Confidential version of this filing, excepting VPCI, will be made available for inspection pursuant to the terms of the Protective Order.

Pursuant to the Request’s instructions, TWC also submits one copy of each of its Highly Confidential and VPCI documents via hand delivery to the Commission, with copies being provided to the Commission’s document contractor. The Highly Confidential documents will be made available for inspection pursuant to the terms of the Protective Order.

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<sup>1</sup> *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, Second Amended Modified Joint Protective Order, DA 14-1639 (rel. Nov. 12, 2014).*

The narrative answers and data submissions respond to the Request as clarified by previously disclosed discussions between representatives of TWC and Commission. Based on these discussions, Commission staff and TWC agreed to certain modifications and understandings of the Requests and accompanying Instructions, subject to the Commission's ability to request additional information as it may deem necessary. These modifications and understandings are reflected in the pertinent responses and include the following:

- Specifications 78, 80, and 88 have been modified to reflect that TWC will not provide the requested bates number references; and
- Specification 80 has been limited to the following programmers: CBS, Disney, Discovery, Viacom, Fox, Time Warner Inc., NBCUniversal, Scripps, AETN, and AMC.

In addition to the above modifications, TWC will be supplementing its response to the Commission's request in Specification 87. The requested Form 477 data is due to the Commission on March 1<sup>2</sup> and TWC is still completing its response. TWC will submit this response as soon as possible.

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

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<sup>2</sup> 47 CFR § 1.7002.



**Time Warner Cable Inc.**

**RESPONSE TO THE INFORMATION AND DATA REQUEST ISSUED TO  
TIME WARNER CABLE INC. ON JANUARY 15, 2015 BY THE  
FEDERAL COMMUNICATIONS COMMISSION**

**February 5, 2015**

**NARRATIVE RESPONSE**

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**INTERROGATORIES AND RESPONSES**

**SPECIFICATION 76:**

**For each zip code identified in response to Specification 2(e) of the Information and Data Request issued to the Company on August 21, 2014, and for the Company as a whole, separately for primary residential subscribers, bulk residential subscribers and commercial subscribers, and as of the end of each month from January, 2011, through June, 2014, state and produce in CSV or Excel format:**

**(a) the number of subscribers to Standalone Services and Bundled Services that discontinued their subscriptions to all of the Company's Cable Services during the month, identifying the following possible reasons for disconnection: voluntary, mover, non-payment, and other, and provide a description of the types of disconnections included in each category;**

**(b) the number of the Company's subscribers that discontinued their subscriptions to the Company's MVPD Service during the month but subscribed to one or more of the Company's other Cable Services as of the end of the month;**

**(c) the number of the Company's subscribers that discontinued their subscriptions to the Company's Internet Access Service during the month but subscribed to one or more of the Company's other Cable Services as of the end of the month;**

**(d) the number of the Company's subscribers that discontinued their subscriptions to the Company's Telephone Services during the month but subscribed to one or more of the Company's other Cable Services as of the end of the month;**

**(e) the number of the Company's subscribers that began a subscription to the Company's MVPD Service during the month and subscribed to at least one of the Company's other Cable Services at the end of the previous month;**

**(f) the number of the Company's subscribers that began a subscription to the Company's Internet Access Service during the month and subscribed to at least one of the Company's other Cable Services at the end of the previous month;**

**(g) the number of the Company's subscribers that began a subscription to the Company's Telephone Services during the month and subscribed to at least one of the Company's other Cable Services at the end of the previous month; (h) the number of the Company's current subscribers who first began subscribing to any of the Company's other standalone services or bundled services in the specified month;**

- (h) the number of subscribers to the Company's Internet Access service that switched to a Service Plan offering a higher download speed during the month (excluding automatic upgrades provided by the Company at no additional cost to the subscriber);**
- (i) the number of subscribers to the Company's Internet Access service whose download speed was increased during the month as a result of an automatic upgrade by the Company provided at no additional cost to the subscriber;**
- (j) the number of subscribers to the Company's Internet Access service whose download speed was increased during the month as a result of a request by the subscriber;**
- (k) the number of subscribers to the Company's Internet Access Service that switched to a Service Plan offering a lower download speed during the month;**
- (l) the number of subscribers to the Company's MVPD Service that switched to a Service Plan with more channels during the month;**
- (m) the number of subscribers to the Company's MVPD Service that switched to a Service Plan with fewer channels during the month;**
- (n) the number of subscribers to the Company's Telephone Services that switched to a Service Plan with more features during the month; and**
- (o) the number of subscribers to the Company's Telephone Service that switched to a Service Plan with fewer features during the month.**

**Response to Specification 76(a):**

*See Exhibit 76-1 for residential and bulk residential customers.*

*See Exhibit 76-2 for commercial customers.*

**Response to Specification 76(b):**

*See Exhibit 76-1 for residential and bulk residential customers.*

*See Exhibit 76-2 for commercial customers.*

**Response to Specification 76(c):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(d):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(e):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(f):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(g):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(h):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(i):**

*See* Exhibit 76-3 for residential and bulk residential customers.

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**Response to Specification 76(j):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(k):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(l):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(m):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(n):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**Response to Specification 76(o):**

*See* Exhibit 76-1 for residential and bulk residential customers.

*See* Exhibit 76-2 for commercial customers.

**SPECIFICATION 77:**

**As of December 31, 2014, and for each DMA, state and produce in CSV or Excel format:**

- (a) the number of subscribers to the Company's MVPD service;**
- (b) the number of the Company's subscribers who will become subscribers of Comcast's, Spinco's, and Charter's MVPD service, stated as if the proposed TWC transaction and the proposed divestiture transactions had been consummated as of December 31, 2014;**
- (c) the number of TV households, citing the source of this information and explaining how this number was calculated;**
- (d) the number of Hispanic TV households, citing the source of this information and explaining how this number was calculated;**
- (e) the number of Hispanic households that subscribe to MVPD service, citing the source of this information and explaining how this number was calculated;**
- (f) the number of Hispanic households that subscribe to the Company's MVPD service; and**
- (g) the number of the Company's Hispanic households who will become subscribers of Comcast's, Charter's and SpinCo's MVPD service, stated as if the proposed TWC transaction and the proposed divestiture transactions had been consummated as of December 31, 2014.**

**In the event that as a result of the proposed divestiture transactions, the assets, Hispanic households and the Hispanic subscribers in a single DMA will be divided between Comcast, Charter and SpinCo, for subparts (b) and (g), allocate the subscribers and Hispanic households to the receiving applicant, and provide an explanation of the methodology used to make the allocation.**

**Response to Specification 77(a):**

*See Exhibit 77-1.*

**Response to Specification 77(b):**

*See Exhibit 77-1.*

**Response to Specification 77(c):**

*See Exhibit 77-2.*

**Response to Specification 77(d):**

*See Exhibit 77-3.*

**Response to Specification 77(e):**

*See Exhibit 77-3.*

**Response to Specification 77(f):**

*See Exhibit 77-1.*

**Response to Specification 77(g):**

*See Exhibit 77-1.*

## **SPECIFICATION 78**

**For each non-broadcast programming network owned by, operated by, managed by, or attributed to the Company, for each of the twenty-five largest MVPDs measured by subscribers, state separately, and produce in CSV or Excel format, for each month from January 2009 to the present, the identity of any MVPD that carries the network, and for each MVPD state the title, date and bates number of the agreement containing the provisions describing the licensing fees that are imposed on the MVPD, and the date the licensing fee provisions became effective.**

### **Response to Specification 78:**

*See Exhibit 78-1.*

**SPECIFICATION 79:**

**For each non-broadcast programming network owned by, operated by, managed by, or attributed to the Company, for each OVD, including but not limited to Apple Inc., Amazon.com, Inc., Google Inc., Netflix, Inc., Hulu, LLC, and the Company, that publishes, sells or distributes, in whole or part, content produced or distributed by the non-broadcast programming network, for each month from January, 2009, to the present, state separately, and produce in CSV or Excel format, the identity of each OVD, and for each OVD, (a) the total fees paid each month by the OVD to the Company for the right to distribute such programming, and (b) the title, date and bates number of the agreement containing the provisions describing the licensing fees that are requested in subpart (a) of this Specification, and the date the licensing fee provisions became effective.**

**Response to Specification 79:**

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**SPECIFICATION 80:**

**For each channel of Video Programming that the Company obtained from another Person, separately for each month from January, 2009, to June, 2014, and for the Company as a whole state:**

- (a) the name and genre of each channel of Video Programming the Company obtained;**
- (b) the number of the Company's subscribers whose MVPD programming packages include each such channel;**
- (c) the total and per subscriber fee paid by the Company for each such channel; and**
- (d) the title, date and bates number of the agreement containing the provisions describing the fees that are requested in subpart (c) of this Specification, and the date that the fees became effective.**

**Response to Specification 80(a):**

*See Exhibit 80-1.*

**Response to Specification 80(b):**

*See Exhibit 80-1.*

**Response to Specification 80(c):**

*See Exhibit 80-1.*

**Response to Specification 80(d):**

*See Exhibit 80-1.*

**SPECIFICATION 81:**

**With respect to Canoe Ventures, LLC (“Canoe”), provide:**

- (a) a description of all ownership, voting, or management interests in Canoe, and the parties that hold these interests;**
- (b) a description of the services, products, roles and functions of Canoe with respect to dynamically inserted advertising;**
- (c) a list of Canoe’s twenty largest customers measured by its annual revenues billed to the customer;**
- (d) an estimation of Canoe’s market share of dynamic advertising insertion as of December 31, 2014;**
- (e) the percent of advertising time allocated to the Company by CBS Corporation, Disney, Discovery, Viacom, Fox, Univision, Time Warner, NBCU, Scripps, A&E, AMC, BBC, Crown Media, that was inserted into the Company’s VOD service by Canoe in 2012, 2013, and 2014;**
- (f) the percent of advertising time allocated for sale by CBS Corporation, Disney, Discovery, Viacom, Fox, Univision, Time Warner, NBCU, Scripps, A&E, AMC, BBC, Crown Media, that was inserted into the Company’s VOD service by Canoe in 2012, 2013, and 2014;**
- (g) a description of any alternatives to the products and services provided by Canoe that were offered or made available to Persons that wish to dynamically insert advertising into the Company’s VOD service;**
- (h) the quarterly revenues received by the Company from Canoe since January 1, 2009; and**
- (i) one copy of the original agreement governing Canoe Ventures, LLC, and any updates, supplements or appendices thereto.**

**Response to Specification 81(a):**

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Equity ownership is derived from the capital contribution made by each of the four entities holding interest in Canoe. Each member appoints one representative to Canoe's Board of Managers and each representative has a single vote, regardless of ownership.

**Response to Specification 81(b):**

Canoe is an advertising technology company that provides a software-based advanced advertising service to national television programming networks who wish to dynamically insert advertising into their Video-on-Demand (VOD) programs that they make available on the VOD platforms of multiple different cable operators on a national basis. Canoe accepts VOD DAI placement orders from multiple programmers and sends electronic instructions to each participating cable operator's VOD platform. The cable operators independently determine the available ad locations on that network and perform the actual insertion of the ad(s) depending on the VOD programs being ordered by subscribers. After the subscriber chooses a program and the program and the ad play out, each cable operator VOD platform automatically sends its ad insertion results to Canoe, and Canoe creates a consolidated "campaign performance report" for the programmer to verify the total number of actual ad insertions in the programmer's VOD content across the multiple participating cable operators. {{

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**Response to Specification 81(c):**

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**Response to Specification 81(d):**

In 2014, the approximately six billion cable VOD ads placed through Canoe accounted for less than two percent of all ads inserted into digital media. Canoe {{

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**Response to Specification 81(e):**

Allocations of advertising time are determined through independent carriage agreements between programmers and MSOs. As described in response to Specification 81(b), Canoe does not insert ads onto services for the MSOs that participate in Canoe, leaving each MSO to insert onto the services themselves. None of the advertising time allocated to TWC by these programmers was inserted into TWC's VOD service by Canoe.

**Response to Specification 81(f):**

Canoe sends ad placement orders on behalf of programmers to TWC and TWC performs the DAI function for its own VOD service. None of the advertising time allocated for sale by TWC by these programmers was inserted into TWC's VOD service by Canoe.

**Response to Specification 81(g):**

Advertisers who wish to buy VOD DAI placements inside of national programming may purchase directly from Time Warner Cable Media. These placements would be fulfilled using local inventory made available to TWC through predefined markers within the VOD assets and would run only in TWC's footprint (as opposed to placements ordered through Canoe, which would run across the footprints of all participating cable operators). These local avails can be fulfilled at the market level depending on available viewer sessions for each programming offering.

**Response to Specification 81(h):**

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**Response to Specification 81(i):**

*See* Bates numbers TWC-FCC-00315800 to TWC-FCC-00315843.

**SPECIFICATION 82:**

**Produce all documents relating to guidance, instruction and scripts provided to the Company's customer service representatives, during the period beginning April, 2013, and ending April 2014, to assist these representatives in responding to inquiries and complaints from the Company's Internet Access Service subscribers concerning the quality of any OVD service or Online Video Programming viewed using the Company's Internet Access Service. Include in your production any instructions relating to offers to make to subscribers who expressed an intent to discontinue their subscription to the Company's Internet Access Service, and data on sales, to subscribers who expressed their intent to discontinue their Internet Access Service subscription because of concerns about the viewing experience of any OVD service, of (a) the Company's subscription VOD service, and (b) Internet Access Service at both higher and lower download speeds.**

**Response to Specification 82:**

TWC has provided non-privileged documents responsive to this specification in its documentary response.

**SPECIFICATION 83:**

**For the period beginning April, 2013, and ending April, 2014, provide all documents summarizing and categorizing any complaints made to the Company by the Company's Internet Access Service subscribers relating to the quality of any Online Video Programming or OVD service viewed using the Company's Internet Access Service, including but not limited to the number of complaints and the type or name of service that was the subject of the complaints. For calls expressing concerns about the subscriber's experiences viewing Video Programming provided by Netflix , Inc., produce all documents containing the resolution of such calls, including but not limited to summaries of any changes to any of the components of the subscriber's Cable Services and subscription VOD service.**

**Response to Specification 83:**

TWC has provided non-privileged documents responsive to this specification in its documentary response.

**SPECIFICATION 84:**

**Submit all documents analyzing CBS All Access service, DISH's Sling TV service, HBO's video streaming service announced on or about October 15, 2014, and Sony Entertainment Network's forthcoming OVD service.**

**Response to Specification 84:**

TWC has provided non-privileged documents responsive to this specification in its documentary response.

**SPECIFICATION 85:**

**Produce the Company's most recently adopted TWC MAXX Plan relating to the rollout of Internet Access Service with higher download speeds.**

**Response to Specification 85:**

*See* Bates numbers TWC-FCC-00315847 to TWC-FCC-00315855.

**SPECIFICATION 86:**

**Produce the Company's most recently adopted Plan relating to the deployment of DOCSIS 3.1.**

**Response to Specification 86:**

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**SPECIFICATION 87:**

**(a) Submit one copy of the Company's 477 data filing for June 2014 and December 2014.**

**(b) Submit one copy of the Company's June 2014 and December 2014 State Broadband Initiative data.**

**Response to Specification 87(a):**

*See Exhibits 87-1 and 87-2. TWC submits its 477 data filings for December 2013 and June 2014. TWC will submit its data filing for December 2014 when it becomes available.*

**Response to Specification 87(b):**

*See Exhibits 87-3 and 87-4. TWC submits its SBI data filings for December 2013 and June 2014. TWC will submit its data filing for December 2014 when it becomes available.*

**SPECIFICATION 88:**

**(a) For each agreement through which the Company acquires Video Programming currently in effect between the Company and CBS Corporation, The Walt Disney Company, Discovery Communications, Inc., Viacom, Inc., 21st Century Fox, Inc., Univision Communications Inc., Time Warner Inc., NBC Universal, Inc., Scripps Interactive Networks, Inc., A&E Television Networks, LLC, AMC Networks Inc., BBC Worldwide Americas Inc., Crown Media Holdings, Inc., Hubbard Broadcasting Inc., and the Tennis Channel, Inc., identify, by Bates number and contract term section number, paragraph, or other identifying information, and describe the effect of (i) all alternative distribution method clauses, windowing clauses or “Most Favored Nation” clauses that, if the clause became effective, would grant the Company rights to distribute the Video Programming over the internet or on a Video-On- Demand basis, or (ii) all alternative distribution method clauses, windowing clauses or unconditional “Most Favored Nation” clauses that, if the clause became effective, would require the Company to be treated in a different or more favorable manner than a similarly situated MVPD or OVD with respect to economic or non-economic terms. Provide this information in a Microsoft Office chart or spreadsheet form that allows comparison of terms among the named entities.**

**(b) Identify and describe each instance where a Person expressed concerns to the Company relating to its inability to offer or difficulty reaching an agreement to license its Video Programming to a third party as a result of the terms identified in response to subpart (a) of this Specification, including but not limited to claims that the provisions identified in subpart (a) would result in different or less favorable economic or non-economic terms between the Person and the Company, and provide all documents relating to these concerns.**

**Response to Specification 88(a):**

(i) *See* Exhibit 88-1.

(ii) {{

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**Response to Specification 88(b):**

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TWC has provided non-privileged documents responsive to this specification in its documentary response.

**SPECIFICATION 89:**

**Describe the Company's current and future Plans to enter term contracts with subscribers or impose early termination fees in connection with Cable Services, whether sold as Bundled Services or Standalone Services, including:**

**(a) a description of all contract and early termination fee test or pilot programs conducted by the Company;**

**(b) a description of the results and findings of these test or pilot programs, including any increase in contract adoption by customers in test or pilot program areas versus those not in such areas;**

**(c) a description of any future term contract or early termination fee test or pilot programs; and**

**(d) a description of any planned Company-wide initiatives to use contracts or early termination fees.**

**Response to Specification 89(a):**

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**Response to Specification 89(b):**

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**Response to Specification 89(c):**

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**Response to Specification 89(d):**

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**SPECIFICATION 90-A:**

**Describe and produce all documents relating to a) any practices and initiatives in which the Company contacted its Internet Access Service subscribers relating to the subscriber's volume of usage of the Company's Internet Access Service, b) any actions taken as a result of the subscriber's excessive consumption of the Company's Internet Access Service, and c) how the practice described in subpart a) impacted the subscriber's usage of the Company's Internet Access Service. In your description, indicate the threshold or amount of bandwidth usage or consumption that triggers this contact.**

**Response to Specification 90-A:**

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**SPECIFICATION 90-B:**

For each zip code identified in response to Request 2(e) of the Information and Data Request issued to the Company on August 21, 2014, from January, 2013, through December, 2016, state and produce in CSV or Excel format:

(a) the date or current plan of record date of TWC MAXX deployment; and

(b) the Internet Access Service download and upload speeds that are or will be available in the zip code after TWC MAXX deployment.

**Response to Specification 90-B(a):**

See Exhibit 90-B-1.

**Response to Specification 90-B(b):**

In every zip code that receives TWC MAXX service, the download and upload speeds will be:

| <b>Current Plan</b> | <b>Current Speeds<br/>(up to)</b> | <b>New Speeds<br/>(up to)</b> | <b>Plan Name</b>   |
|---------------------|-----------------------------------|-------------------------------|--------------------|
| Everyday Low Price  | 2/1 Mbps                          | 3/1 Mbps                      | Everyday Low Price |
| Basic               | 3/1 Mbps                          | 10/1 Mbps                     | Basic              |
| Standard            | 15/1 Mbps                         | 50/5 Mbps                     | Extreme            |
| Turbo               | 20/2 Mbps                         | 100/10 Mbps                   | Ultimate 100       |
| Extreme             | 30/5 Mbps                         | 200/20 Mbps                   | Ultimate 200       |
| Ultimate*           | 100/5 Mbps                        | 300/20 Mbps                   | Ultimate 300       |

\*Ultimate tier has varying current speed starting points ranging from 50 to 75 Mbps.

**SPECIFICATION 91:**

**For each zip code identified in response to Specification 2(e) of the Information and Data Request issued to the Company on August 21, 2014, and for the Company as a whole, separately for primary residential subscribers, bulk residential subscribers and commercial subscribers, and as of the end of each month from January, 2013, through December, 2014, state and produce in CSV or Excel format:**

- (a) for each zip code, the Service Plan names of all Internet Access Service plans offered;**
- (b) the number of subscribers to each Service Plan for Internet Access Service;**
- (c) the download and upload speeds and any other service characteristics of each Service Plan for Internet Access Service; and**
- (d) the promotional, non-promotional and equipment prices for each Service Plan for Internet Access Service when purchased as a Standalone Service or as a Bundled Service.**

**Response to Specification 91(a):**

*See Exhibits 99-1 and 99-2.*

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**Response to Specification 91(b):**

*See* Exhibits 99-1 and 99-2. The following column addresses this specification:

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**Response to Specification 91(c):**

*See* Exhibit 99-1. Exhibit 99-2 provides additional information about the data sets included in Exhibit 99-1.

The following column in Exhibit 99-1 addresses this specification:

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**Response to Specification 91(d):**

*See* Exhibit 91-1.

**SPECIFICATION 92:**

**Produce one copy of all current reports and any other current third party report, such as Squad's SpotCosts, containing cable spot advertising rates by DMA, regularly used by the Company.**

**Response to Specification 92:**

Squad SpotCost reports do not cover cable spot advertising rates and TWC is aware of no other third party reports that would do so. TWC has no documents responsive to this request.

**SPECIFICATION 93:**

**Produce the [BEGIN HIGHLY CONFIDENTIAL INFORMATION] “price sensitivity analysis” [END HIGHLY CONFIDENTIAL INFORMATION] referred to in TWC-DOJ-00022126.**

**Response to Specification 93:**

*See* Bates numbers TWC-FCC-00315227 to 00315295.

**SPECIFICATION 94:**

**Describe and produce all documents relating to the Company's policies, processes and procedures for internet modem lease fees charged to subscribers, including but not limited to: a) the fee increase that was implemented in January 2015, and b) plans for further fee changes.**

**Response to Specification 94:**

TWC has provided non-privileged documents responsive to this specification in its documentary response.

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**SPECIFICATION 95:**

**Separately for TWC Sports Net and TWC Sports Net LA, as of June 30, 2014, identify each MVPD that provides MVPD Service to at least one household in the in-market region of the RSN, and for each MVPD identified, state the number of subscribers to the MVPD that are located in the in-market region of the RSN.**

**Response to Specification 95:**

*See Exhibit 95-1.*

**SPECIFICATION 96:**

**Update all of the fields contained in the “Interconnection ” table, submitted in response to the August 21, 2014 Information and Data Request, to include data up to December 31st, 2014. Additionally, add a field that provides, for each month for the period beginning January, 2009, and ending December, 2014, a measure of the 95th percentile of utilization that either was or would be used for the purposes of billing and explain how this 95th percentile measurement is calculated.**

**Response to Specification 96:**

*See Exhibits 96-1a, 96-1b, 96-1c, 96-1d, 96-1e, and 96-1f.*

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Exhibit 96-2 identifies the method of measuring utilization that is used with each of the customers identified in Exhibit 96-1.

**SPECIFICATION 97:**

**For each zip code identified in response to Specification 2(e) of the Information and Data Request issued to the Company on August 21, 2014, and for the Company as a whole, for residential Internet Access Service subscribers, for each month from January, 2012, through December, 2014, state and produce in CSV or Excel format:**

- (a) the number of residential Internet Access Service subscribers;**
- (b) the average data usage per Internet Access Service subscriber in gigabytes;**
- (c) the following percentiles of data usage per Internet Access Service subscriber in gigabytes: 10th, 25th, 50th, 75th, 90th, 95th and 99th.**

**Response to Specification 97(a):**

*See Exhibit 97-1. TWC maintains 13 months of modem usage data (including the current month) and has presented data from January 2014 through December 2014.*

**Response to Specification 97(b):**

*See Exhibit 97-1. TWC maintains 13 months of modem usage data (including the current month) and has presented data from January 2014 through December 2014.*

**Response to Specification 97(c):**

*See Exhibit 97-1. TWC maintains 13 months of modem usage data (including the current month) and has presented data from January 2014 through December 2014.*

**SPECIFICATION 98:**

**Provide a complete copy of all Paid Peering service invoices in an electronic database and PDF format for Paid Peering services provided from December 31, 2012, through December 31, 2014.**

**Response to Specification 98:**

*See Exhibit 98-1 and Bates numbers TWC-FCC-00315047 to TWC-FCC-00315226.*

**SPECIFICATION 99:**

**(a) Provide a complete description of all services that were included in the Company's response to the "Average Recurring Service Plan Revenue" field in the "Service Plan" table, submitted in response to the August 21, 2014 Information and Data Request.**

**(b) Provide an amendment to the Company's previous "Service Plan" table response so that this table includes the data requested by the following three additional categories:**

**(i) further disaggregation of each ARSPR field into amounts billed for each such service identified in the ARSPR description provided in response to this Specification;**

**(ii) the number of subscribers on each Service Plan that subscribe to each such service using the same subscriber tenure categories; and**

**(iii) for each Service Plan, in each month and zip code, a field that calculates the average promotional discount credit from the Service Plan's rate card price for subscribers in each tenure category. The data table response to this Specification need only include the date, zip\_code, plan\_name and the data requested by the additional requested fields.**

**Response to Specification 99(a):**

*See* Exhibit 99-1. Exhibit 99-2 provides additional information about the data sets included in Exhibit 99-1.

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**Response to Specification 99(b)(i):**

*See* Exhibit 99-1. Exhibit 99-2 provides additional information about the data sets included in Exhibit 99-1.

The following columns in Exhibit 99-1 address this specification:

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}}

**Response to Specification 99(b)(ii):**

*See* Exhibit 99-1. Exhibit 99-2 provides additional information about the data sets included in Exhibit 99-1.

The following columns in Exhibit 99-1 address this specification:

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**Response to Specification 99(b)(iii):**

*See* Exhibit 99-1. Exhibit 99-2 provides additional information about the data sets included in Exhibit 99-1.

The following columns in Exhibit 99-1 address this specification:

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}}

**SPECIFICATION 100:**

**For each zip code identified in response to Specification 2(e) of the Information and Data Request issued to the Company on August 21, 2014, from January 1, 2013, to December 31, 2014, provide the amount subscribers received as non-recurring incentives, including but not limited to gift cards, rebates or installation discounts, to either renew a subscription to the Company’s Cables Services or first subscribe to the Company’s Cable Services.**

**Response to Specification 100:**

*See Exhibit 100-1. TWC does not manage any programs that may be offered in Hawaii with the exception of those offered with {{ }}, for which TWC manages the fulfillment.*

*See Exhibit 100-2. {{*

*}}*

*{{*

*}}*

# EXHIBITS

# Exhibit 76-1

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 76-2

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 76-3

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 77-1

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 77-2

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 77-3

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 78-1

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**REDACTED FOR PUBLIC INSPECTION –  
VIDEO PROGRAMMING INFORMATION**

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# Exhibit 80-1

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**REDACTED FOR PUBLIC INSPECTION –  
VIDEO PROGRAMMING INFORMATION**

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# Exhibit 87-1

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 87-2

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 87-3

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 87-4

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 88-1

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**REDACTED FOR PUBLIC INSPECTION –  
VIDEO PROGRAMMING INFORMATION**

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# Exhibit 90-B-1

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 91-1

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 95-1

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**REDACTED FOR PUBLIC INSPECTION –  
VIDEO PROGRAMMING INFORMATION**

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# Exhibit 96-1a

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 96-1b

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 96-1c

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 96-1d

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 96-1e

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 96-1f

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 96-2

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**REDACTED FOR PUBLIC INSPECTION**

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# Exhibit 97-1

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# Exhibit 100-1

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# Exhibit 100-2

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**REDACTED FOR PUBLIC INSPECTION**

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