



More specifically, TWC undertook this analysis with the assistance of its third-party vendor, Frontier GeoTek, Inc. (“Frontier GeoTek”), with which TWC has worked closely since 2008 in connection with its broadband-related data collection, reporting, and mapping efforts. Frontier GeoTek reviewed TWC coverage maps and network specifications to identify those census blocks included in the AT&T List in which TWC offers Qualifying Service. Frontier GeoTek then confirmed these initial determinations by reference to TWC marketing materials and other customer-facing information. Frontier GeoTek also reviewed TWC’s subscriber databases to confirm that in each of the TWC-Served Census Blocks, TWC currently provides Qualifying Service to at least one customer. Attachment 2 specifies, for illustrative purposes and for each TWC-Served Census Block, the address of one customer to which TWC currently provides Qualifying Service.<sup>2</sup>

This analysis demonstrates and confirms that each TWC-Served Census Block already is served by TWC, an unsubsidized broadband provider, at speeds well above the relevant 3 Mbps downstream and 768 kbps upstream thresholds.<sup>3</sup> Accordingly, the Commission should deny the requested incremental support to AT&T in these census blocks.

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<sup>2</sup> The address information has been redacted to preserve customer privacy, consistent with the Commission’s customer proprietary network information (“CPNI”) and related rules and policies.

<sup>3</sup> *Connect America Fund*, Report and Order, 28 FCC Rcd 7766, at ¶ 7 (2013). Although TWC offers broadband Internet access service at various speed tiers throughout its service areas, it is capable of providing such service throughout its entire 30-state footprint at speeds of at least 20 Mbps downstream and 2 Mbps upstream in all of its service areas, and throughout most its footprint at speeds of 50 Mbps downstream and 5 Mbps upstream. Further information about TWC’s speed tiers can be found at <https://www.timewarnercable.com/en/plans-packages/internet/internet-service-plans.html>.

Respectfully submitted,

**TIME WARNER CABLE INC.**

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March 16, 2015

/s/ Matthew A. Brill  
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**Attachment 1: TWC-Served Census Blocks**

<b>Census Block</b>	<b>State</b>
210139601001031	Kentucky
210139604002032	Kentucky
370819801001016	North Carolina
371570401023003	North Carolina
450910617011026	South Carolina

**CERTIFICATION OF STEVEN FULLER**

I, Steven Fuller, certify under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am the Geographic Information Systems Manager for Frontier GeoTek, Inc. ("Frontier GeoTek"). Frontier GeoTek specializes in the implementation of intelligent mapping systems integrated with network design and documentation. Our business address is 6377 S. Revere Parkway, Suite 300, Centennial, Colorado 80111.
2. In 2008, Time Warner Cable Inc. ("TWC") retained Frontier GeoTek to assist it in compiling broadband-related data that TWC then reports to relevant state mapping entities for inclusion in the National Broadband Map. TWC subsequently also retained Frontier GeoTek to assist with government regulatory mapping needs (e.g., in connection with state video franchises) and various engineering-related survey and design maps. In connection with that arrangement, TWC asked Frontier GeoTek to review the list of census blocks identified by the Wireline Competition Bureau as those in which AT&T Inc. has sought Phase I incremental support (the "AT&T List"). See Public Notice, *Wireline Competition Bureau Announces Deadline for Existing Providers to Notify AT&T that they Serve Census Blocks that AT&T Proposes to Serve with Connect America Phase I Incremental Support*, WC Docket No. 10-90, DA 15-118 (rel. Jan. 28, 2015).
3. More specifically, TWC asked Frontier GeoTek to review TWC coverage maps and network specifications to identify those census blocks included in the AT&T List in which TWC offers broadband services exceeding 3 Mbps downstream and 768 kbps upstream ("Qualifying Service"). Frontier GeoTek completed this review and identified five census blocks that meet these criteria, which are listed in Schedule 1 (the "TWC-Served Census Blocks"). Frontier GeoTek then confirmed these initial determinations by reference to TWC marketing materials and other customer-facing information.
4. Frontier GeoTek also reviewed TWC's subscriber databases to confirm that, in each of the TWC-Served Census Blocks, TWC currently provides Qualifying Service to at least one customer. Those databases include, among other things, information with respect to the nature of the services to which TWC's customers subscribe or subscribed and the address at which such service is or was provided. Schedule 1 specifies, for illustrative purposes and for each census block identified therein, the address of one customer to which TWC currently provides Qualifying Service.

Executed this 16 th day of March, 2015.

  
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Steven Fuller  
Geographic Information Systems Manager  
Frontier GeoTek, Inc.

Schedule 1: TWC-Served Census Blocks

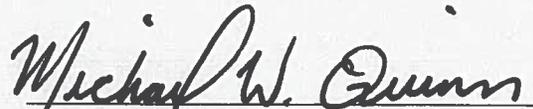
CENSUS BLOCK	ADDRESS	CITY	STATE	ZIP	ZIP4
210139604002032	BLACKSNAKE BRANCH RD	MIRACLE	KY	40856	9013
210139601001031	WHITE MOUNTAIN RD	ARJAY	KY	40902	8963
370819801001016	BALLINGER RD	GREENSBORO	NC	27410	9063
371570401023003	GARRISON RD	REIDSVILLE	NC	27320	7597
450910617011026	MICKEYS PL	CLOVER	SC	29710	6480

**CERTIFICATION OF MICHAEL W. QUINN**

I, Michael W. Quinn, certify under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am Group Vice President and Chief Regulatory Counsel for Time Warner Cable Inc. ("TWC"). In that capacity, I am responsible for supervising and directing the compilation and reporting of TWC's broadband-related data for purposes of developing and updating the National Broadband Map and TWC's Form 477 data submissions for broadband and voice service.
2. I have reviewed TWC's Challenge to AT&T's Phase I Incremental Support Election and, based on discussions with my staff, confirm that each of the census blocks identified therein is within TWC's network footprint and served by TWC's physical network assets.
3. Although TWC offers broadband Internet access service at various speed tiers, it is capable of providing such service throughout its entire 30-state footprint at speeds of at least 20 Mbps downstream and 2 Mbps upstream, and throughout most its footprint at speeds of 50 Mbps downstream and 5 Mbps upstream.

Executed this 13<sup>th</sup> day of March, 2015.



Michael W. Quinn  
Group Vice President and Chief Regulatory  
Counsel for Time Warner Cable Inc.