



May 18, 2015

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Amendment to the Commission's Rules Concerning Effective Competition and Implementation of Section 111 of the STELA Reauthorization Act, MB Docket No. 15-53

**Notice of ex parte Communication**

Dear Ms. Dortch:

On May 15, 2015, the undersigned, along with NATOA members Ken Fellman, Mitsuko Herrera, and Jodie Miller, had a telephone call with Maria Kirby, Chairman Wheeler's Legal Advisor, Media, Consumer and Governmental Affairs, and Enforcement, to discuss the above-referenced proceeding. We began by reiterating that our association stood by its earlier comments in arguing that the Commission should narrow the scope of the proceeding and take targeted steps to streamline the current effective competition process in an effort to assist small cable operators. Indeed, NATOA and other commenters have proposed specific means by which any "burden" on small operators could be lessened.

Ken Fellman discussed an Intergovernmental Advisory Committee recommendation that was currently on circulation to IAC members regarding the proceeding. The IAC, too, recommended that the Commission take a narrow approach and raised the recurring concern that cable operators, once subject to a presumption of nationwide effective competition would seek to move PEG channels from the basic tier of service. (The IAC recommendation was filed subsequent to our telephone call; a copy is attached hereto.)

Mitsuko Herrera discussed her experiences with rate regulation in Montgomery County, MD, including the County's history in recovering consumer overcharges. In addition, concerns were raised that the Commission's proposed rule would not only affect rates charged for basic tier service, but also PEG carriage, uniform pricing within the franchise area, and equipment fee increases.

Jodie Miller spoke of a filing submitted by the North Dakota County Cable Communications Commission, which discussed how the Commission's ability to review and possibly file complaints in response to recently proposed cable fee increases would be adversely affected by adoption of the FCC's proposed rule in this proceeding. (A copy of the NDC4 filing is attached hereto.)

Finally, in response to the assertion that nearly all petitions for effective competition are granted, we again asserted that the process requires the submission of documentation to show that effective competition does exist in the affected area and compliance with that requirement would naturally lead to the approval of the vast majority of petitions that have been filed over the years.

Sincerely submitted,

A handwritten signature in black ink, appearing to read "Steve Traylor". The signature is fluid and cursive, written in a professional style.

Steve Traylor  
Executive Director, NATOA



**INTERGOVERNMENTAL ADVISORY COMMITTEE  
to the  
FEDERAL COMMUNICATIONS COMMISSION**

**ADVISORY RECOMMENDATION No: 2015-7**

**In the Matter of Amendment to the Commission's Rules Concerning  
Effective Competition, Implementation of Section 111 of the STELA  
Reauthorization Act (MB Docket No. 15-53 Released March 16, 2015).**

The Intergovernmental Advisory Committee ("IAC") to the Federal Communications Commission ("Commission") submits this Advisory Recommendation regarding the above referenced NPRM addressing revising the Commission rules pertaining to effective competition and implementation of Section 111 of the STELA Reauthorization Act.

1. As an initial matter, we understand that several stakeholders in this proceeding have requested additional time to submit comments and reply comments. The IAC respectfully requests that the Commission grant additional time to such stakeholders. While the Commission may be under Congressional mandate to address certain aspect of these rules particularly dealing with streamlining the process for small cable operators, it does not appear that the Commission is under any time pressure with respect to a wholesale change in the rules. In addition, there has been no pressing timeframe with respect to such matters. Often, when petitions filed by cable operators are opposed, they remain pending for many years at the Commission. Similarly, jurisdictions' petitions to overturn previous findings of effective competition when there have been changed circumstances often remain pending at the Commission for many years.<sup>1</sup> Thus, there has never been urgency with respect to the majority of the issues raised in this proceeding. The IAC respectfully requests that the Commission afford all stakeholders sufficient time to prepare and submit comments.
  
2. With respect to the substance of the NPRM, the IAC submits that adoption of a rebuttable presumption of effective competition for the entire country is contrary to the public interest.

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<sup>1</sup> For example, the City of Coral Gables, FL submitted an application for review of a determination of effective competition in 2007, after circumstances changed when the cable operator which had petitioned for effective competition, Comcast, acquired one of its competitors in the City, Adelphia, thus reducing the number of households that subscribed to services from another provider. That application was filed in 2007, and it is believed that the Commission dismissed it as moot in 2015. See CSR 6406 *et al.* Thus, there seems to be no rush pertaining to petitions filed by such large cable operators.

3. There can be no doubt that cable services as a practical matter are not subject to effective competition, despite the language of the statute and tests established pursuant to federal law. Cable rates have risen at rates substantially higher than inflation and consumer satisfaction with cable services has consistently been a significant issue, even in areas found by the Commission to be subject to effective competition. If there were truly effective competition in the true sense of the term, rates would decrease and consumer satisfaction would increase.
4. The Commission's apparent reliance on the number of successful effective competition petitions as support for changing the standard is not appropriate. As the Commission correctly noted, in the vast majority of petitions filed by cable operators, local franchise authorities have not responded or filed any opposition. There are many reasons for this, most of which have nothing to do with whether there actually is effective competition in the jurisdiction. For example, cable operators serve the petitions on the local franchise authority and the petition may not be brought to the attention of the appropriate municipal or county official with authority to determine whether to oppose the petition for several weeks or months. Most LFAs do not have expertise in this area. Thus, even if it is brought to the attention of appropriate public officials, they are at a loss as to how to respond or address the petition. Many governments have to undertake a public hearing to decide whether to oppose such petitions, which may further delay responding. Further, LFAs lack resources to effectively oppose such petitions. The IAC submits that these are primarily the reasons why so many petitions go unopposed. It is not because there truly is effective competition in such jurisdictions. If that were the case, the few positions that are opposed would be easily dealt with by the Commission, as opposed to remaining pending for years on end, or withdrawn by the cable operators. The IAC submits that it would be appropriate to review how many petitions that were actually opposed were withdrawn by the cable operators. That may be a more **telling** statistic as to what percentage of petitions actually should be denied as not having a basis under the statute.
5. In addition, the IAC questions how many petitions for effective competition affecting how many communities were incorrectly granted by the Commission. In 2008, Time Warner Cable filed 25 petitions to determine effective competition in 725 communities in New York and Pennsylvania.<sup>2</sup> None were opposed. Unusually, the Media Bureau questioned the data when it showed on its face that by using zip code information, competitors served more households than there actually were in the jurisdictions. The Media Bureau denied on its own initiative the finding of effective competition in 226 of the 725 separate jurisdictions. The Media Bureau determined that five digit zip data may be unreliable and created the requirement effective September 1, 2008, that cable operators submit zip+4 data in such petitions.<sup>3</sup> However, the Bureau had been granting such obviously erroneous petitions for six years, since 2002. If the Commission is now

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<sup>2</sup> *In re Time Warner Cable Inc., and Time Warner Entertainment-Advance/Newhouse Partnership 25 Petitions for Determination of Effective Competition in Various Communities in the State of New York and the Commonwealth of Pennsylvania*, Memorandum Opinion and Order, DA 08-1893, MB released August 13, 2008.

<sup>3</sup> Public Notice, *Commission Announces New Standards for Showings of effective Competition for Cable Service*, DA-08-1892, released August 13, 2008.

going to shift the burden and presumption based on its notion that a substantial number of jurisdictions have been found correctly to be subject to effective competition, the IAC submits that the Commission must audit these earlier results and determine how many jurisdictions were incorrectly found to be subject to effective competition.

6. Even when the Commission grants unopposed petitions, this is not equivalent to the Commission finding that effective competition exists. Rather, such orders routinely provide that the petitioner has satisfied the requirements of the Commission's rules.
7. More importantly, creating a presumption that the entire country is subject to effective competition, with the changes that this would mean to important consumer protection provisions, would adversely affect cable consumers. The IAC is not primarily concerned with the ability of LFAs to regulate basic service rates and rates for equipment, although that is important to many consumers. As the Commission is aware, very few LFAs have actually implemented rate regulations.
8. On the other hand, there are important consumer protections in federal law that cable operators claim disappear when there is a finding of effective competition. As indicated in the NPRM, approximately 23,000 local franchise authorities remain subject to effective competition. We do not know how many households subscribing to cable services this affects. But it is clearly millions.
9. Federal law provides numerous protections to cable consumers, *unless they are subject to effective competition*.<sup>4</sup>
10. When the Commission grants a Petition for Effective Competition the authority to cap the price of the basic tier and equipment not only is removed,<sup>5</sup> but all cable consumers lose the protection of a uniform rate structure.<sup>6</sup> In addition, cable operators may require subscribers to purchase any number of programming tiers before they may order premium and pay per view offerings.<sup>7</sup> Significantly, a finding of effective competition also removes the prohibition against negative option billing.<sup>8</sup> The Commission should specifically address whether regulation presumption of effective competition would preempt state laws prohibiting negative option billing. In addition, use of public rights of ways by SMATV operators serving individual properties may be allowed if there is a finding of effective competition.<sup>9</sup> Further, there remains a question whether public

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<sup>4</sup> See 47 U.S.C. § 543(b)(1).

<sup>5</sup> The requirement to maintain a low priced basic service tier is undoubtedly beneficial to low income residents and residents on fixed incomes who may not be able to afford paying for more robust tiers of programming.

<sup>6</sup> 47 C.F.R. § 76.984 requires a uniform rate structure throughout a franchise area unless it is subject to effective competition.

<sup>7</sup> The anti-buy through requirement of 47 C.F.R. § 76.921 is no longer applicable if the franchise area is subject to effective competition.

<sup>8</sup> 47 CFR §76.981. Thus, cable operators will be able to add an a la carte service and charge customers, unless customers contact the cable operator to cancel the service. It should be pointed out that such negative option billing may violate state law and thus, create issues as to whether the application of federal law in this regard would preempt state law.

<sup>9</sup> 47 C.F.R. §76.501(d) forbids a cable operator from offering SMATV service in its franchise area except under the franchise. However, subsection (f) provides that this restriction does not apply under effective competition.

educational and government (PEG) channels must still be carried on a basic tier, if such a tier is offered, where there has been a determination of effective competition.<sup>10</sup>

11. It is incumbent that the Commission fully understand the impacts of reversing the standard for effective competition before moving down this path. The IAC submits that if the Commission does move forward with upending the burden and creating a presumption of effective competition, the Commission clarify that it is retaining consumer protections and PEG requirements, and continuing to allow local and tribal governments to require such provisions, even if there is a finding of effective competition. These are real protections that have practical consequences that should not be lost through artificial designations. In addition, because many localities adopt the federal customer service standards in to their local franchises, we strongly urge the Commission to consider initiating a proceeding to modernize its customer service rules.
12. The Commission is aware that there is local franchising in many states. Many states, at the urging of cable operators, have adopted state cable franchising whereby a state agency is the franchising authority. This makes creating the presumption of effective competition in the “franchising authority” particularly troublesome. IAC inquired how this would work in a state with such state franchising. The Media Bureau staff indicated that a state could be divided into separate areas for purposes of effective competition petitions. IAC would request the Commission to clarify how this would work and if municipalities and counties would have standing to challenge petitions for effective competition if they are no longer the franchising authority under state law.
13. The state of the video industry indicates that there is less competition, not more. The IAC submits that it may be appropriate to create a rebuttable presumption that the entire country is subject to video competition if there were numerous cable, satellite and other providers competing aggressively throughout the nation. However, quite the opposite is the case. As the Commission has noted on numerous occasions, in many situations there is only one dominant franchised cable provider. At most, residents may have the option to subscribe to video service by a direct broadcast satellite company or potentially from a local exchange carrier. However, the vast majority of households do not have such options.
14. In addition, there are efforts to further consolidate the industry with Comcast’s recent effort to acquire Time Warner and Charter’s efforts to acquire Bright House Networks and potentially Time Warner, thus reducing cable competition, and further with AT&T seeking to acquire DirecTV, further reducing video competition. Thus, the industry seems intent on greater consolidation with fewer and fewer video providers competing in the

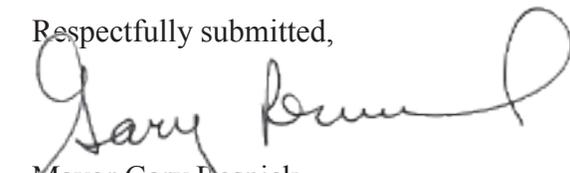
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<sup>10</sup> We note that some commenters indicated that local franchise authorities can require that PEG channels be carried on the basic service tier in their franchises. However, there is a significant question as to whether that is correct and how this would apply in states where the state is the franchise authority. In addition, some cable operators have informed LFAs that if there is a finding of effective competition, there is no longer any legal authority, either under a franchise or under the Cable Act, for the LFA to require that PEG channels and local broadcast channels be carried on the basic service tier.

vast majority of households in the country as opposed to smaller and more cable providers offering competing services.

15. The nationwide presumption contemplated by the NPRM is not consistent with Congress' request to the Commission. As has been explained to the IAC, Congress asked for the FCC to consider ways to streamline the process to declare effective competition in the case of small cable operators. Federal law did not ask the FCC to consider creating a nationwide presumption that the entire country is subject to effective competition. The anti-consumer impacts of a Commission decision to declare the entire country subject to effective competition will likely have the effect of further angering cable subscribers, and thus generating more complaints to members of Congress and the Commission.
16. The IAC submits that for the most part, the Commission has been very sensitive to consumer issues and applauds the Commission's actions in this regard. The Commission's recent enhancements of the consumer complaint portal is one example of the Commission's efforts to address consumer issues. However, the IAC submits that the Commission is not acting in the best interests of American consumers by seeking to change the burden and create a presumption that the entire country is subject to effective competition. States, local governments and Indian tribes simply do not have the resources to address petitions filed under such presumption, nor will they be able to counter the arguments submitted by cable operators that file petitions under this standard.
17. The IAC and its members, and previous IACs periodically addressed the issue of effective competition. We remain willing to work with the Commission if there are issues the Commission would like to address to deal effectively with federal statutes mandating Commission action with respect to effective competition. However, we caution that the Commission not move forward with a presumption that the entire United States is subject to effective competition, making it likely that all of the important consumer safeguards that go along with such finding, will be lost.

Respectfully submitted,



Mayor Gary Resnick  
Chair of the IAC

May 15, 2015



NORTHERN DAKOTA COUNTY CABLE  
COMMUNICATIONS COMMISSION  
5845 Blaine Avenue  
Inver Grove Heights, Minnesota 55076-1401  
651/450-9891 Fax 651/450-9429 e-mail: NDC4@townsquare.tv

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Amendment to the Commission's Rules Concerning Effective Competition and Implementation of Section 111 of the STELA Reauthorization Act, MB Docket No. 15-53

Dear Ms. Dortch:

The Northern Dakota County Cable Communications Commission ("NDC4") is a municipal joint powers cooperative formed in 1982 by the seven cities of Inver Grove Heights, Lilydale, Mendota, Mendota Heights, South St. Paul, Sunfish Lake, and West St. Paul (the "Member Cities"). NDC4 serves as the local franchise authority (LFA) representing approximately 21,000 cable subscribing households in suburban St. Paul, Minnesota. NDC4 negotiated a Cable Television Franchise Ordinance with MediaOne of St. Paul, Inc. ("MediaOne") adopted by all of the Member Cities on or about April 1, 2000 ("Franchise"). Comcast of Minnesota, Inc. ("Comcast") is the successor in interest to MediaOne under the Franchise.

NDC4 has been certified for many years to exercise rate regulation authority under the FCC's rules. NDC4 also oversees the local Public, Education, Government ("PEG") channels and programming serving the Member Cities.

Enclosed is a letter NDC4 received from Comcast just ONE WEEK after Comcast terminated its proposed acquisition of Time Warner and spin-off of Twin Cities cable systems to GreatLand Connections/Charter. Please see the attached rate increase announcement to be EFFECTIVE JUNE 1, and AUGUST 1, 2015, where Comcast notified its subscribers of the following:

- A NEW "broadcast fee" of \$1.50 per month
- A NEW "regional sports fee" of \$1.00 per month
- A \$1.00 (50%) increase in the high def DTA fee per month
- Several increases to additional outlet services ranging from \$.50 to \$2.50 per month

NDC4 requests that the Commission NOT act to take away LFA authority to protect local consumers. NDC4 desires to use basic rate regulation authority to conduct a review and possibly file a complaint on the above referenced Comcast rate increases, to protect our local consumers as much as possible, given the limited authority provided to LFAs over Basic One services, Basic One equipment, and technical support related to Basic One.

This is a significant rate increase for consumers.

Just in our relatively small part of the Twin Cities cable market, the first three increases on the list above would calculate to roughly \$872,000 per year, or approximately \$25 Million annually in new Comcast revenue in the Twin Cities area, so imagine what that would be multiplied by the entire region or country.

NDC4 will use its rate regulatory authority to review whether these rate increases are justified.

Not only do these new Comcast fees cause a substantial rate increase (33% for Basic One), but they will also create a stack of “fees” on the subscribers’ bills that will cause confusion and mislead consumers. Customers may not understand the difference between these new Comcast “fees” (such as “broadcast fee” and “regional sports fee”) and legitimate fees that are actually collected from consumers and remitted to government agencies for established public benefits, such as the FCC regulatory fee, local government franchise fees, and local programming (“PEG”) fees.

Local governments’ regulatory authority over Basic One rates, equipment, and technical services is not obsolete in today’s marketplace.

The Basic One tier of service provides essential connections to the community at an affordable rate. Without the FCC’s rate regulations in place low income customers, households without smart phones or high speed internet, households without new modern television equipment, and some elderly or “low-tech” subscribers may have no ability to access an affordable communications service. The Basic One tier of service that is available to customers in the NDC4 service area currently has approximately 31 channels of service, including broadcast and PEG, for less than \$15 per month. Our PEG channels provide local government meetings, local news, school and educational programming, health and social services information, community, faith, and entertainment programming, all relevant here in the neighborhoods where people live and work. If these PEG channels are placed in more expensive tiers of service that also require more expensive equipment, they may become unavailable to many residents that depend on PEG for local community information.

Preserving Basic One protects local PEG programming in the changing marketplace.

Many subscribers who obtain video content via Dish, Broadcast, or Internet television choose to subscribe to Basic One cable service for the purpose of receiving the local PEG channels. By having the Basic One service available for about \$15 per month, our local non-profit PEG station continues to receive some (albeit more limited) franchise fee and PEG fee funding to support our operation, and these residents have access to this important community connection (PEG channels) along with their chosen package of television.

Basic One rate regulation is needed through the transition to more competition.

NDC4 has received an application for a second wireline cable competitor, and we hope to be granting a second cable franchise sometime in 2015. If we are successful, the deployment of a second wireline video service will roll out in our community over the next five years. But the benefits of Basic One cable rate regulation are needed to protect consumers and provide an important transition until we get to the point of true competition (and ideally TWO wireline competitors providing our PEG channels).

However the Commission determines to proceed, it should take steps to maintain the following pro-consumer benefits of current Commission regulations:

- 1) Uniform rate structure - 47 C.F.R. § 76.984 - which requires a uniform rate structure throughout a franchise area with respect to the rates charged by a cable operator for basic service, cable programming service, and associated equipment and installation charges. This would prevent neighbors from being charged different rates for the same service. ALL residents will have the same access to the pricing from each cable operator across the community, even where true cable competition may not exist. Uniform pricing would also prevent harmful unfair predatory pricing during the build-out period of a new competitor, allowing the new entrant to develop and establish robust competition for consumers as it enters the wireline video market.
- 2) Charges for change of service - 47 C.F.R. § 76.980 - which places limitations on the charges which can be imposed by a cable operator on a customer for various changes in the services which the customer selects from the cable operator; and
- 3) Negative option billing - 47 C.F.R. § 76.981- which prohibits negative option billing by a cable operator. Without this safeguard nothing prohibits a cable operator from imposing negative option charges on a subscriber.

Effective Competition filings are a barrier to LFAs protecting consumers locally.

NDC4 understands that some of our fellow LFAs in the Twin Cities conducted extensive financial and legal rate reviews about two years ago when Comcast first implemented its DTA fee (framed as a “service” fee when it is a charge for a piece of equipment related to Basic One). While we are told that the FCC agreed with and affirmed several of the rate findings of these Minnesota LFAs, unfortunately the LFA’s have been unable to act to protect their local consumers because of cable operator “effective competition” filings on some of these communities. We see no benefit to consumers of these effective competition filings. We have seen no market data proving that whether or not a community has 15% or more dish penetration has a meaningful impact on cable TV rates. In fact, the effective competition rules create a barrier to local governments and LFAS ability to protect consumers from unreasonable cable rate increases, especially for those households least able to afford it, as described above.

While the marketplace is in transition and television viewing is rapidly changing through the convergence of voice, video, and data services, the Commission must not prematurely take away valuable and necessary protections for consumers, local PEG stations, and local governments.

Sincerely,

A handwritten signature in blue ink that reads "George Tourville" followed by a stylized flourish that appears to be "gmm".

George Tourville  
Mayor of Inver Grove Heights, MN  
Chair of NDC4 Cable Commission

cc: Bill Lake, Michelle Carey, Holly Saurer, Mary Beth Murphy, Steven Broeckaert, Diana Sokolow

RECEIVED MAY 04 2015



May 1, 2015

Ms. Jodie Miller  
Executive Director  
NDC Cable Communications  
5845 Blaine Avenue  
Inver Grove Heights, MN 55076

Dear Jodie:

At Comcast we are committed to constantly improving your entertainment and communications experience, and we continue to invest in making your services even better. As we make these and other investments, we periodically need to adjust prices due to increases we incur in business costs. Starting June 1, 2015, new prices will apply to select XFINITY TV and Internet services and equipment will change. We've included the changes in this notice.

Enclosed with this letter are the ad pages that began running in customers' bills on 5/1.

As always, should you have any questions please don't hesitate to contact me at 651-493-5777.

Sincerely,

Karly Werner  
Director, Government Affairs

## Comcast Products And Services Price List

Andover, Anoka, Champlin, Ramsey, Columbia Heights, Hilltop, Mounds View, New Brighton, North Oaks, Roseville, St. Anthony, Shoreview, Birchwood, Dellwood, Grant, Lake Elmo, Mahtomedi, Maplewood, North Saint Paul, Oakdale, Vadnais Heights, White Bear Lake, White Bear Township, Willernie, Hudson, North Hudson, Fridley, St. Louis Park, Burnsville, Eagan, Pine Springs, Gem Lake, Landfall, Coon Rapids, Blaine, Centerville, Circle Pines, Ham Lake, Lexington, Lino Lakes, Spring Lake Park, Arden Hills, Falcon Heights, Lauderdale, Little Canada, Hanover-Hennipen, Brooklyn Center, Brooklyn Park, Crystal, Golden Valley, Maple Grove, New Hope, Osseo, Plymouth, Robbinsdale, St. Paul, Inver Grove Heights, Lilydale, Mendota, Mendota Heights, South St. Paul, Sunfish Lake, West St. Paul, Minneapolis, University of Minnesota, Richfield, Eden Prairie, Minnetonka, Hopkins, Edina, Bloomington, Lakeland, Lakeland Shores, St. Croix Beach, St. Mary's Point, Afton, West Lakeland, Hastings, Denmark Township, Cottage Grove, Woodbury, Newport, Saint Paul Park, Grey Cloud Island, Prescott, Bayport, Oak Park Heights, Stillwater, Baytown Township, Stillwater Township

### Important Information Regarding Your XFINITY Services And Rates

At Comcast, we are committed to constantly improving your entertainment and communications experience, and we continue to invest in making your services even better. As we make these and other investments, we periodically need to adjust prices due to increases we incur in programming and other business costs.

Starting on **June 1, 2015\***, the prices of select XFINITY® TV and Internet services and equipment will change. **We've included the changes in this notice.**

Among these price changes, we have itemized a Regional Sports fee for customers receiving Starter service tiers and above to offset the rising costs of distributing regional sports networks. Additionally, we have itemized a Broadcast TV Fee in order to defray the rising costs of retransmitting broadcast television signals. In recent years, the cost of retransmitting broadcast television signals has increased significantly, and we want to address these more recent increases through a separate itemized charge so that they are clear to you.

If you're currently receiving services on a promotional basis, under a minimum term agreement associated with a specific rate, or in the guaranteed period of one of our SurePrice™ plans, the prices for those specific services will not be affected during the applicable period.

Have questions? Please visit us at [comcast.com/questions](http://comcast.com/questions) or call us at **1-855-688-9460**.

\*Video Installation Fee increases will take effect August 1, 2015

### XFINITY TV

#### BASIC SERVICES

	Current Price	New Price
Broadcast TV Fee	N/A	\$1.50

#### BASIC AND DIGITAL ANCILLARY SERVICES

	Current Price	New Price
HD DVR Service (Primary Outlet)	\$17.95	\$19.95
Digital Additional Outlet Service with HD DVR Service	\$17.95	\$19.90
Digital Adapter Additional Outlet Service (SD or HD)	\$1.99	\$2.99
Includes Digital Adapter Equipment at \$0.50		

#### VIDEO EQUIPMENT

	Current Price	New Price
HD Digital Converter (Limited Basic Only)	\$2.20	\$2.00
CableCARD (Second Card in Same Device)	\$1.00	\$0.80

#### VIDEO INSTALLATION FEES

	Current Price	New Price
Unwired Home (Standard Installation)	\$44.50	\$38.50
Wired Home (Standard Installation)	\$32.00	\$29.50
Hourly Service Charge (Custom Installation)	\$35.00	\$34.50

#### VIDEO INSTALLATION FEES\* (EFFECTIVE AUGUST 1, 2015)

	Current Price	New Price
New Additional Outlet (After Initial Installation of Service)	\$32.00	\$32.50
Activate Pre-Existing Additional Outlet (After Initial Installation of Service)	\$22.00	\$24.00
Relocate Additional Outlet (After Initial Installation of Service)	\$29.50	\$32.00
Connect VCR/DVD (Initial Installation of Service)	\$7.50	\$8.00
Connect VCR/DVD (After Initial Installation of Service)	\$18.50	\$19.00
Upgrade of Service (In-Home Visit Required)	\$27.50	\$29.00
In-Home Service Visit	\$36.00	\$36.50

#### DOUBLE PLAY PACKAGES

	Current Price	New Price
Internet Plus	\$69.95	\$72.95

#### MISCELLANEOUS FEES

	Current Price	New Price
Regional Sports Fee (Applies to XFINITY TV Digital Starter and above)	N/A	\$1.00

5010-5090, 5110-5120, 5140-5580,  
5630-5810, 5840-5850, 5900-6220

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