

broadband service at actual speeds of at least 10 Mbps downstream and 1 Mbps upstream (“Qualifying Service”) to 100 percent of one of the Identified Study Areas (the “TWC-Served Study Area”), as detailed on Attachment 1.

More specifically, TWC undertook this analysis with the assistance of its third-party vendor, Frontier GeoTek, Inc., with which TWC has worked closely since 2008 in connection with its broadband-related data collection, reporting, and mapping efforts. Frontier GeoTek reviewed TWC’s coverage maps and network specifications to identify in which, if any, of the Identified Study Areas TWC offers Qualifying Service to 100 percent of the study area. Attachment 2 specifies, by census block, where TWC is currently able to provide Qualifying Service to 100 percent of the census block in each of the Identified Study Areas.

This analysis demonstrates and confirms that one of the Identified Study Areas is subject to a 100 percent overlap by TWC, which is an unsubsidized competitor that provides service in excess of the required 10 Mbps downstream and 1 Mbps upstream thresholds. Accordingly, the Commission should make a final determination that the relevant study area is subject to a 100 percent overlap and should commence the phase-down in high-cost universal service support within that study area.

With respect to the other two Identified Study Areas, although TWC serves the overwhelming majority of the relevant service territories, TWC was unable to confirm that it serves 100 percent of the incumbent carrier’s study area. However, because Frontier GeoTek’s analysis indicates the presence of other unsubsidized competitors serving those study areas, the Commission may be able to determine (based on the combination of Attachment 2 hereto and submissions from those providers) that 100 percent of those study areas is served by a combination of unsubsidized competitors.

Respectfully submitted,

TIME WARNER CABLE INC.

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Attachment 1: TWC-Served Study Area

SAC	State	Study Area
230494	NC	PINEVILLE TEL CO

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 12354 E. Caley Avenue, Suite 106, 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 rate-of-return study areas identified by the Wireline Competition Bureau as those in which TWC may, by itself or in combination with other unsubsidized competitors, cause the study area to be subject to a 100 percent overlap by unsubsidized competition (the "Identified Study Areas"). See Public Notice, *Wireline Competition Bureau Publishes Preliminary Determination of Rate-Of-Return Study Areas 100 Percent Overlapped by Unsubsidized Competitors*, WC Docket No. 10-90, DA 15-868 (rel. July 29, 2015).
3. More specifically, TWC asked Frontier GeoTek to review TWC coverage maps and network specifications to identify those census blocks included each of the Identified Study Areas in which TWC offers broadband services meeting or exceeding 10 Mbps downstream and 1 Mbps upstream ("Qualifying Service") to 100 percent of the census block. Frontier GeoTek completed this review and found that TWC provides Qualifying Service to 100 percent of one of the Identified Study Areas.
4. Exhibits 1, 2, and 3 specify, for each of the Identified Study Areas, whether TWC provides Qualifying Service to all, none, or a portion of each census block included within the Identified Study Area.

Executed this 26 th day of August, 2015.



Steven Fuller
Geographic Information Systems Manager
Frontier GeoTek, Inc.

Exhibit 1 – PINEVILLE TEL CO

REDACTED

Exhibit 2 – LAKEFIELD TEL CO

REDACTED

Exhibit 3 – PINE TREE TEL & TEL

REDACTED

CERTIFICATION OF PATRICIA MCCAUSLAND

I, Patricia McCausland, 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 Vice President and Assistant Chief Counsel, Regulatory for Time Warner Cable Inc. ("TWC"). In that capacity, I am one of the attorneys responsible for supervising and directing the compilation and reporting of TWC's broadband-related data to state mapping entities 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 analysis of the list of rate-of-return study areas identified by the Wireline Competition Bureau as those in which TWC may, by itself or in combination with other unsubsidized competitors, cause the study area to be subject to a 100 percent overlap by unsubsidized competition (the "Identified Study Areas"). See Public Notice, *Wireline Competition Bureau Publishes Preliminary Determination of Rate-Of-Return Study Areas 100 Percent Overlapped by Unsubsidized Competitors*, WC Docket No. 10-90, DA 15-868 (rel. July 29, 2015). Based on this review and discussion with my staff, I confirm that TWC's network footprint and physical network assets serve 100 percent of one of the Identified Study Areas, SAC 230494 – PINEVILLE TEL CO (the "TWC-Served Study Area").
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 10 Mbps downstream and 1 Mbps upstream, and throughout most its footprint at speeds of 50 Mbps downstream and 5 Mbps upstream.
4. TWC's broadband Internet access service generally is offered throughout its entire 30-state footprint with latency of between 40 and 50 milliseconds (ms), making TWC's broadband service suitable for real time applications.
5. Throughout its entire 30-state footprint, TWC's mass market broadband Internet access service is offered without any usage limitation, although it does offer *optional* usage-based options for certain of its speed tiers at discounted rates.
6. TWC offers voice and broadband Internet access services at various monthly rates. However, throughout its entire 30-state footprint TWC offers at least one mass market non-promotional plan that includes voice service at an effective monthly rate of less than \$47.48 and at least one mass market non-promotional plan that includes broadband Internet access service meeting the Commission's minimum broadband requirements at an effective monthly rate of less than \$77.81 per month. TWC's rates are roughly consistent throughout its entire 30-state footprint, and do not vary significantly based on whether the area served is an urban or rural area. Notably, the voice and broadband services offered under these plans generally are more robust than required by the Commission's minimum broadband requirements.

7. As discussed in the Certification of Steven Fuller, TWC has confirmed that, in 100 percent of one of the Identified Study Areas, TWC: (i) offers voice services and broadband services meeting the Commission's speed, usage allowance, latency, and pricing criteria ("Qualifying Service"); (ii) maintains physical assets used to provide Qualifying Service; (iii) holds itself out to the public as offering Qualifying Service; and (iv) is willing and able to provide Qualifying Service to a requesting customer within seven to ten business days without an extraordinary commitment or resources.

Executed this 27th day of August, 2015.



Patricia McCausland
Patricia McCausland
Vice President and Assistant Chief Counsel,
Regulatory for Time Warner Cable Inc.