

REDACTED — FOR PUBLIC INSPECTION

October 23, 2015

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VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: **MB Docket No. 15-149**  
**Charter Communications Response to FCC's Information and Data Request**

Dear Ms. Dortch:

Attached please find supplemental materials from Charter Communications, Inc. ("Charter") in response to the Information and Data Request issued by the Federal Communications Commission ("Commission" or "FCC") on September 21, 2015, in connection with the Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Transfer Control of Licenses and Authorizations, MB Docket No. 15-149.

The supplemental materials, which contain proprietary and non-public information, are being submitted on a Highly Confidential basis under the Protective Order in effect in this proceeding. Consistent with the instructions in the Protective Order, the Highly Confidential version is being hand-filed under separate cover, and copies are being provided to the Media Bureau.

These materials are being submitted pursuant to the same modifications to the Commission's Information and Data Request set forth in my letter dated October 13, 2015.

The materials being submitted today include the following:

- **Supplemental Narrative Responses**

We are submitting supplemental narrative responses to several Requests.

- **Exhibits to Supplemental Narrative Responses**

We are submitting a disk containing exhibits in support of the supplemental narrative responses.

- **Supplemental Dykhouse Emails**

Per agreement with the Commission, with respect to Request No. 61, we conducted a supplemental search of emails sent to and from Richard Dykhouse (General Counsel), through October 15, 2015, regarding negotiations of Charter's interconnection policy announced July 15, 2015. The responsive, non-privileged documents are contained in Folder 61 on the enclosed disk.

- **Supplemental Document Production**

We are submitting a hard drive containing additional documents responsive to the Requests for Information.

- This production includes supplemental documents produced to the Department of Justice ("DOJ") in 2015 in connection with the current proposed transaction, excluding documents that contain VPCI. These documents are marked with the same Bates prefixes and numbers as used in the submission to the DOJ: "CHR2-DOJ-00000000000" and "CHTR-SUPP-000000000." There are gaps in the Bates range where VPCI documents have been removed.
- Charter's production also includes documents responsive to the FCC's Requests that are not contained in the aforementioned document set. These documents are marked with the Bates prefix "CHR2-FCC-0000000000." Charter has excluded documents containing VPCI from these new materials, and there are gaps in the Bates range where VPCI documents have been removed.

We are also submitting a disk containing corrected production files. These files relate to documents Charter produced to the Commission on October 13, 2015 and to the DOJ in 2015. The documents are marked with the same Bates prefix and numbers used in those prior submissions: "CHR2-DOJ-00000000000."

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- **Privilege Logs**

We are submitting several privilege logs and accompanying legends. First, we are submitting a privilege log that corresponds to the documents Charter has produced and is producing to the Commission for the first time in this proceeding. Second, we are submitting the privilege log that corresponds to the documents Charter produced to the Commission in 2014 in connection with MB Docket No. 14-7 and has re-produced in this proceeding. Third, we are submitting privilege logs that correspond to the documents Charter produced to the DOJ in connection with the current proposed transaction and the prior proposed transaction and has re-produced in this proceeding. Because the privilege logs submitted to the DOJ are exceedingly large, we are providing them in electronic format only. If you would like us to provide hard copies, please let me know.

Please let me know if you have any questions.

Sincerely,

*/s/ John L. Flynn*

John L. Flynn

Enclosures

cc: V. Lemmé

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

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In the Matter of )

Applications of Charter Communications, Inc., )  
Time Warner Cable Inc., and Advance/Newhouse )  
Partnership for Consent to Transfer Control of )  
Licenses and Authorizations. )

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MB Docket No. 15-149

**SUPPLEMENTAL RESPONSE OF CHARTER COMMUNICATIONS, INC. TO  
INFORMATION AND DATA REQUESTS DATED SEPTEMBER 21, 2015**

**October 23, 2015**

INTRODUCTION

In response to the letter dated September 21, 2015 from William T. Lake, Chief of the Media Bureau, to the accompanying Information and Data Request to Charter Communications, Inc., Charter Communications, Inc. (“Charter” or the “Company”) provides the following supplemental answers and responsive documents, as applicable. Unless otherwise defined herein, capitalized terms shall have the meanings set forth in the Definitions section of the Information Request.

Charter has based its responses on a review of available documents that are reasonably likely to contain responsive information and on inquiries of those individuals and available sources that are likely to have relevant information. In certain cases, Charter does not maintain in the ordinary course of business some of the information requested, or does not maintain the information in the precise manner requested.

In addition, per discussions with Commission Staff, Charter notes that several qualifications and agreements apply regarding its submissions. These modifications appear in the cover letter to Charter’s initial responses, dated October 13, 2015 (“Cover Letter”), and are referenced as necessary in the responses herein.

The narratives, attachments and submitted data contain material that is extremely sensitive from a commercial, competitive and financial perspective, and that, in the normal course of its business, Charter would not reveal to the public, to its competitors or to other third parties. Per discussions with Commission Staff, Charter is submitting these responses on a Highly Confidential basis under the Joint Protective Order in effect in this proceeding.<sup>1</sup>

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<sup>1</sup> *Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 15-149, Protective Order, FCC 15-110 (Sept. 11, 2015) (“Protective Order”).

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Redacted submissions are marked, “**REDACTED – FOR PUBLIC INSPECTION,**” and are being filed electronically in the Commission’s Electronic Comment Filing System (“ECFS”).

The confidential, unredacted submissions are marked “**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN MB DOCKET NO. 15-149 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**” and are being delivered to the Secretary. Additional copies of the unredacted response are being delivered as instructed in the Information Request and will be made available pursuant to the Protective Order.

Any inadvertent inclusion of material subject to the attorney-client, attorney work-product, or other applicable privilege does not constitute a waiver of that privilege. Charter requests the return or destruction of all confidential material at the conclusion of this proceeding.

*[remainder of this page intentionally left blank – responses follow]*

**INFORMATION AND DATA REQUEST TO CHARTER COMMUNICATIONS, INC.**

**REQUEST 22**

22. Submit all documents relating to any plans of, interest in, or efforts undertaken by the Company or any other person for any acquisition, divestiture, joint venture, alliance, or merger of any kind involving the sale of any relevant service other than the Transaction. Describe, and identify documents sufficient to show each instance when the Company attempted to partner with another MVPD to achieve joint objectives, including but not limited to, attempts to launch or deploy a coordinated or joint OVD service, business services, reciprocal access to Wi-Fi networks, out of home data access service, or mobile wireless service (*e.g.*, sales agent, reseller, mobile virtual network operator). In the description, state the results of each instance and the reasons for its success or failure.

**Response to Request 22:**

Additional documents in support of the Company's initial response to Request 22 are provided in Exhibit 22 on the enclosed disk in the folder "Request 22 Supplemental Production."

REQUEST 47

47. Provide a list and produce a copy of all Internet interconnection agreements (and amendments), formal or informal, the Company has entered into with any person (including CDNs, edge providers, Internet access service providers and Internet backbone services providers) that are currently in effect or entered into since January 1, 2013. For each person on the list, identify and describe the number of ports, capacity, utilization/congestion, whether the interconnection is peering or transit service traffic, whether the traffic must be localized, and the financial terms associated with each interconnection agreement.

- a. Produce all documents discussing factors the Company considers or considered in negotiating the terms of any interconnection agreement; and
- b. Provide a list of all Internet interconnection agreements entered into or amended after September 11, 2014. If amended, describe the content of the amendment.

Response to Request 47:

Charter is providing on the enclosed disk in the folder “Request 47” a spreadsheet titled “Exhibit 47-1,” which lists each of Charter’s interconnection agreements with its settlement-free peers and paid transit vendors, each of which is separately identified, as well as identifying the provisions within Charter’s paid transit agreements setting forth the financial terms in Charter’s agreements with those vendors. Exhibit 47-1 also identifies amendments to those agreements where applicable, as well as the dates of the relevant agreements and amendments. With respect to the request to identify whether the traffic must be “localized,” the locations at which Charter interconnects with its settlement-free peers and paid transit providers are identified in Charter’s responses to Requests 63 and 64, respectively. Factors the Company considers in negotiating the terms of interconnection agreements are discussed in Charter’s responses to Requests 49(b) and 61-63.

Exhibit 47-2 consists of information on the ports, capacity, and utilization of the interconnectors identified in Exhibit 47-1. **[BEGIN HIGHLY CONFIDENTIAL**

INFORMATION]

[END HIGHLY

CONFIDENTIAL INFORMATION] Note that these data are limited to interconnectors identified in Exhibit 47-1 that currently have a peering or transit purchase relationship with Charter. [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END

HIGHLY CONFIDENTIAL INFORMATION] Finally, interconnection data are not currently available for Netflix, with whom Charter entered into a transit purchase agreement effective October 12, 2015.

Column A (“Name”) shows the name of the interconnector for which the metrics requested are reported, and Column B (“Type”) indicates whether this interconnector is a settlement-free peer or a transit provider. Column C (“Interconnections”) indicates the total amount of interconnections across all Points of Presence with the given interconnector. Column D (“Capacity (GBPS)”) provides the total capacity between the settlement-free peer or transit provider and Charter, in gigabits per second. Capacity is calculated by summing the capacity of interconnections across all Points of Presence for a given interconnector. Column E (“Average Peak Utilization (%”) shows the average peak traffic level utilization of incoming

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and outgoing traffic across all interconnections and Points of Presence for a given interconnector.

Peak utilization represents the highest data traffic rates captured in a snapshot for the given interconnector over the week.

**REQUEST 48**

48. Describe your Internet backbone in the United States, including identifying and describing all routes, capacity, and each IP point of presence. Identify and describe any fiber (owned or leased), including name of vendor used to transmit data between one IP point of presence and another IP point of presence within the Company's network. For each IP point of presence for your Internet backbone network located in the United States, identify the owner or name of the IP point of presence (e.g., Equinix) and the geographic location (e.g., Ashburn, VA).

Response to Request 48:

Charter's response to Request 48 is provided in Exhibits 48-1 through 48-3 in the folder designated as "Request 48" on the enclosed disk. Exhibit 48-1 consists of a map of the Charter National IP Backbone as of the third quarter of 2015. Exhibit 48-2 consists of geographic information on all of the current IP Points of Presence in Charter's Internet backbone network located in the United States. Exhibit 48-3 consists of information on the routes connecting Charter's IP Points of Presence. Data for Exhibits 48-1 and 48-2 are sourced from materials maintained in the ordinary course of business by Charter's Internet backbone group. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The map comprising Exhibit 48-1 diagrams all nodes on Charter's Internet backbone network and the number and type of connections between them, in terms of 10G wave counts. It also identifies the location of the Network Operations Center ("NOC"), located in **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** and network access points ("NAP") for peering.

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Column A (“Owner/Name”) in Exhibit 48-2 shows the name or owner for a given IP Point of Presence. Columns B through E provide information on geographic location, including address, city, state, and ZIP code for each IP Point of Presence.

Exhibit 48-3 provides a separate response for each connected IP Point of Presence route (“route”) and each lessee (if any) that provides transit services on the given route. As such, each row represents a given lessee (if any) providing transit service for a given route.

Column A (“Owner/Name”) shows the name or owner of the first IP Point of Presence for the given route and lessee. Columns B through E provide information on geographic location, including address, city, state, and ZIP code for the first IP Point of Presence for the given route and lessee. Column F (“Owner/Name”) shows the name or owner of the second IP Point of Presence for the given route and lessee. Columns G through J provide information on geographic location, including address, city, state, and ZIP code for the second IP Point of Presence for the given route and lessee. Column K (“Leased”) shows whether the fiber connecting the IP Points of Presence is leased for the given route and lessee. Leased routes are labeled “Y” and routes that are not leased are labeled “N.” Column L (“Lessee”) shows the lessee of the fiber if any. Routes that do not have leased fiber are labeled “Charter.” Column M (“Capacity (MBPS)”) provides the total capacity of all interconnections for the given route and lessee, in megabits per second. Column N (“Interconnections”) shows the total number of interconnections for the given route and lessee.

**REQUEST 57**

57. For your 25 largest interconnection partners by traffic volume, provide a complete copy of all paid peering and transit service invoices for services provided from December 31, 2012, through June 30th, 2015. If invoices are provided for a combination of services (e.g., transit service and paid peering), provide an itemized version of each invoice, or explain in detail how the total invoice amount is allocated across services. Submission for the Request should be submitted separately from any document load file and be in an OCR searchable PDF and the invoices should be organized by interconnection partner.

**Response to Request 57:**

Charter does not participate in any paid peering arrangements and has not participated in any paid peering arrangements during the relevant period. As such, there are no responsive paid peering invoices to provide. Nor does Charter provide transit services to third parties.

Itemized invoices Charter has received from its paid transit service vendors, in OCR searchable PDF format and organized by vendor and by date, are included on the enclosed disk in the folder designated “Request 57.” To the extent Charter’s transit vendors also provided additional, non-transit services to Charter during the relevant periods, the invoices reflect itemized charges.

REQUEST 107

107. Identify, as of June 30, 2012, December 31, 2012, June 30, 2013, December 31, 2013, June 30, 2014, December 31, 2014 and June 30, 2015, each cable system owned by, operated by, managed by, or attributed to the Company, and for each cable system identify the nature of the Company's interests, and state and identify the following in CSV format files:

- a. the Company's data as specified in Attachment A, which seeks data relating to geographic identifiers associated with each cable system;
- b. the facilities-based competing providers of Internet access service and MVPD service (excluding private cable and wireless cable operators), separately identified by service and provider, and the distribution technology used by the competing provider (e.g., wireless, fiber optic cable, hybrid fiber optic cable, or satellite) for each zip code served;
- c. internal estimates of the percentage of homes passed that are overbuilt by any facilities-based competing provider of MVPD service and Internet access service separately for each such competing provider;
- d. the total capacity and the total unused capacity of each of the Company's cable systems by (i) MHz and the spectrum allocated to each cable service and any other service, and (ii) the number of non-broadcast programming networks;
- e. the headends serving each cable system, their physical locations, and the number of subscribers to each Cable Service served by each headend; and
- f. the channel lineups associated with each channel lineup identifier provided in Request 107(a).

Response to Request 107(c):

Charter's response to Request 107(c) is contained in Exhibits 107(c)-1 and 107(c)-2, which are provided in the enclosed disk in the folder "Request 107," which consists of information on the percentage of homes passed that are overbuilt by facilities-based competing providers of MVPD service and Internet access service. Specifically, Exhibits 107(c)-1 and 107(c)-2 consist of reports provided by Centris Marketing Science ("Centris") that Charter purchased for the purpose of responding to this Request 107(c). Please note that Charter instructed Centris to limit the report only to larger competitors, rather than all competitors

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tracked generally by Centris. Exhibits 107(c)-1 and 107(c)-2 therefore are not intended to represent an exhaustive set of competitors for the relevant services.

Exhibit 107(c)-1 consists of data regarding overbuilding by facilities-based competing providers of MVPD services, and Exhibit 107(c)-2 consists of data regarding overbuilding by facilities-based competing providers of Internet access services. Within each exhibit, for the given service, data are provided on the number of residential locations to which each competing provider's services were available as of June 2012, December 2012, June 2013, December 2013, June 2014, December 2014, and June 2015, and the percent of Charter's residential locations passed that this represents.

Response to Request 107(e):

Charter's response to Request 107(e) is provided in Exhibit 107(e) on the enclosed disk in the folder "Request 107," which consists of information on Charter's cable systems as of mid-year and year-end 2012 through 2015, as well as the headends serving each cable system, the physical location of each headend, and the number of cable service subscribers served by each headend. Data included in Exhibit 107(e) are sourced from **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The field "date" in Exhibit 107(e) shows the date as of which the requested information is provided. Note that **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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actually provided as of the 21<sup>st</sup> of each requested month, rather than the month-end. The field “lineup\_id” shows the unique numeric identifier of the Charter cable system (*i.e.*, channel lineup) for the given date. The field “lineup\_name” shows the name of the cable system for which the requested information is provided for the given date. The field “headend\_id” shows the unique numeric identifier of the headend serving the given cable system for the given date. The field “headend” shows the name of the headend serving the given cable system for the given date. The fields “address,” “city,” “state,” and “zip” show the address, city, state, and ZIP code, respectively, of the headend serving the given cable system for the given date. Note that some headends share the same address. These headends have been “collapsed” into one location in order to simplify the Charter network and improve support services. The field “subscribers” shows the number of residential cable subscribers in the given cable system being served by the given headend for the given date.

**REQUEST 108**

108. For each zip code identified in Request 107(a) and for the Company as a whole, separately for residential subscribers, bulk residential, and non-residential subscribers, and for each month for the period beginning June 2012 through August 2015 provide the following:

- a. the Company's data as specified in Attachment B, which seeks subscriber data relating to each of the Company's service plans;
- b. a complete description of all services that were included in the Company's response to the "Monthly Recurring Revenue" (MRR), "Monthly Recurring Core Service Plan Revenue", and "Monthly Recurring and Non-Recurring Revenue Per Subscriber" (ARPU) fields in the "Service Plan" table provided for subpart (a);
- c. the Company's data as specified in: i) Attachment C. 1, which seeks data relating to subscriber counts; ii) Attachment C.2, which seeks data relating to disconnects; iii) Attachment C.3, which seeks data relating to new connects; iv) Attachment C.4, which seeks data relating to continuing subscribers; v) Attachment C.5, which seeks data relating to Internet Access Service tier transitions; vi) Attachment C.6, which seeks data relating to sidegrades; vii) Attachment C.7, which seeks data on long-run customer behavior; viii) Attachment C.8, which seeks data relating to chum by tenure; and ix) Attachment C.9, which seeks data relating to recent downgrades; and
- d. a description of the main types of disconnects that are included in each of the four categories of disconnects - mover, voluntary, non-payment, and all other - reported in Attachment C.2 and an explanation of the methodology the Company uses to estimate the number of disconnects in each category, including a discussion of the extent to which the Company is unable to obtain information on the reason for the disconnect and how the disconnect is classified in such cases.

Response to Attachment B "Service Plan Data" Table Columns A-BH, BQ-BY:

Charter's response to Request 108(a), Attachment B "Service Plan Data" – Columns A-BH, BQ-BY, is provided in Exhibits 108(a)-3, 108(a)-4 and 108(a)-6 on the enclosed disk in the folder entitled "Request 108." Exhibits 108(a)-3 and 108(a)-4 consist of information on subscribers, service plans, and monthly recurring revenues ("MRR") by ZIP code on a monthly basis from June 2012 through August 2015 residential and bulk residential. Data responsive to

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this Request as it pertains to commercial subscribers will be provided in a subsequent production. Exhibit 108(a)-10 consists of a crosswalk mapping the ZIP codes from Exhibit 107(a)-1 to channel lineups. Except as noted, information in this file is sourced from **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** for Charter residential subscribers. Data on bulk residential subscribers pertain only to services and revenues for which tenants pay as individuals, above and beyond those services provided through bulk contracts.

Exhibits 108(a)-3 and 108(a)-4 show the requested metrics for residential and bulk residential subscribers, respectively, and share the same structure. The field “Date” shows the month for which the requested metrics are reported. Note that **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY**

**CONFIDENTIAL INFORMATION]**so this information is actually provided as of the 21<sup>st</sup> of each requested month, rather than the last day. The field “zip” shows the ZIP code for which the metrics are reported in the given month. The fields “plan\_id” and “plan\_name” identify the particular combination of MVPD, Internet access, and phone services for which the metrics are reported for the given month and ZIP code. Note that in the normal course of business, Charter does not sell its MVPD, Internet access, and phone services in set “plans,” but rather sells these services individually and then incentivizes residential subscribers to bundle services via discounts. As such, the Company’s response to this table is provided separately for each iteration of MVPD tier, Internet tier, and phone tier purchased by Charter subscribers, corresponding to the service tier fields in the remainder of the table. The “plan\_name” field

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contains a concatenation of the service levels included in each of these iterations for MVPD, Internet access, and phone, while the “plan\_id” contains a unique ID assigned to each of these “plans” for the purposes of responding to this Request.

The field “internet” indicates whether the given combination of services includes Internet access service. The field “internet tier” shows the name of the tier of Internet access services offered; for purposes of this response tiers are determined by download speed and are assigned the speed as a name. The fields “down\_speed” and “up\_speed” show the download speed and upload speed, respectively, associated with the Internet access tier provided in the particular plan, in megabits per second. Note that only the download speed associated with a customer’s Internet service is tracked within the scope of **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]**; upload speed, as provided here, was determined based on the typical upload speed offered in correspondence with the provided download speed. Due to the existence of legacy Internet offerings, the corresponding upload speed was not available for particular download speeds that are no longer offered.

The field “mvpd” indicates whether the given combination of services includes MVPD service. The field “video\_tier” indicates the MVPD tier provided in the particular plan. Charter delineates its cable systems by what are internally known as “channel lineups,” a geographic designation that is defined based on a unique MVPD service offering to residential subscribers. These channel lineups are subdivisions of cable headends and divide the Charter footprint into several hundred geographic areas. All such cable systems are 100% owned by Charter. The field “lineup\_id” shows the internal code associated with each cable system. Only the current

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lineup is reported, which may not necessarily be the lineup ID for that ZIP code during that month. Also, any ZIP code can contain subscribers receiving service based on multiple channel lineups.

Accordingly, Exhibit 108(a)-6 provides a list of 5-digit ZIP codes and corresponding lineup\_IDs and lineup names. In that exhibit the field “zip” lists the ZIP code, while the fields “lineup\_id” and “lineup\_name” report the ID and name of the cable system. Returning to Exhibits 108(a)-3 and 108(a)-4, the field “voice” indicates whether the given combination of services includes phone service. The field “plan\_offered” indicates whether the service plan had subscribers as of August 2015. The field “subs” shows the number of Charter residential subscribers to the given combination of services in the given ZIP code and month. The fields “subs\_1month,” “subs\_12months,” “subs\_12\_24months,” and “subs\_24months” show the number of Charter residential subscribers to the given combination of services in the given ZIP code and month who have been subscribers of the bundle for 1 month or less, 12 months or less, more than 12 months and 24 months or less, and more than 24 months, respectively. Note that for all fields in this table that delineate metrics based on subscriber tenure, that tenure is determined at the bundle level, rather than at the level of the specific service plan indicated. For example, a triple play subscriber’s tenure is determined by how long the subscriber has subscribed to all of MVPD, Internet access, and phone services, not how long the subscriber has subscribed to the particular tiers of MVPD, Internet access, and phone services that the subscriber currently has. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY**

**CONFIDENTIAL INFORMATION]** The fields “subs\_promo” and “subs\_nopromo” indicate the number of subscribers who were or were not receiving a promotional rate. In all cases subscriber counts include those tenant bulk video subscribers who also pay individually for additional services.

The field “connects” reports customers who previously did not subscribe to any Charter Cable Service who became subscribers during the current month. The fields “downgrade\_video,” “downgrade\_internet,” and “downgrade\_phone” report subscribers who subscribed to the respective services at the end of the prior month but no longer subscribe to those services at the end of the current month. The fields “upgrade\_video,” “upgrade\_internet,” and “upgrade\_phone” report subscribers who did not subscribe to the respective services at the end of the prior month but added the service during the current month. The fields “sidegrade\_video\_up,” “sidegrade\_internet\_up,” “sidegrade\_phone\_up,” “sidegrade\_video\_down,” “sidegrade\_internet\_down,” and “sidegrade\_phone\_down” report subscribers who had a service plan including the respective service at the end of the prior month who subscribed to a higher or lower tier of that service at the end of the current month. Counts of sidegrades ignore subscribers for whom the tier or prior month tier for that service is unknown. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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The field “disconnects” shows the number of Charter residential subscribers who have discontinued service to the given combination of services in the given ZIP code and month. This is inclusive of only full disconnects to Charter services, rather than downgrades or upgrades. The fields “disconnects\_1month,” “disconnects\_12months,” “disconnects\_12\_24months,” and “disconnects\_24months” show the number of Charter residential subscribers who have discontinued from the given combination of services in the given ZIP code and month who have been subscribers of the bundle for 1 month or less, 12 months or less, more than 12 months and 24 months or less, and more than 24 months, respectively. Note that for bulk residential subscribers, **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The fields “disconnects\_vol,” “disconnects\_vol\_1month,” “disconnects\_vol\_12months,” “disconnects\_vol\_12\_24months,” and “disconnects\_vol\_24months” show the number of Charter residential subscribers who have voluntarily discontinued from the given combination of services in the given ZIP code and month who have been subscribers of the bundle for 1 month or less, 12 months or less, more than 12 months and 24 months or less, and more than 24 months, respectively. Charter’s response to Request 108(d) describes the information that Charter collects on reasons for disconnection; the reason coded as voluntary for purposes of responding to this response is “SWITCH,” which means the customer has indicated competition as the reason for requesting disconnection and is not moving. The field “mrr” shows the average MRR per Charter subscriber to the given combination of services in the given ZIP code and month.

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The fields “mrr\_1month,” “mrr\_12months,” “mrr\_12\_24months,” and “mrr\_24months” show the average MRR per Charter subscriber to the given combination of services in the given ZIP code and month who have been subscribers of the bundle for 1 month or less, 12 months or less, more than 12 months and 24 months or less, and more than 24 months, respectively. The fields “mrr\_video,” “mrr\_data,” and “mrr\_phone” report MRR arising from that particular service, as determined by an allocation of service codes to each service and as commonly reported in the

**[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY**

**CONFIDENTIAL INFORMATION]**. Note that total MRR may be less than the sum of video, data, and phone MRR because of credits, in particular promotional credits, which are not allocated to the services individually. The fields “mrr\_promo” and “mrr\_nopromo” report total MRR for those subscribers who are or are not receiving a promotional price in that month.

**[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END**

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The field “mrr\_core” shows the average MRR per Charter subscriber for revenues for the given combination of services in the given ZIP code and month that have been allocated to core services for purposes of this response. Charter’s response to Request 108(b) describes the allocation of revenues to core versus non-core categories. The fields “mrr\_1month,” “mrr\_12months,” “mrr\_12\_24months,” and “mrr\_24months” show the average MRR per Charter subscriber to the given combination of services in the given ZIP code and month who have been subscribers of the bundle for 1 month or less, 12 months or less, more than 12 months and 24 months or less, and more than 24 months, respectively. The fields “mrr\_video,” “mrr\_data,” and

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“mrr\_phone” report MRR arising from that particular service, as determined by an allocation of service codes to each service and as commonly reported in the **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** Note that total MRR may be less than the sum of video, data, and phone MRR because of credits, in particular promotional credits, which are not allocated to the services individually. The fields “mrr\_promo” and “mrr\_nopromo” report total MRR for those subscribers who are or are not receiving a promotional price in that month. Note that in a small number of cases, **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** identifies subscribers for ZIP-month-plan combinations but does not contain data on corresponding revenues by subcategory.

The field “premium\_revenues” shows the total MRR for revenues allocated to premium services for purposes of this response. The field “premium\_units” reports the number of premium channels subscribed to, summed across all subscribers in the ZIP code, month, and service plan. A premium unit is defined to be a single premium channel subscribed to by one subscriber. Thus, if a customer has subscribed to HBO, Starz, and TMC, that will appear in the data as three premium units. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY**

**CONFIDENTIAL INFORMATION]**

The field “modem\_revenues” shows the total MRR for revenues allocated to modems for purposes of this response. The field “modem\_units” reports the number of modem units. Charter does not track modem units by subscriber. The value for this field counts one modem

for each subscriber for whom [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [END HIGHLY CONFIDENTIAL INFORMATION] reports positive modem revenues, as allocated for purposes of this response, summed across all subscribers in the ZIP code, month, and service plan. The field “settopbox\_revenue” shows the total MRR for revenues allocated to set-top boxes for purposes of this response. The field “settopbox\_units” reports the number of standard, high-definition, and DVR boxes as recorded in [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [END HIGHLY CONFIDENTIAL INFORMATION]. Charter’s response to Request 108(b) describes the allocation of revenues to categories.

Response to Attachment B “Service Plan Data” Table Columns BI-BP, BZ, CC-CF:

Charter’s response to Request 108(a), Attachment B “Service Plan Data” – Columns BI-BP, BZ, and CC-CF, is provided in Exhibits 108(a)-7 through 108(a)-10 on the enclosed disk in the folder entitled “Request 108.” Exhibits 108(a)-7 through 108(a)-9 consist of information on the average revenue per user, non-recurring revenues excluding VOD services, and termination fee revenues by billing franchise tax area (“FTA”) on a monthly basis from June 2012 through August 2015 for residential, bulk residential, and commercial subscribers. Exhibit 108(a)-10 consists of a crosswalk mapping the ZIP codes from Exhibit 107(a)-1 to FTAs. Revenue data for these Exhibits are sourced from Charter’s [BEGIN HIGHLY CONFIDENTIAL INFORMATION] [END HIGHLY CONFIDENTIAL INFORMATION] and subscriber data used in these Exhibits are sourced from Charter’s [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY

**CONFIDENTIAL INFORMATION]** FTAs are below the cable system level (*i.e.*, channel line-up), but are generally larger geographic units than ZIP codes. The FTAs included in Exhibits 108(a)-7 through 108(a)-9 are limited to FTAs that include ZIP codes in Exhibit 107(a)-

1. [BEGIN HIGHLY CONFIDENTIAL INFORMATION]

[END HIGHLY

**CONFIDENTIAL INFORMATION]** Finally, note that all revenue fields can take negative values, which represent accounting adjustments.

Exhibits 108(a)-7 and 108(a)-9 show the requested metrics for residential and commercial subscribers, respectively. Exhibits 108(a)-7 and 108(a)-9 share the same structure. The field “date” shows the month for which the requested metrics are provided. The field “fta” shows the eight digit FTA code for which the requested metrics are provided. The field “arpu” shows the average monthly recurring and non-recurring revenue per subscriber for a given month and FTA. The fields “arpu\_video,” “arpu\_data,” and “arpu\_phone” show average monthly recurring and non-recurring revenue per subscriber for MVPD, Internet access, and telephone services, respectively for the given month and FTA. A more detailed explanation of the revenue elements used to calculate the ARPU variables can be found in Charter’s response to Request 108(b). The field “other\_nrr” shows non-recurring revenues excluding VOD services and

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termination fees for a given month and FTA. The field “terminationfee\_revenues” shows the total termination fees paid by subscribers for a given month and FTA. Note Charter no longer sells residential packages subject to contract terms and termination fees, and has not done so since 2012. The amounts shown in Exhibit 108(a)-7 are from legacy contracts that included termination fees.

Exhibit 108(a)-8 shows the requested metrics for bulk residential subscribers. Note that the bulk residential subscriber counts used to calculate ARPU include bulk residential subscribers that pay for additional Charter services as well as bulk residential subscribers that do not pay for additional Charter services. The field “date” shows the month for which the requested metrics are provided. The field “fta” shows the eight digit FTA code for which the requested metrics are provided. Note Exhibit 108(a)-8 does not include the field “other\_nrr” because only recurring revenue service codes are associated with bulk residential services. The field “arpu\_video” shows the MRR per subscriber for MVPD services for a given month and FTA. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END**

**HIGHLY CONFIDENTIAL INFORMATION]** Charter currently has approximately **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** bulk residential Internet access subscribers nationwide. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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The field “fta” in Exhibit 108(a)-10 shows the eight digit FTA code for the FTA that includes the given ZIP code serviced by Charter. The field “zip code” shows the ZIP code that is included in a given FTA. The ZIP codes included in Exhibit 108(a)-10 are limited to ZIP codes that are in Exhibit 107(a)-1. Note that a particular ZIP code can span multiple FTAs. There is not a one to one relationship between FTA and ZIP code.

Response to Attachment B “Service Plan Data” Table Columns CH-CM:

Charter’s response to Request 108(a), Attachment B “Service Plan Data” – Column CG, is provided in Exhibits 108(a)-11 through 108(a)-14 on the enclosed disk in the folder entitled “Request 108,” which consists of information on the average data usage in gigabytes per Internet access modem on the Charter network. **[BEGIN HIGHLY CONFIDENTIAL**

**INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

Metrics on average data usage are provided for Charter as a whole from June 2012 to August 2015 (see Exhibit 108(a)-11), by Cable Modem Termination System (“CMTS”) from August 2013 to August 2015 (see Exhibit 108(a)-12), and by CMTS and ZIP code from December 2014 to August 2015 (see Exhibit 108(a)-14). Where ZIP codes are reported, this information is provided for Charter-served modems in the ZIP codes identified in Charter’s response to Request 107(a)-1. A mapping of current CMTSs serving ZIP codes identified in Charter’s response to Request 107(a)-1 is provided in Exhibit 108(a)-13. Data included in these Exhibits are sourced from the Charter Network Operations department. **[BEGIN HIGHLY CONFIDENTIAL**

**INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The field “date” in Exhibit 108(a)-11 shows the month over which the requested metrics are reported. The field “down\_avg\_usage” shows the average downstream data usage per Internet access service modem for Charter as a whole in the given month, in gigabytes. The field “up\_avg\_usage” shows the average upstream data usage per Internet access service modem for Charter as a whole in the given month, in gigabytes. The field “total\_avg\_usage” shows the average total data usage per Internet access service modem for Charter as a whole in the given month, in gigabytes. Note that the average data usage in January 2015 is higher than normal due

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to a data reporting issue where a portion of the data usage from December 2014 was reported in January 2015.

The field “date” in Exhibit 108(a)-12 shows the month over which the requested metrics are reported. The field “cmts” shows the Charter CMTS for which the requested metrics are reported for the given month. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL**

**INFORMATION]** The field “down\_avg\_usage” shows the average downstream data usage per Internet access service modem for the given month and CMTS, in gigabytes. The field “up\_avg\_usage” shows the average upstream data usage per Internet access service modem for the given month and CMTS, in gigabytes. The field “total\_avg\_usage” shows the average total data usage per Internet access service modem for the given month and CMTS, in gigabytes.

The field “cmts” in Exhibit 108(a)-13 shows the CMTS for which ZIP codes served with Internet access service are provided. Note that only CMTSs that service the ZIP codes identified in Exhibit 107(a)-1 are provided in Exhibit 108(a)-13. The field “zip” shows the given ZIP code identified in Exhibit 107(a)-1 served by the given CMTS. Note that a particular ZIP code can be served by multiple CMTSs; there is not a one to one relationship between CMTS and ZIP code.

The field “date” in Exhibit 108(a)-14 shows the month over which the requested metrics are reported. The field “cmts” shows the Charter CMTS for which the requested metrics are reported for the given month. The field “zip” shows the ZIP code for which the requested metrics are reported for the given month and CMTS. The field “down\_avg\_usage” shows the

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average downstream data usage per Internet access service modem in the given month, CMTS, and ZIP code, in gigabytes. The field “up\_avg\_usage” shows the average upstream data usage per Internet access service modem in the given month, CMTS, and ZIP code, in gigabytes. The field “total\_avg\_usage” shows the average total data usage per Internet access service modem in the given month, CMTS, and ZIP code, in gigabytes.

Response to Attachment B “Service Plan Data” Table Columns CH-CM:

Charter’s response to Request 108(a), Attachment B “Service Plan Data” – Columns CH-CM, is provided in Exhibit 108(a)-15 on the enclosed disk in the folder entitled “Request 108,” which consists of information on average data usage in gigabytes per Internet access modem for percentile groups of data usage, for Charter as a whole on a monthly basis from June 2012 to August 2015. For example, the 45<sup>th</sup> percentile group in the Exhibit represents the total data usage of Internet access subscribers in the 41<sup>st</sup> to 45<sup>th</sup> percentiles. Total data usage is then divided by the number of modems within a percentile group to calculate average data usage by percentile group. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** Data included in Exhibit 108(a)-15 are sourced from the Charter Network Operations department. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The field “date” in Exhibit 108(a)-15 shows the month over which the requested metrics are reported for Charter as a whole. The field “percentile” shows the particular percentile group of Internet access data usage provided. The field “down\_avg\_usage” shows the average downstream data usage per Internet access service modem for Charter as a whole for the given month and percentile group, in gigabytes. The field “up\_avg\_usage” shows the average upstream data usage per Internet access service modem for Charter as a whole for the given month and percentile group, in gigabytes. The field “total\_avg\_usage” shows the average total data usage per Internet access service modem for Charter as a whole for the given month and percentile group, in gigabytes.

Response to Request 108(b):

Charter’s Response to Request 108(b) is provided in Exhibits 108(b)-1 and 108(b)-2 on the enclosed disk in the folder entitled “Request 108.” Exhibit 108(b)-1 consists of service code categories used to calculate Charter’s response to “Monthly Recurring Revenue” and “Monthly Recurring Core Service Plan Revenue.” Exhibit 108(b)-2 consists of the General Ledger revenue accounts used to calculate Charter’s response to “Monthly Recurring and Non-recurring Revenue per Subscriber” (ARPU).

**[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL**

**INFORMATION]** For purposes of this response Charter has assigned each designated group of these service codes to one of the MRR subcategories for which data was requested in Attachment B: core, premium, modem, set-top box, and other. Exhibit 108(b)-1 reports the assignments of revenue categories. Column A (“Product Summary Category”) reports the top-level categorization of each of Charter’s service codes as tracked in **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]**. Column B (“Product Detail Category”) reports the second-level categorization. Column C (“Revenue Category”) reports the FCC requested MRR subcategory to which each Charter product detail category was assigned for purposes of responding to Request 108(a).

Column A (“General Ledger Revenue Account”) in Exhibit 108(b)-2 shows the unique identifier for the General Ledger revenue account included in the ARPU calculation. Column B (“Description”) shows a description of the service for the given General Ledger revenue account. Column C (“Recurring/Non-Recurring”) shows whether the given General Ledger revenue account is categorized as a recurring or non-recurring revenue. Column D (“LOB”) shows the line of business that the General Ledger revenue account is categorized as (“MVPD,” “Internet Access,” “Telephone,” “Other”). Column E (“Customer Type”) shows the customer type associated with the given General Ledger revenue account (“Residential,” “Bulk Residential,” “Commercial). Note that the ARPU calculation includes all General Ledger revenue accounts.

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The ARPUs for specific lines of business include only General Ledger revenue accounts relevant to the given line of business.

Response to Request 108(c):

Data responsive to this Request will be provided in a subsequent production.

Response to Request 108(d):

Reasons for disconnection are captured by the Company's call center representatives and entered into **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]**. These are the potential reasons for disconnection captured in **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]**:

- “DISCONTINUE”: Customer requests disconnection of all services and does not indicate the reason is due to relocation or competition.
- “MOVE”: Customer moves outside of Charter's footprint or within footprint and declines to transfer service.
- “NON-PAY”: Customer's account is disconnected for non-payment.
- “OTHER”: Account is closed or services are removed as billing correction.
- “SWITCH”: Customer indicates competition as the reason for requesting disconnection and is not moving.
- “TRANSFER”: Customer moves within the Charter service area and transfers service(s).

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For purposes of responding to Request 108(a) Attachment B Charter has chosen to indicate that a disconnection is voluntary when a reason of “SWITCH” is recorded. For purposes of responding to Request 108(c) Attachment C.2, being provided in a subsequent production, Charter recognizes that the FCC’s categories of mover, non-pay, voluntary, and all other do not correspond precisely to the categories tracked in **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** and will report data separately by each of the six categories tracked.

REQUEST 109

109. For each zip code identified in Request 107(a) and for the Company as a whole, separately for each VOD service (Subscription, Free, Transactional, Pay-Per-View) and for each month for the period beginning June 2012 through August 2015, state and provide the following:

- a. the Company's data related to VOD as specified in Attachment D; and
- b. in a separate CSV format file, for each VOD service, and for each month for the period beginning June 2012 through August 2015: (1) the total revenues; (2) the total cost of video programming distribution rights; (3) the total number of hours viewed; (4) the price of the service and a description of all discounts or promotions that were in effect; and (5) the percentage of the Company's MVPD subscribers that view video programming via the service.

Response to Attachment D "Video-On-Demand" Table Columns A-D, F, J-K:

Charter's response to Request 109(a), Attachment D, "Video-On-Demand Data" – Columns A-D, F, and J-K, is provided in Exhibit 109(a)-1 on the enclosed disk in the folder entitled "Request 109," which consists of information on the number of unique users, the number of total transactions, and total revenue for Charter's transactional VOD and PPV services by ZIP code on a monthly basis from June 2012 to December 2015. The ZIP codes included in Exhibit 109(a)-1 are limited to ZIP codes in Exhibit 107(a)-1. Data included in Exhibit 109(a)-1 are sourced from Charter's **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The field "date" in Exhibit 109(a)-1 shows the month for which the requested metrics are provided. The field "zip" shows the ZIP code for which the requested metrics are provided for the given month. The field "vod\_transaction\_once" shows the number of Charter subscribers who used a transactional VOD service at least once for a given month and ZIP code. The field "vod\_transaction\_total" shows the total number of transactions for transactional VOD service for a given month and ZIP code. The field "vod\_transaction\_revenue" shows the total revenue

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accruing to Charter from transactional VOD services for a given month and ZIP code. The field “ppv\_once” shows the number of Charter subscribers who used a PPV service at least once for a given month and ZIP code. The field “ppv\_total” shows the total number of PPV transactions for a given month and ZIP code. The field “ppv\_revenue” shows the total revenue accruing to Charter from PPV services for a given month and ZIP code.

Response to Attachment D “Video-On-Demand Data” Table Columns E, G-I, L:

Charter’s response to Request 109(a), Attachment D, “Video-On-Demand Data” – Columns E, G-I, and L, is provided in Exhibits 109(a)-2 and 109(a)-3 on the enclosed disk in the folder entitled “Request 109.” Exhibit 109(a)-2 consists of information on hours viewed of VOD services, unique free VOD users, and total free VOD transactions by VOD headend on a monthly basis from June 2012 to August 2015. Exhibit 109(a)-3 consists of a mapping of ZIP codes to VOD headends limited to ZIP codes included in Exhibit 107(a)-1. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The field “date” in Exhibit 109(a)-2 shows the month for which the requested metrics are provided. The field “vod\_headend” shows the name of the VOD headend for which the requested metrics are provided for the given month. The field “vod\_transaction\_hours” shows the number of hours watched for Charter’s transactional VOD services for the given month and VOD headend. The field “vod\_free\_once” shows the number of Charter subscribers who used a free VOD service at least once for a given month and VOD headend. The field “vod\_free\_total” shows the total number of transactions for free VOD service for a given month and VOD headend. The field “vod\_free\_hours” shows the number of hours watched for Charter’s free VOD service, for the given month and VOD headend.

The field “vod\_headend” in Exhibit 109(a)-3 shows the VOD headend servicing the given ZIP code. The field “zip” shows the ZIP code serviced by the given VOD headend. ZIP codes in this Exhibit are limited to the ZIP codes in Exhibit 107(a)-1. Note that ZIP codes can be serviced by multiple VOD headends. There is not a one to one relationship between ZIP code and VOD headend.

Response to Attachment D “Video-On-Demand Data” Table Columns N-Q:

Charter’s response to Request 109(a), Attachment D, “Video-On-Demand Data” – Columns N-Q, is provided in Exhibit 109(a)-4 on the enclosed disk in the folder entitled “Request 109,” which consists of information on subscription VOD service upgrades, connects,

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downgrades, and disconnects, by ZIP code on a monthly basis from June 2012 through August 2015. The ZIP codes included in Exhibit 109(a)-4 are limited to ZIP codes included in Exhibit 107(a)-1. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END**

**HIGHLY CONFIDENTIAL INFORMATION]** Data included in Exhibit 109(a)-4 include the following subscription VOD services: Anime SVOD, Disney Family Movies SVOD, Here TV on Demand, Howard TV SVOD, Karaoke on Demand, Too Much for TV SVOD, and WWE on Demand. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END**

**HIGHLY CONFIDENTIAL INFORMATION]** Charter's response is limited to stand alone subscription VOD services. Stand-alone subscription VOD services do not include VOD services bundled with premium channels such as HBO and Starz. Data included in Exhibit 109(a)-4 are sourced from Charter's **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL**

**INFORMATION]** for residential subscribers.

The field "date" in Exhibit 109(a)-4 shows the month for which the requested metrics are provided. The field "zip" shows the ZIP code for which the requested metrics are provided for the given month. The field "svod\_upgrades" shows the number of subscribers that upgraded to a subscription VOD service for a given month and ZIP code. The field "svod\_subs\_connects" shows the number of new connects that added a subscription VOD service at the time of connection for the given month and ZIP code. The field "svod\_subs\_downgrades" shows the number of subscribers that downgraded subscription VOD service at the same time they

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cancelled MVPD service for the given month and ZIP code. The field “svod\_subs\_disconnects” shows the number of subscribers that with subscription VOD service that disconnected service with Charter.

Response to Attachment D “Video-On-Demand Data” Table Column R:

Charter’s response to Request 109(a), Attachment D, “Video-On-Demand Data” – Column R, is provided in Exhibit 109(a)-5 on the enclosed disk in the folder entitled “Request 109,” which consists of information on subscription VOD service revenues by billing FTA, on a monthly basis from June 2012 to August 2015. Data for Exhibit 109(a)-5 are sourced from Charter’s **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** The FTAs included in Exhibits 109(a)-5 are limited to FTAs that include ZIP codes in Exhibit 107(a)-1. Please see Exhibit 108(a)-10 for a crosswalk mapping the ZIP codes from Exhibit 107(a)-1 to FTAs. Subscription VOD revenues included are for standalone subscription VOD services. Stand-alone subscription VOD services do not include VOD services bundled with premium channels such as HBO and Starz.

The field “date” in Exhibit 109(a)-5 provides the month for which the requested metrics are provided. The field “fta” shows the 12-digit FTA code for which the requested metrics are provided. The field “svod\_revenue” shows the total revenue accruing to Charter from subscription VOD services, for a given month and FTA. Note that the “svod\_revenue” field can take negative values, which represent accounting and/or customer billing adjustments.

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Response to Request 109(b):

Charter's response to Request 109(b) is provided in Exhibits 109(b)-1 and 109(b)-2 on the enclosed disk in the folder entitled "Request 109." Exhibit 109(b)-1 consists of information on total revenues from VOD services, the total cost of video programming for VOD services, the total number of hours viewed of VOD services, and the percentage of Charter's MVPD subscribers that view VOD services, for the Company as a whole on a monthly basis from June 2012 through August 2015. Exhibit 109(b)-2 consists of a summary of current price points for VOD services. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** Data for revenues from VOD services in Exhibit 109(b)-1 are sourced from Charter's **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** Data for programming costs of VOD services in Exhibit 109(b)-1 are sourced from the Company's **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** Data for hours viewed of VOD services in Exhibit 109(b)-1 are sourced from **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY**

**CONFIDENTIAL INFORMATION]** Data for the percentage of MVPD subscribers that use VOD services in Exhibit 109(b)-1 are sourced from **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY**

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**CONFIDENTIAL INFORMATION]** Data for Exhibit 109(b)-2 are sourced from materials maintained in the ordinary course of business by Charter’s video product department.

The field “date” in Exhibit 109(b)-1 provides the month for which the requested metrics are provided. The fields “vod\_transaction\_revenue,” “vod\_subscription\_revenue,” and “ppv\_revenue” show the total revenue accruing to Charter from transactional VOD services, PPV services, and subscription VOD services, and PPV services, respectively, for Charter as whole for the given month. The fields “vod\_transaction\_costs,” “vod\_subscription\_costs,” and “ppv\_costs” show the video programming costs associated with transactional VOD, PPV, and subscription VOD services, respectively, for Charter as a whole for the given month. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** The fields “vod\_transaction\_hours,” “vod\_free\_hours,” “vod\_subscription\_hours” show the number of hours watched for transactional VOD, free VOD, and subscription VOD services for Charter as whole for the given month. As noted in Exhibit 109(a)-2, **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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fields “vod\_transaction\_perc,” “vod\_free\_perc,” “vod\_subscription\_perc,” and “ppv\_perc” show the percentage of MVPD subscribers that used transactional VOD, free VOD, subscription VOD, and PPV services, respectively, for Charter as whole for the given month. As with hours watched data, unique users of subscription VOD services includes unique users of premium channel VOD services.

Column A (“VOD Service Name”) of Exhibit 109(b)-2 provides the name of the VOD service for which the requested metrics are provided. Column B (“VOD Category”) shows the category of VOD service (VOD, PPV, or SVOD). Column C (“Price”) shows the one-time price for VOD or PPV services or the monthly price for stand-alone subscription VOD services for the given VOD service. Column D (“Notes”) provides more detailed information concerning the given VOD service price.

REQUEST 110

110. For video programming that the Company obtained from another person, separately for each month from June 2012 through August 2015, provide the following:

- a. the Company's video programming data as specified in Attachment E; and
- b. in a separate CSV format file, the name and genre of video programming produced by any person that the Company chose not to obtain and the reasons(s) why the Company chose not to carry the network.

Response to Request 110:

A CSV format file was prepared by a third party in support of the Company's response to Request 110(a) is provided on the enclosed disk in the folder "Request 110." The response has been formatted according to the template and instructions provided in "Attachment\_E\_CHARTER\_clean.xlsx."

Anonymized ratios were constructed as requested for 36 programs in the Video Program List.

For payments, where programs are paid on a quarterly basis, payments have been allocated evenly across the months of the quarter. In calculating service subscriber penetration ratios for programs paid on a quarterly basis, the calculation uses subscribers in the first month of the corresponding quarter to reflect how payments are determined.

REQUEST 111

111. Provide the Company's internet traffic exchange data as specified in Attachment F.

Response to "Sales of Transit Service" Table:

Charter does not sell transit service and has not sold transit service during the relevant period. As such, there is no response to this table.

Response to "Purchases of Transit Service" Table:

The Company's response to the "Purchases of Transit Service" table in Attachment F is provided in Exhibit 111-1 on the enclosed disk in the folder "Request 111," which consists of information requested in the "Purchases of Transit Service" table on a monthly basis from January 2012 to August 2015. Information in this file is mainly sourced from monthly billings from the purchase of transit, as invoiced to Charter by the companies providing the Company with transit.

The field "Date" in Exhibit 111-1 shows the month for which the requested metrics are reported, in the format requested. The fields "Provider\_Name" and "Provider\_DBA\_Name" show the name of the transit provider for which the requested metrics are provided for the given month. The field "Capacity" shows the total capacity of Charter's connections with the given transit provider as of the given month, in megabits per second. **[BEGIN HIGHLY**

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**[END HIGHLY CONFIDENTIAL**

**INFORMATION]** Because these reports are weekly rather than monthly, the capacity reported is taken from the last weekly report in the given month. Additionally, because the weekly

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backbone reports and the monthly transit billings data are from separate sources (*i.e.*, Charter's monitoring of its interconnection circuits vs. Charter's transit providers tracking of Charter's billable data volume), there may appear to be some discrepancies in the capacity attributed to a particular provider in a particular month and the traffic on which Charter was billed.

The field "Utilization" provides the data utilization on which Charter was billed by the given transit provider in the given month, measured in megabits per second. This utilization is calculated using the industry standard 95<sup>th</sup> percentile method, which entails collecting frequent snapshots of inbound and outbound data traffic over a given time period and using the 95<sup>th</sup> percentile utilization to determine how the transit customer should be billed for that period.

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**[END HIGHLY**

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The fields "Total Revenue," "Non\_Recurring\_Revenue," and "Recurring\_Revenue" show the amount that Charter was billed by the given provider in the given month for transit provision, in dollars. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL**

**INFORMATION]** The field "Contract\_Doc" provides the Bates number of the contract, if any, that governed the particular transit provision agreement, as produced by Charter in response to Request 47. Note that this generally represents the most recent contract submitted for the given transit provider as of the given month. The field "Contract\_Start" provides the effective date of

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the contract identified in “Contract\_Doc,” while the field “Contract\_End” provides the pending term date for the transit provision contracts that are currently in effect, if available.

Responses to “Sales of Paid Peering” Table and “Internet Traffic Exchange: Paid Peering Nodes” Table:

Charter does not participate in any paid peering arrangements and has not participated in any paid peering arrangements during the relevant period. As such, there is no response to these tables.

Response to “Settlement-Free Peering Traffic” Table and “Internet Traffic Exchange: Settlement-Free Peering Node” Table:

The Company’s response to the “Settlement-Free Peering Traffic” table and “Internet Traffic Exchange: Settlement-Free Peering Node” table in Attachment F is provided in Exhibit 111-2 on the enclosed disk in the folder “Request 111,” which consists of information requested in both of these tables, on a weekly basis from June 2012 to August 2015. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

[END

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The field “Date” in Exhibit 111-2 shows the week for which the requested metrics are reported. This date represents the end date of the week that is covered by the particular weekly Charter backbone report. The fields “Peer\_Name” and “Peer\_DBA\_Name” show the name of the settlement-free peer for which the requested metrics are provided for the given week. The fields “Facility\_Name,” “Street\_Address,” “City\_Name,” “State\_Abbreviation,” “Zip” show location information for the node at which the settlement-free peering metrics are reported for the given peer and week. The field “Ownership” indicates whether this node facility is owned by Charter or whether it is an independently owned facility. The field “ASN” shows the Autonomous System Number for the given peer; this information is not available for parties with which Charter no longer has a settlement-free peering arrangement. The field “Circuit” delineates the separate ports between Charter and the given settlement-free peer at the given node, as the metrics requested are reported separately for each individual port.

The field “Node\_Capacity” shows the capacity of Charter’s connection with the given peer as of the given week at the given node and on the given port, in megabits per second. The fields “Node\_Utilization\_In” and “Node\_Utilization\_Out” provide the inbound and outbound data utilization, respectively, as captured by Charter for the given week, peer, node, and port, measured in megabits per second. This utilization is calculated using the industry standard 95<sup>th</sup> percentile method, which entails collecting frequent snapshots of inbound and outbound data traffic over a given time period and using the 95<sup>th</sup> percentile level of data traffic in each direction to monitor capacity utilization. Because Charter’s settlement-free peering arrangements do not

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involve any form of penalties or fees, the fields “Peer\_Penalty\_Fees\_Paid” and “Company\_Penalty\_Fees\_Paid” are always set as zero.

The field “Contract\_Doc” provides the Bates number of the contract, if any, that governed the particular settlement-free peering agreement, as produced by Charter in response to Request 47. The field “Contract\_Start” provides the effective date of the contract identified in “Contract\_Doc,” while the field “Contract\_End” provides the pending term date for the settlement-free peering agreement, if available. Note that for each peer, Charter has submitted only one contract that governs the settlement-free peering arrangement. Each of these contracts is stipulated to renew automatically in perpetuity barring either party choosing to cancel it. As such, there is no contract end date to provide for any of these agreements.

Response to “Internet Traffic Exchange: Transit Purchase Node” Table:

The Company’s response to the “Internet Traffic Exchange: Transit Purchase Node” table in Attachment F is provided in Exhibit 111-3 on the enclosed disk in the folder “Request 111,” which consists of information requested, on a weekly basis from June 2012 to August 2015.

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The field “Date” in Exhibit 111-3 shows the week for which the requested metrics are reported. This date represents the end date of the week that is covered by the particular weekly Charter backbone report. The fields “Facility\_Name,” “Street\_Address,” “City\_Name,” “State\_Abbreviation,” and “Zip” show location information for the node at which the transit purchase metrics are reported for the given peer and week. The field “Ownership” indicates whether this node facility is owned by Charter or whether it is an independently owned facility. The field “ASN” shows the Autonomous System Number for the given transit provider. The fields “Peer\_Name” and “Peer\_DBA\_Name” show the name of the transit provider for which the requested metrics are provided for the given week. The field “Circuit” delineates the separate ports between Charter and the given transit provider at the given node, as the metrics requested are reported separately for each individual port.

The field “Node\_Capacity” shows the capacity of Charter’s connection with the given peer as of the given week at the given node and on the given port, in megabits per second. The fields “Node\_Utilization\_In” and “Node\_Utilization\_Out” provide the inbound and outbound data utilization, respectively, as captured by Charter for the given week, peer, node, and port, measured in megabits per second. This utilization is calculated using the industry standard 95<sup>th</sup> percentile method, which entails collecting frequent snapshots of inbound and outbound data

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traffic over a given time period and using the 95<sup>th</sup> percentile level of data traffic in each direction to monitor capacity utilization.

REQUEST 114

114. For each market region identified in Request 107(a) and for the Company as a whole, separately for residential subscribers, bulk residential, and non-residential subscribers, and for each month for the period beginning June 2012 through August 2015, provide the following:

- a. the Company's data as specified in Attachment H, which seeks data relating to non-advertising revenues by Bundled Services;
- b. the Company's data as specified in Attachment I, which seeks data relating to Cable Services costs and advertising revenues;
- c. a complete and detailed description of the revenue elements the Company includes in each of the following categories of revenues reported in Attachments H and I: MVPD advertising revenues; Internet Access Service advertising revenues; total non-advertising revenue; recurring non-advertising revenue; and non-recurring non-advertising revenue; and
- d. a complete and detailed description of the cost elements that the Company includes in each of the following categories of costs reported in Attachment I: total programming cost; total MVPD advertising cost; total Internet Access Service advertising cost; variable cost of providing MVPD service other than programming cost and advertising cost; variable cost of providing Internet service other than advertising cost; and variable cost of providing phone service.

Response to Attachment H "Non-Advertising Revenues by Bundle" Table:

Charter's response to Request 114(a), Attachment H "Non-Advertising Revenues by Bundle" is provided in Exhibits 114(a)-1 through 114(a)-3 on the enclosed disk in the folder entitled "Request 114," which consist of information on the total non-advertising revenues, recurring non-advertising revenues, and non-recurring non-advertising revenues by Key Market Area ("KMA"), on a monthly basis from June 2012 through August 2015 for residential, bulk residential, and commercial subscribers. Data included in these Exhibits are limited to the KMAs included in Exhibit 107(a)-1. Data for these Exhibits are sourced from Charter's

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Exhibits 114(a)-1, 114(a)-2, and 114(a)-3 show the requested metrics for residential, bulk residential, and commercial subscribers, respectively. Each exhibit has the same structure. The field “date” shows the month for which the requested metrics are provided. The field “market\_id” gives the unique numeric identifier for the given KMA. The field “market” gives the name of the given KMA. The field “service” shows the code for the cable service provided by Charter for which the requested metrics are given. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** Charter provides four service codes in response to this Request 114(a); “Telephone,” “MVPD,” “Internet Access,” and “All Cable Services” are coded “1,” “2,” “3,” and “4,” respectively. Note that the “All Cable Services” category includes revenues that are not associated with a particular line of business and is not the sum of all services. The field “subs” shows the number of subscribers for the given month, market, and service. Note that subscriber counts are not available prior to December 2013 for the “Mountain States (KMA),” which consists of cable systems Charter acquired from Bresnan in July 2013. The field “total\_nonadrevenue” shows the total non-advertising revenue accrued by Charter for the given month, market, and service. The field “recurring\_nonadrevenue” shows the total recurring non-advertising revenue accrued by Charter for the given month, market, and service. The field “nonrecurring\_nonadrevenue” shows the total non-recurring non-advertising revenue accrued by Charter for the given month, market, and service. Note revenue fields can take negative values, which represent accounting and/or customer billing adjustments. A more

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detailed explanation of the revenue elements used to calculate these variables can be found in Charter's response to Request 114(c).

Exhibit 114(a)-2, which contains information for bulk residential subscribers, does not include the service code "1" ("Telephone") because Charter does not sell bulk telephone services. Additionally, Exhibit 114(a)-2 does not include the field "non-recurring\_nonadvenue," because only recurring revenue service codes are associated with bulk residential services. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** Charter currently has approximately **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]** bulk residential Internet access subscribers nationwide.

Response to Attachment I "Costs by Cable Service and Advertising Revenue" Table Columns A-H:

Charter's response to Request 114(b), Attachment I "Costs by Cable Service and Advertising Revenue" – Columns A-H, is provided in Exhibits 114(b)-1 and 114(b)-2 on the enclosed disk in the folder entitled "Request 114." Exhibit 114(b)-1 consists of information on advertising revenues generated by MVPD service subscribers, advertising revenues generated by Internet access service subscribers, and advertising costs associated with these advertising revenues by advertising General Ledger ID ("GLID") on a monthly basis from June 2012 through August 2015. Exhibit 114(b)-2 consists of a mapping of advertising GLIDs to the various geographic units they are associated with (DMAs, states, cities). Data for these Exhibits are sourced from the Charter Media department. **[BEGIN HIGHLY CONFIDENTIAL**

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**[END HIGHLY CONFIDENTIAL INFORMATION]** Advertising GLIDs are distinct from the GLIDs described in Exhibit 107(a)-1 and do not map to KMAs. A number of advertising GLIDs map to Designated Market Areas (“DMA”). **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]**

The field “date” in Exhibit 114(b)-1 shows the month for which the requested metrics are provided. The field “market id” gives the unique identifier for the given advertising GLID. The field “market” gives the name of the given advertising GLID. The fields “res\_sub,” “bulkres\_sub,” and “com\_sub” show the number of residential, bulk residential, and commercial subscribers respectively, for the given month and advertising GLID. Note that subscriber numbers are only provided for advertising GLIDs associated with DMAs. DMAs are limited to those included in Exhibit 107(a)-1. The field “mvpd\_adrevenue” shows the total advertising revenue generated by MVPD service subscribers for the given month and advertising GLID. Note that this number includes both “owned and operated” advertising revenues (*i.e.*, revenues generated from sales of Charter advertising spots by Charter or a third party) and “third party represented” revenues (*i.e.*, revenues from advertising spots Charter sales on the behalf of a third party). The field “internet\_adrevenue” shows advertising revenues generated by Internet access service subscribers for the given month and advertising GLID. As with the field “mvpd\_adrevenue,” the field “internet\_adrevenue” includes both “owned and operated” advertising revenues and “third party represented” revenues. The field “total\_adrevenue” shows

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the total amount of MVPD and Internet advertising revenues for the given month and advertising GLID. The fields “owned\_mvpd\_adrevenue” and “thirdparty\_mvpd\_revenue” show “owned and operated” and “third party represented” advertising revenues, respectively, generated by MVPD service subscribers for a given month and advertising GLID. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END HIGHLY CONFIDENTIAL INFORMATION]** A more detailed explanation of advertising revenues can be found in Charter’s response to Request 114(c), and a more detailed explanation of advertising costs can be found in Charter’s response to Request 114(d).

Column A (“GLID ID”) in Exhibit 114(b)-2 shows the unique identifier assigned to the given advertising GLID. Column B (“GLID Name”) shows the name assigned to the given advertising GLID. Column C (“GLID Geographic Description (DMA/State/City)”) shows the DMA, state, or city that is included in the given advertising GLID. Note that some advertising GLIDs are for expense purposes and are labeled “Expense GLID.” Additionally some advertising GLIDs are regional GLIDs. Regional GLIDs are generally used for expense purposes, but can also have revenues assigned from geographies linked to the region.

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Response to Attachment I “Costs by Cable Service and Advertising Revenue” Table Columns I-L:

Charter’s response to Request 114(b), Attachment I “Costs by Cable Service and Advertising Revenue” – Columns I-L, is provided in Exhibit 114(b)-3 on the enclosed disk in the folder entitled “Request 114,” which consists of information on programming costs and variable costs by KMA on a monthly basis from June 2012 through August 2015. Programming cost data are sourced from the Company’s **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]** **[END HIGHLY CONFIDENTIAL INFORMATION]**, and are inclusive of the costs for acquiring distribution rights for PPV and VOD programming.

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**INFORMATION]** Variable costs data are sourced from Charter’s **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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The field “date” provides the month for which the requested metrics are provided. The field “market\_id” gives the unique numeric identifier for the given KMA. The field “market” gives the name of the given KMA. The fields “res\_subs,” “bulkres\_subs,” and “com\_subs” show residential, bulk residential, and commercial subscribers for the given KMA and month. Note that subscriber counts are not available prior to December 2013 for the “Mountain States

(KMA),” which consists of cable systems Charter acquired from Bresnan in July 2013. The field “total\_programmingcost” shows the total programming costs for the given KMA and month.

The field “res\_othervariablecosts” shows the variable costs of providing cable services to residential and bulk residential subscribers. The field “com\_othervariablecosts” shows the variable costs of providing cable services to commercial subscribers. Variable cost fields exclude advertising costs and programming costs. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

**[END**

**HIGHLY CONFIDENTIAL INFORMATION]** The field “total\_othervariablecosts” shows the variable costs for all types of subscribers (residential, bulk residential, and commercial). Note that the “Mountain States (KMA)” market, which is comprised of geographies Charter acquired in the Bresnan acquisition, includes variable costs data for months prior to Charter’s acquisition of these systems in July 2013. These variable costs are on a pro forma basis. A more detailed explanation of the costs in this request can be found in the narrative for Request 114(d).

Response to Request 114(c):

Charter’s response to Request 114(c) is provided in the following narrative, which describes the revenue elements used to calculate the fields “MVPD Advertising Revenues,” “Internet Advertising Revenues,” “Total Non-Advertising Revenue,” “Recurring Non-Advertising Revenue,” “ and “Non-Recurring Non-Advertising Revenue.”

The field “MVPD Advertising Revenues” was calculated using advertising revenues attributed to MVPD subscribers. This calculation includes the following categories:

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- Revenues from “owned and operated” and “third party represented” advertising sales including local spot revenues, national spot revenues, enhanced spot revenues, and trade revenues.
- MVPD advertising revenues also include contractor revenues, programming/retransmission revenues, and political advertising revenues.

The field “Internet Advertising Revenues,” was calculated using advertising revenues attributed to Internet access subscribers. This calculation includes the following categories:

- Revenues from “owned and operated” and “third party represented” advertising sales including **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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The revenue elements used to calculate the fields “Total Non-Advertising Revenue,” “Recurring Non-Advertising revenue,” and “Non-Recurring Non-Advertising Revenue” in Attachment H are the same as those used to create the ARPU variables in Exhibits 108(a)-7 through 108(a)-9. Please see Exhibit 108(b)-2 and the corresponding narrative response for Request 108(b) for a detailed explanation of the recurring and non-recurring revenue elements used to create the requested metrics. Note Column C (“Recurring/Non-Recurring”) in Exhibit 108(b)-2 shows whether the given General Ledger revenue account is categorized as a recurring or non-recurring revenue. Column D (“LOB”) shows the line of business that the General Ledger revenue account is

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categorized as (“MVPD,” “Internet Access,” “Telephone,” “Other”). Column E (“Customer Type”) shows the customer type associated with the given General Ledger revenue account (“Residential,” “Bulk Residential,” “Commercial”).

Response to Request 114(d):

Charter’s response to Request 114(d) is provided in the following narrative, which describes the cost elements used to calculate “Total Programming Costs,” “Total Advertising Costs,” and the “Variable Costs” fields.

The cost elements used to calculate the field “Total Programming Costs” include the cost for video distribution rights of both on linear and VOD programming. As noted previously, data are sourced from the Company’s **[BEGIN HIGHLY CONFIDENTIAL INFORMATION]**

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The cost elements used to calculate the field “Total Advertising Costs” include all costs associated with MVPD and Internet access advertising revenues. This calculation includes the following cost categories:

- Costs from personnel expenses, cost of sales (including commissions), education and training for advertising representatives, travel costs, computer and database maintenance, billing expenses, bad debt, marketing and marketing research, advertising production, building and supplies, and other miscellaneous expenses such as recruitment and relocation, public relations, and convention expenses.

The cost elements used to calculate the fields “Residential Variable Costs,” “Commercial Variable Costs,” and “Total Variable Costs” include costs associated with providing cable services excluding advertising costs and video programming costs. These calculations include the following cost categories:

- Direct video costs excluding programming, but including franchise fees, FCC fees, pass through of franchise granting costs, copyright fees, costs associated with channel guides, costs associated with Charter.net and TV Everywhere.

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- Direct Internet costs including IP costs, network backbone costs, circuit costs, external network-network interface costs, and product support.
- Direct voice costs including network facilities, long distance costs, usage, customer support, Federal and state Universal Service Fund fees, and other regulatory fees.
- All commissions excluding advertising sales.
- Bad debt and collection expenses.
- Customer reconnection costs.

**REQUEST 118**

118. For each relevant service, identify each electronic or other database or data set used or maintained by the Company at any time after January 1, 2012, without regard to custodian, that contains information concerning the Company's (i) sales; (ii) prices; (iii) margins; (iv) costs, including but not limited to, programming costs, distribution costs, standard costs, expected costs, and opportunity costs; (v) patents or other intellectual property; (vi) research or development projects; (vii) licensing of video programming; (viii) customers; and (ix) network performance, to the extent such customer information is not provided in response to other Requests elsewhere in the document. For each such database, identify (a) the database type, i.e., flat, relational, or enterprise; (b) the size in both number of records and bytes of information; (c) the fields, query forms, and reports available or maintained; and (d) any software product or platform required to access the database.

**Response to Request 118:**

Charter's response to Request 118 is provided in Exhibits 118-1 through 118-12 on the enclosed disk in the folder marked "Request 118." Pursuant to discussions with FCC staff, Charter is responding to this request by providing updated descriptions of responsive databases along with sample reports and data dictionaries.

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