



**Charter Communications Acquisition of Time Warner Cable
and Advance/Newhouse Partnership – Bright House Networks
(MB Docket 15-149)
The Imperative for a Substantive Public Benefit with Accountability
*Internet For All Now!***

More Than a Quarter of the Population is Not Connected

- 33% of U.S. households do not have high-speed Internet access at home--are stuck on the wrong side of the Digital Divide up against a “wall of poverty”. Affordable broadband is an integral component of a comprehensive approach to tackle concentrated and persistent poverty.
- 43% of those without Internet at home say cost is the reason. It is the high monthly cost and cost of a computer. The poor should not be relegated to aging copper-based phone systems and slow broadband services carried over it in an outdated Lifeline program.
- There are almost 3 times as many other low-income households without children in school as there are families on NSLP.
- There is ample evidence that being connected enables low-income households to become more self-sufficient—technology is empowering and transforming.
- There are 3 barriers a successful broadband adoption program for low-income households must address: (1) cost; (2) relevance; and (3) digital literacy. The New Charter affordable rate is a good start, but needs to be coupled with company funding for CBOs to assist with outreach in-language and in-culture, digital literacy training, and subscribing to drive broadband adoption.

Public Benefit for Broadband Adoption is a Bridge to FCC Broadband Lifeline

- FCC has approved actions historically to promote affordable broadband:
 - SBC – AT&T: 100,000 DSL lines.
 - Comcast – NBC Universal: Comcast Internet Essentials @ \$10/month.
 - AT&T – DirecTV: affordable broadband program @ \$10/month for 4 years.
- New Charter service areas will include significant low-income populations:
 - New Charter California will have 2,312,454 low-income households.
(529,956 Charter + 1,680,826 TWC + 91,671 BH)
 - New Charter California will be: 72% of low-income households in AT&T territory; 165% of Comcast; 235% of Frontier (post Verizon transfer).
- New Charter should have a goal of 696,000 – 960,000 low-income household adoptions in California as “appropriate, fair, and comparable” public benefit.

CETF 8 Recommendations for Substantive Public Benefit in the Charter-TWC-Bright House Corporate Consolidation

5 Requirements for Broadband Adoption

1. Include All Low-Income Households (Expanding the Charter \$14.99 Offer)
 - Expand to all low-income HHs: seniors, people with disabilities, and veterans.
 - Require a wireless modem to be compatible with most school devices.
2. Set Performance Goals
 - Increase subscriptions equal to 45% of eligible households in 2 years.
 - Continue offer until adoption rate is 80% in low-income service areas.
3. Direct Collaboration with States on Strategic Plans to Close Digital Divide
4. Establish an Independent Fund (Specific Allocation in Major Market States)
 - Establish an independent fund with an appropriate allocation in each major market state (multi-state fund for others) to support CBOs (including libraries and schools) as “trusted messengers” to help increase broadband adoption.
 - Foster a sincere and effective public-private partnership.
5. Establish a National Oversight Committee

3 Requirements for Broadband Deployment

1. Require Infrastructure Builds in 10 Unserved and Underserved Areas
 - Make consistent with state programs and priorities.
 - Focus on priority areas in California: Inland Empire; San Joaquin Valley; Salinas Valley (Monterey County); Modoc County.
2. Direct Network Upgrades
3. Encourage Collaboration with Other Public-Interest Deployment Initiatives
 - Encourage leveraging of other FCC USF resources: CAF; HCF; E-Rate.
 - Urge cooperation with other public-interest deployment initiatives: FirstNet; California Telehealth Network; CENIC; K-12 HSN; CalREN.

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