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March 24, 2016

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

Re: Applications of Charter Communications, Inc., Time Warner Cable Inc., and
Advance/Newhouse Partnership for For Consent to the Transfer of Control of
Licenses and Authorizations, MB Docket No. 15-149

Dear Ms. Dortch:

On March 23, 2016 representatives of the Coalition for Broadband Equity (CBE) participated in a conference call with Commission Staff including: Bakari Middleton, Wireline Competition Bureau; Adam Copeland, Assistant Division Chief, WCB; Betsy McIntyre, WCB; Jamila- Bess Johnson, Media Bureau; and Owen Kendler, Chief of the Charter Transaction Review Team, Office of General Counsel.

Present on the call for CBE were: Ellis Jacobs, Attorney, Advocates for Basic Legal Equality (Dayton, OH); Bill Callahan, Director, Connect Your Community 2.0 (Cleveland, OH); Thomas Esselman, Executive Director, Connecting For Good (Kansas City, MO); and Angela Siefer, Executive Director, National Broadband Inclusion Alliance (Columbus, OH)

The CBE representatives discussed, with the Commission Staff present, our views and recommendations regarding measures that should be included in any order approving the proposed Transactions in order to significantly increase home cable Internet access for low income households in our communities. Specifically, we responded to Staff questions regarding our views on the proposed New Charter low cost broadband service described in the Applicants' *ex parte* letter filed on December 22, 2015, including program eligibility criteria, cost and duration. We also reiterated, and responded to questions from Staff about, CBE's recommendations regarding specific customer acquisition benchmarks and expenditure commitments for a New Charter low income discount rate program, as presented in our *Initial Comments*, pp 11-12.

One Staff question concerned the basis of our recommendation of a minimum \$50 million annual commitment for marketing and new customer support for a discount program, tied to a minimum annual enrollment goal of 200,000 households – an average of \$200 per new discount customer – and a priority for investing these funds in direct outreach and training partnerships with community-based digital literacy programs in underserved communities. Staff asked whether these numbers were based on specific cost experience or budgeting information from community initiatives of the kind envisioned by our recommendation.



Callahan explained that the recommended minimum commitments are not based primarily on projections from historical community program costs, and that the average \$200 per customer cost is mentioned in our *Initial Comments* primarily to illustrate the reasonableness of our recommendations compared to ordinary customer acquisition expenditures. But Callahan added that \$200 per new broadband adopter is not out of line with actual community outreach and training program costs being budgeted for current initiatives by CBE partner organizations in Cleveland.

For Staff's further information, it may be useful to note that the costs incurred by any effective community-based program are primarily for *people on the ground*: modestly paid outreach staff to engage low income residents through churches, schools, agencies and other community networks as well as door-to-door; experienced trainers to help large numbers of digitally illiterate new adopters through a hands-on, personalized introduction to the technology; and one or two experienced program managers to organize the effort and insure the delivery of results. Many or most of our programs' staff are residents of the communities they serve, working for "nonprofit pay" and heavily leveraging volunteer resources and other social capital to maximize their impact.

Community digital inclusion programs seldom budget much for paid advertising, online marketing, (after all, our audience consists of residents who don't have Internet access), or media designers and consultants. Overhead and even technology costs are also typically fairly modest. The critical success factor for recruitment and training in our communities is *high touch* – consistent, supportive personal interaction with potential new broadband adopters, as well as with neighbors and organizations who can help with our efforts to engage, train, equip and support them.

Please contact me if you need anything further.

Yours,

 /s/Ellis Jacobs

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