

# COVINGTON

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April 26, 2016

*By Electronic Filing*

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

**Re: WC Docket No. 15-257, Joint Application of Altice N.V., Transferee, and Cablevision Systems Corporation, Transferor, for Authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Transfer Control of Domestic and International Section 214 Authorizations**

Dear Ms. Dortch:

Altice N.V. (“Altice”) and Cablevision Systems Corporation (“Cablevision,” and together with Altice, the “Joint Applicants”) submit this letter to provide further information regarding the ways in which referenced transaction (the “Transaction”) will result in tangible benefits for consumers through network investment and new product offerings.

In their Joint Application, Altice and Cablevision explained that approval of the Transaction will enable Altice to build on Cablevision’s historical commitment to network investment, consumer-focused products and services and innovative approaches to video pricing and packaging, broadband connectivity and WiFi service deployment, as well as its enthusiastic embrace of over-the-top video services. Cablevision subscribers, in turn, will benefit from Altice’s global scale, access to capital, and fresh perspective in the most highly-competitive broadband market in the country.

The Joint Applicants noted that Altice has a demonstrated history of investing in video, telephony and broadband service providers, accelerating existing network investment plans and funding new network investment. As a result, consumers in regions served by providers acquired by Altice have enjoyed increased broadband availability, faster speeds and expanded service offerings. These same types of benefits can be expected to result from the proposed Transaction. The Joint Applicants explained that, in particular, Altice’s fundamental operating philosophy is to invest in the networks of its operating companies, and that doing so in the wake of the Transaction will enable Cablevision to reduce its operating costs, enhance network reliability, and compete more effectively with Verizon FiOS -- thereby improving the service offerings available to consumers throughout Cablevision’s footprint.

Since the announcement of the proposed Transaction, Altice has considered ways in which to effectuate these objectives in the Cablevision region and has engaged in productive discussions with state and local regulators about these issues. Working collaboratively, the Joint Applicants have developed more detailed plans for prioritizing future investments in ways that

## COVINGTON

Marlene H. Dortch, Secretary  
April 26, 2016  
Page 2

best meet the needs of Cablevision's communities, with a focus on (1) implementing network enhancements for all customers within Cablevision's footprint; and (2) working to bridge the Digital Divide by offering affordable broadband access to low-income households. These plans will, at a minimum, include the following:

1. Network Upgrades. Altice recognizes that greater network investment and higher broadband speeds are important policy objectives of the Commission, state and local leaders, and the communities Cablevision serves. Altice also recognizes that increased broadband speeds will be critical to meeting consumer demand over time and ensuring that consumers have the tools they need to thrive in the Digital Age.

In reply comments filed with the New York Public Service Commission ("PSC") earlier this year, the Joint Applicants committed to upgrade the Cablevision network so that all existing customer locations are able to receive broadband service of up to 300 Mbps. Since that time, the Joint Applicants have been developing plans to effectuate this commitment. Although certain technical aspects of these plans are still under development, the Joint Applicants expect to effectuate this commitment in all existing customer locations in Cablevision's service territory.<sup>1</sup> The Joint Applicants expect to commence this network upgrade immediately after the Transaction closes, and to complete it to all such locations no later than the end of calendar year 2017. To ensure that all communities within Cablevision's service territory are treated fairly, the Joint Applicant are committed to rolling out this network upgrade on an equitable and nondiscriminatory basis.

2. Low Income Broadband. Cablevision currently has several product offerings intended to address every segment of the market, including "cord cutter" packages, value packages, low-cost standalone broadband, and WiFi access. Altice likewise has an interest in continuing to reach as much of the market as possible.

At the same time, Altice appreciates the crucial role broadband can play in keeping individuals, families, and businesses connected and, in particular, the critical importance of low income broadband offerings to Federal and state policies intended to close the Digital Divide. It is for this reason that, earlier this year, the Joint Applicants committed in their reply comments with the New York PSC to, in addition to upgrading Cablevision's network, making available a new low income broadband product.

Since that time, the Joint Applicants have developed additional details regarding this new product, which, like the network upgrade, Altice will make available in all existing customer locations in Cablevision's service territory. Specifically, Altice will maintain and advance Cablevision's commitment to affordable Internet product offerings by introducing a new

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<sup>1</sup> As used herein, the term "Cablevision's service territory" refers to all broadband Cablevision customer locations in New York, Jersey and Connecticut, and the single franchise community Cablevision serves in Pennsylvania.

## COVINGTON

Marlene H. Dortch, Secretary

April 26, 2016

Page 3

low income broadband package of 30 Mbps for \$14.99 a month throughout Cablevision's service territory, subject to the following eligibility requirements. First, there will be no modem fees. Second, the program will be open, without any credit checks, to (1) households with children eligible for the National School Lunch Program, and (2) individuals age 65 and older who are eligible for and receive benefits under the federal Supplemental Security Income program, in each case so long as the enrollee has not had a Cablevision broadband subscription within 60 days of signing up for the low-income program and is not in arrears on any payments to Cablevision at the time of enrollment. Within six months following consummation of the Transaction, Cablevision will begin piloting the low income program, as well as begin associated training and outreach to stakeholders. The low income package will be available to all eligible customers in Cablevision's footprint within 15 months after closing.

These specific commitments -- and any others that may result from other reviews of the Transaction -- demonstrate clearly that the Transaction will provide specific, verifiable benefits by improving the quality of communications services available to consumers and facilitating access to such services throughout the Cablevision service territory. The Joint Applicants therefore respectfully submit that the proposed Transaction is in the public interest and should be approved forthwith.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

### CABLEVISION SYSTEMS CORPORATION

By: \_\_\_\_\_/s/

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### ALTICE N.V.

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