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May 12, 2016

VIA ECFS

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

Re: *Special Access Rates for Price Cap Local Exchange Carriers, WC Docket No. 05-25*

Dear Ms. Dortch,

In response to questions from Commission staff, I am submitting this letter on behalf of Time Warner Cable Inc. (“TWC”) to clarify TWC’s methodology for responding to Section II.A.3 of the Commission’s 2015 special access data collection. TWC identified all known business Locations connected to a node from which a “Dedicated” service (as defined by the Commission) was being offered as of 2013, regardless of whether the Location was connected to the node via fiber or hybrid fiber-coaxial (“HFC”) facilities. Because TWC was not offering any Dedicated service over HFC facilities as of 2013, however, it did not consider business locations that were connected to TWC’s network only via HFC to be “Locations” within the meaning of the data request unless they were directly served by a node that also supported the provision of Dedicated service to other business customers.

TWC now understands that Commission staff intended cable operators to identify all business locations connected directly or indirectly to a Metro-Ethernet-capable headend, even if such locations were connected through an intermediate node, *i.e.*, the first *Node* on the network that did not also support a Dedicated service. Notably, all of TWC’s headends throughout its entire service footprint were Metro-Ethernet-capable by 2013. As a result, the areas in which TWC was capable of serving business customers via HFC plant (in addition to those identified in Section II.A.3 of TWC’s special access data submission) can be ascertained based on the census blocks listed in TWC’s 2013 State Broadband Initiative (“SBI”) submission (*see* TWC’s

response to Section II.C.1.a. of the special access data collection)¹ and the corresponding counties listed in TWC's response to Section II. C.1.b. of the special access data collection.

Please contact the undersigned if you have any questions regarding this submission.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill
of LATHAM & WATKINS LLP
Counsel for Time Warner Cable Inc.

cc: William Dever
William Layton
Eric Ralph
Deena Shetler

¹ In 2014, the Commission assumed responsibility for the collection, through its Form 477 filing process, of broadband deployment data by census block, previously collected through the SBI. See <http://transition.fcc.gov/Forms/Form477/form477changes.pdf>.