

REDACTED – FOR PUBLIC INSPECTION

May 27, 2016

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VIA ECFS

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

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

Dear Ms. Dortch:

Charter Communications, Inc. submits this letter to clarify the methodology it used to respond to Section II.A.3 of the Commission's 2015 special access data collection, in which Charter identified all known "Locations" to which it had a "Connection" as of 2013. Pursuant to the Commission's instructions, Charter excluded Locations that were connected only via best-efforts Internet lines. That is because the Commission defined "Connection" as a "'channel' that provides a dedicated communication path between a *Location* and the first *Node* on a *Provider's* network" and that has "the capability of being used to provide one or more Dedicated Services." Because Charter's best-efforts Internet lines did not have the capability of being used to provide a Dedicated Service, Locations connected via such lines were excluded.

Charter now understands that Commission staff would like Charter's response to include all Locations connected to a Metro-Ethernet-capable headend, even if such Locations were connected via best-efforts-Internet lines. While Charter does not think that information about such Locations is relevant to the Commission's inquiry in this proceeding, areas in which Charter served Locations via best-efforts-Internet lines can be ascertained based on the list of census blocks served by Metro-Ethernet capable nodes on the enclosed disk.

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Please contact me if you have any questions.

Sincerely,

/s/ Samuel L. Feder

Samuel L. Feder
Counsel for Charter Communications, Inc.

Enclosure (Redacted)

cc: William Dever
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