



FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF GENERAL COUNSEL

# memorandum

TO: Chief, Reference Operations Division  
Chief, Cable Services Bureau

FROM: Daniel M. Armstrong *DMA*  
Associate General Counsel

SUBJECT: Time Warner Entertainment Company, L.P. v. FCC & USA, No. 99-1500 and Time Warner Entertainment Company, L.P. v. FCC & USA, No. 99-1503.  
Filing of two new Petitions for Review in the United States Court of Appeals for the District of Columbia Circuit.

DATE: December 17, 1999

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This is to advise you that, on December 1, and on December 2, 1999, Time Warner Entertainment Company, L.P. filed new Petitions for Review pursuant to 47 U.S.C. § 402(a) of: Implementation of the Cable Television Consumer Protection and Competition Act of 1992; Implementation of Cable Act Reform Provisions of the Telecommunications Act of 1996 - Review of the Commission's Cable Attribution Rules CS Docket Nos. 98-82 and 96-85, FCC 99-288 (released October 20, 1999). Time Warner filed the second Petition for Review as a protective measure, to safeguard against any risk that the prior petition might subsequently be deemed premature.

Time Warner challenges the Commission's rules for determining what ownership interests are attributable to cable operators for purposes of implementing the subscriber limit and other FCC regulations.

The Court has docketed these cases as Nos. 99-1500 and 99-1503. The attorney assigned to handle the litigation of these cases is James M. Carr.