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BY ELECTRONIC FILING

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

Re: MB Docket No. 05-192

Dear Ms. Dortch:

On November 16, 2005, representatives of Time Warner Cable Inc. ("TWC") made a presentation to members of the Commission staff regarding the company's local video on demand ("LVOD") services and how the expanded availability of such services was one of the public interest benefits that will accrue to local communities and subscribers as a result of the proposed transactions whereby TWC will acquire certain cable systems from affiliates of Adelphia Communications Corporation and Comcast Corporation. Following the presentation, members of the Commission staff requested that TWC submit additional information regarding its LVOD services. This letter is submitted in response to that request.

As described in the November 16, 2005 presentation, approximately two-thirds of TWC's operating divisions are offering at least one dedicated channel of LVOD programming. It is expected that each of the remaining divisions will be offering one or more such channels by the end of 2006. Moreover, as discussed in the presentation, it is expected that, following the closing of the transactions with Adelphia and Comcast, TWC will begin expanding its existing LVOD offerings into the systems being acquired.

The November 16, 2005 presentation focused in particular on the history and operations of Wisconsin on Demand ("WIoD"), TWC's first LVOD channel. It should be noted that, in addition to WIoD (channel 1111), TWC's Southeast Wisconsin Division offers a second LVOD channel called Education on Demand (channel 1112), which presents courses from the Milwaukee Area Technical College.

Some of the LVOD channels that have been, and are being, introduced by TWC's other divisions follow a format that is generally similar to WIOD. However, the specific amount and types of programming offered varies depending on local needs and interests and the local programming resources available to the division. While most of TWC's divisions that provide LVOD programming offer at least 50 hours of local content, the current range of offerings varies by division, ranging as high as approximately 200 hours in one division. The typical pattern is that, as the channel matures and awareness grows among community partners and subscribers, the quantity of programming available increases.

The following discussion summarizes some of TWC's current LVOD service offerings:

Albany, NY: The Capital Region On Demand channel (channel 1009) is available to digital cable subscribers in TWC's Albany Division. This channel, which was launched in the Fall of 2004, offers approximately 100 hours of on-demand content from a variety of sources, including programming that first appeared on the Division's 24/7 analog local news channel, Capital News 9, as well as programming from the local PBS affiliate and from TW3, an analog local channel that focuses on local news, sports (high school and college), and entertainment content. Some examples of the programming available on Capital Region On Demand include:

- Cooking at Home
- 9 on Education
- Health Team 9
- Tone Up (exercise)
- 9 at Home – Do it Yourself (home improvement)
- Exterior Designs (home improvement)
- Interior Designs (home improvement)
- Dine on 9 (restaurant reviews)
- Making Cents (money tips)
- Lift Ticket 9 (area ski information)
- Travel with Val
- Ethan Allen Tragedy (boating accident coverage)
- Hurricane Katrina coverage
- NY Regents Review
- MasterMinds (local kids quiz show)
- The Gallery (museum previews)
- Common Ave. (XY.tv programming shot in Albany)
- The VIP (XY.tv programming shot in Albany)
- Parental Controls (instructional)
- Rosendale Learning Fair 2005
- Union College Presidential Address
- YMCA Black & Latino Achievers Awards Gala 2005
- Capital Region High School Football
- University of Albany Basketball, Football and Volleyball

- Siena College Women's Volleyball
- Saints Alive (Siena College sports show)
- Capital Tonight – City Tours

NE Ohio: In April 2004, TWC's NE Ohio Division launched its NE Ohio On Demand service (channel 1111). This LVOD channel provides digital cable customers with on-demand access to programming originally featured on the system's linear analog Local Channel 23, such as the Civic Forum of the Air, Education Matters, Government Matters, and Medical Matters as well as additional locally-produced programming, such as a growing list of narrated children's books. In addition, in July 2005, the NE Ohio Division began providing the Akron/Canton News (a joint production of TWC and the local NBC affiliate) on a separate LVOD channel (channel 1123). Together, these two channels offer subscribers approximately 200 hours of LVOD programming. Some additional examples of this programming includes:

- Akron Beacon Journal Spelling Bee
- Akron Aeros (minor league baseball)
- Akron Chamber Report
- Candidates Night
- Cedar Point MaXair
- Dept. of Development Information
- Football Drum Corps
- Help for Parents
- Hometown Heroes
- K9 Agility Training
- Keeping It Real
- Kessler's Legacy
- Kids ID
- Kids in the Valley
- Last Light on Corregidor
- LeBron's Bikeathon
- Off to College
- Pro Football Hall of Fame Induction Festivities
- Retiring Old Glory
- Road Runner Marathon
- Wild Ohio
- Stark County Alive
- The Zoo After Hours
- Uncommon Valor
- Welcome Home

San Antonio, TX: The San Antonio Division currently offers digital cable customers two LVOD channels, San Antonio On Demand (channel 988) and WOAI On Demand (channel 989), featuring a combined total of around 100 hours of local content. San Antonio On Demand (which was launched in October 2003) focuses on local sports, education, government, tourism, and entertainment, while WOAI On Demand (which launched on November 1, 2005) provides on demand access to all of the local NBC affiliate's newscasts as well as to other local WOAI programming. Examples of LVOD programs available in the San Antonio Division include:

- High School Football (including halftime productions)
- 3-point Shot Contest for High School Boys and Girls
- San Antonio Sports Foundation Hall of Fame Induction Gala
- Our Part of Town Talent Show Competition
- Free Trade Forum (featuring Reps. Smith, Gonzalez, and Cuellar)
- Texas Lyceum (emerging Texas leaders)
- A Tejano Son of Texas (documentary)
- Cable Puts You In Control (parental control instructional video)
- San Antonio Youth Literacy (educational)
- Veterans Day Parade
- Battle Flowers Band (high school band competition)
- Installation of Archbishop Jose Gomez
- 2005 Martin Luther King Commemorative Programming
- Holiday in Blue Concert (USAF Band)
- Locally-produced films

Finally, TWC also notes that with respect to certain types of LVOD programming, it is more appropriate to consider the number of titles available rather than the number of hours. For example, TWC's Raleigh Division has launched News 14 Carolina On Demand (channel 514), which offers featured program segments from the division's analog 24/7 local news channel, News 14 Carolina. These features, which are organized into five categories (At Home, Cooking, Health and Fitness, Tech, and Weather), typically are only one or two minutes in duration. At present, the Raleigh Division's digital cable subscribers can choose from over 100 such program segments on an LVOD basis.

Please do not hesitate to contact the undersigned if you have any questions concerning this matter.

Respectfully submitted,



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Ms. Marlene Dortch

December 5, 2005

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