

Matthew A. Brill  
(202) 637-1095  
matthew.brill@lw.com

555 Eleventh Street, N.W., Suite 1000  
Washington, D.C. 20004-1304  
Tel: (202) 637-2200 Fax: (202) 637-2201  
www.lw.com

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October 11, 2007

### BY ELECTRONIC FILING

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

**Re: Time Warner Cable Section 63.71 Discontinuance Application  
WC Docket No. 07-203; Comp. Pol. File No. 829**

Dear Ms. Dortch:

This letter responds to the comments that were filed in connection with the above-referenced application of Time Warner Cable Information Services (California), LLC d/b/a Time Warner Cable (“TWC”) to discontinue the provision of circuit-switched domestic telecommunications services to customers in and around Los Angeles, California.

In these comments, four of the more than 20,000 customers affected by the planned discontinuance in the communities at issue in the instant application expressed concerns about switching to another carrier’s local service or TWC’s Digital Phone service. In an effort to resolve these concerns, TWC contacted each customer and explained the alternative offerings from other carriers, including the regulated local service offered by the incumbent LEC (Verizon in one case, and AT&T in the others). Three of these customers have decided to purchase service from the incumbent LEC, and have already switched their service to that carrier. Specifically, Mr. Goldshine switched to AT&T on September 7, Mr. Feingersh switched to Verizon on October 1, and Ms. Lowry switched to AT&T on October 8. The remaining customer, Mr. Kingsley, has signed up for TWC’s Digital Phone service and is scheduled for installation on October 26, 2007.

The Commission normally will “authorize proposed discontinuances of service unless it is shown that customers would be unable to receive service or a reasonable substitute from

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another carrier.”<sup>1</sup> Each of the customers who initially objected to the planned discontinuance is able to obtain service from another carrier; indeed, each has already done so or has an installation order pending. In addition, TWC has taken steps to ensure that the customers have not been billed for service for any period after the carrier change and TWC has paid the related change costs.

With regard to Ms. Lowry’s concern regarding the ability to retain her telephone number after transferring to a new carrier, TWC contacted her to address this concern and explained that there has been a change in rate center boundaries since her number was assigned. Thus, any port of this customer’s telephone number from one carrier to another would be automatically rejected due to a rate center violation. TWC pursued several avenues to help the customer retain her telephone number after the transfer. Nonetheless, when the customer switched service to AT&T on October 8, 2007, AT&T was required to issue the customer a new telephone number for reasons beyond TWC’s control.

Because the record fails to indicate that any customer would be unable to obtain local telephone service from another carrier, the Commission should authorize the proposed discontinuance.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill  
*Counsel for Time Warner Cable*

cc: Kimberly Jackson  
Rodney McDonald  
Carmell Weathers

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<sup>1</sup> *Comments Invited on Application of Time Warner Cable Information Services (California), L.P. d/b/a Time Warner Cable to Discontinue Domestic Telecommunications Services, Public Notice, WC Docket No. 07-203, Comp. Pol. File No. 829 (Sept. 17, 2007).*