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**REDACTED FOR PUBLIC INSPECTION
PURSUANT TO PROTECTIVE ORDER, WC DOCKET 06-172**

November 6, 2007

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: WC Docket 06-172; Verizon Petitions for Forbearance

Dear Ms. Dortch:

This letter responds to the recent request from the Wireline Competition Bureau, pursuant to Bureau Chief Schaffer's letter of October 29, 2007, requesting information from Charter Communications, Inc. ("Charter") for the record in the above-referenced proceeding.

The request seeks information concerning the "coverage"¹ of Charter's service offerings, and Charter's end-user access line counts by capacity in those geographic areas where Charter offers service. Specifically, the Bureau has asked Charter to provide specific information concerning its end-user access line counts and customer locations in the Verizon wire centers in those Metropolitan Statistical Areas ("MSA") at issue in the Verizon Forbearance Petitions filed in WC Docket 06-172. As noted in its previously filed comments, Charter provides service in only the Boston MSA, and this response is therefore limited to that MSA.

For the record, Charter notes that the Bureau's request seeks highly confidential and competitively sensitive information. Nevertheless, in the interest of providing the Commission

¹ For purposes of this response, Charter has relied on the Commission's definition of the term "coverage" as set forth in the Qwest Omaha Forbearance Order. See *Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Omaha Metropolitan Statistical Area*, WC Docket No. 04-223, Memorandum Opinion and Order, 20 FCC Rcd 19415, 19444, ¶ 60, n. 156 (2005) (*Qwest Omaha Forbearance Order*).

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with the information it believes is necessary to render a decision in this proceeding, Charter responds to the request as set forth below.

Responding to the request is difficult because the information requested by the Bureau is not information that Charter maintains in the normal course of business. Historic differences in the deployment and development of hybrid fiber coaxial networks capable of providing cable-based voice communications services, and those networks deployed by incumbent local exchange companies, result in differences in the manner in which services are provisioned over those networks, and the data and information relied upon to provide such service.

For example, from an operational perspective Charter does not provide service or track customer locations, or line counts, using wire center boundary designations. Instead, Charter generally relies upon rate center boundary designations to track customer locations and similar information. Further, Charter is not required to report customer locations, or line counts, by wire center and, therefore, does not maintain or utilize the requested information in the normal course of business. Notably, rate centers are distinct from wire centers in several ways. For example, rate centers are normally used to identify specific geographic points and corresponding geographic areas associated with one or more NPA-NXX codes that have been assigned to an entity for its provision of services within such area. On the other hand, wire centers are understood to mean the geographic area of an exchange area served by a single wire center. Thus, rate centers are essentially geographic designations used primarily for the assignment of NPA-NXXs and retail rate purposes, while wire centers are normally used to reflect the incumbent local exchange company's geographic network topology (which does not correspond to Charter's network topology). For that reason, the requested information is not in Charter's possession.

Nevertheless, in order to respond to the Bureau's request, Charter has obtained wire center boundary information and attempted to correlate that information with Charter's own data regarding the geographic location of its customer locations. In so doing Charter has attempted to correlate the rate center boundaries it utilizes with the wire center boundaries apparently used by Verizon. However, the wire center boundaries do not correlate, exactly, to the rate center boundaries that Charter relies upon in its operations. Therefore, the data presented in this filing, relies upon an approximation of Charter network and line count data within a rate center to the Verizon wire center boundaries. Accordingly, because these boundaries do not precisely correlate to one another, there are inherent limitations in Charter's ability to accurately convey information concerning its network and line count data within Verizon's wire centers.

Through the process described above Charter has been able to determine approximate coverage in [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] separate wire centers: [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] As detailed in Table 1, below, Charter maintains coverage in such wire centers [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] threshold utilized by the Commission in the *Qwest Omaha Forbearance Order*.

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For at least [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] Verizon wire centers, [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL], Charter has not been able to determine its coverage in these wire centers because of an apparent anomaly in the number of households calculated by Verizon in these wire centers. Specifically, Charter figures concerning network coverage [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] the number of households recently identified by Verizon in such wire centers.² Accordingly, Charter is not able, at this time, to provide accurate coverage information for those two Verizon wire centers. Charter will continue to work to reconcile this data, and will provide such information as soon as practically possible.

Finally, with respect to the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] wire center, Charter has not been able to correlate its rate center boundaries with the wire center boundaries. The analogous Charter rate center encompasses three separate wire centers, and Charter is not able to segregate the wire center boundaries from the Charter rate center boundaries. As a result, the information provided below with respect to this wire center is limited by this fact. And, notably, this anomaly suggests that the actual Charter coverage information is likely lower than that which is set forth below because the Charter coverage data is drawn from a geographic area larger than the Verizon wire center.

More significantly, Charter provides telephone service in only a small number of wire centers in the Boston MSA. Indeed, although there are more than [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] in the Boston MSA, Charter serves end-user locations in only [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] of those wire centers. Furthermore, in those wire centers where Charter does provide service, as evidenced by Table 1 below, it does not provide service to the entire geographic area within such wire centers.

Of those wire centers, and subject to the limitations described above, Charter has determined its "coverage" in such wire centers to be as follows:

TABLE 1: CHARTER "COVERAGE" STATISTICS

[BEGIN CONFIDENTIAL]

² This anomaly may result from the fact that the data used by Verizon to calculate households in these wire centers relies upon US Census Data from 2000, extrapolated to *approximate* the number of 2007 households. It is therefore difficult to ascertain the accuracy of Verizon's 2007 household data.

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[END CONFIDENTIAL]

Second, for each of the above referenced wire centers Charter's end-user access line counts by capacity are as follows:

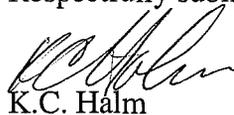
TABLE 2: CHARTER END-USER ACCESS LINE COUNTS

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

Should you have any questions about this information please contact me at your convenience. Thank you.

Respectfully submitted,



K.C. Halm
Counsel for Charter Communications, Inc.

cc: Ms. Dana R. Shaffer, Chief, Wireline Competition Bureau
Mr. Marcus Maher, Assoc. Bureau Chief, Wireline Competition Bureau
Mr. Tim Stelzig, Asst. Division Chief, Competition Policy Division