

BEFORE THE  
Federal Communications Commission  
WASHINGTON, D.C.

In the Matter of	)	
	)	WC Docket No. 07-245
	)	
Implementation of Section 224 of the Act;	)	RM-11293
Amendment of the Commission's Rules and	)	
Policies Governing Pole Attachments	)	RM-11303
	)	

**COMMENTS OF CHARTER COMMUNICATIONS, INC.**

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March 7, 2008

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**COMMENTS OF CHARTER COMMUNICATIONS, INC.**

Pursuant to the Commission’s Notice of Proposed Rulemaking (“NPRM”) in the above captioned matter, Charter Communications, Inc. (“Charter”) submits the following Comments.

**I. INTRODUCTION AND SUMMARY**

The Commission’s proposal to raise pole rents would impose an unjustified and massive “broadband tax” on cable operator provided Internet services, disserving the very policies for broadband deployment that every other branch of government is trying to promote. According to the Notice, offering high speed cable modem service would trigger a higher pole rate, one as high as the “telecommunications” rate. The resulting harm would be especially acute in rural communities. Pole cost increases would translate to a range of \$4.95-\$8.66 per Internet subscriber per month and \$13.27-\$23.23 per voice subscriber per month—wiping out entirely the consumer benefits of VOIP, sheltering ILECs from needed competition, and providing a windfall for the electric utilities.

Every reviewing tribunal, including the FCC, has upheld the current cable pole attachment rental formula as providing far more than just compensation for the use of monopoly utility poles. Raising pole rents now would open a new, damaging, and counter-productive chapter in a long history of pole abuses.

## **II. ANY INCREASE IN POLE ATTACHMENT RENTAL WILL HARM SERVICES IN RURAL COMMUNITIES**

The consumer benefits of today's broadband technology are astonishing. Thanks to an integrated IP-enabled broadband technology, the same network that carries Charter's video can provide high-speed Internet access and competitive voice services without occupying more space or adding more burden to utility poles. The direct savings to consumers in discounted digital voice bills average \$11.70 per month per customer across the industry. The indirect consumer benefits multiply the effect, by facilitating delivery of "over the top" voice services by IP providers and thereby fomenting competition that pressures ILECs to lower their circuit-switched prices for telephony. Total savings are projected to exceed \$71 billion over the next five years.<sup>1</sup>

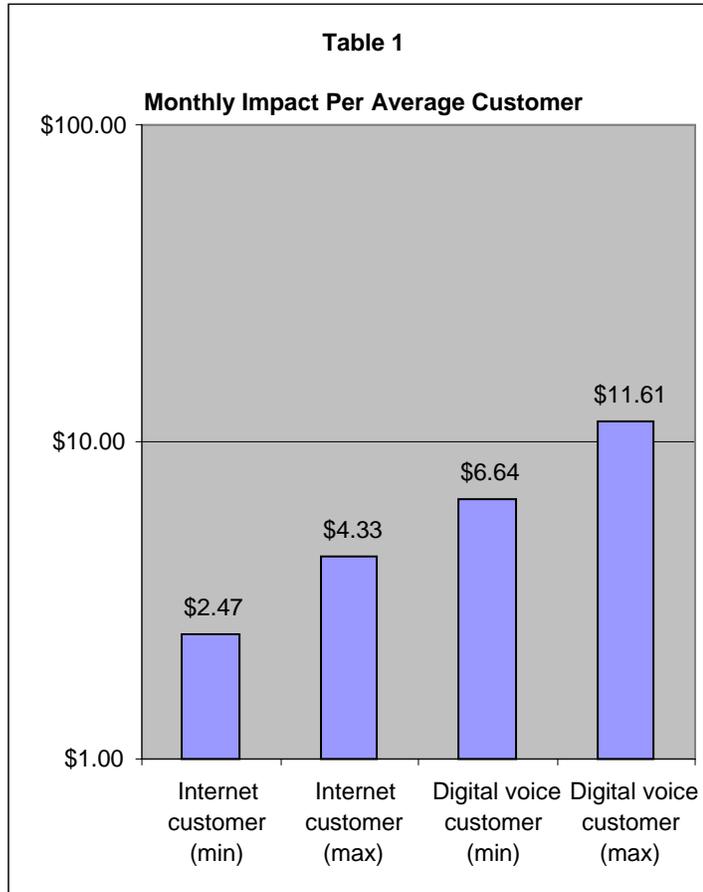
A pole rent increase of the scale suggested in the Notice (of up to the telecommunications rate) would undo these benefits, particularly in rural areas. Charter has extensive experience operating cable television systems in rural communities. Of the 639 U.S. counties in which Charter provides service, more than half are "majority rural," according to U.S. Census standards. It is much more expensive per customer to deliver services (especially broadband and other advanced services) to less densely populated rural areas because there are fewer

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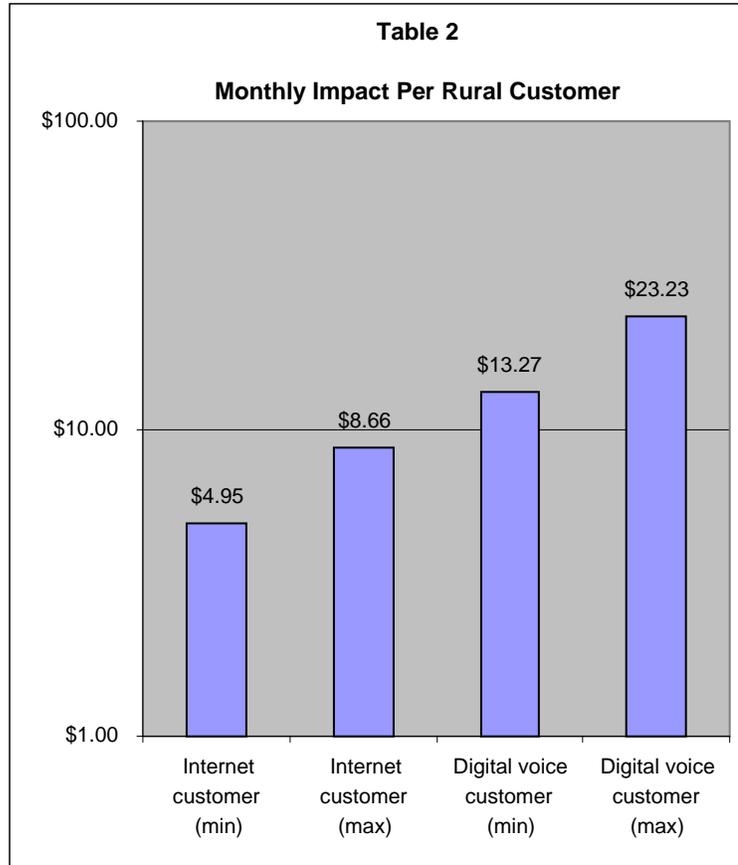
<sup>1</sup> Consumer Benefits from Cable-Telco Competition, Nov. 2007, [http://www.micradc.com/news/publications/pdfs/Updated\\_MiCRA\\_Report\\_FINAL.pdf](http://www.micradc.com/news/publications/pdfs/Updated_MiCRA_Report_FINAL.pdf).

subscribers overall and fewer subscribers per plant mile from which to recover costs. Only *six* of Charter's 384 headends serve more than 15,000 subscribers and pass even 100 homes per mile. These six headends serve a total of fewer than 350,000 Charter subscribers, or 6.6% of Charter's total subscribers. The remaining Charter systems have to deal with the low population density characteristic of rural America. In Connecticut, for example, Charter has only 23 subscribers per average plant mile. It takes many more poles to put wireline plant in front of one rural customer in such reduced population densities. Pole attachment rental rates thus form a much larger portion of the cost of serving its subscribers, and increases in pole rental rates will have great impact.

A pole rent increase would profoundly harm the availability and cost of advanced services in cable systems. Let us take as an example an average pole rent of \$7.50, and assume that the Commission was to follow through on the suggestions of the Notice. Given that under one approach suggested in the Notice the presence of one Internet customer would "contaminate" the entire system and thus all pole attachments with a higher rate, the results would be severe for all Charter's customers. With a broadband pole rate as high as the current telecommunications rate in most areas, the cost per customer would increase by \$2.47-4.33 per subscriber per month over and above current pole costs. (Source: Exhibit A)



But that is not the worst of it. In the areas that Charter serves with 10-15 subscribers per mile, the impact of an FCC broadband tax in rural areas would be devastating given the already higher costs in rural areas. (Source: Exhibit A)



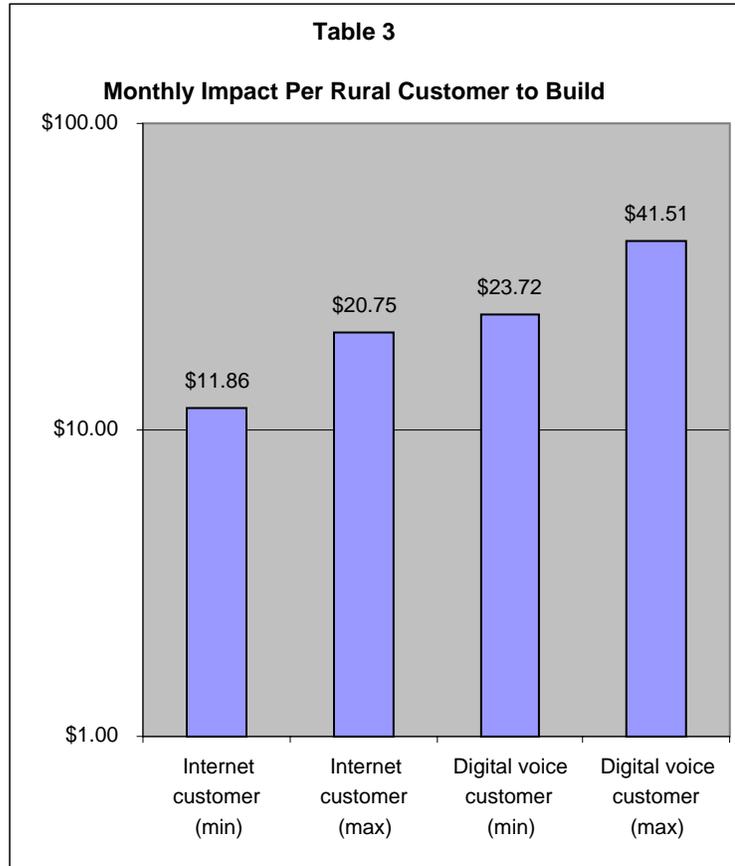
Such higher costs resulting from the proposed pole rent increase will further degrade Charter's penetration rate expectations and thus deter broadband investment and deployment, particularly to rural communities. It will severely harm the very facilities-based local voice competition that has been producing greater choice and lower prices for consumers.<sup>2</sup>

Even these figures do not adequately portray the full extent of the chilling effect that the proposed pole rent increases would have on decisions to deploy broadband facilities and services in rural areas. The impact on a new entrant who must charge incrementally more to recoup its new plant investment within a reasonable amount of time by building its subscriber base from

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<sup>2</sup> Consumer Benefits from Cable-Telco Competition, Nov. 2007, [http://www.micradc.com/news/publications/pdfs/Updated\\_MiCRA\\_Report\\_FINAL.pdf](http://www.micradc.com/news/publications/pdfs/Updated_MiCRA_Report_FINAL.pdf).

the ground up in rural areas, is utterly forbidding, as the following chart illustrates. (Source: Exhibit B)



Such increases in rates will serve as a penalty causing substantial harm to new entrants as soon as the first few Internet customers are signed up. The increases will be so significant and the cost pressure so intense that many competitors will forego providing service in rural areas as the domino effect on projected take rates by rural customers will further reduce such providers' expectation of a return on investment that would outpace capital debt reimbursement obligations.

The FCC took the opposite approach when inviting ILECs into providing competitive video services. When an ILEC adds video services, it incurs no increased pole rents. Under the

new rules promulgated by the FCC in 2006, ILECs enjoy streamlined access, and franchise fees and PEG burdens are proportional to market share.<sup>3</sup> Disparate treatment of cable by increasing pole rents and thus erecting a new barrier to voice competition will slow (and in some cases stop) the roll out of facilities-based competitive voice services, and thus undermine the national policy of promoting broadband services.<sup>4</sup> Conversely, this proposal would also protect the ILECs from further competition from IP-enabled voice providers now discouraged from undertaking overly risky plant extension, at the expense of the broadband consumer.

### **III. RAISING POLE RATES DOES NOT PROMOTE BROADBAND DEPLOYMENT**

#### **A. Pole Rate Regulation Is Supposed to Address Electric Utilities' and Telephone Companies' Monopoly Power Over Poles That Are Essential To Competition**

Raising pole rents with a new and massive “broadband tax” on cable operator Internet services would open a new, damaging, and counter-productive chapter in a long history of monopoly pole abuses. Congress adopted Section 224 to remedy the electric utility and telephone companies' monopoly over the distribution and use of utility poles in the public rights-of-way.<sup>5</sup> The Act was designed to halt the pole-owning utilities from “extract[ing] monopoly rents from cable TV systems in the form of unreasonably high pole attachment rates,”<sup>6</sup> and to

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<sup>3</sup> *Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984*, Report and Order and Further Notice of Proposed Rulemaking, FCC 06-180, 22 FCC Rcd 5101, 5154, ¶ 120 (2006).

<sup>4</sup> Section 706 of the Telecommunications Act of 1996 directs the Commission to promote innovation and investment by multiple market participants in order to stimulate competition for all services, including broadband communications services. Section 230(b) also requires the Commission to implement congressional policy of promoting the continued development of the Internet and related technologies.

<sup>5</sup> *See, e.g., NCTA v. Gulf Power Co.*, 534 U.S. 327, 330 (2002) (finding that cable companies have “found it convenient, and often essential, to lease space for their cables on telephone and electric utility poles. . . . Utilities, in turn, have found it convenient to charge monopoly rents.”).

<sup>6</sup> S. Rep. No. 95-580, at 13 (1977), *reprinted in* 1978 U.S.C.C.A.N. 109, 121.

bring them into line with actual costs.<sup>7</sup> The Act later served as a bulwark when electric utilities, now interested in telecommunications, tried to stop cable's deployment of fiber for data services.<sup>8</sup> As the Commission put it in 2001: "Nothing in the record demonstrates that the utilities' monopoly over poles has since changed."<sup>9</sup>

## **B. Current Pole Rates Fully Compensate Utilities for the Costs of Cable Pole Attachments**

It is beyond doubt that under current compensation arrangements for pole attachments, cable operators pay more than a fair share of pole costs. Through "make-ready," cable operators pay for all of the pole owners' costs needed to rearrange existing lines and to replace short poles with poles tall enough for cable, thus covering the marginal costs of attachment. Cable operators also pay pole rent, calculated under FCC formula as a proportionate share of all of the costs (including a reasonable profit) for the entire pole, not just for the usable space.<sup>10</sup> Not one single

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<sup>7</sup> The Act culminated from a long history of ILECs from leverage their pole ownership into control over emergent communications markets, and to stop a history of onerous pole rents draining cable of capital otherwise available for competitive services. *Applications of Telephone Companies for Section 214 Certificates*, 21 F.C.C.2d 307, 323-29 (1970) (cable systems "have to rely on the telephone companies for either construction and lease of channel facilities or for the use of poles for the construction of their own facilities."); *General Tel. Co. of California*, 13 F.C.C.2d 448, 463 (1968) (by control over poles, telco is in a position to preclude an unaffiliated CATV system from commencing service).

<sup>8</sup> In *Heritage*, the Commission interpreted Section 224 to apply to operators installing fiber to provide cable and data services and could continue to pay the same cable rate for pole attachments. *Heritage Cablevision Assocs. of Dallas, L.P. et al. v. Texas Util. Elec. Co.*, FCC 91-379, 6 FCC Rcd 7099, 7101 ¶ 12 (1991) ("We believe that in light of the fact that Section 224 includes no language limiting the nature of the services of a cable operator to which it applies, Section 224 is most reasonably read to provide that a cable operator may seek Commission-regulated rates for all pole attachments within its system, regardless of the type of service provided over the equipment attached to the poles.") (*Heritage*), *recon. dismissed*, FCC 92-266, 7 FCC Rcd 4192 (1992), *aff'd*, *Texas Utils. Elec. Co. v. FCC*, 997 F.2d 925 (D.C. Cir. 1993).

<sup>9</sup> *Amendment of the Commission's Rules and Policies Governing Pole Attachments; Implementation of Section 703(e) of the Telecommunications Act of 1996*, Consolidated Partial Order on Reconsideration, FCC 01-170, 16 FCC Rcd 12103, 12112-13 ¶ 13 (2001) ("2001 Reconsideration Order").

<sup>10</sup> The belief to the contrary expressed in the Notice has been described by the Commission itself as "a complete mischaracterization of the Pole Attachment Act and the Commission's rules. *2001 Reconsideration Order*, 16 FCC Rcd at 12131 ¶ 53 ("Under the *Cable Formula*, the costs of unusable space are allocated based on the portion of usable space an attachment occupies, the space factor."); *Alabama Cable Telecomm's Ass'n. v. Alabama Power Co.*, FCC 01-181, 16 FCC Rcd 12209, 12236 ¶ 60 (2001) ("Respondent's repeated claims that cable attachers do not pay for any costs of unusable space is a complete mischaracterization of the Pole Attachment Act and the Commission's rules. *Cable attachers pay all of the costs associated with the pole attachment, which are allocated based on the*

court, including the FCC itself, has *ever* found that the cable rate formula results in any subsidy.<sup>11</sup> To the contrary, every decision considering the adequacy of the cable pole attachment rates has found the rate to be constitutionally sound and more than just compensation.

The telecommunication pole rate is not an appropriate approach for today's market. That formula was set in 1996 when Congress expected many new competing facilities-based providers under the federal and state laws then opening up the local exchange market. The greater the number of entities competing with facilities attached to the poles, the lesser amount that each would pay. Had new entrants proliferated and succeeded, the "telecom" formula would have produced a rate quite similar to the cable rate. But instead, the CLEC market collapsed, and the technology changed from one involving more attached lines to that of integrated IP-enabled broadband networks that carry video, Internet access, and voice on one line that occupy no more space and add no new burden to justify any surcharge. Applying the telecom formula today would create an artificial and drastic penalty in the form of a substantial rate increase. The telecommunication pole rate set for CLECs in 1996 does not make sense for CLECs or for cable. As the New York PSC expressed it when rejecting a telecom pole penalty: "To allow increased pole attachment rates at this time, when competition and the number of attachers has not developed as previously contemplated, is contrary to the public interest under PSL §119-a, in

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*portion of usable space occupied by the attachment. The costs associated with the entire pole are included in that calculation.*") (emphasis supplied)

<sup>11</sup> *Gulf Power Co. v. United States*, 998 F. Supp. 1386 (N.D. Fla. 1998), *aff'd*, 187 F.3d 1324 (11<sup>th</sup> Cir. 1999); *In re Alabama Cable Telecomm's Ass'n., et al. v. Alabama Power Co.*, Order, 15 F.C.C.R. 17346 (2000); *In re Alabama Cable Telecomm's Ass'n., et al. v. Alabama Power Co.*, Order, 16 F.C.C.R. 12209 at ¶60 (2001). To the contrary, every decision considering the adequacy of the cable pole attachment rates has found the rate to be constitutionally sound and affording more than just compensation. See, e.g., *Implementation of Section 703(e) of the Telecommunications Act of 1996, Amendment of the Commission's Rules and Policies Governing Pole Attachments*, FCC 98-20, 13 FCC Rcd 6777, 6795-96 ¶ 32 (1998) ("We conclude, pursuant to Section 224 (b)(1), that the just and reasonable rate for commingled cable and Internet service is the Section 224(d)(3) rate."), *aff'd*, *NCTA v. Gulf Power*, 534 U.S. 327 (2002).

that it would undermine efforts to encourage facilities-based competition and to attract business in New York.”<sup>12</sup>

**C. A pole rent increase would impose a massive broadband tax**

The proposal in the NPRM to increase pole rents for modem service would impose a new and massive “broadband tax” on cable operator Internet services, in contravention of federal policies. Increasing pole rents on the Internet would inexplicably reverse Congressional intent to promote new broadband deployment and local voice competition. Section 706 of the 1996 Act directs the Commission to “remove barriers to infrastructure investment.”<sup>13</sup> In specifying the cable rate for broadband attachments in 1998 the Commission stated that:

In specifying this rate, we intend to encourage cable operators to make Internet services available to their customers. We believe that specifying a higher rate might deter an operator from providing non-traditional services. Such a result would not serve the public interest. Rather, we believe that specifying the Section 224(d)(3) rate will encourage greater competition in the provision of Internet service and greater benefits to consumers.<sup>14</sup>

The Supreme Court agreed. Raising pole rents for Internet services would subject innovative cable operators to “monopoly pricing ... [and] defeat Congress’ general instruction to the FCC to ‘encourage the deployment’ of broadband Internet capability and, if necessary, ‘to accelerate deployment of such capability by removing barriers to infrastructure investment.’”<sup>15</sup>

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<sup>12</sup> *Proceeding on Motion of the Commission as to New York State Electric & Gas Corporation’s Proposed Tariff Filing to Revise the Annual Rental Charges for Cable Television Pole Attachments and to Establish a Pole Attachment Rental Rate for Competitive Local Exchange Companies*, Order Directing Utilities to Cancel Tariffs, Case 01-E-0026, 2002 N.Y. PUC LEXIS 14, at \*4 (Jan. 15, 2002).

<sup>13</sup> See § 706(a) of the Telecommunications Act of 1996, Pub. L. 104-104, 110 Stat. 56 (1996), reproduced in notes under 47 U.S.C. § 157.

<sup>14</sup> 13 FCC Rcd 6794, ¶ 32 (footnote omitted). In the omitted footnote the Commission recognized that it had encouraged cable operators to provide Internet services to their customers, citing social contracts with Continental and Time Warner. *Id.* at n. 125.

<sup>15</sup> *Gulf Power*, 534 U.S. at 329.

State PSCs are likewise trying to reduce barriers to broadband. They have specifically rejected this pole attachment rate penalty on broadband.<sup>16</sup> The proposed FCC would only serve to penalize service providers providing new broadband services, operating simply as a tax on the Internet and IP based services, such as competitive voice service, disserving the very policies that every other branch of government is trying to promote.

#### IV. CONCLUSION

Congress has instructed the Commission to promote advanced services and facilitate voice competition. The rest of the government is developing incentives for broadband competition and deployment. Imposing a higher broadband pole rate would only raise barriers to the most promising facilities-based competitor to local phone companies, undoing the consumer savings that competition produces, and leaving consumers to the unchecked rate hikes of the monopoly phone industry.

The Commission should not increase pole rents as proposed in the Notice. If any adjustments are to be made, the rates for CLECs should be brought to the cable rate.

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<sup>16</sup> *Order Instituting Rulemaking on the Commission's Own Motion Into Competition for Local Exchange Service*, R.95-04-043, I.95-04-044, Decision 98-10-058, 1998 Cal. PUC LEXIS 879 (Oct. 22, 1998); *Proceeding on Motion of the Commission as to New York State Electric & Gas Corporation's Proposed Tariff Filing to Revise the Annual Rental Charges for Cable Television Pole Attachments and to Establish a Pole Attachment Rental Rate for Competitive Local Exchange Companies*, Order Directing Utilities to Cancel Tariffs, Case 01-E-0026, 2002 N.Y. PUC LEXIS 14, at \*4 (Jan. 15, 2002); *Consideration of Rules Governing Joint Use of Utility Facilities & Amending Joint-Use Regulations Adopted Under 3 AAC 52.900 – 3 AAC 52.940*, Order Adopting Regulations, 2002 Alas. PUC LEXIS 489 (Oct. 2, 2002); *Petition of the United Illuminating Company For A Declaratory Ruling Regarding Availability Of Cable Tariff Rate For Pole Attachments By Cable Systems Providing Telecommunications Services & Internet Access*, Docket No. 05-06-01, Decision, 2005 Conn. PUC LEXIS 295, at \*11-12 (Dec. 14, 2005); *Rulemaking to Amend & Adopt Rules in OAR 860, Divisions 024 and 028, regarding Pole Attachment Use & Safety (AR 506) & Rulemaking to Amend Rules in OAR 860, Division 028 Relating to Sanctions for Attachments to Utility Poles & Facilities (AR 510)*, Order No. 07-137, 2007 Ore. PUC LEXIS 115, at \*24 (Apr. 10, 2007).

Respectfully Submitted,

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CHARTER COMMUNICATIONS  
WC DOCKET 07-245  
EXHIBIT A

SUBSCRIBER IMPACT		AVERAGE DENSITY	
<b>Cost per broadband Internet subscriber</b>			
Rent Increase	\$	9.60	\$ 16.79
Subscribers per pole		0.32	0.32
Annual Impact	\$	29.69	\$ 51.96
Monthly Impact	\$	2.47	\$ 4.33
<b>Cost per digital voice subscriber</b>			
Rent Increase	\$	9.60	\$ 16.79
Subscribers per pole		0.12	0.12
Annual Impact	\$	79.64	\$ 139.36
Monthly Impact	\$	6.64	\$ 11.61

SUBSCRIBER IMPACT		RURAL DENSITY	
<b>Cost per basic subscriber</b>			
Rent Increase	\$	9.60	\$ 16.79
Subscribers per pole		0.34	0.34
Annual Impact	\$	28.46	\$ 49.81
Monthly Impact	\$	2.37	\$ 4.15
<b>Cost per broadband Internet subscriber</b>			
Rent Increase	\$	9.60	\$ 16.79
Subscribers per pole		0.16	0.16
Annual Impact	\$	59.39	\$ 103.93
Monthly Impact	\$	4.95	\$ 8.66
<b>Cost per digital voice subscriber</b>			
Rent Increase	\$	9.60	\$ 16.79
Subscribers per pole		0.06	0.06
Annual Impact	\$	159.27	\$ 278.73
Monthly Impact	\$	13.27	\$ 23.23

Source Material

Potential Rate Increase	
Average pole rent	\$ 7.50
Cost allocator for cable rent	7.41%
Cost allocator for telecom rent (3 entities)	16.89%
Cost allocator for telecom rent (2 entities)	24.00%
Average telecom pole rent-low	\$ 17.10
Average telecom pole rent-high	\$ 24.29

Density

Source Data:	Connecticut DPUC		
	Plant Miles	Homes Passed	Basic Subscribers
COMPANY NAME			
Charter/Northeastern	1518	51560	31401
Charter/Western	2803	101046	70568
Total	4321	152606	101969

	Average	Rural
Basic subscribers per plant mile	23.60	11.80
Broadband Internet Subscribers per mile	11.31	5.66
Digital voice subscriber per mile	4.22	2.11
Poles per mile	35	35

CHARTER COMMUNICATIONS  
WC DOCKET 07-245  
EXHIBIT B

<b>SUBSCRIBER IMPACT TO BUILD</b>	<b>RURAL DENSITY</b>			
<b>Cost per basic subscriber</b>				
Rent Increase	\$	9.60	\$	16.79
Subscribers per pole		0.34		0.34
Annual Impact	\$	28.46	\$	49.81
Monthly Impact	\$	2.37	\$	4.15
<b>Cost per broadband Internet subscriber</b>				
Rent Increase	\$	9.60	\$	16.79
Subscribers per pole		0.07		0.07
Annual Impact	\$	142.31	\$	249.04
Monthly Impact	\$	11.86	\$	20.75
<b>Cost per digital voice subscriber</b>				
Rent Increase	\$	9.60	\$	16.79
Subscribers per pole		0.03		0.03
Annual Impact	\$	284.62	\$	498.09
Monthly Impact	\$	23.72	\$	41.51

Source Material

Potential Rate Increase	
Average pole rent	\$ 7.50
Cost allocator for cable rent	7.41%
Cost allocator for telecom rent (3 entities)	16.89%
Cost allocator for telecom rent (2 entities)	24.00%
Average telecom pole rent-low	\$ 17.10
Average telecom pole rent-high	\$ 24.29

Density

Source Data:	Connecticut DPUC		
COMPANY NAME	Plant Miles	Homes Passed	Basic Subscribers
Charter/Northeastern	1518	51560	31401
Charter/Western	2803	101046	70568
<b>Total</b>	<b>4321</b>	<b>152606</b>	<b>101969</b>

	Introducing HSD	Building Rural
Basic subscribers per plant mile	23.60	11.80
Broadband Internet Subscribers per mile	4.72	2.36
Digital voice subscriber per mile	2.36	1.18
 Poles per mile	 35	 35