



Massillon Cable TV, Inc.

One Connection. A World of Possibilities.

Received & Inspected

NOV 7 - 2008

FCC Mail Room

November 5, 2008

814 Cable Court N.W.

Post Office Box 1000

Massillon, Ohio

44648-1000

Ms. Marlene Dortch
Secretary
Federal Communications Commission
Washington, DC 20554
Attn: The Chief, Media Bureau

RE: Massillon Cable TV, Inc.
CSR-7229-Z
CS Docket 97-80

330-833-4134

FAX 330-833-7522

Dear Ms. Dortch:

Pursuant to the *Memorandum Opinion and Order* of the Chief, Media Bureau in *Innovative Cable TV, St. Thomas-St. John & St. Croix, et. al.*, DA 08-438, released March 19, 2008, Massillon Cable TV, Inc. was granted a conditional waiver of Section 76.1204(a)(1) of the Commission's rules, 47 C.F.R. § 76.1204(a)(1).

While it is not a requirement, Massillon wants to provide the Commission with an Interim Report of our progress toward the goal of providing all-digital service to our customers. Toward that end, enclosed is an Interim Report on our progress. Please feel free to contact me if you have any questions in this regard.

Sincerely,

Robert Gessner
President

Cc: Monica Shah Desai, Chief, Media Bureau (via email)

Voice: 330-833-5509

Fax: 330-833-7522

Email: rbgessner@massilloncabletv.com

Before the
Federal Communications Commission
Washington, D.C. 20554

| | | |
|---|---|---------------------|
| In the Matter of |) | |
| |) | |
| Innovative Cable TV, St. Thomas-St. John & St. Croix |) | CSR-7224-Z |
| |) | |
| Massillon Cable TV |) | CSR-7229-Z |
| |) | |
| Implementation of Section 304 of the Telecommunications Act of 1996 |) | CS Docket No. 97-80 |
| |) | |
| Commercial Availability of Navigation Devices |) | |
| |) | |

MEMORANDUM OPINION AND ORDER

Adopted: March 19, 2008

Released: March 19, 2008

By the Chief, Media Bureau:

1. The above-captioned multichannel video programming distributors (“Petitioners”) have filed with the Chief of the Media Bureau requests for waiver (the “Waiver Requests”) of the ban on integrated set-top boxes set forth in Section 76.1204(a)(1) of the Commission’s rules.¹ The Petitioners have indicated that they will transition to all-digital systems by February 17, 2009.² Pursuant to the *BendBroadband Order* precedent,³ we grant the Waiver Requests subject to the following conditions: (1) the operator must file with the Media Bureau a sworn declaration within 10 days of the release of this order in which it commits to move to an all-digital network on or before February 17, 2009; (2) the operator must notify all of its analog customers of its plans to transition to all-digital systems within 60 days of the release of this order, and again six months before completing its transition, and each time submit sworn declarations to the Commission confirming that such notice has been provided; (3) within 60 days of the release of this order, the operator must ensure that it has in its inventory or has placed orders for enough set-top boxes to ensure that each of its customers can continue to view its video programming on their television sets after the transition and submit a sworn declaration to the Commission confirming that this is the case, and (4) the operator must publicly commit to this plan by

¹ 47 C.F.R. § 76.1204(a)(1). The separation of the security element from the host device required by this rule is referred to as the “integration ban.”

² See Innovative Amendment to Waiver Request, CSR-7224-Z (filed Aug. 3, 2007); Massillon Amended Waiver Request at 1 (filed Jan. 28, 2008).

³ See *Bend Cable Communications, LLC d/b/a BendBroadband Request for Waiver of Section 76.1204(a)(1) of the Commission’s Rules*, 22 FCC Rcd 209 (2007) (“*BendBroadband Order*”).

sworn declaration. As we explained in the *BendBroadband Order*, such a declaration will “demonstrate [a] commitment to move to an all-digital network.”⁴

2. Accordingly, **IT IS ORDERED** that, pursuant to Sections 1.3 and 76.7 of the Commission’s rules, 47 C.F.R. §§ 1.3, 76.7, a conditional waiver of Section 76.1204(a)(1) of the Commission’s rules, 47 C.F.R. § 76.1204(a)(1), **IS GRANTED** to Innovative Cable TV, St. Thomas-St. John & St. Croix and Massillon Cable TV, conditioned as set forth in this Order.

3. This action is taken pursuant to authority delegated by Section 0.283 of the Commission’s rules, 47 C.F.R. § 0.283.

FEDERAL COMMUNICATIONS COMMISSION

Monica Shah Desai
Chief, Media Bureau

⁴ See *BendBroadband Order*, 22 FCC Rcd at 216, ¶ 21.

Interim Report to FCC

Massillon Cable TV, Inc.

DTV Rollout

November 1, 2008

The purpose of this report is to provide the FCC with information about the progress Massillon Cable TV, Inc. has made toward the goal of eliminating all analog cable TV channels prior to February 18, 2009.

SIGNIFICANT ACHIEVEMENTS TO DATE

Free Customer Premise Equipment and Installation - Massillon Cable TV has taken the unprecedented step of offering up to three digital set-top converters (plus remote control) to all customers at no charge. We will also provide free professional installation upon request. This is not a temporary offer. These converters will be free forever. Customers have no out-of-pocket expense to equip three analog TV sets (the national average per home). In addition, customers will have access to six additional program networks at no additional charge once they install digital converters.

New set-top box - Massillon Cable TV, in conjunction with Evolution Broadband and Homecast, designed and developed a new, low-cost digital converter for use in the United States. We call it the Mini-Max.¹ Massillon Cable TV and TV Max (a Texas company) are the first cable TV companies in the US to deploy these converters. Integral in this design is insuring that parental control, close captioning and EAS information is delivered to consumers.

New subscriber interface - As part of the converter development process, Massillon Cable TV designed a new subscriber interface to provide important program-related information to viewers. Surveys² with consumers reveal that 90% of viewers find this new type of on-screen program information easy to use and helpful in making their choices. The data provided is similar to the information found on most of the converters used for the broadcast DTV Transition.

New remote control - A new remote control unit also was required for this project. Massillon Cable TV helped Contec develop a new remote control with simple, intuitive controls since most of the users of these converters will be unaccustomed to "high tech" remote controls. We felt it was vital that this remote control include the ability to control the TV power and volume so consumers lost no current capability (using one remote). This decision has been verified through

¹ A copy of the "Digital Converter Quick Start Guide" is included to illustrate the converter, remote control and viewer interface.

² Survey results attached.

surveys that reveal more than 75% of consumers programmed the remote to control their television.

New local partnerships - Massillon Cable TV developed new, unique partnerships for rapid, low-cost distribution and self-installation of converters. The Stark County Board of Mental Retardation and Developmental Disabilities was retained to pack and label converters for direct shipment to customers via UPS. This three-way partnership provides work for local citizens, a new customer for UPS and free next-day delivery to consumers.

Effective customer communication program - Massillon Cable TV developed a very effective customer communication and ordering system. Each customer will be contacted as many as 20 times in the 28-day communication cycle of Phase I.³ This includes the development of a fully integrated web site for customer self-fulfillment (www.dtvrollout.com). Copies of all customer communications are included along with a calendar that shows the timing of the various messages to customers. All available channels of customer contact and fulfillment have been developed including:

- o Direct mail – full-color booklets, letters and postcards.
- o Electronic – Email and web browser redirection.
- o Telephonic – Recorded messages and live operators for both inbound and outbound calls.

The program is very effective. It consistently creates response rates of 15% per week among contacted households.

Successful Self-installation Program – Cable TV companies have historically relied on expensive, time-consuming, professional installation for converters. This increases costs to customers and increases the time required to complete a converter roll-out.

Our DTV Rollout relies heavily upon self-installation of equipment. To date, more than 80% of customers have chosen self-installation. Surveys among customers who have ordered converters show that 70% of them have successfully installed the converters they ordered. The remaining 30% have not yet attempted to install the converters.

A similar issue was discovered in Wilmington, NC among over-the-air converter users. For a variety of reasons, they decided to wait until the switch actually took place before connecting the equipment. While it will be very helpful to have these converters pre-positioned prior to the elimination of analog signals, it would be far better to have them connected immediately. We are creating new messages to encourage customers to connect and use the equipment immediately.

³ Phase I and II explained further below.

Surveys among customers show that 88% find the instructions easy to use and fewer than 4% require our assistance to cure self-installation problems.

Our experience shows that consumers are very willing to use the new distribution channels for ordering and self-installation. Following is a table that shows the distribution of orders.

| Type of Order | % of Customers Using |
|------------------------------------|----------------------|
| Online Order/Self-Installation | 54% |
| Converter Pickup/Self-Installation | 27% |
| Professional Installation | 19% |

Professional Installation is a combination of customers who 1) specifically request installation of Mini-Max converters and 2) had Mini-Max converters installed at the same time as other services.

SUPPLY CHAIN

We ordered plenty of converters. However, the longer-than-anticipated design/testing period and manufacturing delays caused the manufacturer to fail to meet the delivery schedule. An unexpected delay was also caused by the Olympics in China. Critical parts from other countries could not enter the country for assembly on a timely basis. Similarly, component parts made in different parts of China were delayed by the heightened security and transportation restrictions in August. The following table shows the difference between our original quantity/delivery schedule and the actual quantity/delivery dates.

| Planned Delivery Date | Planned Delivery Quantity | Total | Actual Delivery Quantity | Total |
|-----------------------|---------------------------|---------------|------------------------------|---------------|
| 8/1/08 | 5,000 | 5,000 | 4,040 | 4,040 |
| 8/8/08 | 12,000 | 17,000 | 1,000 | 5,040 |
| 8/18/08 | 13,000 | 30,000 | 3,434 | 8,474 |
| 9/3/08 | 15,000 | 45,000 | 5,840 | 14,314 |
| 10/3/08 | 15,000 | 60,000 | 6,770 | 21,084 |
| 10/18/08 | 10,000 | 70,000 | 0 | 21,084 |
| 11/1/08 | 0 ⁴ | 70,000 | (received 10/31/08) 17,280 | 38,364 |
| 11/17/08 | 10,000 | 80,000 | (anticipate 11/10/08) 37,036 | 75,400 |

Air freight was used to deliver most of the first 15,000 converters, but fuel costs and air freight schedules made this impractical for the entire quantity. As a result, we were forced to limit our communication and distribution efforts until the "pipeline" is full. The quantities in boldface show we are about 10 weeks behind our original delivery schedule.

Our early experience clearly shows that we are capable of generating, accepting and delivering large quantities of both orders and converters. We know we can distribute more than 1,000 converters per day. The converters delivered to date

⁴ No delivery was planned for 11/1/08. The information was inserted to show the inventory status as of 11/1/08 (the date of this report) and the delivery of our first large shipment on 10/31/08.

have allowed us to contact roughly one-third of our customer base. Assuming the balance of the converters are delivered as now anticipated, we may be able to complete the Phase I communications by the end of 2008.

ROLL OUT SCHEDULE

Phase I - Phase I is a targeted approach to insure that all customers are contacted multiple times to explain this program that requires a digital converter on every analog TV set. This type of project does not lend itself well to a full-blown mass media campaign from the start. The response volume would overwhelm our resources for converter storage, inbound phone calls, technician support, etc. Conducting a steady controlled program on a neighborhood-by-neighborhood basis means we can manage the process very well and avoid confusion, long lines, long wait times and, most importantly, insure the availability of equipment.

Phase II – Phase II is a mass-marketed approach to emphasize that immediate action is required. We know that some people will not respond to the Phase I message. Some simply will not act in advance and will wait until they lose their analog channels. Therefore, a mass media campaign must eventually be conducted to alert all customers to the impending loss of analog channels. We will activate Phase II as soon as all customers have been contacted with Phase I material and we have sufficient converters on hand or in the pipeline to meet customer demand.

Phase II is designed to last 12 weeks. The campaign will consist of:

- Direct Mail – all customers will receive announcements with very specific information about the date of analog channel eliminations. This also will include information about the addition of High Definition and other program networks.
- Television – we will produce long-form television programs to support Phase II. Long-form programs (infomercials) will explain and demonstrate, in detail, the entire program, the converters, subscriber interface and installation process. These programs will be seen by analog-only-viewers to avoid confusion.

These methods will be used for the first four weeks of Phase II.⁵

After that time, new tactics will be added:

- On Screen Alerts – About five days prior to the elimination of an analog channel, we will place a crawl on that channel that appears during the program content. This crawl, much more noticeable than normal commercials, will run throughout the five day period to alert viewers to the

⁵ This cannot be shortened due to FCC Regulations that require 30-day advance written notice to all customers prior to dropping or moving a program service. We consider the elimination of the analog version of a program service to be a deletion even though it will still be available in a digital format. Of course, all program networks will be informed of the specific elimination schedule in advance.

exact date of the elimination of the analog channel they are watching. These crawls will only be seen by analog viewers. Digital viewers will be unaffected.

- Long-Form Alerts – For about two days after an analog channel is eliminated, a long-form infomercial will appear in its place to explain what has happened and what steps must be taken to obtain and install free converters.

Schedule of Analog Channel Eliminations

Experience with other channel migration projects has proven that the best method is a staged, systematic approach rather than a single action. We have 76 analog channels to eliminate. Eliminating all 76 analog channels at the same time and date would create an overwhelming volume of calls and questions.

Some of the results would be:

- Even next-day delivery of converters would be considered too long by people without service if all analog channels were eliminated at the same date and time.
- Many people would come to our offices to pick up converters instead of waiting for delivery. This would lead to long lines and wait times at our offices. Even those customers willing to pick up and install converters would be without service for some period of time and would disrupt their daily schedule with “an emergency.”
- A large volume of self-installation attempts would cause a corresponding increase in the number of service calls. A large volume of service calls means customers would be required to wait longer (with no television service) for a technician to arrive and solve their problem.
- Similarly, eliminating all channels at the same time would lead to an overwhelming number of demands for immediate installation. Customers who are unable or unwilling to install converters on their own would require professional installation. A large influx of requests for professional installation would cause longer lead times. Thus, customers would experience longer periods of time without service. This outcome would fall most often on those with lesser means of transportation and those with a fear of technology or limited skills.

In short, we will not be able to serve everyone well if we eliminate all analog channels at the same time. Fortunately, unlike the broadcast transition, there is no need to undertake an across-the-board elimination that affects all viewers and all program networks at precisely the same time. Spreading the channel eliminations over a period of time will not adversely impact anyone.

To avoid this avalanche of calls, we will divide the 76 channels into seven or eight groups and eliminate one group each week. Customers will be aware of the exact date and time that each analog channel will be eliminated so they can plan accordingly. Channel groups will be composed of a variety of different program services that include sports, news, children’s, family, music, movies and

general entertainment channels. The goal is to remove analog channels that impact all segments of the viewing public without eliminating all of one type of programming. In this way, we accomplish two things.

- First, we will impact all segments of viewers to some extent. Including some of each type of programming increases the likelihood that every household will notice and act after losing only a small amount of programming. For example, removing all children's programming at once would have no impact on households with no children. Similarly, removing all the sports channels would have no impact on homes with no sports viewers. If, however, we remove one network from each program category, we have a greater probability of impacting someone in the household. This will cause them to act before they lose all channels.
- Second, we will not completely eliminate a viewer's favorite category. To return to the example, removing the Cartoon Network will upset some young viewers, but they will still have other viewing options designed for children (Nickelodeon, Disney, Boomerang). Certainly, they will be disappointed when the Cartoon Network is unavailable, but they will have reasonable alternatives until they install a digital converter. Hopefully, this small amount of disappointment will cause them to act before losing more of their viewing options.

Basically, we want to avoid an "all-or-nothing" approach. Such an approach would be fine if we lived in a world where everyone read all their mail and promptly followed all instructions. But, we don't live in such a world. Eliminating all analog channels on the same day and time will cause an outcry from those who have procrastinated throughout the DTV Rollout effort. Despite their lethargy, we want to be sure they are able to install digital converters without losing all of their program choices.

It is important to keep in mind that, by the time we reach Phase II, we will be dealing only with a small subset of customers. It will be composed of:

- Customers who ordered converters but have not installed them – These customers will only need to install the converters they already have in their homes. The early messages in Phase II will give them an ample opportunity to install their converters before they lose any programming. The long-form infomercial will give them step-by-step instructions. We will have time to dispatch technicians to solve any problems they encounter.
- Customers who have ignored all previous messages – These, of course, are the tough cases. Like the last analog over-the-air viewers in Wilmington, NC, they will not act until they actually lose some programming. Unlike Wilmington, however, we will 1) more forcefully announce the upcoming elimination and 2) gradually remove the program services. We can be more forceful because we can segregate the viewers into analog viewers (who will see the messages) and digital viewers (who will not). Analog viewers will have sufficient time to order and install converters before they lose all of their programming.

SUMMARY

As of November 1, 2008, we have directly communicated the details of our DTV Rollout to 38% of all customers. As noted above, we were compelled to limit the number of customers contacted due to a shortage of converters. Almost 25% of all households are now equipped with free Mini-Max converters. We also have other types of converters. The number of households with at least one digital converter stands at 52%.

Mini-Max Converter Survey 2

1. Are the Mini-Max converter/s in your home working properly at this time?

| | Response Percent | Response Count |
|---------------------------|------------------|----------------|
| Yes. <input type="text"/> | 71.3% | 548 |
| No. <input type="text"/> | 28.7% | 221 |
| answered question | | 769 |
| skipped question | | 0 |

2. Is the On-Screen Program Information helpful?

| | Response Percent | Response Count |
|---------------------------|------------------|----------------|
| Yes. <input type="text"/> | 87.1% | 425 |
| No. <input type="text"/> | 12.9% | 63 |
| answered question | | 488 |
| skipped question | | 281 |

3. Is the remote control easy to use and understand?

| | Response Percent | Response Count |
|---------------------------|------------------|----------------|
| Yes. <input type="text"/> | 90.9% | 441 |
| No. <input type="text"/> | 9.3% | 45 |
| answered question | | 485 |
| skipped question | | 284 |

4. Did you program the remote control to turn your TV set on and off?

| | Response Percent | Response Count |
|---------------------------|------------------|----------------|
| Yes. <input type="text"/> | 76.2% | 369 |
| No. <input type="text"/> | 24.0% | 116 |
| <i>answered question</i> | | 484 |
| <i>skipped question</i> | | 285 |

5. If Yes, was it easy to program the Remote Control to turn your TV on and off?

| | Response Percent | Response Count |
|---------------------------|------------------|----------------|
| Yes. <input type="text"/> | 82.9% | 329 |
| No. <input type="text"/> | 17.4% | 69 |
| <i>answered question</i> | | 397 |
| <i>skipped question</i> | | 372 |

6. How did you receive your Mini-Max converters?

| | Response Percent | Response Count |
|--|------------------|----------------|
| They were delivered by UPS. <input type="text"/> | 62.4% | 428 |
| I visited the office. <input type="text"/> | 20.8% | 143 |
| An installer came to my home. <input type="text"/> | 16.8% | 115 |
| <i>answered question</i> | | 686 |
| <i>skipped question</i> | | 83 |

7. How did you order your Mini-Max converters?

| | Response Percent | Response Count |
|--|------------------|----------------|
| I ordered online. <input type="text"/> | 57.0% | 243 |
| I ordered by telephone. <input type="text"/> | 43.0% | 183 |
| <i>answered question</i> | | 426 |
| <i>skipped question</i> | | 343 |

8. Did the information on the website answer your questions?

| | Response Percent | Response Count |
|------------------------------|------------------|----------------|
| Yes. <input type="text"/> | 96.3% | 231 |
| No. <input type="checkbox"/> | 3.8% | 9 |
| <i>answered question</i> | | 240 |
| <i>skipped question</i> | | 529 |

9. Was the ordering process easy to understand?

| | Response Percent | Response Count |
|------------------------------|------------------|----------------|
| Yes. <input type="text"/> | 97.5% | 231 |
| No. <input type="checkbox"/> | 2.5% | 6 |
| <i>answered question</i> | | 237 |
| <i>skipped question</i> | | 532 |

10. Was the office staff knowledgeable and able to answer all your questions?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 94.3% | 133 |
| No. <input type="checkbox"/> | 5.7% | 8 |
| answered question | | 141 |
| skipped question | | 628 |

11. Was the wait time to pick up your Mini-Max converters reasonable?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 99.3% | 141 |
| No. <input type="checkbox"/> | 0.7% | 1 |
| answered question | | 142 |
| skipped question | | 627 |

12. Which phone number did you use?

| | Response Percent | Response Count |
|---|------------------|----------------|
| DTV Rollout Center (877-212-3322). <input type="checkbox"/> | 58.6% | 102 |
| Regular Office number. <input type="checkbox"/> | 41.4% | 72 |
| answered question | | 174 |
| skipped question | | 595 |

13. Was the agent able to answer all your questions?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 96.7% | 174 |
| No. <input type="checkbox"/> | 3.3% | 6 |
| answered question | | 180 |
| skipped question | | 589 |

14. When you scheduled your installation, was the agent you spoke to able to answer all your questions?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 94.4% | 101 |
| No. <input type="checkbox"/> | 5.6% | 6 |
| answered question | | 107 |
| skipped question | | 662 |

15. Did you order Mini-Max converters specifically or as part of another installation job?

| | Response Percent | Response Count |
|---|------------------|----------------|
| Mini-Max only. <input type="checkbox"/> | 44.0% | 48 |
| Part of another job. <input type="checkbox"/> | 56.0% | 61 |
| answered question | | 109 |
| skipped question | | 660 |

16. Did the installer arrive when you expected?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 95.5% | 105 |
| No. <input type="checkbox"/> | 4.5% | 5 |
| answered question | | 110 |
| skipped question | | 659 |

17. Was the installer knowledgeable and able to answer your questions?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 93.5% | 101 |
| No. <input type="checkbox"/> | 6.5% | 7 |
| answered question | | 108 |
| skipped question | | 661 |

18. Did the installer explain how to operate the Mini-Max converter?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 88.1% | 96 |
| No. <input type="checkbox"/> | 11.9% | 13 |
| answered question | | 109 |
| skipped question | | 660 |

19. Did the package arrive in a reasonable period of time?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 99.0% | 416 |
| No. <input type="checkbox"/> | 1.0% | 4 |
| answered question | | 420 |
| skipped question | | 349 |

20. Did the package arrived undamaged?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 98.1% | 414 |
| No. <input type="checkbox"/> | 1.9% | 8 |
| answered question | | 422 |
| skipped question | | 347 |

21. The box you received should have included the Mini-Max converter, power supply, remote control and batteries, RF wire, A/V wire, instruction booklet. Were all of these things inside the box you received?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 98.8% | 499 |
| No. <input type="checkbox"/> | 1.2% | 6 |
| answered question | | 505 |
| skipped question | | 264 |

22. If NO, what was missing? Check all that apply.

| | Response Percent | Response Count |
|--|------------------|----------------|
| Mini-Max converter. <input type="checkbox"/> | 37.5% | 3 |
| Power Supply. <input type="checkbox"/> | 0.0% | 0 |
| Remote Control and batteries. <input type="checkbox"/> | 50.0% | 4 |
| RF wire. <input type="checkbox"/> | 12.5% | 1 |
| A/V wire. <input type="checkbox"/> | 25.0% | 2 |
| Instruction Booklet. <input type="checkbox"/> | 0.0% | 0 |
| answered question | | 8 |
| skipped question | | 761 |

23. Were you able to install the Mini-Max converter easily?

| | Response Percent | Response Count |
|---|------------------|----------------|
| Yes. <input type="checkbox"/> | 71.7% | 382 |
| No. <input type="checkbox"/> | 11.8% | 63 |
| I haven't tried yet. <input type="checkbox"/> | 16.5% | 88 |
| answered question | | 533 |
| skipped question | | 236 |

24. Were the instructions inside the box easy to follow?

| | Response Percent | Response Count |
|-------------------------------|------------------|----------------|
| Yes. <input type="checkbox"/> | 87.7% | 426 |
| No. <input type="checkbox"/> | 12.3% | 60 |
| answered question | | 486 |
| skipped question | | 283 |

COMMUNICATION SCHEDULE

August 2008

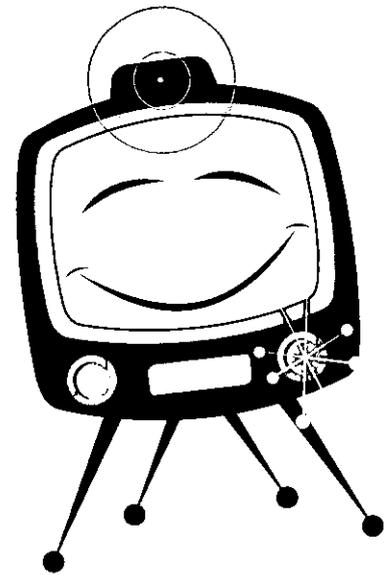
| Sun | Mon | Tue | Wed | Thu | Fri | Sat |
|--|--------------------|--|---|---------------------------------------|--------------------------------------|--|
| 27 | 28 | 29 | 30 | 31 | 1 | 2 |
| 3 | 4 | 5 | 6 | 7 | 8 | 9 |
| 10 Don't Delay Go Digital Today | 11 NAC POSTCARD | 12 LETTER # 1 INFORMATION BOOK | 13 EMAIL # 1 IVR CALL(Cont.) | 14 POSTCARD # 1 IVR CALL(Cont.) | 15 | 16 FILTER LISTS |
| 17 Don't Let Your TV Go Dark | 18 | 19 Email # 2 | 20 POSTCARD # 2 | 21 Front Porch # 1 | 22 | 23 |
| 24 Don't Be Left Out In The Cold | 25 OBTC # 1 | 26 POSTCARD # 3 FRONT PORCH # 2 OBTC # 1 (Cont.) | 27 OBTC # 2 FRONT PORCH#2 Cont. EMAIL # 3 | 28 OBTC # 2 (Cont.) | 29 FRONT PORCH # 3 OBTC # 3 | 30 FRONT PORCH#3 Cont. OBTC #3(Cont.) |
| 31 OBTC # 3 (Cont.) We Will Be Back FRONT PORCH#3 Cont. | 1 | 2 LETTER # 3 | 3 EMAIL # 4 | 4 IVR # 2 | 5 POSTCARD # 4 | 6 |



Massillon Cable TV, Inc.
 One Connection. A World of Possibilities.
 P.O. Box 1000
 Massillon, OH 44648-1000



Clear Picture, Inc.
 One Connection. A World of Possibilities.
 P.O. Box 917
 Wooster, OH 44691-0917



MASSILLON CABLE
 814 CABLE CT NW
 MASSILLON OH 44648

Dear MCTV Customer:

Starting in February, **YOUR TVs WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

DON'T DELAY! GO DIGITAL TODAY!

The Digital TV Rollout has reached your neighborhood. NOW is the time for you and your neighbors to order digital converters for your TV sets.

An information booklet is on its way to you now with complete information. You also can find complete information at:

www.dtvrollout.com
 or by calling
1-877-212-3322 (toll free)
8AM - 8PM Mon - Fri, 9AM - 5PM Sat & Sun

You will need your account number to order online. Your account number is: XXXXXX.

These are the basic facts about the DTV Rollout:

- You will need a digital converter for every analog TV set in your home.
- Digital TV sets with a QAM tuner will not need a converter.
- Up to three new Mini-Max converters will be provided **FREE** of any monthly charge - permanently.
- Mini-Max converters will be shipped to your home **FREE** of charge.

The online order process is quick and simple. Ordering is **FREE**. Shipping is **FREE**. Up to three Mini-Max converters are **FREE**. **Plus, every 100th order placed at www.dtvrollout.com will receive a \$48.50 credit (one month of Basic Cable TV service.)**

DON'T DELAY — GO DIGITAL TODAY!

Please visit **www.dtvrollout.com**
 or call **1-877-212-3322 (toll free)**
(8AM - 8PM Mon - Fri, 9AM - 5PM Sat & Sun)
 to order the converters you need.



Sincerely,

Robert Gessner
 Robert Gessner
 President

LETTER #1

**THE FUTURE
 IS ALL DIGITAL**



Starting in February, **YOUR TVS WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

DON'T DELAY!!! GO DIGITAL TODAY!!!

The Digital TV Rollout has reached your neighborhood. NOW is the time for you and your neighbors to order digital converters for your analog TV sets.

**Please visit www.dtvrollout.com or
Call 877-212-3322 (toll free)
9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun
to order the converters you need.**

These are the basic facts about the DTV Rollout:

- You will need a digital converter for every analog TV set in your home.
- Digital TV sets with a QAM tuner will not need a converter.
- Up to three new, Mini-Max converters will be provided **FREE** of any monthly charge - permanently. Mini-Max converters will be shipped to your home **FREE** of charge.

The on line order process is quick and simple. Ordering is FREE. Shipping is FREE. Up to three Mini-Max converters are FREE. **Plus, every 100th order placed at www.dtvrollout.com will receive a \$48.50 credit (one month of Basic Cable TV service).**

You recently received an information booklet in the mail announcing this program. Please refer to that booklet for more information. You also can find complete information at:

**www.dtvrollout.com
or by calling
1-877-212-3322 (toll free)
from 9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun.**

You will need your account number to order on line. Your account number is:

Don't Delay - Go Digital Today

EMAIL #1

IVR Script # 1

Hello. This is not a sales call. It is a courtesy call from Massillon Cable TV/Clear Picture. The Digital TV Rollout is coming to your neighborhood. You received information from us about our change to all-digital television service. It is not an advertising brochure. It is important information you need to make sure your cable television service continues to work properly. Please review it and visit www.dtvrollout.com or call toll free 1-877-212-3322. Thank you.



Starting in February, **YOUR TVS WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

Don't Let Your TV Go Dark

The Digital TV Rollout has reached your neighborhood. NOW is the time for you and your neighbors to order digital converters for your analog TV sets.

**Please visit www.dtvrollout.com or
Call 877-212-3322 (toll free)
9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun
to order the converters you need.**

These are the basic facts about the DTV Rollout:

- You will need a digital converter for every analog TV set in your home.
- Digital TV sets with a QAM tuner will not need a converter.
- Up to three new, Mini-Max converters will be provided **FREE** of any monthly charge - permanently. Mini-Max converters will be shipped to your home **FREE** of charge.

The on line order process is quick and simple. Ordering is FREE. Shipping is FREE. Up to three Mini-Max converters are FREE. **Plus, every 100th order placed at www.dtvrollout.com will receive a \$48.50 credit (one month of Basic Cable TV service).**

You recently received an information booklet in the mail announcing this program. Please refer to that booklet for more information. You also can find complete information at:

**www.dtvrollout.com
or by calling
1-877-212-3322 (toll free)
from 9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun.**

You will need your account number to order on line. Your account number is:

Don't Delay – Go Digital Today

If we haven't heard from you in a few days, we will send a series of reminder postcards. We also will redirect your Internet browsing a few times to remind you about the need for a digital converter on each analog TV set. Finally, we will attempt to contact you by telephone. PLEASE ACT NOW to avoid these messages.

Avalanche of Information

We apologize for sending multiple messages. There is an easy way to stop this avalanche of information: **order the converters you need NOW!** We will stop sending information about the DTV Rollout once you order converters.

Already All-Digital???

EMAIL #2

If you already have a digital converter on every TV set (or TV sets with built-in QAM tuners), you don't need to exchange those converters or order more. Instead, please just visit www.dtvrollout.com or call 1-877-212-3322 (toll free) and tell us that you are 100% digital. We will make a note of that and stop sending more information.

Please take a few minutes NOW to ensure you have everything you need to enjoy all-digital TV in February. Remember, the first three Mini-Max converters are FREE and will be shipped FREE to your home for easy self- installation.

Don't Delay – Go Digital Today



Starting in February, **YOUR TVS WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

DON'T DELAY!!! GO DIGITAL TODAY!!!

We apologize for interrupting your Internet browsing. We wouldn't do this if it weren't very important. This web page includes important information about your cable TV service. Please take a moment to read this.

Massillon Cable TV & Clear Picture will end all analog cable TV service on February 17, 2009. This means you will need a digital converter for every analog TV set in your home. Find out more at www.dtvrollout.com

We are focusing on your neighborhood now to make sure everyone is aware of this coming change and make sure everyone has the converters they need for uninterrupted TV service.

Our records show you have not responded to any of our messages. Please take a moment to

Visit www.dtvrollout.com

or

Call **877-212-3322 (toll free)**

9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun

Order the converters you need today.

- Ordering is **FREE**.
- Delivery is **FREE**.
- Up to three Mini-Max converters are **FREE of any monthly charge - EVER**.

ACT NOW to avoid further reminders. If you already have a digital converter on every TV set or already have digital TV sets with QAM tuners, please tell us that too. It will only take a few minutes. Once you order or call, all other messages will stop.

KIDS

This message is for the adult in your home who pays for the cable TV and Internet service. Please tell them about this message. It is very important.

FRONT PORCH #1

OBTC Script #1

"Hello. This is _____ calling from Massillon Cable TV (or Clear Picture). Is this the _____ residence?"

(After they verify that they have a responsible party, they should state): "This is not a sales call. It is a courtesy call about the Digital TV Transition. We have been sending you information about this transition. Have you received it? (should be yes). Can I answer any questions you have about it?"

At this point, I don't think we can dictate the script. It will vary depending on the customer questions. However, here are some multiple options for closing sale:

- We really want to help you start enjoying the benefits of digital TV. It only takes a few minutes. Can I help you with an order today?
- Up to three Mini-Max converters are available at no charge. Would you like to order them now?
- Ordering now will save you from a long line or a last minute order. Can I place an order for you now?
- Let's make sure all your TV sets are ready for the digital transition by ordering converters now.
- The first three Mini-Max converters are free. So is shipping. Can I do that for you now?

I think multiple closing options will be very helpful.

Answering Machine Message

"Hello. This is _____ from Massillon Cable TV (or Clear Picture). This is not a sales call. I am calling to remind you about the DTV Rollout. We know how important TV is to you and your family, so please take some time to review the information we have been sending about this change. We are here every day of the week to help you with questions and ordering free converters. Please call us at 877-212-3322. The number again is 877-212-3322."

Response to Subscribers Complaints About The Phone Call

If the subscriber asks that you do not call them again. Ask if you can place their order now for the Mini-Max converter, and this will stop all future phone calls and other communications.

If the subscriber advises that they are not ready to order now and does not want to receive any further communication from us, we should politely advised them the following:

I understand that you are not ready to order and requesting that we send no additional information. I will take you off our mailing list immediately, but will contact you again later in the year when we announce the schedule for the elimination of analog TV channels. Please remember that every TV set in your home must be connected to a digital converter before February 17,2009, or be equipped with a QAM tuner to receive cable TV service.

OUTBOUND PHONE SCRIPT #1



Starting in February, **YOUR TVS WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

Don't Let Your TV Go Dark!!! Go Digital Today!!!

We apologize for interrupting your Internet browsing again. We are taking this extraordinary step because we want you to receive uninterrupted TV service. Please take a moment to read this.

All analog cable TV service will end on February 17, 2009. You **MUST** have a digital converter for every analog TV set connected to the cable system by that date. Find out more at

www.dtvrollout.com

We are focusing on your neighborhood now to make sure everyone is aware of this coming change. PLEASE ACT NOW for fastest service.

WE NEED TO HEAR FROM YOU. Our records show you have not ordered any converters. Please take a moment to

Visit www.dtvrollout.com

or

Call 877-212-3322 (toll free)

9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun

Order the converters you need today.

- Ordering is **FREE**.
- Delivery is **FREE**.
- Up to three Mini-Max converters are **FREE of any monthly charge - EVER**.

ACT NOW to avoid further reminders. If you already have a digital converter on every TV set or have digital TV sets with QAM tuners, please tell us that too. It will only take a few minutes. Once you order or call, all other messages will stop.

KIDS

This message is for the adult in your home who pays for the cable TV and Internet service. Please tell them about this message. It is very important.

FRONT PORCH #2

OBTC Script # 2

"Hello. This is _____ calling from Massillon Cable TV (or Clear Picture). Is this the _____ residence?"

(After they verify that they have a responsible party, they should state): "This is not a sales call. It is a courtesy call about the Digital TV Transition. We have been sending you information about this transition. Have you received it? (should be yes). Can I answer any questions you have about it?"

At this point, I don't think we can dictate the script. It will vary depending on the customer questions. However, here are some multiple options for closing sale:

- We really want to help you start enjoying the benefits of digital TV. It only takes a few minutes. Can I help you with an order today?
- Up to three Mini-Max converters are available at no charge. Would you like to order them now?
- Ordering now will save you from a long line or a last minute order. Can I place an order for you now?
- Let's make sure all your TV sets are ready for the digital transition by ordering converters now.
- The first three Mini-Max converters are free. So is shipping. Can I do that for you now?

I think multiple closing options will be very helpful.

Answering Machine Message

"Hello. This is _____ from Massillon Cable TV (or Clear Picture). This is not a sales call. This is our second attempt to remind you about the DTV Rollout. We know how important TV is to you and your family, so please take some time to review the information we have been sending about this change. We are here every day of the week to help you with questions and ordering free converters. Please call us toll free at 877-212-3322. The number again is 877-212-3322."

Response to Subscribers Complaints About The Phone Call

If the subscriber asks that you do not call them again. Ask if you can place their order now for the Mini-Max converter, and this will stop all future phone calls and other communications.

If the subscriber advises that they are not ready to order now and does not want to receive any further communication from us, we should politely advised them the following:

I understand that you are not ready to order and requesting that we send no additional information. I will take you off our mailing list immediately, but will contact you again later in the year when we announce the schedule for the elimination of analog TV channels. Please remember that every TV set in your home must be connected to a digital converter before February 17,2009, or be equipped with a QAM tuner to receive cable TV service.

OUTBOUND PHONE SCRIPT #2



Starting in February, **YOUR TVS WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

Don't Worry! We Won't Forget You!

The Digital TV Rollout is almost finished in your neighborhood. We have been writing and calling you for almost three weeks. Obviously, you aren't ready to install FREE Mini-Max converters yet. When you are ready,

Please Call 1-877-212-3322 (toll free)
(9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun)
to ensure uninterrupted service.

You will need your account number to order on line. Your account number is:

We must move on to other neighborhoods very soon. When we do, the steady stream of reminders will stop. However, you still need to connect a digital converter to every analog TV set in your home. **TV sets not connected to a digital converter (or equipped with a built-in QAM Tuner) will not work.**

Of course, you can still visit www.dtvrollout.com or call 1-877-212-3322 (toll free) for the converters you need. PLEASE ACT NOW to avoid a service interruption or waiting in a long line to pick up converters.

Don't Delay - Go Digital Today

REMEMBER:

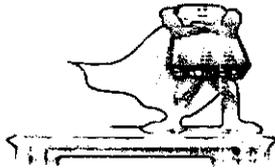
- The first three Mini-Max converters are FREE (**no monthly charge and no security deposit - EVER**).
- Ordering at www.dtvrollout.com or 1-877-212-3322 (toll free) is **FREE**.
- Home delivery of converters is **FREE**.

Already All-Digital???

If you already have a digital converter on every TV set (or TV sets with built-in QAM tuners), you don't need to exchange those converters or order more. Instead, please just visit www.dtvrollout.com or call 1-877-212-3322 (toll free) and tell us that you are 100% digital. We will make a note of that and stop sending more information.

Don't Delay - Go Digital Today

EMAIL #3



KIDS This message is for the adult in your home who pays for the cable TV and Internet service. Please tell them about this message. It is very important.

Starting in February, **YOUR TVS WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

Don't Be Left Out In The Cold!!! Go Digital Today!!!

We apologize for interrupting your Internet browsing again. The DTV Rollout will soon move to another neighborhood. Once we do, **these reminders will stop but you still need a digital converter for every analog TV** set in your home before February 17, 2009. PLEASE visit www.dtvrollout.com or call 1-877-212-3322 (toll free) to make sure you are ready. PLEASE ACT NOW to avoid a service interruption or waiting in a long line to pick up converters. Find out more at www.dtvrollout.com.

WE NEED TO HEAR FROM YOU. Our records show you have not ordered any converters. Please take a moment to

Visit www.dtvrollout.com

or

Call 877-212-3322 (toll free)

9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun

Order the converters you need today.

- Ordering is **FREE**.
- Delivery is **FREE**.
- Up to three Mini-Max converters are **FREE of any monthly charge - EVER**.

ACT NOW to avoid further reminders. If you already have a digital converter on every TV set or have digital TV sets with QAM tuners, please tell us that too. It will only take a few minutes. Once you order or call, all other messages will stop.

FRONT PORCH #3

OBTC Script # 3

"Hello. This is _____ calling from Massillon Cable TV (or Clear Picture). Is this the _____ residence?"

(After they verify that they have a responsible party, they should state): "This is not a sales call. It is a courtesy call about the Digital TV Transition. We have been sending you information about this transition. Have you received it? (should be yes). Can I answer any questions you have about it?"

At this point, I don't think we can dictate the script. It will vary depending on the customer questions. However, here are some multiple options for closing sale:

- We really want to help you start enjoying the benefits of digital TV. It only takes a few minutes. Can I help you with an order today?
- Up to three Mini-Max converters are available at no charge. Would you like to order them now?
- Ordering now will save you from a long line or a last minute order. Can I place an order for you now?
- Let's make sure all your TV sets are ready for the digital transition by ordering converters now.
- The first three Mini-Max converters are free. So is shipping. Can I do that for you now?

I think multiple closing options will be very helpful.

Answering Machine Message

"Hello. This is _____ from Massillon Cable TV (or Clear Picture). This is not a sales call. This is our third and final attempt to remind you about the DTV Rollout. We know how important TV is to you and your family, so please take some time to review the information we have been sending about this change. We are here every day of the week to help you with questions and ordering free converters. Please act now and call us toll free at 877-212-3322. The number again is 877-212-3322."

Response to Subscribers Complaints About The Phone Call

If the subscriber asks that you do not call them again. Ask if you can place their order now for the Mini-Max converter, and this will stop all future phone calls and other communications.

If the subscriber advises that they are not ready to order now and does not want to receive any further communication from us, we should politely advised them the following:

I understand that you are not ready to order and requesting that we send no additional information. I will take you off our mailing list immediately, but will contact you again later in the year when we announce the schedule for the elimination of analog TV channels. Please remember that every TV set in your home must be connected to a digital converter before February 17,2009, or be equipped with a QAM tuner to receive cable TV service.

OUTBOUND PHONE SCRIPT #3



Massillon Cable TV, Inc.
One Connection. A World of Possibilities.

P.O. Box 1000
Massillon, OH 44648-1000



Clear Picture, Inc.

One Connection. A World of Possibilities.
P.O. Box 917
Wooster, OH 44691-0917



MASSILLON CABLE
814 CABLE CT NW
MASSILLON OH 44648



Dear MCTV Customer:

Starting in February, **YOUR TV'S WILL NOT WORK UNLESS THEY ARE CONNECTED TO DIGITAL CONVERTERS OR HAVE BUILT-IN QAM TUNERS.**

DON'T WORRY! WE WON'T FORGET YOU!

The Digital TV Rollout is almost finished in your neighborhood. We have been writing and calling you for almost three weeks. Obviously, you aren't ready to install FREE Mini-Max converters yet. When you are ready,

**Please call 1-877-212-3322 (toll free)
(8 AM - 8 PM Mon - Fri, 9 am - 5 pm Sat & Sun)
to ensure uninterrupted service.**

We must move on to other neighborhoods very soon. When we do, the steady stream of reminders will stop. However, you still need to connect to a digital converter to every analog TV set in your home. **TV sets not connected to a digital converter (or equipped with a built-in QAM Tuner) will not work.**

Of course, you can still visit www.dtvrollout.com or call **1-877-212-3322 (toll free)** for the converters you need. PLEASE ACT NOW to avoid a service interruption or waiting in a long line to pick up converters.

DON'T DELAY — GO DIGITAL TODAY!

REMEMBER:

- The first three Mini-Max converters are FREE (no monthly charge and no security deposit - EVER).
- Ordering at www.dtvrollout.com or **1-877-212-3322 (toll free)** is FREE.
- Home delivery of converters is FREE.

Already All-Digital?

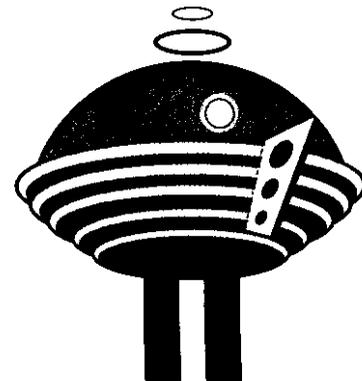
If you already have a digital converter on **every** TV set (or TV sets with built-in QAM tuners), you don't need to exchange those converters or order more. Instead, please just visit www.dtvrollout.com or call **1-877-212-3322 (toll free)** and tell us that you are 100% digital. We will make a note of that and stop sending more information.

DON'T DELAY — GO DIGITAL TODAY!

LETTER #3

Sincerely,

Robert Gessner
President



THE FUTURE IS ALL DIGITAL



Final Digital TV Reminder

The Digital TV Rollout is finished in your neighborhood. We have been writing and calling you for almost three weeks. Obviously, you aren't ready to install FREE Mini-Max converters yet. When you are ready,

Please Call 1-877-212-3322 (toll free)
(9A - 8P Mon - Fri, 11:30A - 8P Sat & Sun)
to ensure uninterrupted service.

We must move on to other neighborhoods now and the steady stream of reminders will stop. However, you will still need to connect a digital converter to every analog TV set in your home. Massillon Cable TV & Clear Picture will end all analog TV channels before February 17, 2009. Analog TV sets not connected to a digital converter will not work.

Of course, you can still visit www.dtvrollout.com or call 1-877-212-3322 (toll free) for the converters you need. PLEASE ACT NOW to avoid a service interruption or waiting in a long line to pick up converters.

DON'T DELAY!!! GO DIGITAL TODAY!!!

REMEMBER:

- The first three Mini-Max converters are FREE (no monthly charge and no security deposit).
- Ordering at www.dtvrollout.com or 1-877-212-3322 (toll free) is FREE.
- Home delivery of converters is FREE.

Act Now To Order The Converters You Need.

EMAIL #4

IVR #2

Hello. This is a courtesy call from Massillon Cable TV (or Clear Picture). The Digital TV Rollout has been working in your neighborhood, but we are just about done. We must move on to other neighborhoods now so you won't receive any more information for a while. You still need a digital converter on every TV set to insure uninterrupted service. Please review the information you have received and call us at 877-212-3322 if you have any questions. Thank you.

8/28/2008

IVR SCRIPT #2

DOCKET NO.

97-80

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o This document is confidential (**NOT FOR PUBLIC INSPECTION**)

- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.

- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (**EXCLUDING CONFIDENTIAL DOCUMENTS**) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

7 pamphlets