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October 15, 2009

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

Re: Notification of Ex Parte Presentation of Time Warner Cable Inc., *A National Broadband Plan for Our Future,* GN Docket No. 09-51; *Implementation of Section* 224 *of the Act: Amendment of the Communications Rules and Policies Governing Pole Attachments.* WC Docket No. 07-245, *Universal Service Contribution Methodology,* WC Docket No. 06-122; *High-Cost Universal Service Support,* WC Docket No. 05-337; *Developing a Unified Intercarrier Compensation Regime,* CC Docket No. 01-92; *Federal-State Joint Board on Universal Service,* CC Docket No. 96-45

Dear Ms. Dortch:

On October 14, 2009, Steven Teplitz and Terri Natoli of Time Warner Cable Inc. ("TWC") and the undersigned met with Carol Mattey, Rebekah Goodheart, and Mukul Chawla of the FCC's Omnibus Broadband Initiative Team to discuss several policy issues relating to the development of the National Broadband Plan. In accordance with the Commission's rules, this letter is being filed electronically in each of the above-captioned dockets.

First, we discussed economic considerations that affect TWC's decisions whether to deploy broadband facilities in currently unserved areas. Among other cost drivers, we indicated that pole attachment costs are a significant factor and explained that increasing those rates would undercut the Commission's goal of spurring increased investment in such areas. We also explained that barriers to entry in the voice marketplace can impede broadband deployment, because the business case for extending new lines in rural areas may not be viable without the ability to deliver a triple-play of broadband, video, and voice services.

Second, we discussed the intersection of universal service policy and the National Broadband Plan. Consistent with TWC's advocacy in the Commission's universal service proceedings, we explained that subsidies should be available only based on a clear showing of need and only where the funding mechanism is competitively neutral. In particular, we stated that any support for broadband Internet access services should be made available to service

providers irrespective of whether they are currently designated as "eligible telecommunications carriers," and that the areas within which support is provided should not be tied to a particular provider's service territory (such as ILEC study areas). TWC also expressed support for revising the contribution methodology to rely primarily on telephone numbers, with appropriate carve-outs for very low-volume or low-revenue services.

Finally, with respect to intercarrier compensation, we advocated transitioning to a low, uniform rate for all telecommunications traffic. The existing patchwork of above-cost rates impedes and distorts competition, particularly in rural areas.

Please contact the undersigned if you have any questions regarding these issues.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill
Counsel for Time Warner Cable Inc.

cc: Carol Mattey
Rebekah Goodheart
Mukul Chawla