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February 10, 2011

***VIA ECFS*** **EX PARTE NOTICE**

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

**Re:** *Implementation of Section 224 of the Act*, WC Docket 07-245; *A National Broadband Plan for Our Future*, GN Docket 09-51

Dear Ms. Dortch:

On February 9, 2011, Craig Rosenthal of Suddenlink Communications, Tom Larsen of Mediacom Communications Corp. and the undersigned met with Al Lewis, Jeremy Miller, Marv Sacks and Marcus Maher of the Wireline Competition Bureau to discuss the pole attachment rulemaking in the above-captioned dockets. We expressed the companies' support for the Commission's proposed revised rate scheme contained in the Commission's further notice of proposed rulemakings.

We also discussed the companies' similar experiences with pole attachments and interactions with public utility pole owners, given the companies' similar size, rural footprints and customer demographics. We explained that the costs of attachment incurred by providers with large rural footprints is much higher than that in urban or suburban areas with lower pole per customers served densities. For example, Mediacom serves over 10,000 customers in Cole County, MO and under 1,000 customers in neighboring Callaway County, MO. In its larger, more urban Cole County system, Mediacom attaches to 4.4 poles for every 10 customers it serves, whereas, in its smaller, more rural Callaway County system, Mediacom attaches to 7.4 poles for every 10 customers it serves. While Mediacom provides exactly the same triple play suite of video, high-speed Internet and phone services in both counties, its operational costs are greater in more rural Callaway County because Mediacom has to attach to more poles per customer.

We then explained how the existing dual rate structure presents significant financial risks to the companies, and that the prospect of both higher pole rental rates and litigation with utilities discourages the deployment or continuation of broadband services, especially commercial broadband services, and may lead to the reduction of advanced services or even the closing of some, low-density cable systems altogether. Finally, we explained that adoption of a lower, unified rate formula for all broadband services would provide the companies the regulatory and financial certainty needed to increase their broadband service offerings.

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Please feel free to contact me with any questions regarding this letter.

Respectfully submitted,

Craig A. Gilley
*Counsel for Suddenlink Communications*
*and Mediacom Communcations Corp.*

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| cc: | Al Lewis (via e-mail) | Marv Sacks (via e-mail) |
| | Jeremy Miller (via e-mail) | Marcus Maher (via e-mail) |