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March 15, 2012

Mr. Julius Knapp, Chief
Office of Engineering and Technology
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: 2012 Measuring Broadband America Performance Study
CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36**

Dear Mr. Knapp:

Prior to the recent commencement of Phase II of the Commission's "Measuring Broadband America" project, representatives of Mediacom Communications Corporation ("Mediacom") met with Office of Engineering and Technology staffers Walter Johnston and James Miller to discuss Mediacom's concerns regarding the testing methodology employed by SamKnows in assessing broadband performance. As described in that meeting, Mediacom's concerns center in particular on how the disproportionate inclusion of test subjects from states outside the core area of Mediacom's service, compounded by a small sample size, distorted the Phase I measured results and, relative to other tested ISPs, disadvantaged Mediacom.

Mediacom greatly appreciates the spirit of cooperation that characterized its meeting with Messrs. Johnston and Miller and their willingness to consider steps to address Mediacom's concerns. For example, there was agreement that the addition of a test server in St. Louis might result in the collection of more representative data. Unfortunately, while Mediacom was prepared to take the steps necessary to install this new server, it turned out that doing so required the involvement of several parties and there simply was not enough time to coordinate the efforts of these parties to get the server installed before the Phase II testing commenced.

Thus, Mediacom wishes to take this opportunity to note for the record that the results of the Phase II testing are likely to be distorted by the same flaws in the testing protocol as the Phase I testing and not be representative of Mediacom's actual broadband performance.

Looking ahead, Mediacom hopes to continue to work cooperatively with the Commission to find ways to ensure that test results are collected from appropriately located test servers and that the data collected from such servers is used in formulating any public reports regarding the testing.

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If there are any questions regarding this matter, please do not hesitate to contact me directly.

Sincerely,



Seth A. Davidson
*Counsel to Mediacom Communications
Corporation*

cc: Walter Johnston
James Miller, Esq.