



Terri B. Natoli
Vice President, Regulatory Affairs

January 18, 2013

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte; WC Docket Nos. 11-10, 07-38, 08-190, 10-132

Dear Ms. Dortch:

On January 17, 2013, Monique Crawford, Michael Evans, and the undersigned, all of Time Warner Cable Inc. ("TWC"), spoke by telephone with Steve Rosenberg, Lisa Gelb, Travis Litman, Rodger Woock, Carol Simpson, Ken Lynch, and Chelsea Fallon of the Wireline Competition Bureau, and with Mitali Shah of the Wireless Telecommunications Bureau.

The purpose of this call was to discuss potential changes to the Form 477 currently under consideration by the Commission. Specifically, we discussed a method of standardizing and automating the Form 477 data submitted to the Commission through the use of a client-side application for the purpose of geo-coding the data, and also discussed whether such an approach would potentially reduce the burdens on service providers in connection with the preparation of their Form 477 submissions. Such an application would be installed by the service provider and run against its raw data in order to produce the aggregated results that would be submitted to the Commission.

TWC explained that it was not able to determine precisely what would be required at this time to comply with a revised reporting requirement of this sort without additional, more detailed information regarding the proposal. TWC also explained that if



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the application under consideration pulled data from a web-based source, it could suffer performance issues given the large amount of data that would be batch processed.

In addition, we discussed the potential inclusion in the Commission's Form 477 process of broadband deployment data similar to what currently is submitted to the state mapping agencies through NTIA's implementation of the Broadband Data Improvement Act, including the shape-file mapping information currently provided and used to create the National Broadband Map.

Finally, consistent with its comments in this proceeding, TWC emphasized that including any additional data fields in the current Form 477 reporting obligations would substantially increase the time required for TWC to prepare the Form 477, due to the multiple different systems from which it must extract and compile data.

Please contact me if you have any questions.

Sincerely,

/s/ Terri B. Natoli

Terri B. Natoli

cc: Steve Rosenberg
Lisa Gelb
Travis Litman
Rodger Woock
Carol Simpson
Ken Lynch
Chelsea Fallon
Mitali Shah