



Terri B. Natoli
Vice President, Regulatory Affairs

February 13, 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 February 11, 2013, Monique Crawford and the undersigned, all of Time Warner Cable Inc. ("TWC"), together with Steve Fuller and Erin Cunliffe of Frontier GeoTek, Inc., and Michael Evans of Chord Consulting, each a TWC vendor, spoke by telephone with Steve Rosenberg, Lisa Gelb, Travis Litman, and Carol Simpson of the Wireline Competition Bureau, and with Mitali Shah and Susan Singer of the Wireless Telecommunications Bureau.

The purpose of the call was to discuss further potential changes to the Form 477 under consideration by the Commission. Specifically, we discussed the potential inclusion in the Commission's mandatory Form 477 process of broadband deployment data similar to that which is currently submitted on a voluntary basis to state mapping agencies through NTIA's implementation of the Broadband Data Improvement Act. We also discussed the fact that an accompanying obligation to include a certification as to the validity of such data likely would attach, and further discussed whether such a certification would be difficult to make.

Commission Staff also inquired about TWC's ability to distinguish between residential and nonresidential deployment data. We explained that TWC does not



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currently retain deployment data based on such a distinction, and further explained that because state mapping requirements focus on broadband availability within a 7-10 day time period, such data does not typically include commercial fiber.

Finally, we discussed the possibility of reducing the number of speed tiers for which broadband deployment reporting would be required.

Please contact me if you have any questions.

Sincerely,

/s/ Terri B. Natoli

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cc: Steve Rosenberg
Lisa Gelb
Travis Litman
Carol Simpson
Mitali Shah
Susan Singer