Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Comcast Cable Communications, LLC	
Petition for Determination of Effective Competition in:	
Duxbury, MA (MA0302)	MB 13-157, CSR-8803-E
Easton, MA (MA0233)	MB 13-158, CSR-8804-E
Lakeville, MA (MA0278)	MB 13-159, CSR-8805-E
Billerica, MA (MA0079)	MB 13-160, CSR-8806-E
Chelmsford, MA (MA0147)	
North Andover, MA (MA0102)	MB 13-161, CSR-8807-E
Danvers, MA (MA0279)	MB 13-167, CSR-8809-E
Marblehead, MA (MA0263)	
Middleton, MA (MA0223)	
Topsfield, MA (MA0288)	
6 Massachusetts Franchise Areas	MB 13-168, CSR-8810-E
Dover, MA (MA0314)	MB 13-169, CSR-8811-E
Foxborough, MA (MA0176)	
Norfolk, MA (MA0248)	
Walpole, MA (MA0220)	
Wrentham, MA (MA0203)	
Wayland, MA (MA0267)	MB 13-170, CSR-8812-E
Weston, MA (MA0268)	
Ashby, MA (MA0262)	MB 13-172, CSR-8814-E
Leominster, MA (MA0017)	
Maynard, MA (MA0146)	
Shirley, MA (MA0295)	
Stow, MA (MA0256)	
Templeton, MA (MA0127)	
8 Massachusetts Franchise Areas	MB 13-180, CSR-8817-E

REPLY TO OPPOSITIONS

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September 4, 2013

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REPLY TO OPPOSITIONS

INTRODUCTION AND SUMMARY

Comcast Cable Communications, LLC ("Comcast") hereby replies to the Oppositions to Comcast's Petitions for Special Relief ("Oppositions") submitted by the Massachusetts

Department of Telecommunications and Cable ("MDTC") and the Town of Hull ("Town") in the above-captioned proceeding. Significantly, there is no dispute that competing MVPDs (*i.e.*, Verizon, DirecTV and DISH) serve well above the statutory 15 percent threshold required to demonstrate effective competition under the Competing Provider Test. Neither Opposition presents any evidence to the contrary. In fact, the evidence in the record clearly demonstrates that the Competing Provider Test is easily satisfied in every community -- with competing MVPDs reporting a combined subscriber penetration rate *more than double* the required 15 percent level in each of the 21 contested communities.[1]

Unable to challenge the presence of robust MVPD competition, the MDTC and the Town instead criticize the *cumulative* MVPD subscriber numbers associated with certain communities. They contend that effective competition should be denied in 21 Franchise Areas -- *not* because the competing MVPDs fall short of the 15 percent subscriber threshold -- but because combining the competing MVPD subscriber data Comcast submitted with the MDTC's figures for Comcast subscribers produces a *cumulative* MVPD subscriber count slightly exceeding 100 percent of the reported households in these communities. The Commission should reject this argument.

As detailed below, the Opposition arguments are unavailing because they are dependent upon an analysis that yields overstated cumulative subscriber counts. Specifically, the inclusion of "commercial," "seasonal," and "dual" subscribers in MDTC's subscriber numbers, and the exclusion of new "occupied households" that were not reported in the 2010 Census, erroneously inflate the cumulative MVPD penetration rate. Even *without* making any reduction for the difficult to quantify "dual" subscribers, adjusting for the three other identified factors brings the

[1] *See* Attachment A for a complete listing of the Contested Franchise Areas and their competing MVPD penetration rates reported in Comcast's Petitions.

cumulative MVPD subscriber penetration rate *below* the 100 percent level in 20 of the 21 contested communities. But, in all events, leaving aside these corrections, the alleged subscriber surplus does not in any way impact the Competing Provider Test. The bottom line is that the critical 15 percent threshold is exceeded by a wide margin in *every community,* and nothing in the Opposition undermines that essential, and decisive, fact. Because the Oppositions fail to refute Comcast's compelling demonstration of effective competition under the Competing Provider Test, they should be rejected and the Petitions promptly granted.

I. THE COMPETING PROVIDER EFFECTIVE COMPETITION FINDINGS REMAIN VALID FOR ALL FRANCHISE AREAS

In the sections that follow, Comcast refutes the allegations in the Oppositions regarding the purported cumulative subscriber totals in certain communities. Before delving into the reasons why these allegations are erroneous, however, it is important to understand that even if they were valid – which they are not – the Commission should still grant Comcast's Petitions because the Opposition allegations have no impact on the effective competition findings.

In rendering an effective competition decision, the Commission focuses on whether it has sufficient relevant evidence before it to reach a reasoned outcome: "We entertain data that is relevant to the statutory tests for effective competition and, if we conclude that we have enough evidence to reach a competent and reasonable decision, we make a decision based on that evidence."[2] Where such evidence exists, the Commission does not focus on whether all data

[2] *Petition of the Town of Richlands, North Carolina for Recertification*, Memorandum Opinion and Order , 25 FCC Rcd 4958, ¶ 9 (2010) ("*Town of Richlands*")

before it is "of unimpeachable quality"[3] – especially where, as here, the alleged concern does not in any way impact the clear evidence demonstrating effective competition.

The overwhelming evidence of effective competition presented by Comcast in this case is more than sufficient for the Commission to grant the requested relief, even if the Commission were to take the Opposition arguments at face value. If the Commission were to attribute the alleged subscriber surplus touted in the Oppositions to the competing MVPDs, and remove that figure from the competing MVPD subscriber tallies reported by Comcast, every single Franchise Area at issue would still be well above 15% penetration threshold required by the Competing Provider Test.[4] In fact, the Commission could reduce the competing MVPD subscriber counts by a number *several times the alleged surplus identified by the MDTC*, and the Competing Provider Test would remain easily satisfied in each Franchise Area.[5] In short, the cumulative MVPD subscriber surplus alleged in the Oppositions has no decisional significance, and the Commission should grant the Petitions in reliance on the overwhelming evidence of effective competition presented by Comcast.

II. THE OPPOSITIONS IGNORE REASONABLE FACTORS THAT REDUCE THE MVPD SUBSCRIBER TOTALS IN EACH COMMUNITY

As explained above, the MDTC and the Town premise their Oppositions on a purported MVPD subscriber surplus in 21 Franchise Areas – an alleged surplus that has no conceivable

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[3] *Id.*

[4] Indeed, the cumulative subscriber surplus is negligible relative to the amount by which the competing MVPD penetration rate exceeds the statutory threshold. After making the adjustments set forth below, the average competing MVPD penetration rate is still 40.87 percent, with the lowest such figure being Easton at 30.45 percent. *See* Attachment M.

[5] *See* Attachment N.

impact on Comcast's demonstration that the Competing Provider Test has been met for each Franchise Area. In any event, the Oppositions' technical objection to the Petitions is unfounded, as the MDTC and the Town have ignored a host of factors that reveal the illusory nature of their criticisms.

A. Commercial Customers

Comcast's submission in this effective competition proceeding relies on the publicly available subscriber data that Verizon reported to the MDTC as part of its annual Form 500 filing. The MDTC's Opposition calculation adds the subscriber data reported on Comcast's own Form 500 filing to the Verizon and DBS subscriber figures included in Comcast's Petition. The Opposition calculation therefore yields an overstated cumulative MVPD subscriber rate, because the subscriber figures reported by Verizon and Comcast on the Form 500 include "commercial" subscribers that should be excluded from the effective competition calculation.[6] These subscribers do not inhabit "occupied households" and, therefore, were not included in the 2010 Census number for total occupied households. Thus, the inclusion of these commercial subscribers mistakenly inflates the *cumulative* MVPD subscriber counts and penetration rates in the communities.

[6] Comcast included "commercial" subscribers in its own Form 500 reporting to the MDTC, and it now understands that Verizon did so as well. *See* Attachment B (Declaration of Mark Renaud). For its part, SCBA expressly excludes commercial subscribers from the DBS subscriber counts it provides pursuant to Section 76.907(c) of the Commission's rules. *See, e.g.*, "Petition for Special Relief," Docket No. MB 13-157, CSR-8803-E, Exhibit 6 (submitted June 6, 2013) (the "Duxbury Petition") (The Effective Competition Tracking Report includes an explanation of SBCA's reporting methodology.).

When these commercial subscribers are removed from the MDTC's calculation, the subscriber surplus identified in the Oppositions largely disappears.[7] The cumulative MVPD penetration rate decreases in each of the 21 contested communities, and the majority of these communities no longer show any surplus subscribers.

The presence of commercial customers in Verizon's Form 500 filing does not in any way undermine Comcast's showing that the Competing Provider Test has been met. The competing MVPD subscribers exceed the 15 percent threshold by such a large margin that the number of Verizon's commercial subscribers could be multiplied *tenfold,* and then excluded from the competing MVPD subscriber count, and the revised calculation would still pass the 15 percent threshold.[8] In short, the use of the MDTC Form 500 (with its inclusion of commercial customers) in this proceeding explains much of the identified subscriber surplus, yet the inclusion of Verizon commercial subscribers is of no decisional significance, as the Competing Provider Test is still easily met in each Franchise Area when those commercial subscribers are excluded.

B. Seasonal Subscribers

In addition to the inclusion of commercial subscribers in their cumulative MVPD penetration calculations, the MDTC and the Town overlook the impact of "seasonal" subscribers on the cumulative MVPD subscriber counts. Like commercial subscribers, seasonal subscribers

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[7] *See* Attachment C. Comcast's actual commercial subscriber count is identified in this Attachment and removed from the revised subscriber calculation. Comcast does not know Verizon's precise commercial subscriber count and, due to competitive concerns, has not sought that specific information. For purposes of this revised calculation, Comcast has simply assumed that Verizon's ratio of commercial to total subscribers matches Comcast's ratio of commercial to total subscribers.

[8] *See* Attachment D.

do not inhabit "occupied households" and, therefore, similarly were not included in the 2010 Census number for purposes of the Competing Provider Test.[9] Accordingly, where a community has a significant number of seasonal MVPD subscribers, the resulting MVPD subscribers likely will exceed 100 percent of "occupied households" reported in the 2010 Census.

Ironically, the Town of Hull (the sole local franchising authority joining the MDTC's Opposition) perfectly illustrates the seasonality issue and shows why, contrary to the assertions in the Oppositions, the initial finding of a cumulative MVPD penetration exceeding 100 percent does *not* in any way undermine the clear evidence of effective competition. The Census Bureau reports that there are 798 seasonal households in Hull, equivalent to 17.24 percent of all occupied housing units.[10] Including these "seasonal" households potentially inflates the MVPD subscriber penetration rates for Hull.

The MDTC, in a separate Opposition involving Comcast and the Town of Gloucester, has espoused a methodology for adjusting the MVPD penetration calculation to remove seasonal households.[11] The MDTC argues in the Gloucester proceeding that the Commission should assume that seasonal residents subscribe to MVPDs at about the same rate as the overall population and deduct this figure from the numerator of the MPVD penetration calculation.[12] If that same approach is applied to Hull (using a 100 percent cumulative MPVD penetration

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[9] The Census Bureau officially classifies seasonal residences as "vacant," rather than "occupied," housing units. *See , e.g.,* http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1&prodType=table (showing "seasonal" housing units listed under "vacant" (rather than "occupied") housing units).

[10] *See* Attachment E. 798/4630 = 17.24%.

[11] *See* MDTC Opposition, Docket No. MB 13-142, CSR-8800-E, at 4 (submitted July 25, 2013).

[12] *Id.*

figure), it would indicate that there are 798 seasonal subscribers in Hull's *cumulative* MVPD subscriber total. If this number were removed from the cumulative MVPD penetration calculation (including the commercial adjustment described above), it would reduce that rate from 104.35 percent to 87.11 percent -- thereby entirely resolving the concern about surplus MVPD subscribers.[13]

More importantly, this seasonal subscriber adjustment does *not* adversely affect the results of the Competing Provider Test in Hull. Assuming (consistent with the MDTC's suggested approach) that seasonal housing units in Hull subscribe to *competing* MVPDs at about the same rate as the overall population, the seasonal adjustment advocated by the MDTC would identify 336 seasonal subscribers within the *competing* MVPD tally for Hull.[14] If this number were removed from Comcast's original calculation (combined with the commercial adjustment described above), it would reduce the *competing* MVPD penetration rate in Hull to 34.45 percent – still more than double the requisite 15 percent.[15]

The other contested Franchise Areas in this proceeding have far fewer seasonal households than Hull.[16] Although the potential seasonal subscriber impact is less in these communities, Comcast has adjusted for this factor in Attachment F. Removing seasonal subscribers – in addition to the commercial subscriber adjustment discussed above – further

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[13] *See* Attachment F.

[14] *See* Attachment G. 798 x 42.16% = 336.

[15] *See id.*

[16] The average seasonal household figure for these communities is just 1.70 percent. *See* Attachment E.

reduces the cumulative MVPD penetration figure so that another five Franchise Areas no longer show any subscriber surplus.[17]

C. Dual Subscribers

The MDTC and the Town also fail to consider that a number of the total MVPD subscribers are "dual" subscribers. The Commission has repeatedly recognized the existence of dual subscribers, and has been very clear that dual subscribers should be counted for purposes of effective competition analysis.[18] Although Commission precedent allows for the inclusion of dual subscribers in the competing MVPD penetration calculation, their inclusion necessarily inflates the cumulative number of MVPD subscribers in each community as well as the overall penetration rate, potentially above 100 percent.

Although it is not possible to quantify the exact number of dual subscribers in these communities, it is clear that at least some number of households were subscribing to more than one MVPD at the time the MDTC subscriber reports were submitted. In addition to consumers who might select dual service on a long-term basis, it is reasonable to assume that there are

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[17] *See* Attachment F.

[18] *See, e.g., Mediacom Minnesota LLC Petition for Determination of Effective Competition and Revocation of Certification in Sixteen Minnesota Communities,* Memorandum Opinion and Order, 20 FCC Rcd 4984 ¶ 13 (2005) ("The dual cable/DBS subscribers need not be subtracted from total DBS subscribers before calculating the DBS penetration level."); *Comcast Cable Communications, LLC Petition for Determination of Effective Competition in Fourteen Florida Communities*, Memorandum Opinion and Order, 22 FCC Rcd. 1691, ¶ 15 (2007) ("The Commission has determined that there is no rationale for discounting dual subscribers . . . for the purpose of the competing provider test."); *Comcast Cable Communications LLC Petition for Determination of Effective Competition in Nine Texas Communities*, Memorandum Opinion and Order, 26 FCC Rcd 3850, ¶ 16 (2011) ("[T]he Commission has long included dual subscriber households. . . ."); *Town of Richlands,* 25 FCC Rcd 4958, ¶ 6 (rejecting a reduction for "dual households").

consumers in these very competitive Massachusetts communities who commenced service with a competing provider before officially terminating service with their original provider. Comcast understands that Verizon actively encourages consumers to enroll in its FiOS service *before* terminating service from alternative MVPDs – effectively leading to a temporary double-counting of consumers migrating to Verizon service. Even a modest number of such dual subscribers would contribute to the small subscriber surplus in the cumulative MVPD total at issue here.

D. Housing Units

Finally, the MDTC and the Town do not consider how the original reporting of "occupied households" might have affected the cumulative MVPD penetration rate. Consistent with well-established Commission precedent, Comcast properly used "occupied household" data from the 2010 Census in the denominator of its competing MVPD penetration rate calculation.[19] Neither the MDTC nor the Town challenge this use. Yet, based on past population growth rates in the communities at issue, it is likely that there was an increase in occupied households (and MVPD subscribers in those new households) in certain Franchise Areas subsequent to the 2010 Census that would modestly inflate the cumulative MVPD penetration calculation.

Although there does not appear to be a source for updated household information for the specific Franchise Areas, Comcast did identify a Census Bureau report of countywide population growth between 2010 and 2012.[20] For the counties at issue in this proceeding, the population

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[19] *See, e.g.*, Duxbury Petition, Exhibit 7. The Commission has consistently approved cable operators' reliance on the most recent Census data available in effective competition cases. *See, e.g., Comcast Cable Communications, LLC-15 Illinois Franchise Areas,* Memorandum Opinion and Order, 28 FCC Rcd. 9316, ¶ 6 (2013).

[20] *See* Attachment H.

growth ranged from 0.5 percent to 2.3 percent.[21] Assuming that this population growth rate translated to a corresponding growth rate in occupied households, this adjustment further reduces the number of alleged surplus MVPD subscribers in each of the contested Franchise Areas. In addition to the commercial and seasonal adjustments discussed above (but with no adjustment made for dual subscribers), this adjustment to the occupied households included in the denominator of the cumulative MVPD penetration calculation would leave just three Franchise Areas (Topsfield, Cohasset, and Norfolk) with any "surplus" subscribers.[22]

In response to the MDTC's Opposition, Comcast was able to identify updated household data for Cohasset and Norfolk that impacts the cumulative MVPD penetration rate for these two communities. Comcast's construction records identify a significant number of additional housing units built in Cohasset and Norfolk since the 2010 Census – particularly in the Avalon Bay community in Cohasset and the Village at River's Edge in Norfolk.[23] While it is difficult to identify the precise number of units that were occupied at a particular date, the total number of new units in Cohasset and Norfolk appears to be 268 and 69, respectively.[24] If these figures are added to the denominator of the cumulative MVPD penetration calculation for these two communities (in addition to the other adjustments discussed), the cumulative MVPD penetration rate for each community falls below 100 percent.[25]

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[21] *Id.*

[22] *See* Attachment I. The 100.16% cumulative MVPD penetration rate calculated for Norfolk equates to an alleged surplus of just 5 subscribers.

[23] *See* Attachments B and J.

[24] *Id.*

[25] *See* Attachment K. With the Cohasset and Norfolk adjustments, the average cumulative MVPD penetration rate in the 21 contested Franchise Areas would fall to 96.48 percent (still

III. THE OPPOSITIONS RELY ON DISTINGUISHABLE BUREAU PRECEDENT

Both Oppositions erroneously contend that effective competition precedent involving Time Warner Cable[26] compels the Commission to reject Comcast's Petitions in each community for which the cumulative MVPD penetration rate exceeds 100 percent.[27] In fact, the *Time Warner* precedent relied upon by the MDTC and the Town is easily distinguished from the current case.

First, Comcast does *not* use the controversial five-digit zip code subscriber allocation approach challenged in the *Time Warner* cases. To ensure a reliable DBS subscriber count, Comcast instead incurred the extra expense necessary to use the Commission's "preferred" ZIP+4 approach. And to calculate the much larger Verizon subscriber count, Comcast relied on franchise-specific data provided by Verizon to the MDTC. This difference in methodology is

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without any adjustment for dual subscribers). *See* Attachment L. These adjustments collectively leave only the community of Topsfield with a cumulative MVPD subscriber percentage (106.37) exceeding 100 percent. Comcast assumes that the remaining surplus in Topsfield's cumulative MVPD penetration rate is attributable to dual subscribers, which cannot be readily quantified. This small surplus in Topsfield does not, in any event, justify rejecting the overwhelming evidence that competing MVPDs enjoy a subscribership in Topsfield of 62.63 percent, more than four times the required 15 percent penetration level. *See* Attachment A. Even after reducing this figure by the adjustments discussed above, the competing MVPD penetration rate for Topsfield is 57.85 percent. *See* Attachment M. There is certainly "enough evidence" in this case for the Commission to "reach a competent and reasonable decision" in Comcast's favor and affirm the presence of effective competition in Topsfield. *See Town of Richlands*, 25 FCC 4958, ¶ 9. Indeed, there is no credible basis for the Commission to conclude otherwise.

[26] *Time Warner Cable Inc. Petition for Determination of Effective Competition in 105 Franchise Areas in Ohio,* Memorandum Opinion and Order, 25 FCC Rcd. 14422 (rel. Oct. 14, 2010); *Time Warner Cable Inc. & Time Warner Entm't-Advance Newhouse P'ship (25 Petitions in Various Cmtys. in New York & Pennsylvania, 23 FCC Rcd. 12069 (2008), recons. denied,* 23 FCC Rcd. 16483 (2008); *Time Warner Cable Inc., Petition for Determination of Effective Competition in Cheshire, MA,* Memorandum Opinion and Order, 26 FCC Rcd. 1728 (2011) (collectively "*Time Warner*").

[27] *See* MDTC Opp. at 2-3; Town Opp. at 3.

critical, as the operator's use of a contested five-digit zip code allocation was a fundamental consideration in the *Time Warner* precedent.

Second, the extraordinarily high cumulative penetration rates that troubled the Bureau in the *Time Warner* cases were of a dramatically greater magnitude than the penetration rates at issue here. In one *Time Warner* case, the cable operator reported five communities with a cumulative MVPD penetration rate *exceeding 200 percent*,[28] and in another case there were two communities with a cumulative penetration rate *at more than 200 percent*, and the average cumulative MVPD penetration rate for the contested communities was 135 percent.[29] The Bureau also confronted multiple communities in the *Time Warner* cases for which the operator reported *its own subscribership* exceeding 100 percent and adjacent cable communities with such disparate penetration rates as to "strain[] credulity."[30]

In short, the *Time Warner* precedent was based upon the operator's use of a contested five-digit zip code subscriber allocation methodology, as well as a collection of improbable and unexplained statistics. None of these factors are even remotely present in this proceeding.

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[28] *See* 23 FCC Rcd. 12069, Attachment C.

[29] *See* 25 FCC Rcd. 14422, Attachment B. In fact, the Town fails to identify a subsequent decision involving the same communities, in which the Commission actually removes its entire discussion of this issue based on Time Warner having withdrawn the subject communities prior to the Commission's initial decision. *See Time Warner Cable Inc. Petition for Determination of Effective Competition in 105 Franchise Areas in Ohio,* Memorandum Opinion and Order, 25 FCC Rcd. 14422 (dated Nov, 19, 2010).

[30] 23 FCC Rcd. 16483, ¶ 4.

CONCLUSION

The Oppositions never dispute that competing MVPDs far exceed the 15 percent penetration threshold necessary to demonstrate effective competition. They focus instead on the cumulative MVPD subscriber totals – without even considering the reasonable adjustment factors that effectively eliminate the alleged "surplus." Moreover, the purported surplus is so small relative to the Competing Provider Test penetration rates as to be mathematically insignificant. The Oppositions have entirely failed to provide any reasonable basis for rejecting the clear demonstration of effective competition under the Competing Provider Test that has been made for each of the Franchise Areas. Accordingly, Comcast requests that the Commission promptly grant the Petitions for Special Relief.

Respectfully submitted,

Comcast Cable Communications, LLC
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September 4, 2013

Its Attorneys

ATTACHMENT A

CONTESTED FRANCHISE AREAS

Community	State	Competing Provider Penetration Rate
TOPSFIELD	MA	62.63%
COHASSET	MA	35.67%
HANOVER	MA	47.63%
LAKEVILLE	MN	47.76%
DUXBURY	MA	44.76%
HULL	MA	42.16%
NORWELL	MA	40.47%
WRENTHAM	MA	45.45%
MIDDLETON	MA	40.92%
NORFOLK	MA	61.40%
EASTON	MA	31.82%
FOXBOROUGH	MA	33.18%
HOPEDALE	MA	40.79%
NORTH ANDOVER	MA	40.11%
MARBLEHEAD	MA	39.15%
WESTON	MA	39.33%
BILLERICA	MA	39.74%
MENDON	MA	47.58%
BELLINGHAM	MA	47.33%
STOW	MA	53.31%
DOVER	MA	51.31%

ATTACHMENT B

DECLARATION OF MARK RENAUD

I, Mark Renaud, declare, under penalty of perjury that:

1. I am Director of Regulatory Accounting for Comcast Cable Communications, LLC ("Comcast").

2. I have read the foregoing Reply to Oppositions ("Reply") and am familiar with the contents thereof and the matters referred to therein.

3. I am responsible for providing the subscriber data included in the annual Form 500 that Comcast submits to the Massachusetts Department of Telecommunications and Cable. Consistent with our historic practice, Comcast's last Form 500 filing (using data from year-end 2012) included both residential and commercial subscribers in the subscriber tally. The number of commercial subscribers included in that tally is correctly stated in Attachment C to the Reply. I understand that Verizon similarly includes commercial subscribers in its Form 500 filing.

4. I have consulted with Comcast's construction team for Massachusetts in an effort to quantify residential units constructed subsequent to the 2010 Census. They identified existing business records reporting Comcast's new residential construction (*i.e.*, homes passed) for Cohasset and Norfolk, Massachusetts in 2010, 2011, and 2012. The number of new residential units identified in those records is correctly stated in Attachment J to the Reply.

5. I have consulted with Comcast's marketing team for Massachusetts in an effort to quantify dual MVPD subscribers. Although they could not quantify dual subscribers, they reported a significant number of "disconnect" requests where the existing Comcast customer has already been installed with Verizon's competing cable service. They believe this is attributable to Verizon encouraging customers to install FiOS before terminating Comcast's service.

6. The facts contained within the Reply are true and correct to the best of my knowledge, information and belief.

September 4, 2013
Date

Mark Renaud

ATTACHMENT C

Cumulative MVPD Penetration Removing Commercial Subscribers

	A	B	C	D	E	G	H	I
1	**Community**	**DBS Subs**	**Verizon Subs (DTC)**	**Comcast Subs (DTC)**	**2010 Census Occupied Housing Units**	**Comcast Commercial Subs**	**Verizon Commercial Subs (Estimate) C/D *G**	**Cumulative Penetration Rate Removing Commercial Subs (B+C+D-G-H)/E**
2	TOPSFIELD	44	1,265	1097	2,090	59	68	109.04%
3	COHASSET	92	879	2114	2,722	72	30	109.59%
4	HANOVER	135	2,108	2837	4,709	198	147	100.55%
5	LAKEVILLE	151	1,628	2,214	3,725	58	43	104.49%
6	DUXBURY	242	2,150	3,273	5,344	80	53	103.53%
7	HULL	167	1,785	2934	4,630	34	21	104.35%
8	NORWELL	108	1,330	2305	3,553	151	87	98.65%
9	WRENTHAM	227	1,456	2191	3,703	54	36	102.19%
10	MIDDLETON	100	1,086	1845	2,898	111	65	98.50%
11	NORFOLK	132	1,740	1312	3,049	31	41	102.06%
12	EASTON	164	2,339	5,666	7,865	194	80	100.38%
13	FOXBOROUGH	370	1,788	4561	6,504	166	65	99.75%
14	HOPEDALE	141	754	1351	2,194	68	38	97.54%
15	NORTH ANDOVER	309	3,909	6,520	10,516	266	159	98.07%
16	MARBLEHEAD	190	2,998	5125	8,144	111	65	99.91%
17	WESTON	127	1,358	2369	3,776	36	21	100.57%
18	BILLERICA	566	5,011	8,556	14,034	328	192	97.00%
19	MENDON	149	813	1071	2,022	32	24	97.76%
20	BELLINGHAM	384	2,529	3270	6,155	105	81	97.43%
21	STOW	95	1,200	1142	2,429	23	24	98.39%
22	DOVER	77	882	916	1,869	7	7	99.59%
23							Average	100.92%

ATTACHMENT C

ATTACHMENT D

Competing Provider Subscriber Surplus Compared to Commercial Subscribers

	A	B	C	D	E	F	G	H	R	S	V
1	Community	DBS Subs	Verizon Subs (DTC)	Comcast Subs (DTC)	2010 Census Occupied Housing Units	Competing Provider Penetration Rate (B+C)/E	Comcast Commercial Subs	Verizon Commercial Subs (Estimate) C/D *G	Competing Provider Subscriber Threshold (15%) E*15	Competing Provider Subscriber Surplus B+C-R	Competing Provider Subscriber Surplus Compared to Verizon Commercial Subs S/H
2	TOPSFIELD	44	1,265	1097	2,090	62.63%	59	68	314	996	1463%
3	COHASSET	92	879	2114	2,722	35.67%	72	30	408	563	1880%
4	HANOVER	135	2,108	2837	4,709	47.63%	198	147	706	1537	1044%
5	LAKEVILLE	151	1,628	2,214	3,725	47.76%	58	43	559	1220	2861%
6	DUXBURY	242	2,150	3,273	5,344	44.76%	80	53	802	1590	3026%
7	HULL	167	1,785	2934	4,630	42.16%	34	21	695	1258	6079%
8	NORWELL	108	1,330	2305	3,553	40.47%	151	87	533	905	1039%
9	WRENTHAM	227	1,456	2191	3,703	45.45%	54	36	555	1128	3142%
10	MIDDLETON	100	1,086	1845	2,898	40.92%	111	65	435	751	1150%
11	NORFOLK	132	1,740	1312	3,049	61.40%	31	41	457	1415	3441%
12	EASTON	164	2,339	5,666	7,865	31.82%	194	80	1180	1323	1652%
13	FOXBOROUGH	370	1,788	4561	6,504	33.18%	166	65	976	1182	1817%
14	HOPEDALE	141	754	1351	2,194	40.79%	68	38	329	566	1491%
15	NORTH ANDOVER	309	3,909	6,520	10,516	40.11%	266	159	1577	2641	1656%
16	MARBLEHEAD	190	2,998	5125	8,144	39.15%	111	65	1222	1966	3028%
17	WESTON	127	1,358	2369	3,776	39.33%	36	21	566	919	4451%
18	BILLERICA	566	5,011	8,556	14,034	39.74%	328	192	2105	3472	1807%
19	MENDON	149	813	1071	2,022	47.58%	32	24	303	659	2712%
20	BELLINGHAM	384	2,529	3270	6,155	47.33%	105	81	923	1990	2450%
21	STOW	95	1,200	1142	2,429	53.31%	23	24	364	931	3851%
22	DOVER	77	882	916	1,869	51.31%	7	7	280	679	10069%

ATTACHMENT D

ATTACHMENT E

Seasonal Housing Units Compared to Occupied Housing Units

	A	E	J	K
1	**Community**	**2010 Census Occupied Housing Units**	**2010 Census Seasonal Housing Units**	**Seasonal Housing Units Compared to Occupied Housing Units J/E**
2	TOPSFIELD	2,090	18	0.86%
3	COHASSET	2,722	82	3.01%
4	HANOVER	4,709	20	0.42%
5	LAKEVILLE	3,725	325	8.72%
6	DUXBURY	5,344	343	6.42%
7	NORWELL	3,553	23	0.65%
8	WRENTHAM	3,703	48	1.30%
9	MIDDLETON	2,898	34	1.17%
10	NORFOLK	3,049	9	0.30%
11	EASTON	7,865	50	0.64%
12	FOXBOROUGH	6,504	42	0.65%
13	HOPEDALE	2,194	7	0.32%
14	NORTH ANDOVER	10,516	62	0.59%
15	MARBLEHEAD	8,144	310	3.81%
16	WESTON	3,776	56	1.48%
17	BILLERICA	14,034	39	0.28%
18	MENDON	2,022	19	0.94%
19	BELLINGHAM	6,155	24	0.39%
20	STOW	2,429	26	1.07%
21	DOVER	1,869	19	1.02%
22			Average	1.70%
23				
24	HULL	4,630	798	17.24%

ATTACHMENT E

ATTACHMENT F

Cumulative MVPD Penetration
Removing Commercial and Seasonal Subscribers

	A	B	C	D	E	G	H	J	L
1	**Community**	**DBS Subs**	**Verizon Subs (DTC)**	**Comcast Subs (DTC)**	**2010 Census Occupied Housing Units**	**Comcast Commercial Subs**	**Verizon Commercial Subs (Estimate) C/D *G**	**2010 Census Seasonal Housing Units**	**Cumulative Penetration Rate Removing Seasonal and Commercial Subs (B+C+D-G-H-J)/E**
2	TOPSFIELD	44	1,265	1097	2,090	59	68	18	108.18%
3	COHASSET	92	879	2114	2,722	72	30	82	106.58%
4	HANOVER	135	2,108	2837	4,709	198	147	20	100.12%
5	LAKEVILLE	151	1,628	2,214	3,725	58	43	325	95.77%
6	DUXBURY	242	2,150	3,273	5,344	80	53	343	97.11%
7	HULL	167	1,785	2934	4,630	34	21	798	87.11%
8	NORWELL	108	1,330	2305	3,553	151	87	23	98.00%
9	WRENTHAM	227	1,456	2191	3,703	54	36	48	100.89%
10	MIDDLETON	100	1,086	1845	2,898	111	65	34	97.33%
11	NORFOLK	132	1,740	1312	3,049	31	41	9	101.77%
12	EASTON	164	2,339	5,666	7,865	194	80	50	99.74%
13	FOXBOROUGH	370	1,788	4561	6,504	166	65	42	99.11%
14	HOPEDALE	141	754	1351	2,194	68	38	7	97.22%
15	NORTH ANDOVER	309	3,909	6,520	10,516	266	159	62	97.48%
16	MARBLEHEAD	190	2,998	5125	8,144	111	65	310	96.11%
17	WESTON	127	1,358	2369	3,776	36	21	56	99.08%
18	BILLERICA	566	5,011	8,556	14,034	328	192	39	96.72%
19	MENDON	149	813	1071	2,022	32	24	19	96.82%
20	BELLINGHAM	384	2,529	3270	6,155	105	81	24	97.04%
21	STOW	95	1,200	1142	2,429	23	24	26	97.32%
22	DOVER	77	882	916	1,869	7	7	19	98.57%
23								Average	98.48%

ATTACHMENT F

ATTACHMENT G

Competing MVPD Penetration Rate
Town of Hull
Removing Commercial and Seasonal Subscribers

	A	B	C	D	E	F	G	H	J	N
1	**Community**	**DBS Subs**	**Verizon Subs (DTC)**	**Comcast Subs (DTC)**	**2010 Census Occupied Housing Units**	**Competing Provider Penetration Rate (B+C)/E**	**Comcast Commercial Subs**	**Verizon Commercial Subs (Estimate) C/D *G**	**2010 Census Seasonal Housing Units**	**Competing Provider Rate After Commercial and Seasonal Adjustments (B+C-H-(J*F))/E**
2	HULL	167	1,785	2934	4,630	42.16%	34	21	798	34.45%

ATTACHMENT G

ATTACHMENT H

PEPCUMCHG

Cumulative Estimates of Resident Population Change and Rankings: April 1, 2010 to July 1, 2012 - State -- County / County Equivalent

2012 Population Estimates

Geography: Massachusetts

Geography	Population Estimates		Change, 2010 to 2012		Rankings
	April 1, 2010 Estimates Base	July 1, 2012	Number	Percent [1]	Population Estimates April 1, 2010 Estimates Base
Massachusetts	6,547,629	6,646,144	98,515	1.5	(X)
Barnstable County	215,888	215,423	-465	-0.2	9
Berkshire County	131,219	130,016	-1,203	-0.9	11
Bristol County	548,285	551,082	2,797	0.5	6
Dukes County	16,535	17,041	506	3.1	13
Essex County	743,167	755,618	12,451	1.7	3
Franklin County	71,372	71,540	168	0.2	12
Hampden County	463,490	465,923	2,433	0.5	8
Hampshire County	158,080	159,795	1,715	1.1	10
Middlesex County	1,503,077	1,537,215	34,138	2.3	1
Nantucket County	10,172	10,298	126	1.2	14
Norfolk County	670,850	681,845	10,995	1.6	5
Plymouth County	494,919	499,759	4,840	1.0	7
Suffolk County	722,023	744,426	22,403	3.1	4
Worcester County	798,552	806,163	7,611	1.0	2

ATTACHMENT I

Cumulative MVPD Penetration
Removing Commercial and Seasonal Subscribers and Updating Housing Units

	A	B	C	D	E	F	G	H	J	M	Q
1	Community	DBS Subs	Verizon Subs (DTC)	Comcast Subs (DTC)	2010 Census Occupied Housing Units	Competing Provider Penetration Rate (B+C)/E	Comcast Commercial Subs	Verizon Commercial Subs (Estimate) C/D *G	2010 Census Seasonal Housing Units	Updated Housing Units Attachment H Data*E	Revised Cumulative Penetration Rate After Standard Adjustments ((B+C+ D) - (G+H+J))/M
2	TOPSFIELD	44	1,265	1097	2,090	62.63%	59	68	18	2126	106.37%
3	COHASSET	92	879	2114	2,722	35.67%	72	30	82	2766	104.90%
4	HANOVER	135	2,108	2837	4,709	47.63%	198	147	20	4756	99.13%
5	LAKEVILLE	151	1,628	2,214	3,725	47.76%	58	43	325	3762	94.82%
6	DUXBURY	242	2,150	3,273	5,344	44.76%	80	53	343	5397	96.15%
7	HULL	167	1,785	2934	4,630	42.16%	34	21	798	4676	86.25%
8	NORWELL	108	1,330	2305	3,553	40.47%	151	87	23	3589	97.03%
9	WRENTHAM	227	1,456	2191	3,703	45.45%	54	36	48	3762	99.31%
10	MIDDLETON	100	1,086	1845	2,898	40.92%	111	65	34	2947	95.70%
11	NORFOLK	132	1,740	1312	3,049	61.40%	31	41	9	3098	100.16%
12	EASTON	164	2,339	5,666	7,865	31.82%	194	80	50	7904	99.25%
13	FOXBOROUGH	370	1,788	4561	6,504	33.18%	166	65	42	6608	97.55%
14	HOPEDALE	141	754	1351	2,194	40.79%	68	38	7	2216	96.26%
15	NORTH ANDOVER	309	3,909	6,520	10,516	40.11%	266	159	62	10695	95.85%
16	MARBLEHEAD	190	2,998	5125	8,144	39.15%	111	65	310	8282	94.50%
17	WESTON	127	1,358	2369	3,776	39.33%	36	21	56	3863	96.86%
18	BILLERICA	566	5,011	8,556	14,034	39.74%	328	192	39	14357	94.55%
19	MENDON	149	813	1071	2,022	47.58%	32	24	19	2042	95.86%
20	BELLINGHAM	384	2,529	3270	6,155	47.33%	105	81	24	6253	95.51%
21	STOW	95	1,200	1142	2,429	53.31%	23	24	26	2485	95.13%
22	DOVER	77	882	916	1,869	51.31%	7	7	19	1899	97.02%
23										Average	97.05%

ATTACHMENT I

ATTACHMENT J

Comcast Residential Unit Construction

COHASSET	
2010	16
2011	118
2012	134
Total	268

NORFOLK	
2010	64
2011	3
2012	2
Total	69

ATTACHMENT J

ATTACHMENT K

Competing and Cumulative MVPD Penetration
After New Housing Unit Adjustment -- Cohasset/Norfolk

	A	B	C	D	E	G	H	J	N	O	P
1	Community	DBS Subs	Verizon Subs (DTC)	Comcast Subs (DTC)	2010 Census Occupied Housing Units	Comcast Commercial Subs	Verizon Commercial Subs (Estimate) C/D *G	2010 Census Seasonal Housing Units	New Construction Housing Units Cohasset/Norfolk (Attachment J)	Competing Provider Penetration Rate After Standard Adjustments and Cohasset/Norfolk Adjustments (B+C-H-(J*F))/E+N	Cumulative Penetration Rate After Standard Adjustments & Cohasset/Norfolk Adjustments ((B+C+D)-(G+J+H))/(E+N)
2	COHASSET	92	879	2114	2,722	72	30	82	268	30.50%	97.03%
3	NORFOLK	132	1,740	1312	3,049	31	41	9	69	58.54%	99.52%

ATTACHMENT K

ATTACHMENT L

Cumulative MVPD Penetration
Removing Commercial and Seasonal Subscribers and Updating Housing Units
with Cohasset/Norfolk Adjustment

	A	B	C	D	E	G	H	J	M	R
1	**Community**	**DBS Subs**	**Verizon Subs (DTC)**	**Comcast Subs (DTC)**	**2010 Census Occupied Housing Units**	**Comcast Commercial Subs**	**Verizon Commercial Subs (Estimate) C/D *G**	**2010 Census Seasonal Housing Units**	**Updated Housing Units Attachment H Data*E**	**Revised Cumulative Penetration Rate After Standard Adjustments and Cohasset/Norfolk Adjustments**
2	TOPSFIELD	44	1,265	1097	2,090	59	68	18	2126	106.37%
3	COHASSET	92	879	2114	2,722	72	30	82	2766	97.03%*
4	HANOVER	135	2,108	2837	4,709	198	147	20	4756	99.13%
5	LAKEVILLE	151	1,628	2,214	3,725	58	43	325	3762	94.82%
6	DUXBURY	242	2,150	3,273	5,344	80	53	343	5397	96.15%
7	HULL	167	1,785	2934	4,630	34	21	798	4676	86.25%
8	NORWELL	108	1,330	2305	3,553	151	87	23	3589	97.03%
9	WRENTHAM	227	1,456	2191	3,703	54	36	48	3762	99.31%
10	MIDDLETON	100	1,086	1845	2,898	111	65	34	2947	95.70%
11	NORFOLK	132	1,740	1312	3,049	31	41	9	3098	99.52%*
12	EASTON	164	2,339	5,666	7,865	194	80	50	7904	99.25%
13	FOXBOROUGH	370	1,788	4561	6,504	166	65	42	6608	97.55%
14	HOPEDALE	141	754	1351	2,194	68	38	7	2216	96.26%
15	NORTH ANDOVER	309	3,909	6,520	10,516	266	159	62	10695	95.85%
16	MARBLEHEAD	190	2,998	5125	8,144	111	65	310	8282	94.50%
17	WESTON	127	1,358	2369	3,776	36	21	56	3863	96.86%
18	BILLERICA	566	5,011	8,556	14,034	328	192	39	14357	94.55%
19	MENDON	149	813	1071	2,022	32	24	19	2042	95.86%
20	BELLINGHAM	384	2,529	3270	6,155	105	81	24	6253	95.51%
21	STOW	95	1,200	1142	2,429	23	24	26	2485	95.13%
22	DOVER	77	882	916	1,869	7	7	19	1899	97.02%
23									Average	96.48%
24	*See Attachment K									

ATTACHMENT L

ATTACHMENT M

Competing MVPD Penetration
After All Adjustments

	A	B	C	D	E	F	G	H	J	M	O	P
1	Community	DBS Subs	Verizon Subs (DTC)	Comcast Subs (DTC)	2010 Census Occupied Housing Units	Competing Provider Penetration Rate (B+C)/E	Comcast Commercial Subs	Verizon Commercial Subs (Estimate) C/D *G	2010 Census Seasonal Housing Units	Updated Housing Units Attachment H Data*E	Competing Provider Rate After Standard Adjustments (B+C-H-(J*F))/M	Competing Provider Rate After Standard Adjustments and Cohasset/Norfolk Adjustments
2	TOPSFIELD	44	1,265	1097	2,090	62.63%	59	68	18	2126	57.85%	57.85%
3	COHASSET	92	879	2114	2,722	35.67%	72	30	82	2766	32.97%	30.50%*
4	HANOVER	135	2,108	2837	4,709	47.63%	198	147	20	4756	43.87%	43.87%
5	LAKEVILLE	151	1,628	2,214	3,725	47.76%	58	43	325	3762	42.03%	42.03%
6	DUXBURY	242	2,150	3,273	5,344	44.76%	80	53	343	5397	40.50%	40.50%
7	HULL	167	1,785	2934	4,630	42.16%	34	21	798	4676	34.11%	34.11%
8	NORWELL	108	1,330	2305	3,553	40.47%	151	87	23	3589	37.38%	37.38%
9	WRENTHAM	227	1,456	2191	3,703	45.45%	54	36	48	3762	43.20%	43.20%
10	MIDDLETON	100	1,086	1845	2,898	40.92%	111	65	34	2947	37.55%	37.55%
11	NORFOLK	132	1,740	1312	3,049	61.40%	31	41	9	3098	58.92%	58.54%*
12	EASTON	164	2,339	5,666	7,865	31.82%	194	80	50	7904	30.45%	30.45%
13	FOXBOROUGH	370	1,788	4561	6,504	33.18%	166	65	42	6608	31.46%	31.46%
14	HOPEDALE	141	754	1351	2,194	40.79%	68	38	7	2216	38.55%	38.55%
15	NORTH ANDOVER	309	3,909	6,520	10,516	40.11%	266	159	62	10695	37.72%	37.72%
16	MARBLEHEAD	190	2,998	5125	8,144	39.15%	111	65	310	8282	36.24%	36.24%
17	WESTON	127	1,358	2369	3,776	39.33%	36	21	56	3863	37.34%	37.34%
18	BILLERICA	566	5,011	8,556	14,034	39.74%	328	192	39	14357	37.40%	37.40%
19	MENDON	149	813	1071	2,022	47.58%	32	24	19	2042	45.47%	45.47%
20	BELLINGHAM	384	2,529	3270	6,155	47.33%	105	81	24	6253	45.10%	45.10%
21	STOW	95	1,200	1142	2,429	53.31%	23	24	26	2485	50.59%	50.59%
22	DOVER	77	882	916	1,869	51.31%	7	7	19	1899	49.63%	49.63%
23											Average	40.87%
24	*See Attachment K											

ATTACHMENT M

ATTACHMENT N

Competing Provider Subscriber Surplus Compared to Cumulative Subscriber Surplus

	A	B	C	D	E	S	T	U	V
1	**Community**	**DBS Subs**	**Verizon Subs (DTC)**	**Comcast Subs (DTC)**	**2010 Census Occupied Housing Units**	**Competing Provider Subscriber Threshold (15%) E*15**	**Competing Provider Subscriber Surplus B+C-S**	**Cumulative Subscriber Surplus B+C+D-E**	**Competing Provider Subscriber Surplus Compared to Cumulative Subscriber Surplus T/U**
2	TOPSFIELD	44	1,265	1097	2,090	314	996	316	315%
3	COHASSET	92	879	2114	2,722	408	563	363	155%
4	HANOVER	135	2,108	2837	4,709	706	1537	371	414%
5	LAKEVILLE	151	1,628	2,214	3,725	559	1220	268	455%
6	DUXBURY	242	2,150	3,273	5,344	802	1590	321	495%
7	HULL	167	1,785	2934	4,630	695	1258	256	491%
8	NORWELL	108	1,330	2305	3,553	533	905	190	476%
9	WRENTHAM	227	1,456	2191	3,703	555	1128	171	659%
10	MIDDLETON	100	1,086	1845	2,898	435	751	133	565%
11	NORFOLK	132	1,740	1312	3,049	457	1415	135	1048%
12	EASTON	164	2,339	5,666	7,865	1180	1323	304	435%
13	FOXBOROUGH	370	1,788	4561	6,504	976	1182	215	550%
14	HOPEDALE	141	754	1351	2,194	329	566	52	1088%
15	NORTH ANDOVER	309	3,909	6,520	10,516	1577	2641	222	1189%
16	MARBLEHEAD	190	2,998	5125	8,144	1222	1966	169	1164%
17	WESTON	127	1,358	2369	3,776	566	919	78	1178%
18	BILLERICA	566	5,011	8,556	14,034	2105	3472	99	3507%
19	MENDON	149	813	1071	2,022	303	659	11	5988%
20	BELLINGHAM	384	2,529	3270	6,155	923	1990	28	7106%
21	STOW	95	1,200	1142	2,429	364	931	8	11633%
22	DOVER	77	882	916	1,869	280	679	6	11311%

ATTACHMENT N

CERTIFICATE OF SERVICE

I, Nichele Rice, do hereby certify on this 4th day of September, 2013 that a true and correct copy of the foregoing "Reply to Oppositions" has been sent via U.S. mail, postage prepaid to the following:

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Washington, DC 20554

Mr. Steven Broeckaert, Deputy Division Chief
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Town of Mendon
20 Main Street
Mendon, MA 01756

Board of Selectman
Town of North Andover
120 Main Street
North Andover, MA 01845

Board of Selectmen
Town of Milford
52 Main Street
Milford, MA 01757

Board of Selectmen Town of Marblehead
Abbott Hall
188 Washington Street
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Board of Selectmen
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Duxbury, MA 02332

Board of Selectman
Town of Easton
136 Elm Street
Easton, MA 02356

Board of Selectman
Town of Lakeville
346 Bedford Street
Lakeville, MA 02347

Board of Selectman
Town of Billerica
365 Boston Road
Billerica, MA 01821

Board of Selectman
Town of Chelmsford
50 Billerica Road
Chelmsford, MA 01824

Town Council
Town of Randolph
41 South Main Street
Randolph, MA 02368

Board of Selectmen
Town of Cohasset
41 Highland Avenue
Cohasset. MA 02025

Board of Selectmen
Town of Topsfield
8 West Common Street
Topsfield, MA 01983

Board of Selectmen
Town of Danvers
One Sylvan Street
Danvers, MA 01923

Board of Selectmen
Town of Middleton
48 South Main Street
Middleton. MA 01949

Board of Selectmen
Town of Hanover
550 Hanover Street
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Board of Selectmen
Town of Hull
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Hull, MA 02045

Board of Selectmen
Town of Wayland
41 Cochituate Road
Wayland, MA 01778

Board of Selectmen
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Board of Selectmen
Town of Hingham
210 Central Street
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Board of Selectmen
Town of Norwell
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Board of Selectmen
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Board of Selectmen
Town of Norfolk
One Liberty Lane
Norfolk, MA 02056

Board of Selectmen
Town of Wrentham
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Wrentham, MA 02093

Board of Selectmen
Town of Foxborough
40 South Street
Foxborough, MA 02035

Board of Selectmen
Town of Walpole
135 School Street
Walpole, MA 02081

The Honorable Dean Mazzarella
Office of the Mayor
City of Leominster
25 West Street
Leominster, MA 01453

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Town of Shirley
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Board of Selectmen
Town of Ashby
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Ashby, MA 01431

Board of Selectmen
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195 Main Street
Maynard, MA 01754

Board of Selectmen
Town of Stow
380 Great Road
Stow, MA 01775

Board of Selectmen
Town of Ashland
101 Main Street
Ashland, MA 01721

Board of Selectmen
Town of Bellingham
10 Mechanic Street
Bellingham, MA 02019

Board of Selectmen
Town of Holliston
703 Washington Street
Holliston, MA 01746

Board of Selectmen
Town of Hopedale
78 Hopedale Street
Hopedale, MA 01747

Board of Selectmen
Town of Medway
155 Village Street
Medway, MA 02053

Board of Selectmen
Town of Millis
Veterans Memorial Building
900 Main Street
Millis, MA 02054

Nichele Rice