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September 30, 2013

Via ECFS

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

Re: WideOpenWest Finance, LLC, Notice of Ex Parte Presentation – Accessibility of User Interfaces, and Video Programming Guides and Menus; MB Docket No. 12-108

Dear Ms. Dortch:

WideOpenWest Finance, LLC (“WOW!”) submits this letter and Declaration in the above-captioned rulemaking in support of expanding the class of cable operators that have two additional years beyond the deadline required for large cable operators to provide accessible programming user guides (“talking guides”).¹

WOW! owns and operates 20 cable television systems that provide video, Internet and voice service to subscribers in 13 mid-western and southeastern states. At the end of 2012, WOW! provided cable service to approximately 705,000 video subscribers. Approximately ten of WOW!’s cable systems serve more than 20,000 video subscribers.

We understand that the Commission is considering providing additional compliance time of two years to small cable operators (defined as having 400,000 or fewer subscribers), and cable systems serving 20,000 or fewer subscribers operated by providers with more than 400,000 subscribers. Such a definition of “small cable operator” would provide no relief for many WOW! systems, even though WOW! will be in no position to ensure compliance by the end of the three year compliance deadline currently contemplated for larger cable multiple system operators (“MSOs”), for the reasons set forth in the attached Declaration of Cash Hagen, Chief Technology Officer of WideOpenWest Finance, LLC (“Declaration”).

¹ See *Accessibility of User Interfaces, and Video Programming Guides and Menus*, Notice of Proposed Rulemaking, MB Docket No. 12-108, 28 FCC Rcd 8506 (2013) (“NPRM”). See Comments of American Cable Association at 6-13 (“ACA Comments”); Twenty-First Century Communications and Video Accessibility Act, Pub. L. 111–260, Oct. 8, 2010, 124 Stat. 2775, § 205 (“CVAA”).

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As explained in the Declaration, because equipment suppliers look to the overall size of their customer, not the size of individual systems that customer may operate, the buying power required to influence hardware and software vendors' application development road map and timetables for product releases rests almost exclusively with the largest operators, *e.g.*, with 2 million or more subscribers. Operators the size of WOW! simply have no ability to materially influence these schedules. At the very least, all WOW! systems should be allowed at least five years to comply with any "talking guide" mandate.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Very truly yours,

WOW! Internet Cable and Phone

A handwritten signature in black ink, appearing to read "Cash Hagen", written over a light blue horizontal line.

Cash Hagen
Chief Technology Officer

Enclosure