BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Joint Application of)
Charter Fiberlink-Missouri, LLC and Time)
Warner Cable Information Services (Missouri),)
LLC d/b/a Time Warner Cable (TWCIS) for) File No. TA-2021-0204
Designation as Eligible Telecommunications)
Carriers to Receive Rural Digital Opportunity)
Fund Action (Auction 904) Support for Voice)
and Broadband Services)

ORDER DIRECTING NOTICE, SETTING INTERVENTION DEADLINE, AND DIRECTING STAFF TO FILE A RECOMMENDATION

Issue Date: January 11, 2021 Effective Date: January 11, 2021

On January 7, 2021, Charter Fiberlink-Missouri, LLC and Time Warner Cable Information Services (Missouri), LLC d/b/a Time Warner Cable (TWCIS) filed their application for designation as wireless Eligible Telecommunications Carriers. The Commission will direct its Data Center to issue notice of the application, set a deadline for requests to intervene, and direct the Staff of the Commission to file a recommendation.

THE COMMISSION ORDERS THAT:

- 1. The Commission's Data Center shall send notice of this application to all local exchange carriers certificated to provide service in Missouri.
- 2. Requests to intervene shall be filed with the Commission no later than January 26, 2021.
- 3. The Staff of the Commission shall file a recommendation no later than February 12, 2021.
 - 4. This order shall be effective when issued.



BY THE COMMISSION

Morris L. Woodruff

Secretary

Ronald D. Pridgin, Regulatory Law Judge, by delegation of authority pursuant to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri, on this 11th day of January, 2021.

Mark P. Johnson
Partner
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Dentons US LLP 4520 Main Street Suite 1100 Kansas City, MO 64111-7700 United States

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January 6, 2021

Mr. Morris Woodruff Secretary, Missouri Public Service Commission 200 Madison Street, PO Box 360 Jefferson City, MO 65102-0360

Re: Joint Application of Charter Fiberlink - Missouri, LLC and Time Warner Cable Information Services (Missouri), LLC for Designation as Eligible Telecommunications Carriers to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services

Dear Mr. Woodruff:

On behalf of Charter Fiberlink - Missouri, LLC and Time Warner Cable Information Services (Missouri), LLC ("the Applicants"), please find attached for filing the Joint Application of Charter Fiberlink - Missouri, LLC and Time Warner Cable Information Services (Missouri), LLC for Designation as Eligible Telecommunications Carriers to Receive Rural Digital Opportunity Fund Auction (Auction 904) Support for Voice and Broadband Services ("the Application"). Please accept the attached for filing and assign a Case Number for future reference.

Exhibits A and B to the Application are lists of census blocks in which the Applicants have been assigned Rural Development Opportunity Fund subsidies. The Exhibits are provided in hard copy form, but the Applicants will make available upon Staff request the census block lists in Excel spreadsheet format.

Thank you for accepting the Application for filing. Should you have any questions, please address them to the undersigned at your convenience.

Very truly yours,

Dentons US LLP

Mark P. Johnson

Partner

MJ:

Attachments

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of)
)
Joint Application of Charter Fiberlink -	
Missouri, LLC and Time Warner Cable) Case No
Information Services (Missouri), LLC for	
Designation as Eligible Telecommunications	
Carriers to Receive Rural Digital Opportunity	
Fund Auction (Auction 904) Support for	
Voice and Broadband Services	

JOINT APPLICATION OF CHARTER FIBERLINK - MISSOURI, LLC AND TIME WARNER CABLE INFORMATION SERVICES (MISSOURI), LLC FOR DESIGNATION AS ELIGIBLE TELECOMMUNICATIONS CARRIERS TO RECEIVE RURAL DIGITAL OPPORTUNITY FUND AUCTION (AUCTION 904) SUPPORT FOR VOICE AND BROADBAND SERVICES AND REQUEST FOR EXPEDITED CONSIDERATION

Charter Fiberlink - Missouri, LLC ("Charter Fiberlink") and Time Warner Cable Information Services (Missouri), LLC ("TWCIS", and together with Charter Fiberlink, each individually a "Charter Entity" and collectively the "Charter Entities") respectfully submit this Joint Application for Designation as Eligible Telecommunications Carriers ("ETCs") to the Public Service Commission of Missouri ("Commission") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act"), Sections 54.201 and 54.202 of the Federal Communications Commission ("FCC") rules, and the Commission's requirements in 20 C.S.R. 4240-31.015 and -31.016. For the reasons set forth below, the Charter Entities request that the Commission approve this Joint Application by no later than April 15, 2021.

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R §§ 54.201 and 54.202.

On December 7, 2020, the FCC announced the winning bidders for the Rural Digital Opportunity Fund Phase I Auction (Auction 904) ("RDOF Auction"). CCO Holdings, LLC ("CCO Holdings"), an affiliate of the Charter Entities, was selected as a winning bidder in Missouri. CCO Holdings assigned its winning RDOF Auction bid in Missouri to Charter Fiberlink, which is the "lead operating company" with respect to such bid, and TWCIS must satisfy certain public interest requirements in connection with the bid. The Charter Entities' receipt of RDOF Auction funding and building to these unserved areas, however, are conditioned upon them obtaining designation as ETCs in the Census Blocks where CCO Holdings was the winning bidder in Missouri. The Census Blocks associated with CCO Holdings' winning bid are identified in Exhibits A and B ("RDOF Census Blocks"). A map illustrating the RDOF Census Blocks is attached as Exhibit C. Accordingly, Charter Fiberlink and TWCIS seek ETC designation in the RDOF Census Blocks in their respective service areas in Missouri so they may satisfy their FCC RDOF Auction requirements. Further, the Charter Entities seek a waiver of the pre-application notice required by 20 C.S.R. 4240-4.017(1), for the reasons explained below.

Section 214(e)(2) of the Act authorizes the Commission to designate a company that meets the requirements of 47 U.S.C. § 214(e)(1), such as each Charter Entity, as an ETC. As demonstrated in this Joint Application, each Charter Entity meets all requirements for ETC designation. Further, as shown by the descriptions herein, designating each Charter Entity as an ETC in its RDOF Census Blocks would allow the Charter Entities, either directly or through their

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³ See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes; Winning Bidders Announced; FCC Form 683 Due January 29, 2021, Public Notice, DA 20-1422 (Dec. 7, 2020) ("Auction 904 Results Notice").

⁴ Auction 904 Results Notice, at Attachment A, p. 4.

⁵ See Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904, Public Notice, 35 FCC Rcd 6077 (2020) ("Auction 904 Procedures Public Notice").

⁶ See Auction 904 Results Notice, at ¶ 36.

affiliates,⁷ to bring high-quality, innovative voice and broadband Internet access services to consumers in unserved portions of Missouri, advance the goals of universal service, and serve the public interest.

Ensuring that high-speed broadband service is available to those without access in the state has been a major priority of the Governor and its lawmakers. By granting this Joint Application, the Commission has the potential to bring significant public and private investment to Missouri and to advance the state's goals in making sure that more of its citizens have access to high-speed broadband Internet services. The FCC estimates that Missouri has more than 199,211 unserved residential and small business locations, ⁸ and granting this Joint Application will help to lower that number substantially. While the Charter Entities, through other Charter affiliates, have participated in state programs to advance broadband buildout in Missouri, participation through RDOF presents a unique opportunity for Missouri to do substantially more to bridge the digital divide in unserved areas.

In support of their Joint Application, the Charter Entities state as follows:

I. OVERVIEW OF THE CHARTER ENTITIES AND CHARTER

Charter Entities. Each Charter Entity is a Delaware limited liability company with a place of business at 12405 Powerscourt Drive, St. Louis, Missouri 63131. Both Charter Entities are majority owned and wholly controlled subsidiaries of Charter Communications, Inc. ("Charter"), which is headquartered at 400 Atlantic Street, Stamford, Connecticut 06901. CCO Holdings and both Charter Entities are subsidiaries of Charter. A copy of each Charter Entity's registration with

⁷ While the entity seeking ETC designation will directly provide the supported Lifeline voice services, different Charter affiliated entities may directly provide the broadband Internet access services and non-Lifeline voice services in the RDOF Census Blocks.

⁸ See Auction 904 Results Notice, at Attachment B, p. 2. The FCC defines "locations" as "housing units" and "small businesses" that receive "consumer-grade broadband service." See Wireline Competition Bureau Provides Guidance to Carriers Receiving Connect America Fund Support Regarding Their Broadband Location Reporting Obligations, Public Notice, WC Docket No. 10-90, DA 16-1363 (2016).

the Missouri Secretary of State, including Certificate of Good Standing, is attached at **Exhibits D** and **E**. Both Charter Entities are authorized by the Commission to provide local exchange and interexchange telecommunications services in Missouri. A copy of each Charter Entity's authorization is attached at **Exhibits F and G**.

Charter. Charter is a leading broadband connectivity company, serving more than 30 million customers nationwide. Under the brand name Spectrum, the company offers a suite of advanced communications services, including broadband Internet access, cable video, voice, and mobile services. Through its subsidiaries, Charter provides these services in 41 states, including to approximately 769,000 customers in Missouri.

Helping to drive Charter's rapid growth is Charter's strong network investment which has significantly enhanced Charter's broadband Internet access service and allowed Charter to better serve its customers in both urban and rural communities across the United States. In 2018-2019, Charter extended its network to more than 1.5 million unserved homes and businesses, 30% of which were in rural areas. And from 2015 to 2019, Charter invested nearly \$40 billion in infrastructure and technology to expand the reach of its network.

Charter's customers directly benefit from Charter's commitment to and investment in its network. The FCC recently reported that Charter had one of the fastest, most consistent broadband Internet download speeds in the industry, including at peak times of the day when customer

⁹ Charter Fiberlink is authorized in Missouri to provide (i) intrastate local exchange and (ii) intrastate interexchange and exchange access telephone service pursuant to its certification granted in Case No. TA-2001-346 (eff. Apr. 16, 2001). TWCIS is authorized in Missouri to provide (i) intrastate local exchange and (ii) intrastate interexchange and exchange access telephone service pursuant to its certification granted in Case No. LA-2004-0133 (eff. Mar. 12, 2004). ¹⁰ Certain of the subjects and benefits discussed in this filing pertain to non-jurisdictional products and services. While those items are included herein in order to provide a comprehensive view of the public interest benefits of designating each Charter Entity as an ETC, the Charter Entities respectfully reserve all rights relating to the inclusion of or reference to such information, including without limitation the Charter Entities' legal and equitable rights relating to jurisdiction, filing, disclosure, relevancy, due process, review, and appeal.

Internet usage is the highest.¹¹ Additionally, recognizing Charter's experience and commitment to its customers, its network, and its products, *Multichannel News* recently awarded Charter as its "Operator of the Year for 2020."¹² With millions working and learning from home due to the COVID-19 pandemic, access to dependable, high-speed broadband Internet access services and reliable voice services has never been more important, especially in the unserved areas comprising the RDOF Census Blocks. Further, Charter's network investment has spurred the development of products such as Charter's Spectrum Mobile service, which relies on the use of the Verizon Wireless mobile network and Charter's own broadband network infrastructure to provide fast, reliable broadband and voice services from customers' mobile phones.

Charter is committed to being part of a comprehensive solution to close the digital divide throughout the United States. With more than \$1.2 billion in RDOF funding awarded to the company across the country, Charter plans to continue its efforts as a leader in rural broadband deployment, bringing innovative, high-quality voice and broadband Internet access service offerings to unserved communities. In Missouri, the more than \$48 million of RDOF funding assigned to the Charter Entities will help enable Charter to expand the availability of its network and services in the RDOF census blocks. In fact, according to the FCC, it assigned Charter the most locations of any provider that participated in the RDOF Auction.

¹¹ See Ninth Measuring Broadband America Fixed Broadband Report, A Report on Consumer Fixed Broadband Performance in the United States, FCC Office of Engineering and Technology (Aug. 3, 2020), pp. 15-16.

¹² See Cover Story: Charter's 'Giffen Good,' MultiChannel News (Sept. 28, 2020), https://www.nexttv.com/features/cover-story-charters-giffen-good#:~:text=Charter%2C%20the%20Multichannel%20News%20Operator%20of%20the%20Year,it%20completed

good#:~:text=Charter%2C%20the%20Multichannel%20News%20Operator%20oth%20the%20 Year,1t%20completed %20the%20purchase%20of%20Time%20Warner%20Cable (last visited Dec. 13, 2020) (stating that Charter "has managed record broadband and positive video subscriber growth during the pandemic by sticking to its game plan, initiated more than four years ago ... [including setting] out to make Charter's plant across its 41-state footprint fully digital (achieved in 2018), to roll out DOCSIS 3.1 (completed in 2018), to uniformly align products and packaging across all markets (as of Q4 2019, 85% of its customers were in Spectrum pricing and packaging) and to raise broadband speeds (in 2019, it raised the minimum speed to 200 Megabits per second for 60% of the footprint and that rate continues to grow; the remaining 40% are at 100 Mbps).").

Additional information discussing Charter's RDOF funding in Missouri is described at **Exhibit H**, which is being provided to the Commission in accordance with the Commission's requirements for confidential information.

A. RDOF Support Assigned to the Charter Entities Will Enable Charter to Extend Voice Services to the RDOF Census Blocks

Charter provides voice communications services to over 9.3 million residential customers throughout its 41-state footprint using interconnected Voice over Internet Protocol technology. ¹³ Charter's voice service offering includes unlimited long distance calling in the United States, Canada, Puerto Rico, the US Virgin Islands, and Guam. Calling features include voicemail, call waiting, caller ID, call forwarding, and other features, at no additional charge. In addition, the E911 feature automatically provides the emergency service operator with a caller's phone number and location. With respect to its residential voice services, Charter offers customers a simplified pricing structure with plans that include all applicable fees¹⁴ – thus permitting such customers to know their total costs in advance of choosing Charter's services, rather than facing a variety of complicated surcharges after they receive their first billing statement. ¹⁵

The RDOF support assigned to each Charter Entity will help enable it to extend and maintain Charter's voice services to and within its respective RDOF Census Blocks in Missouri.

¹³ See Press Release, Charter Communications, Inc., Charter Announces Third Quarter 2020 Results (Oct. 30, 2020), https://corporate.charter.com/newsroom/charter-announces-third-quarter-2020-results.

¹⁴ The rates, terms and conditions of Charter's voice service plans are subject to change in accordance with applicable federal and state regulations.

¹⁵ The Charter Entities remit fees, such as federal or state universal service fund fees or E911 fees, to the appropriate regulatory agencies, where required, and in accordance with law, but do not generally collect them as separate line items on the bill, in addition to the monthly rate that residential customers pay for the Charter Entities' voice services. All such fees are described in the Charter Entities' invoices for voice services in accordance with applicable federal and state billing requirements.

B. RDOF Support Assigned to The Charter Entities Will Enable Charter to Extend Broadband Internet Access Services to the RDOF Census Blocks

Charter's broadband Internet access services deliver industry-leading speeds to the vast majority of its 26.8 million residential broadband Internet customers. ¹⁶ Charter now offers minimum download speeds of at least 200 Mbps in 60% of Charter's national footprint, and 100 Mbps everywhere else in the footprint—including households and small businesses in rural areas. On December 17, 2020, Charter announced that it plans to double Charter's broadband Internet access service starting speeds in 17 U.S. markets, including areas in and around Columbia, Missouri, making 200 Mbps the starting flagship speed in 75% of Charter's communities. These speed enhancements will be available to new customers immediately. Existing customers will receive these speed increases with new Charter broadband Internet access service packages during the first quarter of 2021. ¹⁷

Charter also offers a 1 Gbps connection with maximum download speeds of up to 940 Mbps to the vast majority of those same households, as well as to small and medium-sized businesses. Additionally, recognizing the need for fast, reliable broadband service for community anchor institutions, Charter offers 10 Gbps symmetrical speed broadband Internet connections to schools, libraries, hospitals, and other important community institutions.

The RDOF support assigned to each Charter Entity will enable it to extend Charter's broadband Internet access services to its respective RDOF Census Blocks in Missouri. The terms of the support assigned to each Charter Entity will require it to offer Charter's 1 Gbps connections in the RDOF Census Blocks. According to the FCC, these areas are currently unserved by any

¹⁶ See supra note 13.

¹⁷ See Press Release, Charter Communications, Inc., Spectrum Doubles Spectrum Internet Starting Speed to 200 Mbps in 17 Markets (Dec. 17, 2020), https://corporate.charter.com/newsroom/spectrum-doubles-internet-starting-speed-to-200-mbps.

¹⁸ See supra note 13.

broadband provider offering service at or above 25/3 Mbps. Granting this Joint Application will help extend broadband and unleash tremendous benefits to the communities within these RDOF Census Blocks. Charter's broadband deployment demonstrates its commitment to developing and deploying innovative broadband technology and services in unserved and/or rural areas. Additionally, Charter's services will provide new and innovative services to previously unserved customers in the RDOF Census blocks, including by providing relief to customers struggling as a result of the COVID-19 pandemic. It will allow students and households to get or stay connected, and expand broadband Internet access and adoption among low-income households.

As part of its current broadband Internet access service plans, Charter offers *Spectrum Internet Assist*, a program for low-income households, which is available in its service area in Missouri and elsewhere.¹⁹ Charter does not require customers to sign long-term contracts for its services nor does the company impose early termination fees for failing to fulfill them.²⁰ Charter maintains a focus on ensuring that the broadband user experience is a positive one.²¹

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¹⁹ See Spectrum Internet Assist, Spectrum, https://www.spectrum.com/browse/content/spectrum-internet-assist (last visited Nov. 24, 2020). The rates, terms and conditions of Charter's Spectrum Internet Assist program are subject to change.

²⁰ The rates, terms and conditions of Charter's Internet services are subject to change.

²¹ In the years ahead, cable providers will deploy revolutionary 10 Gbps networks within their footprints. See Press Release, NCTA, Introducing 10G: The Next Great Leap for Broadband (Jan. 7, 2019), https://www.ncta.com/media/mediar-room/introducing-10g. Successful 10 Gbps field tests by cable providers in residential settings have already occurred, and CableLabs has released specifications for DOCSIS 4.0, a new technical standard, to bring 10 Gbps speed capabilities to consumers. 10 Gbps will deliver to customers broadband speeds 10 times faster than what is delivered by today's networks and will have the speed and capacity to change the way we live.

II. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices or other correspondence and communications regarding this

Joint Application should be provided to:

Daniel Gonzalez Group VP – State Regulatory Affairs Charter Communications, Inc. 601 Massachusetts Ave. Suite 400 West Washington, DC 20001

Tel: (202) 370-4282

Email: Dan.Gonzalez@charter.com

and

Michael R. Moore Group VP Law – Telephone Regulatory Charter Communications, Inc. 12405 Powerscourt Drive St. Louis, Missouri 63131 Tel: (314) 394-9007

Email: Michael.Moore@charter.com

With copies to:

Mark P. Johnson Dentons US, LLP 4520 Main Street, Suite 1100 Kansas City, Missouri 64111 Tel: (816) 460-2424

Email: Mark.Johnson@dentons.com

and

Charles A. Hudak Joel L. Thomas Friend, Hudak & Harris, LLP 3 Ravinia Drive, Suite 1700 Atlanta, Georgia 30346 Tel: (770) 399-9500

Email: Chudak@fh2.com
Email: JThomas@fh2.com

III. CHARTER'S PARTICIPATION IN THE RDOF AUCTION

A. Background on the RDOF Auction

On February 7, 2020, the FCC issued a Report and Order establishing the Rural Digital Opportunity Fund, in which service providers would compete to receive up to \$20.4 billion to offer voice and broadband services in unserved high-cost areas.²² Under this program the FCC will disburse federal universal service funds on a technology neutral basis to providers—including competitive local exchange carriers, cable operators, fixed wireless ISPs, satellite broadband providers, electric co-ops and electric utilities—for deploying voice and broadband-capable networks in these unserved areas.

B. CCO Holdings' Selection as a Winning Bidder and Assignment to the Charter Entities

The FCC's December 7, 2020 *Auction 904 Results Notice* announced that CCO Holdings was among the winners of the recently concluded RDOF Auction.²³ Specifically, the FCC announced CCO Holdings as a winning bidder in 8,406 Census Blocks in Missouri. In accordance with the FCC's procedures allowing winning bidders to divide and assign their bids to affiliated operating companies within the relevant state,²⁴ CCO Holdings assigned its winning RDOF Auction bid to Charter Fiberlink, who is the "lead operating company" with respect to such bid, and designated TWCIS to satisfy certain public interest requirements in connection with the bid. Each Charter Entity must demonstrate to the FCC that it has been designated as an ETC in its respective RDOF Census Blocks where CCO Holdings was the winning bidder in Missouri. The

²² Rural Digital Opportunity Fund, Report and Order, 35 FCC Rcd 686 (2020) ("RDOF Order").

²³ See Auction 904 Results Notice, at Attachment A, p. 4.

²⁴ See Auction 904 Procedures Public Notice, at ¶ 43.

FCC's deadline for the Charter Entities to submit appropriate documentation of their ETC designations is June 7, 2021.²⁵

C. Need for Expedited ETC Designation and Waiver of Pre-Application Notice Rule

As noted, On December 7, 2020, the FCC announced the winning bidders for the RDOF Auction, and CCO Holdings was selected as a winning bidder for 8,406 Census Blocks in Missouri. Additionally, the FCC established a deadline of June 7, 2021 for submitting ETC designation documentation.

Based on this timing, the Charter Entities seek a waiver of the Commission's sixty-day pre-application notice rule set forth in 20 C.S.R. 4240-4.017 for good cause, as follows. 20 C.S.R. 4240-4.017(1)(D) permits an entity to request a waiver of the sixty-day pre-application notice rule and identifies several examples of good cause waiver requests, including: (i) the filing party had no communications with the office of the Commission about any substantive issues in their case within the 150-day period preceding their filing; (ii) circumstances prevented filing the required notice; and (iii) delaying a filing for sixty days would cause harm. In the case of this Joint Application, all of these reasons are appropriate. The Charter Entities were unable to discuss their ETC designation request with the Commission due to confidentiality restrictions under the FCC's RDOF Auction rules. The Charter Entities did not learn of their RDOF Auction winning bid in Missouri until December 7, 2020. And, lastly, compliance with the sixty-day preapplication notice rule would create substantial impediments, including a likelihood of significant harm, to the Charter Entities' ability to comply with the FCC's RDOF Auction procedures. Based upon the good cause showing above, the Commission should grant the Charter Entities' request for a waiver of the sixty-day pre-application notice requirement.

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 $^{^{25}}$ See Auction 904 Results Notice, at \P 36.

Second, as discussed, the timeframe for the Charter Entities to obtain ETC designation is short and, so that each Charter Entity may plan its RDOF construction and deployment schedule, the Charter Entities respectfully request that the Commission grant each of them ETC designation on an expedited basis by no later than April 15, 2021. Granting this Joint Application on an expedited basis will benefit the citizens of Missouri by allowing the Charter Entities to meet their RDOF deployment milestones for voice and broadband Internet services in the RDOF Census Blocks and by allowing customers the opportunity to reap the benefits of Charter's broadband services, including by participating in telemedicine, remote work and remote education. Expedited Commission action would serve the public interest and advance the goals of universal service by expediting the deployment of high quality, innovative voice and broadband Internet services in these unserved portions of Missouri.

IV. THE CHARTER ENTITIES' FINANCIAL AND TECHNICAL QUALIFICATIONS

Charter is one of the nation's leading providers of broadband Internet access services and voice services, and Charter has played a significant role in expanding the availability of these services—especially broadband Internet access services—across the United States. Indeed, the Charter Entities and their affiliates currently provide high-quality voice and broadband services to approximately 26.8 million residential Internet access service customers and 9.3 million residential voice service customers in 41 states, including many in rural and "high cost" areas.

Each Charter Entity is highly qualified to meet the FCC's RDOF service obligations given Charter's proven track record of financial, managerial, technical and commercial success operating as an existing provider of broadband Internet and voice services. In 2019, Charter generated over \$45 billion in revenue from the provision of all of Charter's services, along with approximately

\$6.5 billion in income from its operations.²⁶ The Charter Entities will draw upon Charter's financial capability and extensive teams of experienced engineers with expertise in the fields of communications technology, hardware design, software development, data analytics, and networking to construct and/or install the networks and infrastructure necessary to provide the required services in the RDOF Census Blocks. Additionally, the Charter Entities will leverage the significant operational, managerial and technical expertise of Charter to perform all billing, installation, customer service, and other matters related to providing their services in Missouri. The Charter corporate family has extensive experience managing the technical and customer service-related issues associated with the provision of mass-market consumer voice and broadband Internet access (as well as other communications services). Charter monitors its network performance on a 24/7/365 basis and has implemented procedures to leverage its extensive engineering resources quickly and effectively to install, modify, repair, and/or restore services, as necessary.

This expertise made it possible for CCO Holdings to confidently participate in the RDOF auction with the certainty that each Charter Entity will be able to fulfill its RDOF network and service obligations.

V. <u>EACH CHARTER ENTITY MEETS ALL FEDERAL AND STATE STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION</u>

Each Charter Entity meets all applicable federal and state requirements for designation as an ETC in Missouri, including 47 U.S.C. § 214(e), 47 C.F.R. §§ 54.201 *et seq.*, and 20 C.S.R. 4240-31.015 and -31.016.

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²⁶ 2019 Annual Report. Charter Communications, Inc., https://ir.charter.com/financial-information/annual-reports (last visited Dec. 28, 2020).

A. Each Charter Entity Meets All Federal Requirements for ETC Designation

Each Charter Entity meets all criteria for designation as an ETC under federal law, as follows.

- 1) For purposes of its ETC designation, each Charter Entity will operate as a common carrier and offer interstate and intrastate communications on a common carrier basis in its respective RDOF Census Blocks. Designation as an ETC is a predicate to each Charter Entity's eligibility to receive RDOF support to provide voice and broadband Internet services in its respective RDOF Census Blocks (47 U.S.C. § 214(e)(1); 47 C.F.R. § 9.3; 47 C.F.R. § 54.201(d)).
- 2) Charter is a facilities-based broadband Internet access and voice service provider, with its own network, gateways, switching facilities, and other associated facilities. Each Charter Entity will offer the RDOF supported services using its own facilities within the meaning of the FCC's rules or a combination of its own facilities and resale of another carrier's services (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)) within its respective RDOF Census Blocks.
- 3) As required by 47 C.F.R. § 54.101, each Charter Entity, either directly or through an affiliate, will offer voice services and broadband Internet access services supported by federal universal service support mechanisms, including the following capabilities within its respective RDOF Census Blocks:²⁷

<u>Voice Grade Access to the Public Switched Telephone Network</u> – Each Charter Entity meets this requirement through the provision of a competitive voice service that includes minutes of use for local service provided at no charge to end users and access to emergency services via

²⁷ Charter's broadband Internet access and voice services are provided through subsidiaries controlled and majority owned by Charter. While the entity seeking ETC designation will directly provide the supported Lifeline voice services, different Charter affiliated entities may directly provide the broadband Internet access services and non-Lifeline voice services in the RDOF Census Blocks.

911 or E911, wherever available from local government or public safety organizations.²⁸ Toll limitation services will also be offered to qualifying low income consumers as provided in the FCC's rules (47 C.F.R. § 54.101(a)(1)) in the RDOF Census Blocks.

Broadband Internet Access Service – Charter's broadband Internet access service provides the capability to transmit data to, and receive data from, all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service (47 C.F.R. § 54.101(a)(2)) in the RDOF Census Blocks.

Each Charter Entity commits that these services will be provided consistent with applicable high-cost universal service support rules (47 C.F.R. § 54.101(c)) in the RDOF Census Blocks. Each Charter Entity will also ensure that Lifeline voice and broadband Internet services are offered in accordance with the FCC's rules in all Census Blocks where the Charter Entity has been assigned RDOF support (47 C.F.R. § 54.101(d)). Moreover, for its Lifeline voice service offering, each Charter Entity will offer to Lifeline-eligible customers a Charter voice service plan, as described above, at the discounted Lifeline voice service rate in the RDOF Census Blocks. This voice service plan is comparable (if not superior) to the Lifeline voice service offerings of other Lifeline providers in Missouri.

- 4) Each Charter Entity will offer its voice service as a standalone service and at rates that are reasonably comparable to urban rates (47 U.S.C. § 254(b)(3); 47 C.F.R. § 54.313(a)(3)) in its respective RDOF Census Blocks.²⁹
- 5) In its respective RDOF Census Blocks, each Charter Entity will advertise the availability of its universal service offerings and charges for such offerings using media of general

²⁸ See Section I(A) of this Joint Application for a detailed description of Charter's voice service.

²⁹ See RDOF Order, at ¶ 42.

distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)), and in a manner reasonably designed to reach those likely to qualify for the service (47 C.F.R. § 54.405(b)).

- 6) Each Charter Entity will provide the supported services throughout its designated RDOF Auction assigned Census Blocks where it has customers (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d)).
- 7) Each Charter Entity certifies that, in accordance with 47 U.S.C. § 254(e) and 47 C.F.R. § 54.7(a), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the universal service support is intended.
- 8) Each Charter Entity further certifies that it meets all applicable requirements for designation as an ETC under 47 C.F.R. § 54.202 as follows:

<u>Compliance with Applicable Service Requirements</u>. Each Charter Entity certifies that it will comply with the service requirements applicable to the support that it receives, ³⁰ including the requirements of the RDOF Auction.

Ability to Remain Functional in Emergency Situations. Charter has been providing voice and broadband Internet access services to customers on a 24/7/365 basis for almost twenty years. As part of providing these services, it is necessary to have in place contingency plans for emergency situations for each of Charter's major network hubs and/or facilities that are geographically distributed across the United States. These plans contain activation, staffing, escalation, and communication procedures to identify and respond to such emergencies. Additionally, all switching facilities are equipped with independent power generators and sufficient fuel to operate for several days to mitigate commercial power outages. The design of these facilities contains multiple levels of redundancy and autonomy that also mitigate the need

³⁰ 47 C.F.R. § 54.202(a)(1)(i).

for dedicated human interaction. The Charter Entities will apply this successful model to their RDOF services in the RDOF Census Blocks.

B. Each Charter Entity Meets All State Requirements for ETC Designation

In addition to the foregoing, in accordance with the Commission's requirements for ETC designation under 20 C.S.R. 4240-31.016, each Charter Entity states as follows:

- 1) Each Charter Entity is owned 100% by its direct parent company. Each such parent company, in turn, is ultimately majority owned and wholly controlled by Charter, which is a publicly traded company.
 - 2) The names and titles of the corporate officers of each Charter Entity are as follows:

Thomas Rutledge, Chairman & CEO John Bickham, President & COO Christopher Winfrey, CFO Richard Dykhouse, EVP, General Counsel & Corporate Secretary

3) The following companies share common ownership or management with each Charter Entity and both have received federal universal service funds as ETCs and participants in the federal Lifeline program:

Time Warner Cable Information Services (California), LLC Time Warner Cable Information Services (New York), LLC

Time Warner Cable Information Services (California), LLC has also received state universal service funds in California. Other Charter affiliates have participated in the FCC's schools and libraries or rural healthcare programs under the federal Universal Service Fund.

4) The Charter Entities have numerous affiliates nationwide that are involved in the provision of cable video, voice and broadband Internet services, among others. Over the years, such affiliates have participated in inquiries, investigations and/or proceedings involving various federal or state regulatory or law enforcement agencies regarding different aspects of their

business. Due to the broad scope of the affiliates' operations, it is difficult or impractical to identify each relevant inquiry, investigation or proceeding, and/or to identify whether a concluded investigation resulted in a finding of liability particular to the enumerated list in 20 C.S.R. 4240-31.016(2)(B)(4). However, neither the Charter Entities nor the Charter family of companies knowingly engage in fraud, deceit, perjury, stealing, or the omission or misstatement of material facts in the course of their regular and ordinary business dealings and/or in connection with their everyday commercial transactions.

- 5) Information about each Charter Entities' voice services and rates in the RDOF Census Blocks may be obtained at: www.spectrum.com/home-phone or www.spectrum.com/phone. Information about Charter's broadband Internet access service offerings and rates in the RDOF Census Blocks may be obtained at: www.spectrum.com/Internet.
- 6) Each Charter Entity will comply with the Commission's ETC requirements identified in 4 C.S.R. 240-31.015 with respect to its provision of RDOF supported services in the RDOF Census Blocks.
- The Charter Entities have been assigned RDOF funding as a result of the RDOF Auction. Any RDOF funding that the Charter Entities would receive as a result of the RDOF Auction would be provided from the Federal Universal Service Fund. For this reason, the Charter Entities are not applying in this Joint Application for support from the Missouri universal service fund, as described at 20 C.S.R. 4240-31.016. Each Charter Entity reserves its right to request such relief in the future if it is appropriate and in the public interest.
- 8) Each Charter Entity commits to notifying the Commission of any changes to its company contact information.

- 9) Each Charter Entity is certificated by the Commission to provide local exchange telecommunications services in Missouri. A copy of each Charter Entity's certificate is attached at **Exhibits D and E**. Each Charter Entity is compliant with all applicable Commission reporting and assessment obligations.
- 10) Each Charter Entity is compliant with its contribution obligations to the federal universal service fund.

VI. <u>DESIGNATION OF EACH CHARTER ENTITY AS AN ETC IS IN THE PUBLIC INTEREST</u>

As a winning bidder in the RDOF Auction, each Charter Entity is eligible to receive funding to bring high-quality, innovative voice and broadband Internet access services to consumers in unserved portions of Missouri. The RDOF funding assigned to each Charter Entity will help enable it to "[b]ring digital opportunity to Americans living on the wrong side of the digital divide,"³¹ and thereby advance the goals of universal service. Expedited Commission action on this Joint Application serves the public interest by accelerating the deployment of high-quality, innovative voice and broadband Internet access services in unserved portions of Missouri that the Charter Entities and its affiliates will serve in the RDOF Census Blocks.

A. Broadband Deployment Will Promote New Investment, Job Growth and Opportunities in Missouri

Bringing broadband to unserved areas of Missouri has been a major priority of the Governor and state lawmakers. In a statement, Governor Mike Parson said of the importance of broadband, "Expanding broadband is essential to our state's infrastructure ... Connecting more Missourians with high-speed internet will allow them to utilize digital platforms for education,

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³¹ RDOF Order, at ¶ 1.

health, and business"³² Granting this Joint Application will serve the state's goal of expanding its infrastructure and the public interest through the deployment of broadband Internet and voice services to unserved high-cost areas in Missouri. Deployment of those services will spur investment in facilities and equipment and promote new economic opportunities and job growth in Missouri.

Designating the Charter Entities as ETCs will permit them to receive RDOF Auction funds for 8,406 Census Blocks in Missouri, directly advancing the goals of the RDOF Auction and universal service in those RDOF Census Blocks. Moreover, the more than \$1.2 billion of RDOF funding assigned to Charter, which includes more than \$48 million in Missouri, will help enable it to expand the availability of Charter's network and services throughout Charter's service areas, including in Missouri, as discussed in **Exhibit H**. Missouri State Senator Mike Cierpiot said of the importance to close the digital divide, "If we're ever going to get rural areas caught up economically, [broadband] is kind of a basic thing to have ... If we could just get the funding for it, there's a real chance it would help the problem." Charter's deployments will bring expanded voice and broadband connectivity to these areas, many of which are rural and less densely populated in Missouri, which will help close the digital divide for residents of the state and expand economic opportunity and job growth in communities that will benefit from increased connectivity. Because granting this Joint Application will allow each Charter Entity to use its respective RDOF funds as intended to expand voice and broadband Internet access services in its

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³² See Press Release, Off. of the Gov., Emergency Broadband Investment Program Recipients Announced (Aug. 11, 2020), https://governor.mo.gov/press-releases/archive/emergency-broadband-investment-program-recipients-announced.

³³ See Cameron Gerber, Cierpiot Tackles Rural Broadband Expansion in New Bill, The Missouri Times (Dec. 28, 2020), https://themissouritimes.com/cierpiot-tackles-rural-broadband-expansion-in-new-bill/.

respective RDOF Census Blocks in Missouri, designating each Charter Entity as an ETC is in the public interest.

B. Access to Broadband Will Transform Rural and Unserved Areas

The availability of Charter's RDOF supported broadband Internet access services and voice services will have a transformative effect on the unserved and/or rural areas in the RDOF Census Blocks. Charter is committed to expanding access to this life-changing connectivity that will enable consumers to use new technologies, such as distance education, telemedicine, live streaming video, or interactive programming (e.g., a Zoom call). These technologies will create new opportunities for consumers in education, healthcare, business, and civic engagement activities. For example, with access to an online network made available through a Charter broadband Internet connection, an individual may start their own business or take online classes in pursuit of an education. Similarly, local businesses, through use of Charter's broadband Internet and voice services, may connect to vendors and employees, grow their sales, and create new jobs. In short, Charter's broadband Internet access and voice services will enhance the opportunities available to the consumers served by each Charter Entity in its respective RDOF Census Blocks.

C. The Public Will Benefit from Charter's Experience as a Lifeline Voice Service Provider

Charter and its subsidiaries have substantial experience in providing Lifeline voice services to low income consumers and communities, which provides the Charter Entities with important familiarity with the FCC's Lifeline program and with the interactions necessary with the Universal Service Administrative Company, the National Lifeline Accountability Database, and other third party Lifeline administrators. These experiences will facilitate each Charter Entity's swift offering of Lifeline voice services for qualifying low-income customers in the Census Blocks where such Charter Entity receives RDOF support in Missouri.

D. The Public Will Benefit from Charter's Customer-Oriented Policies, Such as Those During The COVID-19 Pandemic

At the onset of the COVID-19 pandemic, Charter joined other telecommunications providers in the Keep Americans Connected Pledge. As part of that effort, Charter voluntarily committed to suspend collections and not charge late fees or terminate service for residential or small business customers who informed Charter that they were experiencing COVID-related economic challenges. Charter extended its commitment through June 30th. During that time, Charter kept connected approximately 700,000 customers who had difficulties meeting bills because of COVID-related economic hardship. Charter has also forgiven approximately \$85 million in customer overdue balances.

Additionally, as schools across the country began to transition to remote learning in March, Charter took action to benefit students, faculty and families. Charter committed to offering broadband Internet service up to 200 Mbps for free for sixty days, including in-home Wi-Fi and a self-installation kit, to households with K-12 and/or college students or educators who did not already have a Charter broadband Internet service subscription for sixty days. Charter extended this offer through June 30th and, by the end of the 2020 school year, Charter was able to help nearly 450,000 students and teachers nationally continue schooling through remote learning. To help ease the strain for families and teachers who still lacked broadband, Charter relaunched its Remote Education Offer beginning on September 21, 2020.

Furthermore, for schools and school districts seeking to establish a centralized purchasing arrangement for the benefit of both students and teachers to support remote learning, Charter currently offers Stay Connected K-12 throughout the Charter footprint. Under Stay Connected K-12, Charter contracts directly with schools and school districts to assist them in offering high-speed broadband Internet access to students, educators and staff in their homes. Charter's Stay

Connected K-12 is designed as a single-payer option for communities to allow payment by a school or school district, based upon the number of connections purchased. This partnership between Charter and the school or school district helps to ensure that learning, teaching, and working are uninterrupted by giving schools and school districts the flexibility to add students to the program, when needed, and to provide much needed in-home broadband Internet connectivity.

Lastly, recognizing the importance of digital skills during this time of unprecedented volume in distance learning and remote working, Charter has doubled the amount of funds available for its Spectrum Digital Education Grants for 2020-21.³⁴ These customer-oriented policies, along with others that Charter implements from time to time, will enhance the choices and capabilities available to the consumers served by each Charter Entity and its affiliates in its respective RDOF Census Blocks.

E. The Public Will Benefit from Each Charter Entity's Advanced Service Offerings

Designating each Charter Entity as an ETC in its respective RDOF Census Blocks will promote the deployment of advanced voice and broadband Internet services in these areas. Charter is widely recognized as a premier provider of voice and broadband Internet offerings that relies on advanced systems, technologies, and infrastructure. Charter provides voice and broadband Internet services to approximately 26.8 million residential Internet access service customers and 9.3 million residential voice service customers in 41 states. Its investments have enabled it to offer minimum download speeds of at least 200 Mbps in 60% of Charter's national footprint, and 100 Mbps everywhere else in the footprint—including households and small businesses in rural areas. On December 17, 2020, Charter announced that it plans to double Charter's broadband Internet

³⁴ See Spectrum Digital Education Grant, Spectrum, https://corporate.charter.com/digital-education/grants (last visited Dec. 13, 2020).

access service starting speeds in 17 U.S. markets, including the areas in and around Columbia, Missouri, making 200 Mbps the starting flagship speed in 75% of Charter's communities. These speed enhancements will be available to new customers immediately. Existing customers will receive these speed increases with new Charter broadband Internet access service packages during the first quarter of 2021.³⁵

Charter also offers a 1 Gbps connection with maximum download speeds of up to 940 Mbps to the vast majority of those same households, as well as to small and medium-sized businesses. Charter's broadband Internet service offerings enable customers "to use tomorrow's Internet applications as well as today's." These levels of service will be made available to consumers in each Charter Entity's RDOF Census Blocks, as well.

³⁵ See supra note 17.

³⁶ RDOF Order, at \P 2.

VIII. CONCLUSION

For the reasons stated herein, each Charter Entity respectfully requests that the Commission designate it as an ETC in its respective RDOF Census Blocks as identified in **Exhibits A and B** by no later than April 15, 2021 and order such other relief as may be appropriate.

Respectfully submitted,

Charter Fiberlink - Missouri, LLC and Time Warner Cable Information Services (Missouri), LLC

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AFFIDAVIT

I, Adam E. Falk, a natural person, do hereby swear and affirm that I am an authorized agent of Charter Communications, Inc., which is the ultimate parent company of Charter Fiberlink – Missouri, LLC and Time Warner Cable Information Services (Missouri), LLC, and that the information and statements contained in this application are true and correct to the best of my knowledge and belief.

By signing this form, I hereby certify that neither I, nor any other members of this filing party, has had communications with a Commissioner, Commissioner Advisor, Regulatory Law Judge, member of the General Counsel or any member of their support team in the sixty (60) days prior to the filing date of this application regarding any substantive issue included in this filing. If any communication of this sort has occurred in the previous sixty (60) day period, I further certify this application was held until sixty (60) days have passed from the date of the subject communication, or we have requested a waiver for good cause as allowed by Commission Rule 20 CSR 4240-4.017(1)(D)

Adam E. Falk

Senior Vice President, Government Affairs Charter Communications, Inc.

State of Maryland

County of Anne Arundel

Subscribed and sworn before me this 5 day of January, 2021.

Notary Public

LIST OF EXHIBITS

Affidavit

Exhibit B – List of Census Blocks Where Time Warner Cable Information Services (Missouri), LLC was Assigned RDOF Auction Support

 $\mathbf{Exhibit}\ \mathbf{C}$ - Map of Census Blocks Where the Charter Entities were Assigned RDOF Auction Support

Exhibit D - Copy of Charter Fiberlink - Missouri, LLC's Missouri Secretary of State Registration

Exhibit E – Copy of Time Warner Cable Information Services (Missouri), LLC's Missouri Secretary of State Registration

Exhibit F – Copy of Charter Fiberlink - Missouri, LLC's Authorization to Provide Competitive Local Exchange Services in Missouri

Exhibit G – Copy of Time Warner Cable Information Services (Missouri), LLC's Authorization to Provide Competitive Local Exchange Services in Missouri

Exhibit H - RDOF Funding Information (Confidential - Redacted)

EXHIBIT A

Exhibit A – List of Census Blocks Where Charter Fiberlink - Missouri, LLC was Assigned RDOF Auction Support

CENSUS BLOCKS¹

290079502001014	290079503001025	290079503001080	290079503001157
290079502001022	290079503001027	290079503001081	290079503001160
290079502001025	290079503001031	290079503001082	290079503001161
290079502001028	290079503001033	290079503001083	290079503001162
290079502001029	290079503001035	290079503001084	290079503001163
290079502001030	290079503001036	290079503001086	290079503001164
290079502001032	290079503001037	290079503001092	290079503001165
290079502001035	290079503001038	290079503001096	290079503001168
290079502001036	290079503001039	290079503001097	290079503001169
290079502001040	290079503001040	290079503001098	290079503001170
290079502001187	290079503001042	290079503001099	290079503001171
290079502001188	290079503001043	290079503001100	290079503001172
290079502001189	290079503001044	290079503001101	290079503001174
290079502001190	290079503001045	290079503001104	290079503001175
290079502001191	290079503001046	290079503001105	290079503001177
290079502001192	290079503001048	290079503001108	290079503001178
290079502001193	290079503001049	290079503001111	290079503001180
290079502001197	290079503001052	290079503001112	290079503001184
290079502001199	290079503001053	290079503001113	290079503001187
290079502001201	290079503001054	290079503001116	290079503001190
290079502001205	290079503001055	290079503001118	290079503001193
290079502001210	290079503001056	290079503001119	290079503001194
290079502001211	290079503001057	290079503001120	290079503001196
290079502001243	290079503001058	290079503001123	290079503001197
290079502001251	290079503001059	290079503001126	290079503001199
290079503001000	290079503001061	290079503001130	290079503001200
290079503001002	290079503001062	290079503001133	290079503001202
290079503001003	290079503001063	290079503001134	290079503001204
290079503001008	290079503001066	290079503001142	290079503001206
290079503001010	290079503001068	290079503001145	290079503001209
290079503001013	290079503001070	290079503001146	290079503001212
290079503001015	290079503001071	290079503001148	290079503001215
290079503001016	290079503001072	290079503001149	290079503001216
290079503001017	290079503001073	290079503001150	290079503002001
290079503001019	290079503001075	290079503001151	290079503002004
290079503001020	290079503001076	290079503001152	290079503002005
290079503001021	290079503001078	290079503001154	290079503002007
290079503001022	290079503001079	290079503001155	290079503002008

¹ This Exhibit is intended to be a full and complete list of the RDOF Census Blocks assigned to CCO Holdings, LLC in Missouri. To the extent there is any inconsistency between the list of RDOF Census Blocks on this Exhibit and the list at the FCC's RDOF Dashboard (https://auctiondata.fcc.gov/public/projects/auction904), the list at the FCC's RDOF Dashboard shall control.

CENSUS BLOCKS

290079503002009	290154601001034	290154601001111	290154602001015
290079503002010	290154601001035	290154601001112	290154602001016
290079503002011	290154601001036	290154601001113	290154602001017
290079503002015	290154601001038	290154601001118	290154602001018
290079503002017	290154601001039	290154601001138	290154602001019
290079503002018	290154601001040	290154601001154	290154602001020
290079503002020	290154601001041	290154601001165	290154602001021
290079503002021	290154601001042	290154601001176	290154602001024
290079503002022	290154601001043	290154601001181	290154602001031
290079503002023	290154601001045	290154601003000	290154602001034
290079503002024	290154601001046	290154601003002	290154602001035
290079503002025	290154601001047	290154601003004	290154602001036
290079503002026	290154601001049	290154601003007	290154602001037
290079503002027	290154601001052	290154601003008	290154602001038
290079503002028	290154601001053	290154601003011	290154602001039
290079503002029	290154601001054	290154601003013	290154602001040
290079503002031	290154601001056	290154601003020	290154602001041
290079503002033	290154601001057	290154601003023	290154602001043
290079503002035	290154601001064	290154601003028	290154602001044
290079503002037	290154601001066	290154601003029	290154602001045
290079503002038	290154601001067	290154601003031	290154602001046
290079503002039	290154601001068	290154601003033	290154602001048
290079503002040	290154601001069	290154601003044	290154602001049
290079503002041	290154601001072	290154601003050	290154602001051
290079503002042	290154601001074	290154601003052	290154602001052
290079503002072	290154601001076	290154601003071	290154602001053
290079503002080	290154601001077	290154601003073	290154602001054
290079503002087	290154601001078	290154601003075	290154602001055
290079503002088	290154601001079	290154601003076	290154602001056
290079503002095	290154601001080	290154601003079	290154602001059
290079503002102	290154601001081	290154601003080	290154602001060
290154601001000	290154601001084	290154601003081	290154602001062
290154601001002	290154601001085	290154601003082	290154602001063
290154601001003	290154601001086	290154601003084	290154602001068
290154601001005	290154601001087	290154601003087	290154602001071
290154601001007	290154601001088	290154602001000	290154602001074
290154601001008	290154601001089	290154602001001	290154602001076
290154601001009	290154601001094	290154602001002	290154602001079
290154601001013	290154601001096	290154602001003	290154602001081
290154601001017	290154601001098	290154602001005	290154602001082
290154601001023	290154601001099	290154602001006	290154602001099
290154601001025	290154601001101	290154602001007	290154602001105
290154601001028	290154601001103	290154602001008	290154602001108
290154601001031	290154601001105	290154602001011	290154602001109
290154601001033	290154601001106	290154602001012	290154602001110

CENSUS BLOCKS

290154602001112	290154602001192	290154603001034	290154603001229
290154602001114	290154602001193	290154603001036	290154603001231
290154602001117	290154602001196	290154603001040	290154603001236
290154602001130	290154602001197	290154603001041	290154603001239
290154602001131	290154602001200	290154603001043	290154603001252
290154602001135	290154602001205	290154603001047	290154603001253
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290154602001142	290154602001214	290154603001070	290179501001000
290154602001143	290154602001216	290154603001076	290179501001001
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290154602001154	290154602002010	290154603001126	290179501001017
290154602001158	290154602002013	290154603001127	290179501001019
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290154602001160	290154602002040	290154603001131	290179501001022
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290154602001168	290154602002049	290154603001145	290179501001029
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290154602001176	290154603001009	290154603001169	290179501001039
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290154602001181	290154603001016	290154603001177	290179501001041
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CENSUS BLOCKS

290179501001055	290179501001127	290179501002069	290179501003046
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290179501001057	290179501001134	290179501002072	290179501003048
290179501001058	290179501001136	290179501002073	290179501003049
290179501001059	290179501001137	290179501002074	290179501003050
290179501001060	290179501001138	290179501002075	290179501003051
290179501001061	290179501001140	290179501002077	290179501003054
290179501001063	290179501001141	290179501002081	290179501003056
290179501001064	290179501002000	290179501002083	290179501003057
290179501001066	290179501002001	290179501002086	290179501003058
290179501001067	290179501002003	290179501002087	290179501003059
290179501001068	290179501002007	290179501002090	290179501003061
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292198201031205	292198202011071	292198202012136	292198202021131
292198201031214	292198202011073	292198202012137	292198202021134
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292198202024007	292214605001017	292214605002011	292214605003039
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292198202024036	292214605001026	292214605002022	292214605003048

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292214605003052	292214605004076	292236902001107
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292214605003060	292214605004081	292236903001002
292214605003064	292214605004085	292236903001003
292214605003066	292214605004088	292236903001006
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	292214605004097	292236903001012
292214605003073	292214605004106	292236903001015
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292214605003086	292214605004115	292236903001022
292214605003095	292214605004117	292236903001023
292214605004000	292214605004119	292236903001026
292214605004002	292214605004120	292236903001028
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292214605004010	292236902001006	292236903001035
292214605004011	292236902001008	292236903001057
292214605004012	292236902001013	292236903001062
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292214605004028	292236902001025	
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	292236902001060	
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292214605004067	292236902001080	
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292214605004070	292236902001086	
292214605004071	292236902001091	
292214605004072	292236902001092	
292214605004073	292236902001096	
292214605004074	292236902001100	

EXHIBIT B

Exhibit B – List of Census Blocks Where Time Warner Cable Information Services (Missouri), LLC was Assigned RDOF Auction Support

CENSUS BLOCKS¹

290259502001001	290259502001074	290259502001154	290259502004000
290259502001002	290259502001075	290259502001155	290259502004001
290259502001003	290259502001076	290259502001156	290259502004007
290259502001004	290259502001077	290259502001157	290259502004011
290259502001005	290259502001078	290259502001159	290259502004013
290259502001008	290259502001086	290259502001160	290259502004015
290259502001010	290259502001088	290259502001164	290259502004016
290259502001013	290259502001089	290259502001167	290259502004017
290259502001015	290259502001090	290259502001170	290259502004018
290259502001017	290259502001091	290259502001172	290259502004019
290259502001018	290259502001094	290259502001173	290259502004021
290259502001019	290259502001095	290259502001177	290259502004023
290259502001021	290259502001096	290259502001178	290259502004024
290259502001025	290259502001099	290259502001189	290259502004025
290259502001026	290259502001100	290259502001190	290259502004026
290259502001028	290259502001102	290259502001192	290259502004028
290259502001030	290259502001103	290259502001193	290259502004032
290259502001033	290259502001104	290259502001194	290259502004033
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290259502001036	290259502001106	290259502001196	290259502004038
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290259502001043	290259502001115	290259502001202	290259502004042
290259502001044	290259502001116	290259502001203	290259502004043
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290259502001059	290259502001133	290259502001208	290259502004048
290259502001060	290259502001134	290259502001209	290259502004050
290259502001062	290259502001139	290259502001211	290259502004051
290259502001065	290259502001140	290259502001212	290259502004052
290259502001066	290259502001141	290259502001214	290259502004057
290259502001067	290259502001142	290259502001215	290259502004059
290259502001068	290259502001143	290259502001216	290259502004065
290259502001069	290259502001144	290259502001217	290259502004067
290259502001070	290259502001148	290259502001218	290259502004076
290259502001072	290259502001150	290259502001228	290259502004083
290259502001073	290259502001151	290259502001234	290259502004084

¹ This Exhibit is intended to be a full and complete list of the RDOF Census Blocks assigned to CCO Holdings, LLC in Missouri. To the extent there is any inconsistency between the list of RDOF Census Blocks on this Exhibit and the list at the FCC's RDOF Dashboard (https://auctiondata.fcc.gov/public/projects/auction904), the list at the FCC's RDOF Dashboard shall control.

290259502004088	290259502005035	290370604002018	290370605001074
290259502004090	290259502005040	290370604002020	290370605001076
290259502004092	290259502005042	290370604002023	290370605001079
290259502004094	290259502005047	290370604002025	290370605001080
290259502004098	290259502005048	290370604002026	290370605001084
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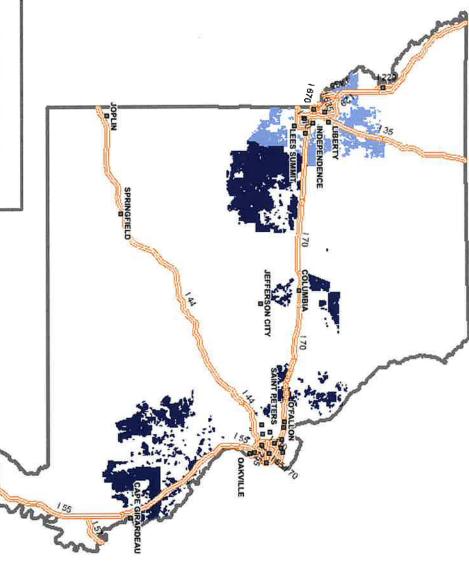
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291770803002071	291770803003087
291770803002075	291770803004001
291770803002075	291770803004004
291770803002077	291770803004005
291770803002077	291770803004007
291770803002079	291770803004022
291770803002080	291770803004035
291770803002081	291770803004039
291770803002087	291770803004074
291770803002087	291770803004074
291770803002089	291770803004083
291770803002092	291770803004087
291770803002093	291770803004110
291770803002094	271770003004130
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291770803002105	
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EXHIBIT C

MISSOURI: ASSIGNED RDOF CENSUS BLOCKS



Legend:

TIME WARNER CABLE INFORMATION SERVICES (MISSOURI), LLCCHARTER FIBERLINK - MISSOURI, LLC



EXHIBIT D

Exhibit D - Copy of Charter Fiberlink - Missouri, LLC's Missouri Secretary of State Registration

STATE OF MISSOURI



John R. Ashcroft Secretary of State

CERTIFICATE OF GOOD STANDING

I, John R. Ashcroft, Secretary of State of the STATE OF MISSOURI, do hereby certify that the records in my office and in my care and custody reveal that

CHARTER FIBERLINK - MISSOURI, LLC FL0044723

A Delaware entity was created under the laws of this State on 11/14/2000, and is Active, having fully complied with all the requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, the 23rd day of December, 2020.

Secretary of State

Certification Number: CERT-IN45483

STATE OF MISSOURI

Rebecca McDowell Cook Secretary of State

MISSOU

CERTIFICATE OF REGISTRATION FOREIGN LIMITED LIABILITY COMPANY

WHEREAS, CHARTER FIBERLINK - MISSOURI, LLC

using in Missouri the name CHARTER FIBERLINK - MISSOURI, LLC

and existing under the laws of the State of DELAWARE has filed with this state its application for registration and WHEREAS this application for registration conforms to the Missouri Limited Liability Company Act;

NOW, THEREFORE, I, REBECCA McDOWELL COOK, Secretary of State, State of Missouri, by virtue of authority vested in me by law, do certify and declare that on the 14th day of NOVEMBER, 2000, the above Foreign Limited Liability Company is duly authorized to transact business in the State of Missouri and is entitled to any rights granted

Limited Liability Companies.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 14th day of NOVEMBER, 2000.

Secretary of State

\$105.00



State of Missouri

Rebecca McDowell Cook, Secretary of State

Corporations Division P.O. Box 778, Jefferson City, MO 65102 James C. Kirkpatrick State Information Center 600 W. Main Street, Rm 322, Jefferson City, MO 65101

Application for Registration of a Foreign Limited Liability Company (Submit in duplicate with filing fee of \$105.00)

FILED AND CERTIFICATE

		LIEFO VIAD OFULLIONE
(1)	The name of the foreign limited liability company is:	ISSUED
	Charter Fiberlink - Missouri, LLC	NOV 1 4 2000
(2)	The name under which the foreign limited liability company will conduct busicompany, "limited liability company", "LC", "LLC", "L.C.", or "L.L.C.") (minuted liability company).	ness in Missouri is (must contain "limited
(3)	The foreign limited liability company was formed under the laws of Delaw	on the
	date of, and is to dissolve on N/A	Perpetual (month/date/year or event)
(4)	The purpose of the foreign limited liability company or the general character state is:	
	Ownership and operation of cable telecommunicati	ons business
(5)	The name and address of the limited liability company's registered agent in N include a street address):	
	Leslie J. LePage, 10422 Rock Creek Road, Centert Name Address (P.O. Box may only be used in conjunction with a physical property of the conjunction with a physical	own, MO 65023 sical street address) City/State/Zip
The Sector	retary of State is appointed agent for service of process if the foreign limited liability company fails ed agent constitutes grounds to cancel the registration of the foreign limited liability company.	
(6)	The address of the registered office in the jurisdiction organized. If none req foreign limited liability company is:	uired, then the principal office address of the
	12444 Powerscourt Drive, Suite 100, St. Louis Name Address (P.O. Box may only be used in conjunction with a ph	MO 63131 vsical street address) City/State/Zip
(7)	For tax purposes, is the limited liability company considered a corporation?	yes X no
	In affirmation thereof, the facts stated above are true.	a ilala
34	(Authorized Signature) Marcy Lift (Printed Name)	on, Vice President 118 00 (Date)
	(Authorized Signature) (Printed Name)	(Date)
	(Authorized Signature) (Printed Name)	(Date)
LLC-4	(12/99)	-
		ì

EXHIBIT E

STATE OF MISSOURI

WISSOURI MISSOURI

John R. Ashcroft Secretary of State

CERTIFICATE OF GOOD STANDING

I, John R. Ashcroft, Secretary of State of the STATE OF MISSOURI, do hereby certify that the records in my office and in my care and custody reveal that

Time Warner Cable Information Services (Missouri), LLC FL0533838

A Delaware entity was created under the laws of this State on 7/30/2003, and is Active, having fully complied with all the requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, the 23rd day of December, 2020.

Secretary of State

Certification Number: CERT-IN45484

State of Missouri



Matt Blunt Secretary of State

CERTIFICATE OF REGISTRATION FOREIGN LIMITED LIABILITY COMPANY

WHEREAS,

Time Warner Cable Information Services (Missouri), LLC FL0533838

Using in Missourithe name

Time Warner Cable Information Services (Missouri), LLC

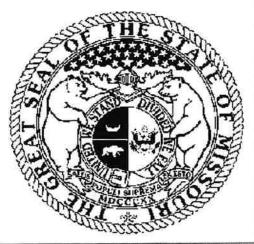
and existing under the laws of the State of Delaware has filed with this state its Application for Registration and whereas this Application for Registration conforms to the Missouri Limited Company Act.

NOW, THEREFORE, I, MATT BLUNT, Secretary of State of the State of Missouri, by virtue of authority vested in me by law, do hereby certify and declare that on the 30th day of July, 2003, the above Foreign Limited Liability Company is duly authorized to transact business in the State of Missouri and is entitled to any rights granted Limited Liability Companies.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 30th day of July, 2003.

the Blunk-

Secretary of State



Delaware PAGE 1

The First State

I, HARRIET SMITH WINDSOR, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "TIME WARNER CABLE INFORMATION SERVICES (MISSOURI), LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE FIFTEENTH DAY OF JULY, A.D. 2003.



AUTHENTICATION: 2527223

DATE: 07-15-03

3681455 8300

030461135

State of Missouri Creation - LLC/LP 2 Page(s)





Corporations Division P.O. Box 778, Jefferson City, MO 65102 File Number: 200321312907 Charter # FL0533838

Date Filed: 07/30/2003 08:49 AM

Matt Blunt **Secretary of State**

James 600 W. Main Street, Rm 322, Jefferson City, MO 65101

Application for Registration of a Foreign Limited Liability Company (Submit in duplicate with filing fee of \$105.00)

	Time Warner Cable Information Services (Missouri), LLC
	A 10
	The name under which the foreign limited liability company will conduct business in Missouri is (must contain "limited company, "limited liability company", "LC", "LLC", "L.C.", or "L.L.C.") (must be filled out if different from line (1)):
	The foreign limited liability company was formed under the laws of Delaware on the on the
'	7 1 14 2003 and is to dissolve on perpetual
	date of July 14, 2003 , and is to dissolve on perpetual (month/day/year, event, or perpetual)
)	The purpose of the foreign limited liability company or the general character of the business it proposes to transact in this state is:
	Provide communications services
)	The name and address of the limited liability company's registered agent in Missouri is (this line must be completed and include a street address): C T Corporation System 120 South Central Avenue, Clayton, Mo 63105 Name Address (P.O. Box may only be used in conjunction with a physical street address) City/State/Zip
ha Sa	cretary of State is appointed agent for service of process if the foreign limited liability company fails to maintain a registered agent. Note: failure to mainta
gister	red agent constitutes grounds to cancel the registration of the foreign limited tiability company.
gister	The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is:
gister	The Corporation Trust Company. 1209 Orange Street Wilmington, DE 19801
gister	The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is:
gister	The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is: The Corporation Trust Company 1209 Orange Street Wilmington, DE 19801 Name Address (P.O. Box may only be used in conjunction with a physical street address) City/State/Zip For tax purposes, is the limited liability company considered a corporation? yes
gister i)	The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is: The Corporation Trust Company 1209 Orange Street Name Address (P.O. Box may only be used in conjunction with a physical street address) City/State/Zip
gister i)	The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is: The Corporation Trust Company 1209 Orange Street The Corporation Trust Company Name Address (P.O. Box may only be used in conjunction with a physical street address) For tax purposes, is the limited liability company considered a corporation? In affirmation thereof the ficts stated above are true. Managing Member, by Gerald D. Campbell, (Authorized Signature) (Paired Name) (Date)
rgister 5)	The address of the registered office in the jurisdiction organized. If none required, then the principal office address of the foreign limited liability company is: The Corporation Trust Company 1209 Orange Street The Corporation Trust Company Name Address (P.O. Box may only be used in conjunction with a physical street address) For tax purposes, is the limited liability company considered a corporation? In affirmation thereof the fifety stated above are true. Managing Member, by Gerald D. Campbell, 7/10/0 Sr. Vice President, Voice, Cable Group (Page)

EXHIBIT F

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Charter Fiberlink - Missouri, LLC, for a Certificate of Service Authority to Provide Basic Local Telecommunications Service and Intrastate Interexchange Services in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.

Case No. TA-2001-346

ORDER GRANTING CERTIFICATE TO PROVIDE BASIC LOCAL AND INTEREXCHANGE TELECOMMUNICATIONS SERVICES

Procedural History

Charter Fiberlink - Missouri, ILC (Charter), applied to the Missouri Public Service Commission on December 4, 2000, for a certificate of service authority to provide basic local and interexchange telecommunications services in Missouri under Sections 392.410 - .450, RSMo 2000. Charter asked the Commission to classify it as a competitive company and waive certain statutes and rules as authorized by Sections 392.361 and 392.420.

The Commission issued a notice and schedule of applicants on December 12, 2000, directing interested parties wishing to intervene to do so by December 27, 2000, for interexchange, and January 11, 2001, for basic local service authority. There were no applications to intervene. On January 29, 2001, Charter filed its First Amended Application. Charter filed a Motion to Supplement First Amended Application on March 9, 2001. The Staff of the Commission (Staff) filed a Staff Recommendation on March 19, 2001.

All statutory references are to Revised Statutes of Missouri 2000 unless otherwise indicated.

Findings of Fact

The requirement for a hearing is met when the opportunity for hearing has been provided and no proper party has requested the opportunity to present evidence. State ex rel. Rex Deffenderfer Enterprises, Inc. v. Public Service Commission, 776 S.W.2d 494, 496 (Mo. App. 1989). no one has requested a hearing in this case, the Commission may grant the relief requested based on the verified application. The Missouri Public Service Commission, having considered all of the competent and substantial evidence upon the whole record, makes the following findings of fact:

Charter is wholly owned by Charter Fiberlink, LLC, and is an affiliate of Charter Communications, Inc. Charter is a Delaware corporation with principal offices located at 12444 Powerscourt Drive, Suite 100, St. Louis, Missouri 63131. Commission Rule 4 CSR 240-2.060 requires a corporation applying for certification to provide telecommunications services to include in its application a certificate from the Secretary of State showing that it is authorized to do business in Missouri, a description of the types of service it intends to provide, a description of the exchanges where it will offer service, and a proposed tariff with a 45-day effective data. Charter has provided the required documentation except for the proposed tariff. Charter requested a temporary waiver of 4 CSR 240-2.060(6)(C) until it has entered into an interconnection agreement with the underlying local exchange carrier and that agreement has been approved by the Commission. Charter stated that it will submit to the Commission for approval a proposed tariff

1. .

The applicant requested a waiver of 4 CSR 240-2.060(4)(H); however, effective March 31, 2000, the Commission's rule requiring the filing of a tariff with an application for telecommunications services is found at 4 CSR 240-2.060(6)(c).

bearing no less than a 30-day effective date in a manner consistent with recent Commission practice in similar cases.

ng g^{ra}nder to the t

Exhibit B to the application lists the names and qualifications of Charter's management team. In addition to academic credentials, the team members have experience in various areas of the telecommunications industry. Staff stated that in its opinion Charter possesses sufficient technical and managerial experience to provide basic .local exchange telecommunications service.

Charter submitted as Exhibit D to its application the necessary financial information. In addition, Staff stated that in its opinion Charter passes the minimum standard to provide basic local exchange telecommunications service.

The Commission finds that Charter possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service.

Charter stated in its application that it will provide services that will meet the minimum basic local service standards required by the Commission, including quality of service and billing standards. In its recommendation, the Staff concurs with this allegation. The Commission finds that Charter proposes to offer basic local services that satisfy the minimum standards established by the Commission.

Charter is seeking certification to provide basic local exchange telecommunications services in portions of Missouri that are currently served by Southwestern Bell Telephone Company, Sprint/United Telephone Company, and GTE Midwest Incorporated. 3 Charter indicates that the specific exchanges within which it proposes to offer service are listed in the incumbent providers' respective local exchange tariffs. Charter is not

³ Now doing business as Verizon Midwest.

asking for certification in any area that is served by a small incumbent local exchange carrier (ILEC). Staff stated in its recommendation that in its opinion, Charter has sufficiently identified the geographic area in which it proposes to offer basic local service and that the area follows ILEC exchange boundaries and is no smaller than an exchange. Commission finds that Charter has sufficiently identified the geographic area in which it proposes to offer service and that Charter has demonstrated that the area follows ILEC exchange boundaries and is no smaller than an exchange.

Charter states that all the services it proposes to offer will be subject to sufficient competition to justify a lesser degree of regulation. Charter is proposing to offer all forms of basic local exchange and interexchange telecommunications service. Charter intends to provide basic local exchange and interexchange telecommunications service as a facilitybased provider and on a resale basis.

Charter stated that it will offer basic local telecommunications service as a separate and distinct service and that, in compliance with section 392.455(6), it will provide equitable access, as determined by the Commission, for all Missourians within the geographic area in which it will offer basic local services. In its recommendation, Staff concurs with this statement. Therefore, the Commission finds that Charter will provide basic local exchange service as a separate and distinct service and that Charter has committed to provide equitable access.

Charter states that considerations of the public interest and particularly equitable access for potential subscribers to service who reside in the area sought to be certified, warrant the granting of this application in that Charter will extend the benefits of competition into the intrastate interexchange market, increase the diversity of choice, and

shall increase consumer access to competitive and affordable telecommunications services.

Staff recommends that Charter be classified as a competitive Staff also recommends that Charter's telecommunications carrier. certificate be conditioned upon certain limitations on its ability to charge for its access services and that Charter's certificate become effective when its tariff becomes effective. Staff's recommended conditions are as follows:

- A. If Charter provides access service, its originating and terminating access rates will be no greater than the lowest Commission approved corresponding access rates in effect for each ILEC within whose service area Charter seeks authority to provide service, unless authorized by the Commission pursuant to Sections 392.220 and 392.230, RSMo.
- The service authority and service classification for switched exchange access is granted conditioned on the continued applicability of Section 392.200, RSMo, and the requirement that any increases in switched access service rates above the maximum switched access service rates set forth herein shall be made pursuant to Sections 392.220 and 392.230, RSMo, and not Sections 392.500 and 392.510, RSMo.
- C. If the directly competing INEC, in whose service area Charter is operating, decreases its originating and/or terminating access service rates, Charter shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates in the directly competing ILEC's service area within 30 days of the directly competing ILEC's reduction of its originating and/or terminating access rates in order to maintain the cap.

The Commission finds that all the telecommunications services Charter proposes to offer are subject to sufficient competition to justify a lesser degree of regulation. Therefore, the Commission finds that all of Charter's proposed telecommunications services are competitive telecommunications services.

Conclusions of Law

Certificate of Service Authority

The Commission has the authority to grant certificates of service authority to provide telecommunications service within the state of Missouri, Charter has requested certification under Sections 392.410 - 392.450, which permit the Commission to grant a certificate of service authority where it is in the public interest. The federal Telecommunications Act of 1996 and Section 392.455, were designed to institute competition in the basic local exchange telecommunications market in order to benefit all telecommunications consumers. See Section 392.185.

section 392.455, RSMo 2000, sets out the requirements for granting certificates to provide basic local telecommunications service to new entrants. A new entrant must: (1) possess sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service; (2) demonstrate that the services it proposes to offer satisfy the minimum standards established by the Commission; (3) set forth the geographic area in which it proposes to offer service and demonstrate that such area follows exchange boundaries of the ILEC and is no smaller than an exchange; and (4) offer basic local telecommunications service as a separate and distinct service. In addition, the Commission must give due consideration to equitable access for all Missourians to affordable telecommunications services, regardless of where they live or their income.

The Commission finds that Charter meets the statutory requirements . for provision of basic local telecommunications services and has stated it will abide by those requirements in the future. The Commission determines that granting Charter a certificate of service authority to provide basic local exchange telecommunications services is in the public interest.

Competitive Classification

Charter requested that its basic local services be classified as competitive and that the application of certain statutes and regulatory rules be waived. The Commission may classify a telecommunications provider as a competitive company if the Commission determines it is subject to sufficient competition to justify a lesser degree of regulation. Section 392.361.2. In making that determination, the Commission may consider such factors as market share, financial resources and name recognition, among others. In the Matter of the Investigation for the Purpose of Determining the Classification of the Services Provided by Interexchange Telecommunications Companies Within the State of Missouri, 30 Mo. P.S.C. (N.S.) 16 (1989); In the Matter of Southwestern Bell Telephone Company's Application for Classification of Certain Services as Transitionally Competitive, 1 Mo. P.S.C. 3d 479, 484 (1992). In addition, the Commission may classify a telecommunications company as a competitive telecommunications company only upon a finding that all telecommunications services offered by such company are competitive telecommunications services pursuant to Section 392.361.3. The Commission has found that whether a service is competitive is a subject for case-by-case examination and that different criteria may be given greater weight depending upon the service being considered. Id. at 487.

The Commission finds that competition in the basic local exchange telecommunications market is in the public interest. The Commission has found that all the telecommunications services offered by Charter are competitive telecommunications services and that the telecommunication services Charter proposes to offer are subject to sufficient competition to justify a lesser degree of regulation. Therefore, the Commission concludes that Charter should be classified as a competitive company.

14 35 XVII

Waivers and Conditions

Subsection 392.470.1 authorizes the Commission to impose conditions upon a telecommunications service provider which the Commission deems reasonable and necessary and which are in the public interest and consistent with the purposes of Chapter 392. Sections 392.361 and .420 authorize the Commission to modify or suspend the application of its rules and certain statutory provisions for companies classified as competitive or transitionally competitive.

The Commission finds that Charter has met the requirements of 4 CSR 240-2.060 for applicants for certificates of service authority to provide telecommunications services with the exception of the filing of a tariff with an effective date which is no fewer than 45 days after the tagiff's issue date. The Commission finds that Charter has demonstrated good cause to support a temporary waiver of the tariff filing requirement and the waiver should be granted.

In addition to the waiver of the tariff requirement, Charter requested a waiver of the following statutes: Sections 392.210.2, 392.240(1), 392.270, 392.280, 392.290, 392.300.2, 392.310, 392.320, 392.330, RSMo Supp. 1999, and 392.340. Charter also requested that the application of these Commission rules be waived: 4 CSR 240-10.020; 4 CSR 240-30.010(2)(C), 4 CSR 240-30.040, 4 CSR 240-32.030(4)(C), 4 CSR 240-33.030, and 4 CSR 240-35. Staff notes that this particular rule pertains to the filing of exchange boundary maps and is not applicable to the provision of interexchange telecommunications services. Therefore, Staff recommended that application of this rule not be waived for the provision of interexchange telecommunications services. However, Staff does recommend that this provision be waived as to the provision of basic local exchange telecommunications service.

· The Commission has found that the telecommunication services Charter proposes to offer are subject to sufficient competition to justify a lesser degree of regulation. The Commission has also found that Charter is a competitive company. Therefore, the Commission determines that Charter should be granted the same waivers of the statutes and rules as the Commission usually grants to competitive companies. The waivers are set out in the ordered paragraph below.

The Commission also finds that the conditions that the Staff recommends are reasonable and necessary to protect the public interest and that they further the purposes of Chapter 392 as stated in Section 392.185. Therefore, the Commission finds that Charter's competitive classification and certification should be expressly conditioned as recommended by staff and as ordered below.

IT IS THEREFORE ORDERED:

.)

- 1. That Charter Fiberlink Missouri, LLC, is granted a certificate of service authority to provide basic local telecommunications services in the state of Missouri, subject to the conditions of certification set out below and to all applicable statutes and Commission rules except as specified in this order.
- 2. That Charter Fiberlink Missouri, LLC, is granted a certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri, subject to all applicable statutes and Commission rules except as specified in this order.
- 3. That Charter Fiberlink Missouri, LLC, is classified as a competitive telecommunications company. Application of the following statutes and regulatory rules shall be waived for the provision of basic local telecommunications services:

Statutes

392.210.2	- uniform system of accounts
392.240.1	- rates-rentals-service & physical
	connections
392.270	 valuation of property (ratemaking)
392.280	- depreciation accounts '
	- issuance of securities
392,300.2	- acquisition of stock
392.310	- stock and debt issuance
392.320	 stock dividend payment
392.340	- reorganization(s)
	- issuance of securities, debts and notes

Commission Rules

4 CSR 240	-10.020 -	depreciation fund income
4 CSR 240	-30.010(2)(C) -	posting of tariffs
4 CSR 240	-30.040 -	uniform system of accounts
4 CSR 240	-32.030(4)(C) -	exchange boundary maps .
4 CSR 240		minimum charges
4 CSR 240	-35	reporting of bypass and
		customer-specific arrangements

4. That Charter Fiberlink - Missouri, LLC, is classified as a competitive telecommunications company. Application of the following statutes and regulatory rules shall be waived for the provision of interexchange telecommunications services:

Statutes

```
392.210.2 - uniform system of accounts
392.240.1 - rates-rentals-service & physical
               connections
           valuation of property (ratemaking)depreciation accounts
392.270
392.280
392.290 - issuance of securities 392.300.2 - acquisition of stock
392.310
           - stock and debt issuance
392.320

    stock dividend payment

392.340
           - reorganization(s)
           - issuance of securities, debts and notes,
392.330
```

Commission Rules

4 CSR 240-10.020	- depreciation fund income .
4 CSR 240-30.010(2)(C)	- posting of tariffs
4 CSR 240-30.040	- uniform system of accounts
4 CSR 240-33.030	- minimum charges
4 CSR 240→35	- reporting of bypass and
	customer-specific arrangements

- 5. That is Charter Fiberlink Missouri, IIC, provides access service, its originating and terminating access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each incumbent local exchange carrier within whose service area Charter is providing service, unless authorized by the Commission pursuant to Sections 392.220 and 392.230, RSMo 2000.
- 6. That the certification and competitive status herein granted to Charter Fiberlink - Missouri, LLC, are expressly conditioned upon the continued applicability of Section 392.200, RSMo 2000, and on the requirement that any increases in switched access service rates above the maximum switched access service rates set out above must be cost-justified pursuant to Sections 392.220. and 392.230, RSMo 2000, rather than Sections 392.500 and 392.510, RSMo 2000.
- 7. That if a directly competing incumbent local exchange carrier, in whose service area Charter Fiberlink - Missouri, LLC, is operating, decreases its originating or terminating access service rates, Charter Fiberlink - Missouri, LLC, shall file an appropriate tariff amendment to reduce its originating or terminating access rates in that directly competing incumbent local exchange carrier's service area within 30 days of the directly competing incumbent local exchange carrier's reduction of its originating or terminating access rates.
- 8. That the request for waiver of 4 CSR 240-2.060(6)(C), which requires the filing of a tariff with an effective date not fawer than 45 days from the issue date, is granted.
 - 9. That this order shall become effective on April 15, 2001.

10. That this case may be closed on April 16, 2001.

BY THE COMMISSION

Hak Hard Roberts

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge

(SEAL)

Vicky Ruth, Regulatory Law Judge, by delegation of authority pursuant to Section 386.240, RSMc 2000.

Dated at Jefferson City, Missouri, on this 5th day of April, 2001.

EXHIBIT G

 $\textbf{Exhibit G}-\textbf{Copy of Time Warner Cable Information Services (Missouri), LLC's Authorization to Provide Competitive Local Exchange Services in Missouri$

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Time Warner)
Cable Information Services (Missouri), LLC, for a	A STATE OF THE STA
Certificate of Service Authority to Provide Local and	Case No. LA-2004-0133
Interexchange Voice Service in Portions of the State	737,20
of Missouri and to Classify Said Services as	14 A
Competitive.)

ORDER GRANTING CERTIFICATE TO PROVIDE BASIC LOCAL, LOCAL EXCHANGE, AND INTEREXCHANGE TELECOMMUNICATIONS SERVICES AND ORDER GRANTING MOTION TO AMEND APPLICATION

This order grants a certificate of service authority to provide basic local, local exchange and interexchange telecommunications services in the state of Missouri, classifies those services and the company as competitive, waives certain statutes and regulations and grants Applicant's motion to amend its application.

Procedural History and Background

On September 12, 2003, Time Warner Cable Information Services (Missouri), LLC, filed an Application for a Certificate of Service Authority to provide local and interexchange voice telecommunications services within the state of Missouri, and for competitive classification. On September 23, 2003, the Missouri Public Service Commission issued its Notice of Applications for Intrastate Certificates of Service Authority and Opportunity to Intervene, establishing October 8 as the deadline for intervention with regard to interexchange services and October 23, as the deadline for intervention with regard to local exchange. Because Time Warner sought to provide services involving aspects of Voice

over Internet Protocol, applications to intervene were filed by a number a parties wishing to be included in a general discussion of the subject. On November 4, 2003, the Commission granted the applications and set the matter for prehearing conference. Prior to the prehearing conference additional applications to intervene were filed out of time and granted by the Commission. As a result of the prehearing conference, the parties and the Commission realized that the services Time Warner sought to provide did not merit a broad discussion of Voice over Internet Protocol. In light of this realization, the Commission established a separate case, Case No. TW-2004-0324, for the purpose of investigating issues surrounding Voice over Internet Protocol.

Also, as a result of the prehearing conference, some intervenors opposed the application filed by Time Warner because Time Warner did not request certification to provide basic local service. Those parties objected because if Time Warner were granted an application to provide local exchange and interexchange voice services, and not basic local, the Company would not be subject to the same regulatory restrictions as companies who have been granted certificates to provide basic local service.

On February 13, 2004, Time Warner filed a Motion to amend its application to include a request to provide basic local service. Also, on February 13, Time Warner filed a Stipulation and Agreement showing that the parties either support or do not oppose the motion to amend the application.

On February 23, 2004, the Staff of the Missouri Public Service Commission filed its Memorandum. Staff recommends that Time Warner be granted a certificate to provide basic local, local exchange and interexchange voice services. Staff also recommends that that competitive classification and waivers granted to Time Warner.

Discussion

Time Warner's seeks certification to provide basic local, local exchange, and interexchange voice services in portions of Missouri that are currently being served by Southwestern Bell Telephone Company, Sprint Missouri, Inc., and CenturyTel

The Commission may grant an application for a certificate of service authority to provide basic local telecommunications service upon a showing that: (1) the applicant has met the statutory requirements, ¹ and (2) the grant of authority is in the public interest. ² The applicant must also comply with the Commission's procedural rules. ³

Time Warner is also requesting that it and its services be classified as competitive and that the application of certain statutes and regulatory rules be waived. The Commission may classify a telecommunications service as competitive if the Commission determines that the applicant is subject to a sufficient degree of competition to justify a lesser degree of regulation. The Commission may only classify a telecommunications carrier as competitive if all of its services are so classified. The Commission may waive the application of certain statutes and of its rules to a competitive carrier if it determines that such waiver is consistent with the purposes of Chapter 392.6

See Sections 392.450, 392.451 and 392.455, RSMo 2000. All statutory references, unless otherwise specified, are to the Revised Statutes of Missouri (RSMo), revision of 2000.

² Sections 392,430 and 392,440.

³ See Chapter 2, 4 GSR 240.

⁴ Section 392.361.2.

⁵ Section 392.361.3.

⁶ See Sections 392.185, 392.361.3 and 392.420.

Findings of Fact

The Missouri Public Service Commission, having considered all of the competent and substantial evidence upon the whole record, makes the following findings of fact. The positions and arguments of all of the parties have been considered by the Commission in making this decision. Failure to specifically address a piece of evidence, position or argument of any party does not indicate that the Commission had failed to consider relevant evidence, but indicates rather that the omitted material was not dispositive of this decision.

Requirements of the Commission's Rules:

Commission Rules 4 CSR 240-2.060(1) and (6) require that an entity seeking certification to provide basic local telecommunications services provide certain information to the Commission in its application, including: a description of the business organization of the applicant, supported by the certificate of the Missouri Secretary of State; names and addresses for contact purposes; a disclosure of any pending or final judgments or decisions against it from any state or federal agency or court involving customer service or rates; a verified statement that there are no outstanding annual reports or assessment fees owed to this Commission; if applicable, a request to be classified as a competitive telecommunications company; a description of the types of service the applicant intends to provide; the exchanges in which service is to be offered; and, a proposed tariff with an effective date which is not fewer than 45 days after its issue date.

Having reviewed the application and supporting materials filed by Time Warner, the

Commission finds that Time Warner has complied with each of these requirements except

for the proposed tariff. Time Warner requests a temporary waiver of 4 CSR

240-2.060(6)(1)(C)⁷ until it has entered into interconnection agreements and such agreements have been approved by the Commission. Time Warner agrees to file tariffs after interconnection agreements have been obtained and will not provide service prior to any such tariffs being effective.

Requirements of Section 392.450:

Section 392.450.1 provides that the Commission may grant a basic local certificate only upon a finding, after notice and a hearing, that the applicant has complied with the certification process established under Section 392.455. Thus, an applicant's satisfaction of the requirements of the Commission's regulations and of Section 392.455 also satisfies Section 392.450.1. As explained below, the Commission does find that Time Warner has satisfied the requirements of the Commission's regulations and of Section 392.455, and consequently finds that Time Warner has complied with the certification process established by the Commission in satisfaction of Section 392.450.1.

Section 392.450.2 provides that an applicant for a basic local certificate must (1) file and maintain tariffs with the Commission in the same manner as the incumbent local exchange carriers and (2) meet the minimum service standards, including quality of service and billing standards, that the Commission requires of the competing incumbent local exchange carriers.

Time Warner did not file a proposed tariff in support of its application. However,

Time Warner stated it will comply with all applicable Commission rules except those

As of March 31, 2003, the requirement that parties file with this type of application a tariff with a 45-day effective date has been moved to 4 CSR 240-3.510(1)(C).

expressly waived by the Commission. Thus, Time Warner has agreed to provide services that will meet the minimum basic local service standards required by the Commission, including quality of service and billing standards. Staff recommends that the certificate be granted. Having reviewed Time Warner's application and supporting materials, as well as Staff's Memorandum and Recommendation, the Commission finds that Time Warner has met the requirements of Section 392.450.2.

Requirement of Section 392.455:

Section 392.455 authorizes the Commission to establish a process to grant basic local certification to new entrants and to grant certificates to new entrants to provide basic local telecommunications service on a common carriage basis. That section further requires that a new entrant: (1) possess sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service; (2) demonstrate that the services it proposes to offer satisfy the minimum standards established by the Commission; (3) set forth the geographic area in which it proposes to offer service and demonstrate that such area follows the exchange boundaries of the incumbent local exchange telecommunications company and is no smaller than an exchange; and, (4) offer basic local telecommunications service as a separate and distinct service. Finally, Section 392.455 also requires that the Commission give due consideration to equitable access for all Missourians to affordable telecommunications services, regardless of where they live or their income.

In support of its application, Time Warner submitted, as Exhibit C to its application, the names and qualifications of its key personnel. As Exhibit E to its application, Time Warner submitted Form 10-K, An Annual Report Pursuant to Section 13 or 15(d) of the

Securities Exchange Act of 1934 for the fiscal year ending December 31, 2002. Time Warner also submitted a letter, Exhibit F, "from Time Warner Entertainment Company, L.P., demonstrating its commitment to provide the necessary financial support to the operation of [Applicant]." In its Memorandum, Staff indicated that Time Warner has sufficient technical, financial and managerial resources and recommends that the application be granted.

Having reviewed Time Warner's application and supporting materials, as well as Staff's Recommendation and Memorandum, the Commission finds that Time Warner has met the requirements of Section 392.455(1) in that it has shown that it possesses sufficient technical, financial and managerial resources and abilities to provide basic local telecommunications service.

As previously noted, Time Warner has stated that it will comply with all applicable Commission rules except those expressly waived by the Commission. Based on this statement, the Commission finds that Time Warner has demonstrated that the services it proposes to offer satisfy the minimum standards promulgated in Section 392.455(2).

In its Application, Time Warner seeks certification in the exchanges or service areas of the incumbent local exchange companies of Southwestern Bell Telephone Company, Sprint Missouri, Inc., and CenturyTel. Staff agrees that Time Warner has sufficiently identified the exchanges in which it seeks certification and recommends that the application be approved. Having reviewed Time Warner's Application and supporting material, as well as Staff's Memorandum and Recommendation, the Commission finds that Time Warner has met the requirements of Section 392.455(3) in that it has set forth the geographic area in which it proposes to offer service and has demonstrated that such area follows the

exchange boundaries of the incumbent local exchange telecommunications companies and is no smaller than an exchange.

and distinct service. Based on this statement, the Commission finds that Time Warner has met the requirements of Section 392.455(4), that all providers offer basic local telecommunications service as a separate and distinct service.

In its Application, Time Warner states that it will give consideration to equitable access for all Missourians, regardless of where they reside or their income, to affordable telecommunications service. Section 392.455(5) requires the Commission give due consideration in this regard. Time Warner's statement furthers this requirement.

Requirement for Competitive Classification

If the requested certification is granted, Time Warner will compete with an incumbent local exchange carrier in each exchange in which it provides basic local telecommunications service. The Commission finds that Time Warner will thus be subject to a sufficient level of competition to justify a lesser degree of regulation. Furthermore, all of the services Time Warner will offer are thus qualified for classification as competitive services.

Conclusions of Law

The Missouri Public Service Commission has reached the following conclusions of law:

Jurisdiction:

The Commission is authorized to create a process by which to certify new entrants to provide local exchange telecommunications services in Missouri as common carriers, and is further authorized to grant such certificates, after notice and a hearing, where it is in

the public interest. The Commission is also authorized to classify services and companies as competitive or transitionally competitive and waive certain statutory provisions and Commission rules. The Commission may also impose any reasonable and necessary conditions upon telecommunications service providers if such conditions are in the public interest and consistent with the provisions and purposes of this chapter.

The Public Interest:

Having found that Time Warner has met all of the requirements for certification to provide basic local telecommunications service as a common carrier, it remains to be determined whether it is in the public interest to grant the requested certificate. It has been legislated that "[t]he provisions of this chapter shall be construed to . . . promote diversity in the supply of telecommunications services and products throughout the state of Missouri; [and to] . . . [a]llow full and fair competition to function as a substitute for regulation when consistent with the protection of ratepayers and otherwise consistent with the public interest[.]" In consideration of the foregoing, and based upon its finding that Time Warner has met all of the requirements for the requested certification, the Commission concludes that granting the requested certification is in the public interest. The Commission also finds that competition in the interexchange telecommunications market is in the public interest and Time Warner should be granted a certificate of service authority to provide interexchange telecommunications services.

⁸ Sections 392.430, 392.450 and 392.455.

⁹ Section 392.361

¹⁰ Section 392.470.1.

¹¹ Section 392.180.

Competitive Classification:

Time Warner seeks competitive classification and the Commission has found that Time Warner will be subject to competition to justify a lesser degree of regulation. The Commission has further found that all of Time Warner's services will be entitled to classification as competitive services. Therefore, the Commission may classify Time Warner as a competitive telecommunications company if such lesser degree of regulation is consistent with the protection of ratepayers and promotes the public interest. In consideration of these findings and of the public interest, the Commission concludes that granting competitive classification to Time Warner is consistent with the protection of ratepayers and promotes the public interest.

Waivers:

The Commission may waive certain statutes and administrative rules for competitively classified carriers "if such waiver or modification is otherwise consistent with the other provisions of Section 392.361 to 392.520 and the purposes of this chapter." The Commission has developed a standard list of statutes and regulations that it waives for competitive local exchange and interexchange carriers. The Commission will waive these provisions for Time Warner because to do so furthers the purposes of Chapter 392 to foster and encourage the development of competition in the telecommunications industry.

Staff's recommendation indicates that Time Warner should be classified as a competitive telecommunications company. Staff agrees that Time Warner's switched exchange access services may be classified as a competitive service, conditioned upon

¹² Sections 392.361.5 and 392.420.

certain limitations on Time Warner's ability to charge for its access services. Those limitations are as follows:

- Time Warner's originating and terminating access rates will be no greater than the lowest Commission approved corresponding access rates in effect for each ILEC within whose service area Western seeks authority to provide service, unless authorized by the Commission pursuant to Sections 392.220 and 392.230.
- The Certificate and service classification for switched access services is conditioned on the continued applicability of Section 392.200, and the requirement that any increase in switched access services rates above the maximum switched access service rates set forth herein shall be made pursuant to Sections 392.220 and 392.230, and not Sections 392.500 and 392.510.
- 3. If the directly competing ILEC, in whose service area the applicant is operating, decreases its originating and/or terminating access service rates, the applicant shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates in the directly competing ILEC's service area within 30 days of the directly competing ILEC's reduction of its originating and/or terminating access rates in order to maintain the cap.

The Commission has considered the conditions proposed by Staff and concludes that they are reasonably necessary to protect the public interest and should be adopted.

Also, the Commission has considered Time Warner's application to amend its application and, finding that it is reasonable, will grant the motion.

Time Warner is advised that the grant of authority contained in this order may not, by itself, be sufficient to permit Western to lawfully provide telecommunications services in Missouri.

IT IS THEREFORE ORDERED:

1. That Time Warner Cable Information Services (Missouri), LLC, is granted a certificate of service authority to provide basic local telecommunications services in the exchanges of Southwestern Bell Telephone Company, Sprint Missouri, Inc., and

CenturyTel, subject to the conditions and recommendations contained in the Staff's Memorandum.

- That Time Warner Cable Information Services (Missouri), LLC, is granted a certificate to provide non-switched local exchange telecommunications service restricted to dedicated private line services.
- That Time Warner Cable Information Services (Missouri), LLC, is granted a
 certificate to provide interexchange telecommunications services.
- That Time Warner Cable Information Services (Missouri), LLC, is granted competitive classification.
- 5. That Time Warner Cable Information Services (Missouri), LLC's, certification and competitive status are expressly conditioned upon the continued applicability of Section 392.200, RSMo 2000, and on the requirement that any increase in switched access service rates above the maximum switched access services rates set forth in the agreement must be cost justified pursuant to Section 392.220, RSMo 2000, and 392.230, rather than Section 392.500 and 392.510.
- 6. That Time Warner Cable Information Services (Missouri), LLC's, originating and terminating access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each incumbent local exchange carrier within whose service area Western Communications, Inc., seeks authority to provide service, unless authorized by the Commission pursuant to Section 392.220 and 392.230, RSMo 2000.
- That the certificate and competitive service classification for switched exchange access is granted conditioned on the continued applicability of Section 392.200,

RSMo 2000, and the requirement that any increase in switched access service rates above the maximum switched access service rates set forth herein shall be made pursuant to Section 392.200 and 392.230, RSMo 2000, and not Section 392.500 and 392.510, RSMo 2000.

- 8. That if the directly competing incumbent local exchange carrier, in whose service area Time Warner Cable Information Services (Missouri), LLC, is operating, decreases its originating or terminating access service rates, Time Warner shall file an appropriate tariff amendment to reduce its originating or terminating access rates in the directly competing incumbent local exchange carrier's service area within 30 days of the directly competing incumbent local exchange carrier's reduction of its originating or terminating access rates in order to maintain the cap.
- 9. That Time Warner Cable Information Services (Missouri), LLC, will provide essential services, as required by Section 392.451, RSMo 2000, and delineated at 4 CSR 240-31.010(5).
 - 10. That application of the following statutes and Commission rules are waived:

Statutes

	392.210.2 -	uniform system of accounts
	392.240.1 -	rates-rentals-service & physical
_	4	connections
gl.	392.270 -	valuation of property (ratemaking)
		depreciation accounts
	392.290 -	issuance of securities
	392.300.2 -	acquisition of stock
	392.310 -	stock and debt issuance
	392.320 -	stock dividend payment
_		reorganization(s)
		issuance of securities, debts and notes
_		

Commission Rules

4 CSR 240-10.020 - depreciation fund income

4 CSR 240-30.010(2)(C) - posting of tariffs

4 CSR 240-30.040 - uniform system of accounts

4 CSR 240-32.030(4)(C) - exchange boundary maps

4 CSR 240-33.030 - minimum charges

11. That Rule 4 CSR 240-3.510(1)(C) is waived. Time Warner Cable Information

Services (Missouri), LLC, may not operate until its tariffs have been submitted to the

Commission and approved.

- 12. That Time Warner Cable Information Services (Missouri), LLC, is advised that the grant of authority contained in this order may not, by itself, be sufficient to permit Western Communications, Inc., to lawfully provide telecommunications services in Missouri.
- 13. That Time Warner Cable Information Services (Missouri), LLC's motion to amend its application is granted.
- 14. That this order and Time Warner Cable Information Services (Missouri), LLC's certificate shall become effective on March 12, 2004.

BY THE COMMISSION

(SEAL)

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge

Kennard L. Jones, Regulatory Law Judge, by delegation of authority pursuant to Section 386.240, RSMo 2000.

Dated at Jefferson City, Missouri, on this 2nd day of March, 2004.

EXHIBIT H

Exhibit H – RDOF Funding Information (Confidential – Redacted)

Filed confidentially pursuant to 20 CSR 4240-2.135(2)(A)3, 4, and 6.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this day of 11th January, 2021.

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Morris L. Woodruff

Secretary

MISSOURI PUBLIC SERVICE COMMISSION January 11, 2021

File/Case No. TA-2021-0204

Missouri Public Service Commission

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orris I Wooduff

Time Warner Cable (TWCIS)

Mark P Johnson 4520 Main Street Suite 1100 Kansas City, MO 64111 Mark.johnson@dentons.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

Morris L. Woodruff Secretary

Distributed to all Local Exchange Carriers Certificated to Provide Service in Missouri.

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.