

Connect Your Community 2.0

Digital Literacy and Access for All Our Neighbors and Neighborhoods

April 15, 2016

Hon. Thomas Wheeler
Chairman
Federal Communications Commission
455 12th St NW
Washington, DC 20554

In the matter of MB Docket No. 15-149, Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Transfer Control of Licenses and Authorizations

Dear Chairman Wheeler:

I am writing on behalf of the Coalition for Broadband Equity, which includes agencies of local government, educational institutions, libraries and community organizations in the cities of Cleveland, Akron, Dayton and Youngstown, OH; Cuyahoga, Greene and Lorain Counties, OH; the city of Milwaukee, WI; the city of Winston-Salem, NC; and the cities of Kansas City, MO and Kansas City, KS.

The Coalition has filed comments in this proceeding, and held ex parte discussions with Commission staff, to advocate for our view that any decision by the Commission to approve the Transactions should be conditioned on a binding commitment by the Applicants to (among other things) spend at least \$50 million a year on marketing and new customer support for their proposed low-income Internet offering, with a priority on investing in direct outreach and training partnerships with community-based digital literacy programs in underserved communities.

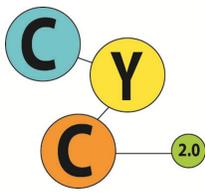
To the extent that the Applicants have responded to our advocacy on the record, that response has been dismissive. However, as this proceeding draws nearer to a decision by the Commission, we have heard that there may be an agreement by the Applicants to make a significant five-year investment to support community outreach and training efforts in support of its proposed low-income Internet plan in at least one state. This agreement has apparently been reached as part of the Applicants' efforts to secure approval of the proposed merger by a state utility regulator.

We assume that the Applicants or other parties have made this agreement known to the Commission, though as yet we find no reference to it in the public record.

Of course we're delighted that digital inclusion advocates in the state in question, empowered by a local regulatory process, have been able to persuade the Applicants to commit to a reasonable investment in community outreach and training to ensure the success of their proposed low-income Internet plan.

But we cannot imagine any rationale by which the Commission could allow the Applicants to limit such a commitment and such an investment to low-income households and communities in a single state, while ignoring equal or greater need in our communities – as documented in our comments – and others throughout the proposed New Charter service territory.

We are therefore writing to urge the Commission, once again, to condition approval of the Transactions on a major investment by New Charter in direct outreach and training partnerships with community-based



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digital literacy programs in underserved communities throughout its proposed territory -- at a level proportional to the amount that Charter seems to have agreed is reasonable for California.

The Coalition would also like to express our agreement with the letter addressed to you, dated 4/14/16, from a group of organizations including Common Cause and the Alliance for Community Media, asking that the Commission “*condition any federal approval on a ...'snap back' clause that would revert any future conditions [of benefit to low income consumers] negotiated at the state level to a federal condition.*” Among the conditions covered by such a snap-back policy should be state or local commitments to invest in community outreach and training programs.

Respectfully,

Bill Callahan, Director
Connect Your Community 2.0
bill@connectyourcommunity.org

on behalf of the Coalition for Broadband Equity:

Akron Urban League, Akron, OH
Ashbury Senior Computer Community Center, Cleveland, OH
Cleveland Housing Network, Cleveland, OH
Cleveland Tenants Organization, Cleveland, OH
Connect Your Community 2.0, Cleveland, OH
Cuyahoga Community College, Cleveland, OH
Esperanza, Inc., Cleveland, OH
Famicos Foundation, Cleveland, OH
OneCommunity, Cleveland, OH
Seeds of Literacy, Cleveland, OH
Straightway Project, Cleveland, OH
Cuyahoga County Public Library, Cuyahoga Co, OH
Dayton Metro Library, Dayton, OH
Edgemont Neighborhood Coalition, Dayton, OH
Lorain County Community College, Lorain Co, OH
Greene County Public Library, Xenia, OH
Youngstown-Mahoning County Public Library, Youngstown, OH
City of Milwaukee, Milwaukee, WI
Milwaukee Housing Authority, Milwaukee, WI
Connecting For Good, Kansas City, MO
Winston Net, Winston-Salem, NC