

Public Utility Law Project of New York, Inc.

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Via email
July 23, 2013

Maureen O. Helmer, Esq.
Hiscock & Barclay, LLP
Representing Time Warner Cable LLC
80 State Street
Albany, NY 12207

Re: Case No. 13-C-0193 - *Petition of Time Warner Cable Information Services (New York), LLC for Waivers of Certain Commission Regulations Pertaining to Partial Payments, Directory Distribution, Timing for Suspension or Termination of Service, and a Partial Waiver of Service Quality Reporting Requirements.*

Dear Ms. Helmer:

The first set of discovery requests from the Public Utility Law Project to Time Warner Cable Information Services (New York), LLC ("Time Warner") is attached. Please respond separately to each question, stating the question and the answer. For each response, please identify the name and title of the respondent. Electronic rather than paper copies of documents are requested by email, with any spreadsheets or data presentations in Excel format.

Pursuant to the Commission's rules, answers shall be served within ten days following service. If a response cannot be prepared within 10 days following service, 16 NYCRR §5.3(d) requires that the interrogating party be so informed along with a statement as to when the response will be forthcoming.

If there are any questions, please contact me.

Sincerely,



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Case 13-C-0193, Petition of Time Warner Cable Information Services (New York),LLC for Waivers of Certain Commission Regulations Pertaining to Partial Payments, Directory Distribution, Timing for Suspension or Termination of Service, and a Partial Waiver of Service Quality Reporting Requirments

PULP’S FIRST INTERROGATORY/DOCUMENT REQUEST TO TWCIS

1. How many residential phone customers does TWCIS have in New York State?
2. How many New York residential phone customers low-income?
3. How many of the low-income customers receive Lifeline service?
4. How much do low income customers save under TWCIS’ calling plans?
5. What is the connection charge and what is the reduced charge for low income LinkUp customers?
6. Are all of your residential calling plans available to low-income customers?
7. For each month in the most recent 24 months please state the following:
 - a. Number of shutoff or suspension notices sent to residential customers for nonpayment of bills
 - b. Number of actual shutoffs or suspension
 - c. Number of deferred payments entered into by customers who received shutoff or suspension notices
 - d. Number of customers shut off whose service was reinstated
 - e. Average amount of the final bill for customers shut off
 - f. Number and percentage of customers shut off who also receive broadband internet service
 - g. Number and percentage of customers shut off who also receive telephone service
 - h. Number of Lifeline customers whose service was shut off or suspended for nonpayment
 - i. Number of Linkup customers
 - j. Number and percentage of Lifeline customers who receive broadband service from TWCIS
 - k. Number and percentage of Lifeline customers who receive television service from TWCIS.
 - l. Number of Lifeline customers receiving premises visits for service repair or maintenance
8. Please provide an estimate of the number of Time Warner “core” residential customers as defined by the Commission regarding Verizon’s service quality plan.
9. Please provide an estimate of the number of Time Warner “core” customers if the change in definition proposed in the petition is adopted.
10. Under the TWCIS definition of “core customers” would Verizon customers on Fire Island who migrate to TWCIS phone service after Verizon’s abandonment of copper landline service be deemed “core” customers.

11. Please provide a copy of the notice of shutoff or suspension of phone service, and the rules or procedures for issuing notices, including the advance notice period and the notice of recourse to the Office of Consumer Services regarding disputes, hotline services, and other assistance, and the method of notification.
12. Please provide a copy of the deferred payment agreement form for residential customer in arrears.
13. Provide the rules and rates for standalone residential phone service from TWCIS.
14. Provide the rules and rates for standalone residential broadband internet service from TWCIS.
15. Provide the rules and rates for standalone residential television service from TWCIS.
16. Provide the rules and rates for combined phone, broadband, and television services from TWCIS.