

STATE OF VERMONT  
PUBLIC SERVICE BOARD

In Re: Renewal of the Certificate of Public )  
Good of Comcast of Connecticut/Georgia/ )  
Massachusetts/New Hampshire/New York/ ) Docket No. 8301  
North Carolina/Virginia/Vermont, LLC, d/b/a )  
Comcast, expiring on December 29, 2016, to )  
provide cable television service )

RESPONSE OF PETITIONER TO VERMONT ACCESS NETWORK'S  
FIRST SET OF INFORMATION REQUESTS ON PETITIONER

This is the response of Comcast of Connecticut/Georgia/ Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC, d/b/a Comcast (“Comcast” or “Petitioner”) to the First Set of Discovery Requests (“Discovery Requests”) of the Vermont Access Network (“VAN”). Petitioner is filing one complete hard copy of its responses with the Public Service Board (“Board”), with two copies served on VAN and a copy served on each other party of record.

**General Objections:**

1. Petitioner objects to any instructions contained in the Discovery Requests to the extent such instructions purport to place on Petitioner greater requirements or reserve greater rights to VAN than are permitted by the Vermont Rules of Civil Procedure as made applicable to Board proceedings through Board Rule 2.214 (A).
2. Petitioner objects to any request for information or production of document(s) that is (or are) subject to the attorney-client privilege, constitute work product, are protected under state or federal law or are proprietary, competitively sensitive or confidential, constitute draft and/or non-final documents and/or constitute communications containing or concerning any of the above.
3. Petitioner objects to requests to the extent that they (a) are overbroad or unduly burdensome; (b) are cumulative; (c) call for the production of documents not in the possession, custody or control of Petitioner; (d) call for the review, compilation, or production of publicly-available documents that could be obtained by the requesting party in a less burdensome manner, including on a public website; (e) call for the review, compilation and/or production of documents already in VAN’s possession, custody, or control; (f) are vague and/or ambiguous; (g) seek information not reasonably calculated to lead to the discovery of admissible evidence; or (h) call for the review, compilation, or production of a voluminous number of documents at great expense to Petitioner.

4. Petitioner objects to the purported requirement that it identify the person who prepared each document produced and the date on which the document was prepared as being unduly burdensome and beyond the requirements of the discovery rules.

5. Petitioner objects to any requests for documents or information beyond the scope of this tribunal's jurisdiction, including without limitation to the extent that (a) primary jurisdiction rests more properly with, and/ or actually has been exercised by, another agency or tribunal; or (b) the document, legal issue or factual information in question has been otherwise determined by another agency or tribunal of competent jurisdiction.

6. Each of these General Objections shall be incorporated by reference into the below-referenced objections and responses as if expressly restated therein. Petitioner does not hereby waive any objections, and it reserves the right to later raise any additional, available objections.

**REGULATORY AFFAIRS**

**Existing Docket 7077 CPG Condition 1 states:**

*For the duration of this Certificate, Comcast shall employ a Regulatory Affairs Manager separate from the Regional Manager position whose responsibility shall include oversight of Comcast's compliance with Vermont statutes, rules, orders and other regulations governing cable operators.*

**Q.VAN:COMCAST.1-1:** During the term of its current CPG issued in Docket 7077, have there been periods when Comcast did not employ a Regulatory Affairs Manager separate from the Regional Manager position? If so, please identify each such period and explain why separate employees were not employed.

**A.VAN:COMCAST.1-1:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-2:** Does Comcast currently employ a Regulatory Affairs Manager separate from the Regional Manager position?

**A.VAN:COMCAST.1-2:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-3:** In Comcast's Proposed CPG Condition 1 found in Exhibit DMG-3 of the Prefiled Testimony of Daniel M. Glanville (hereinafter referred to as "Exhibit DMG-3" or the "Proposed CPG"), please state whether Comcast intends to employ a Regulatory Affairs Manager separate from the Regional Manager position? If not, please explain the reasons why Comcast is proposing this change to Condition 1.

**A.VAN:COMCAST.1-3:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

## **GROSS REVENUE TAX**

### **Existing Docket 7077 CPG Condition 4 states:**

*For the purpose of calculating the gross revenue tax under 30 V.S.A. § 22, Comcast shall use the following definition of gross revenues: all cash, credit, property of any kind or nature, or other consideration received directly or indirectly by Comcast derived from the operation of its cable systems in Vermont including, but not limited to, monthly fees charged to subscribers for basic service; monthly fees charged to subscribers for any optional service; pay television fees; pay-per-view fees, premium-service fees, monthly fees charged to subscribers for any tier of service other than basic service; installation, disconnection and reconnection fees; late fees charged to subscribers; leased-channel fees; fees, payments or other consideration received from programmers; fees, payments or other consideration received from third parties for lease of space on either fiber or coaxial cable; converter rentals or sales; studio rental, production equipment and personnel fees; advertising revenues; and revenues from home shopping networks and revenues from Internet access service until such time that a gross revenue tax is paid on such revenues as telecommunications services.*

**Q.VAN:COMCAST.1-4:** Please define “programming launch fees” as added as an exclusion to the gross revenue tax calculation in the Proposed CPG.

### **A.VAN:COMCAST.1-4:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast does not remit franchise fees for launch support or marketing cooperative payments because these monies are not revenues to the cable system and are not revenues according to U.S. Generally Accepted Accounting Principles (“GAAP”).

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-5:** Why should "programming launch fees" be excluded from the gross revenue tax?

**A.VAN:COMCAST.1-5:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast does not remit franchise fees for launch support or marketing cooperative payments because these monies are not revenues to the cable system and are not revenues according to U.S. Generally Accepted Accounting Principles ("GAAP").

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**CABLE ADVISORY BOARD**

**Existing Docket 7077 CPG Condition 7 states:**

*Comcast shall fund a statewide cable advisory board which shall be self-governing and independent of Comcast to provide public input on community needs and to serve as a vehicle for two-way communication with the Company. At least annually, Comcast shall request to meet with the statewide advisory board.*

**Q.VAN:COMCAST.1-6:** During the term of its Docket 7077 CPG, did Comcast fund and meet with a Cable Advisory Board? If so, please identify when such meetings were held and provide copies of any agendas and/or minutes established as a result of any such meeting. If not, please provide copies of all documents regarding Comcast's efforts to fund and meet with the Cable Advisory Board.

**A.VAN:COMCAST.1-6:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds that it has complied with the material aspects of Condition 7.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-7:** Is Comcast currently funding and meeting with the Cable Advisory Board?

**A.VAN:COMCAST.1-7:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast has corresponded with the Cable Advisory Board on regular occasions, offering to host and/or participate in meetings with this independent board. Comcast has also funded and/or reimbursed meeting costs to the Cable Advisory Board in the past (and has not received recent requests for funding of meetings).

Person Responsible for Response: Daniel M. Glanville  
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Date: November 18, 2015

**Q.VAN:COMCAST.1-8:** If not, please indicate:

- a. When did the Cable Advisory Board cease to exist and why?
- b. The reasons why it is no longer being funded?
- c. How Comcast plans to bring themselves into compliance with the current CPG?

**A.VAN:COMCAST.1-8:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request does not accurately describe the testimony.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-9:** Comcast's Docket 8301 Proposed CPG makes no provision concerning a Cable Advisory Board. Why isn't this Condition included in the Proposed CPG?

**A.VAN:COMCAST.1-9:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast does not believe the condition is necessary, and the condition is not included in various other recent certificates of public good ("CPGs") issued to other cable television service providers in Vermont.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Docket 7077 CPG Condition 30 states:**

*At least annually, Comcast shall request to meet with the statewide advisory board constituted under Paragraph 7. Comcast shall, on an annual basis, inform every municipality, school, library and AMO in every system subject to this Certificate of the opportunity to have two-way capable drops placed at the locations described in Paragraph 20 and offer to meet to: (1) determine each entity's need for two-way capable drops; (2) in the case of municipalities, discuss the location(s) of such drop feed points within each municipality; and (3) negotiate the specific arrangements necessary for installation and maintenance of such drops. If requested by the qualifying entity, at least one two-way capable drop shall be installed at that entity's premises as soon as practicable, but not more than 6 months after receiving a request from the respective school, library, AMO or municipality, provided, however, that Comcast is able to obtain all necessary approvals and permits pursuant to Rule 3.700. Comcast's obligation to install a two-way capable drop in response to a request from an eligible entity shall be ongoing. Comcast shall submit with its Annual Report to the Board and the Department a status report of the installation of two-way capable drops, including the status of negotiations with the municipalities, schools, libraries and AMOs with respect to such installation.*

**Q.VAN:COMCAST.1-10:** Why is this condition not included in the Proposed CPG?

**A.VAN:COMCAST.1-10:**

See Condition 4 of the Proposed CPG filed as Exhibit DMG-3 in Docket 8301 ("Proposed CPG"), pursuant to which, on at least an annual basis, Comcast management with responsibility for Vermont operations shall communicate with city and town government officials via U.S. Mail (and offer to meet with them). This proposed Condition 4 will be clarified by Comcast to state that communication via U.S. Mail will be made to offer to meet with such officials. Attending a meeting of the AMO Board of Directors is sufficient to meet this condition, provided that Comcast notifies the city and town government officials in the AMO's service territory at least two weeks in advance, of their scheduled attendance at the meeting and of their intention to discuss the community's needs and how Comcast and/or the AMOs can address them.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-11:** How does the Proposed CPG address this communication moving forward?

**A.VAN:COMCAST.1-11:**

Referring to Condition 4 of the Docket 8301 Proposed CPG, on at least an annual basis, Comcast management with responsibility for Vermont operations shall communicate with city and town government officials via U.S. Mail (and offer to meet with them). Attending a meeting of the AMO Board of Directors is sufficient to meet this condition, provided that Comcast notifies the city and town government officials in the AMO's service territory at least two weeks in advance, of their scheduled attendance at the meeting and of their intention to discuss the community's needs and how Comcast and/or the AMOs can address them.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**MEETINGS WITH OFFICIALS AND AMOs**

**Existing Docket 7077 CPG Condition 8 states:**

*On at least a bi-annual basis, Comcast's senior Vermont management shall invite city and town government officials in each of the former Adelphia cable systems to meet for the purpose of exchanging information about community needs and the Company's plans. These meetings shall be conducted on a system-wide basis and the PEG Access Management Organization ("AMO") or AMOs serving that system shall also be invited to these meetings. For smaller systems, such meetings may be held under the auspices of a regional planning commission or other appropriate regional entity. The Company shall submit summaries of these meetings, including the recommendations made by participants and the Company's response, to participants, the Board and the Department.*

**Q.VAN:COMCAST.1-12:** During the term of its Docket 7077 CPG, did Comcast invite city and town officials to meet? If so, please identify when such meetings were held and provide copies of any agendas, list of attendees, and/or minutes established as a result of any such meeting. If not, please provide copies of all documents regarding Comcast's efforts to invite city and town officials to such meetings.

**A.VAN:COMCAST.1-12:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Without waiving any objection, Comcast responds it has complied with Condition 8. Also, every AMO is provided with copies of Comcast's outreach to municipalities (which VAN could obtain from its members).

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-13:** Were local AMOs invited and included in these meetings? If not, why not.

**A.VAN:COMCAST.1-13:**

See A.VAN:Comcast.1-12.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-14:** Comcast's Docket 8301 Proposed CPG Condition 4 proposes contacting city and town officials via mail and attending an AMO board meeting in lieu of meeting with city and town officials. How would meeting with PEG AMO Boards of Directors adequately replace meeting with city and town officials?

**A.VAN:COMCAST.1-14:**

OBJECTION. The request does not accurately describe the Proposed CPG Condition. Without waiving any objection, Comcast responds:

Comcast's CPG is regulated through the local franchising authority which is the Vermont Public Service Board. Comcast will continue its practice of meeting with DPS and AMO Boards of Directors. Comcast, through its representatives, will also meet with local municipal officials for any matters under their jurisdiction and control at mutually agreeable times (and anticipates some city and town government officials may attend the meeting with AMO Boards of Directors).

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**Q.VAN:COMCAST.1-15:** Also in connection with Comcast's Proposed CPG Condition 4, why is a notice of two weeks sufficient to notify city and town officials of Comcast meeting dates to discuss community needs and how they can be addressed by Comcast or an AMO?

**A.VAN:COMCAST.1-15:**

OBJECTION. The request is vague and ambiguous.

Without waiving any objection, Comcast responds:

Comcast believes the proposed notice is reasonable, and is consistent with notice provisions in other cable television service CPGs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Docket 7077 CPG Condition 29 states:**

*At least annually, a Comcast representative shall meet with each AMO's governing board. The Comcast representative must have sufficient authority to be able to make binding promises on behalf of the Company.*

**Q.VAN:COMCAST.1-16:** Has Comcast met with each of the AMOs at least annually since the date of Comcast's Docket 7077 CPG? Please provide a schedule or other documents establishing Comcast's meetings with each AMO including who from Comcast was present at each meeting.

**A.VAN:COMCAST.1-16:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Without waiving any objection, Comcast responds:

Comcast has complied with Condition 29. In addition, Comcast notes that it has not rejected a request for a meeting by an AMO. In addition, twice yearly, Comcast does outreach to each AMO advising them of our willingness to meet.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-17:** Please identify Comcast's understanding of what the term "sufficient authority" means.

**A.VAN:COMCAST.1-17:**

Representatives of Comcast who attend the referenced meetings have sufficient authority to represent the Company. That stated, there may and will be instances where any representative will have to seek additional data or information from individuals not in attendance at the meeting on a particular matter.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-18:** Comcast's Proposed CPG Condition 23 requires each AMO to "request" a meeting with a Comcast representative before one will be arranged. Please explain why Comcast proposes this change.

**A.VAN:COMCAST.1-18:**

Comcast is willing to meet with each AMO at times and places that are mutually agreed upon. In addition, Comcast responds electronically and over the telephone to multiple inquiries throughout a given year. We believe this formula works as the parties can resolve matters as they arise and prevent unnecessary meetings, should there be no issues for consideration.

Person Responsible for Response: Daniel M. Glanville  
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**Q.VAN:COMCAST.1-19:** Does Comcast recognize a benefit to meeting with AMOs annually? Please explain.

**A.VAN:COMCAST.1-19:**

See A.VAN:Comcast.1-18.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

## **ANNUAL REPORTING**

### **Existing Docket 7077 CPG Condition 11 states in part:**

*At the time of filing its Annual Report pursuant to 30 V.S.A. § 22, Comcast shall also file with the Board the following:*

- (1) a copy of Comcast's PEG Access Report under PSB Rule 8.419 (formerly referred to as a PEG Access Plan) and a description of its access facilities and services and the use thereof during the preceding calendar year or annual period;*
- (2) subject to Paragraph 42 of this Certificate, a report of all written consumer complaints and notations regarding oral and telephone complaints received during the preceding calendar year or annual period;*
- (3) a map sufficiently outlining the service territory and describing its existing plant and any extensions and replacements planned for commencement or completion within one calendar year from the close of the preceding calendar year or annual period, and a separate map identifying the fiber runs and node locations supporting the current service areas, which shall be maintained as confidential and proprietary;*
- (4) a listing of services, the rates charged for each service as of the date of the filing of the report, a statement of any changes in any such rates from the preceding calendar year or period and a statement of the revenue derived from each service during such calendar year or annual period;*
- (5) a statement of significant changes to be implemented during the current calendar year or annual period in Comcast's business structure, operating procedures and services to be offered;*
- (6) a balance sheet, an income statement, a statement of changes in financial condition and a statement of assets used and useful for the provision of service in Vermont, all as of the close of the preceding calendar year or annual period;*
- (7) a current copy of the complete corporate System of Accounts applied to operations in Vermont, if different from that previously filed;*
- (8) house-count surveys of all unserved areas of the franchised territory, both at the ends-of-lines and unserved interior areas, and a construction budget providing for construction of all areas identified as meeting Comcast's tariffed criteria for line extensions without a contribution-in-aid-of-construction; and*
- (9) the annual calculation of the Minimum Qualifying Density ("H") for the purpose of Comcast's line-extension policy in accordance with the formula set forth in the Order in Docket 6101.*

**Q.VAN:COMCAST.1-20:** Has Comcast provided the Board with its PEG Access Report and a description of its access facilities and services each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-20:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is available to VAN and its AMO members in their own records.

Without waiving any objection, Comcast responds that it has complied with Condition 11 and has provided copies of its Cable Operator PEG Access Reports to each of its designated AMOs on an annual basis in conjunction with filing of its Cable Operator PEG Access Report with the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-21:** Has Comcast provided the Board with a report of all written consumer complaints and notations of oral and telephone complaints each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-21:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast directs VAN to its Cable Operator Annual Report, which is available as a public document at the PSB, and to Attachment A.DPS:Comcast.1-41.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-22:** Has Comcast provided the Board with a map outlining the details of its system each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-22:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast directs VAN to its Cable Operator Annual Report, which is available as a public document at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-23:** Has Comcast provided the Board with a listing of services and rate details each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-23:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast directs VAN to its Cable Operator Annual Report, which is available as a public document at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-24:** Has Comcast provided the Board with a statement of significant changes in its operations each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-24:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast directs VAN to its Cable Operator Annual Report, which is available as a public document at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-25:** Has Comcast provided the Board with the listed financial reports each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-25:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast directs VAN to its Cable Operator Annual Report, which is available as a public document at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-26:** Has Comcast provided the Board with their Systems of Accounts each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-26:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast directs VAN to its Cable Operator Annual Report, which is available as a public document at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-27:** Has Comcast provided the Board with house count surveys of all unserved areas each year since the date of Comcast's Docket 7077 CPG? If not, why not. Please provide all such documentation to VAN.

**A.VAN:COMCAST.1-27:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds that, as provided in VPSB Rule 8.313(L), cable operators are no longer required to file house count surveys. Prior to implementation of the rule, such surveys were filed with, and are available at, the Vermont Public Service Board.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-28:** Has Comcast provided the Board the annual calculation of the Minimum Qualifying Density each year since the date of Comcast's Docket 7077 CPG? If not, why not and please provide all such documentation to VAN.

**A.VAN:COMCAST.1-28:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds that the February 12, 2010 amendment of VPSB Rule 8.313 eliminated the requirement for an annual calculation of the Minimum Qualifying Density. Prior to implementation of the rule amendment, such information was filed with the Cable Operator Annual Report, which is available as a public document at the Vermont Public Service Board.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-29:** Please explain why conditions identified in Interrogatories 26, 27 and 28 were omitted from Comcast's Proposed CPG.

**A.VAN:COMCAST.1-29:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds that the conditions identified in Interrogatories 27 and 28 were eliminated as a result of the February 12, 2010 amendment of VPSB Rule 8.313.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**PEG ACCESS DESIGNATION and ACCESS PLAN**

**Existing Docket 7077 CPG Condition 17 states:**

*Comcast shall designate one or more AMOs as provided in Rule 8.400. Comcast shall provide levels and types of financial, operational, and technical support to those AMOs that are fair and reasonable. **This condition shall not preclude Comcast from designating the same or additional AMOs than has a competitive operator in any area, nor preclude Comcast from offering different or additional public access content to its cable subscribers.** (Bold added.)*

**Q.VAN:COMCAST.1-30:** Has Comcast designated an AMO in each town in Vermont in which Comcast provides cable services? If not, please identify for which towns Comcast has not designated an AMO and provide the reasons therefore.

**A.VAN:COMCAST.1-30:**

Towns without a designated AMO where Comcast provides service are as follows: Andover, Bakersfield, Berkshire, Brookfield, Cambridge, Dummerston, Enosburgh, Fairfield, Greensboro, Holland, Hubbardton, Ira, Jamaica, Landgrove, Leicester, Middletown Springs, Montgomery, Pawlet, Plainfield, Pomfret, Reading, Richford, Salisbury, Shrewsbury, Thetford, Tinmouth, Walden, and Wells.

In accordance with VPSB Rules 8.401(C) and 8.408, when requested, Comcast will designate an AMO, provided the person or organization seeking designation as an AMO demonstrates they or it should be designated. In addition, Comcast notes that it is willing at any time to discuss the consolidation opportunity with VAN members. Such consolidation may be able to provide a combination of resources, reduction in subscribers' costs, and more cost effective method of allocating the more than \$6.5 million Comcast provided to the AMOs in the most recent calendar year.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-31:** For each town identified in the previous interrogatory, please identify Comcast's plan to designate an AMO for said town.

**A.VAN:COMCAST.1-31:**

Comcast will continue to comply with VPSB Rule 8.408.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-33:** Has Comcast offered “different or additional public access content to its cable subscribers” than is otherwise provided by an AMO?

**A.VAN:COMCAST.1-33:**

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-34:** Has an AMO been designated in the North Country Cable System? If not, has Comcast complied with Rule 8.403(E) to provide the minimum PEG Access services where no AMO has been designated in the North Country Cable system?

**A.VAN:COMCAST.1-34:**

Northwest Access Television (NWA-TV) has submitted a formal request to be designated as the AMO for the North Country Cable System. Comcast is in the process of reviewing NWA-TV's request.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-35:** Condition 14 of Comcast's Proposed CPG found at Exhibit DMG-3 provides:

Comcast shall provide reasonable public, educational, and governmental access in accordance with standards for public, education, and government access set forth in 8.400 of the Vermont Public Service Board Cable Television Rule 8.000 et seq. as may be amended from time to time. Comcast shall be required to maintain a plan for reasonable public access ("Plan").

- a. Please describe what Comcast considers to be "reasonable" PEG access?
- b. Please describe what Comcast considers should be incorporated in the "Plan" to provide reasonable public access. (See also the use of the term "Plan" in Comcast's Proposed CPG condition 20.)
- c. Please describe Comcast's understanding of how Vermont Public Service Board Cable Television Rule 8.000 et seq. addresses providing PEG channels and /or AMOs access to new technologies and system improvements established by Comcast during the term of its CPG.

**A.VAN:COMCAST.1-35:**

OBJECTION. The request calls for a legal conclusion, and is vague and ambiguous. Without waiving any objection, Comcast responds:

Comcast believes that it complies with its CPG and relevant VPSB Rules and applicable law regarding the provision of PEG access television. Comcast has contractual agreements with AMOs for the provision of such access. As noted in our Cable Operator PEG Access Report, last year, Comcast allocated more than \$6.5 million for these AMOs to provide such access in Vermont. Comcast believes that the AMOs are providing "reasonable" PEG access as envisioned by the applicable laws and rules.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-36:** Please explain Comcast's intent and the practical effect of the change in language set out in Comcast's Proposed CPG Condition 14 from the second sentence in existing Docket 7077 bolded above in existing Condition 17 (at the top of this section).

**A.VAN:COMCAST.1-36:**

*Res ipsa loquitur.* The language speaks for itself. Comcast does not believe the additional sentences noted by VAN are necessary.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Docket 7077 CPG Condition 26 states:**

*Comcast shall create and maintain a plan for reasonable public access in accordance with Rule 8.401 and Rule 8.419. The Company shall keep a current PEG Access Report on file with the Board.*

**Q.VAN:COMCAST.1-37:** Does Comcast currently have a plan for “reasonable public access”? If so, please produce a copy of the plan. If not, please describe why not.

**A.VAN:COMCAST.1-37:**

As noted in the condition, Comcast's Cable Operator PEG Access Report is filed with, and available at, the Vermont Public Service Board. Note that access plans are addressed in accordance with the PSB Rules including 8.420.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-38:** Does Comcast have a public access report on file with the Board?

**A.VAN:COMCAST.1-38:**

OBJECTION. The information requested is available to VAN and its AMO members in their own records.

Without waiving any objection, Comcast responds that it has a Cable Operator PEG Access Report on file with the Board and also provides copies of this report to each of its designated AMOs on an annual basis.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-39:** Please explain Comcast's intent and the practical effect of the following additional language found in Comcast's Proposed CPG Condition 20 which states: "Comcast may delegate to one or more AMOs the task of preparing PEG-access Plans. Comcast, or any AMO acting on its behalf, shall consult with all active AMOs in the PEG Access service territory in the preparation of the Plan."

**A.VAN:COMCAST.1-39:**

Comcast believes this is consistent with VPSB Rule 8.420(A)(9) and (B) which requires AMOs to prepare an access plan which is designed to anticipate the future cable-related community needs and demand for PEG services, and permits cable operators to delegate various responsibilities to AMOs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-40:** How does Comcast intend to prepare and maintain an access plan going forward and what will it require from the AMOs for this process?

**A.VAN:COMCAST.1-40:**

Comcast expects that its designated AMOs will maintain access plans as required by VPSB Rule 8.420(A)(9).

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**CHANNEL REASSIGNMENT**

**Existing Docket 7077 CPG Condition 19 states:**

*Comcast must work with the relevant AMO prior to any PEG-access-channel reassignment and shall pay the access entity's reasonable costs of such reassignment. Comcast shall not reassign a PEG access channel without advance warning and consultation with the AMO.*

**Q.VAN:COMCAST.1-41:** Has Comcast reassigned any PEG channels since 2005? If so, please provide a list of PEG channels that have been reassigned and the reasons why.

**A.VAN:COMCAST.1-41:**

No, however, Comcast reserves the right to make channel reassignments in compliance with relevant and applicable notice provisions and law.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-42:** Does Comcast have current plans to reassign any PEG channels in its Vermont system? If so, please describe such plans. If not, please describe circumstances which could arise which could result in Comcast reassigning PEG channels in its Vermont system.

**A.VAN:COMCAST.1-42:**

OBJECTION. The request calls for speculation. Without waiving any objection, Comcast responds:

No, and see A.VAN:Comcast.1-41.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-43:** Existing Condition 19 requires Comcast to pay the “reasonable costs” of reassignment. Please describe in detail what Comcast considers “reasonable costs” for such a reassignment?

**A.VAN:COMCAST.1-43:**

Comcast believes the response to this question is determined on a case-by-case basis. That stated, these costs should not exceed \$1,000.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-44:** Please describe in detail why a CPG condition addressing PEG-access-channel reassignment has been omitted from Comcast's Docket 8301 Proposed CPG filed with the PSB as Exhibit DMG-3?

**A.VAN:COMCAST.1-44:**

Issues pertaining to PEG access channel reassignment are addressed through the individual PEG agreements between Comcast and its designated AMOs. Comcast does not believe a condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-45:** Please describe in detail how Comcast will notify AMOs of channel reassignments going forward?

**A.VAN:COMCAST.1-45:**

Issues pertaining to PEG access channel reassignment, including notification, are addressed through the individual PEG agreements between Comcast and its designated AMOs. Also see A.VAN:Comcast.1-41.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-46:** How does Comcast plan to address PEG channel reassignment in the Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-46:**

See A.VAN:Comcast.1-45.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-47:** Please identify, by their positions in Comcast's channel lineups, the three PEG channels Comcast has "designated" for each PEG AMO in its Vermont service areas, indicating which of those designated have been "activated" and in use.

**A.VAN:COMCAST.1-47:**

Comcast designates and activates PEG channels pursuant to VPSB Rule 8.403.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-48:** For any PEG AMO that does not have three activated PEG Access channels, and for which Comcast has not designated the AMO's un-activated 2<sup>nd</sup> or 3<sup>rd</sup> channel, please explain how Comcast will determine where to place a 2<sup>nd</sup> or 3<sup>rd</sup> PEG channel in its Basic lineup.

**A.VAN:COMCAST.1-48:**

See A.VAN:Comcast.1-47.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**STATEWIDE PEG CHANNEL**

**Existing Docket 7077 CPG Condition 20 states:**

*Comcast must provide a statewide PEG access channel, and this commitment may be met through the provision of interconnection bandwidth rather than as a viewable channel. At a minimum, this Network shall enable digital file sharing between AMOs and the ability for AMOs to distribute programs to Comcast subscribers in its Vermont territories. Details of this provision should be determined through negotiation or a later proceeding. Negotiations should be open to all PEG AMOs wishing to take part. Comcast shall provide the statewide network once the details for operation of the network have been decided. Comcast shall offer to interconnect, directly or indirectly, with the Vermont cable systems operated pursuant to Certificates of Public Good to exchange PEG-access programming among the companies' systems. Said interconnection shall be subject to the parties reaching acceptable commercial terms concerning ownership and apportioning the cost of any facilities necessary to interconnect Comcast's and other cable companies' networks. If the cable operators cannot reach an interconnection agreement within 120 days, Comcast shall submit all unresolved issues to the Board for resolution.*

**Q.VAN:COMCAST.1-49:** Has Comcast been asked specifically to provide a statewide PEG access channel in Vermont since the date of Comcast's Docket 7077 CPG?

**A.VAN:COMCAST.1-49:**

No. Comcast fulfilled Docket 7077 CPG Condition 20 by enabling digital file sharing among AMOs. This was accomplished by providing VAN with funds to establish the Vermont Media Exchange ("VMX"). See Attachment A.VAN:Comcast.1-49.1 (1/8/07 Letter of Agreement), and Attachment A.VAN:Comcast.1-49.2 (10/29/07 Letter to PSB re Condition 20).

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-50:** Has Comcast been asked specifically to provide interconnection bandwidth among PEG channels rather than a viewable channel since the date of Comcast's Docket 7077 CPG?

**A.VAN:COMCAST.1-50:**

Comcast fulfilled Docket 7077 CPG Condition 20 by enabling digital file sharing among AMOs. This was done at the request of VAN.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-51:** Has digital file sharing among AMOs been achieved since the date of Comcast's Docket 7077 CPG? If so, please describe how digital file sharing has been achieved.

**A.VAN:COMCAST.1-51:**

See A.VAN:Comcast.1-50.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-52:** Has Comcast assisted in enabling digital file sharing among AMOs since the date of Comcast's Docket 7077 CPG? If so, how has it enabled digital file sharing? In responding to this interrogatory, please be specific in terms of upload and download speeds to describe what level of internet service Comcast has provided to AMOs to support digital file sharing, the level of internet service provided to each AMO in Comcast's service area in Vermont, and other services or funding Comcast provided since the date of Comcast's Docket 7077 CPG to support digital file sharing among AMOs.

**A.VAN:COMCAST.1-52:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-49 and 1-50.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-53:** Has Comcast been asked specifically to interconnect, directly or indirectly, the Comcast cable systems in Vermont to support the exchange of live and recorded PEG access programming since the date of Comcast's Docket 7077 CPG? If so, please describe Comcast's actions in response to and in support of such an ask.

**A.VAN:COMCAST.1-53:**

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-54:** Has Comcast been asked specifically to interconnect, directly or indirectly, with other cable operators' networks in Vermont to support the exchange of PEG access programming since the date of Comcast's Docket 7077 CPG? If so, please describe Comcast's actions in response to and in support of such an ask.

**A.VAN:COMCAST.1-54:**

Yes, on one occasion, Docket 7172. The matter was resolved amicably between the parties.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-55:** Please provide a detailed list of activities Comcast has undertaken in support of existing Docket 7077 CPG Condition 20?

**A.VAN:COMCAST.1-55:**

See A.VAN:Comcast.1-49.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-56:** Why is a condition contemplating a statewide PEG access channel not included in your Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-56:**

Comcast fulfilled Docket 7077 CPG Condition 20 by enabling digital file sharing between AMOs. This was accomplished by providing VAN with funds to establish the Vermont Media Exchange (VMX). This was in lieu of a viewable PEG access channel as allowed by Docket 7077 CPG Condition 20 and as requested by and agreed to by AMO members. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-57:** How is Comcast proposing to plan for a possible statewide PEG access channel during the eleven-year term contemplated by the Docket 8301 CPG?

**A.VAN:COMCAST.1-57:**

Comcast makes no such proposal. Comcast has fulfilled its obligation by enabling digital file sharing between AMOs through provision of funds to VAN to establish the Vermont Media Exchange (VMX). This was in lieu of a viewable PEG access channel, as allowed by Docket 7077 CPG Condition 20 and as requested by and agreed to by AMO members. Further, Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-58:** Does Comcast agree that cable television service in Vermont being provided by a single operator for 80% of subscribers, along with the technically advanced X1 platform, offers significant opportunities for services provided to Vermont consumers, including in the area of PEG access services provided by Comcast?

**A.VAN:COMCAST.1-58:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast also objects that the request is vague and ambiguous and calls for speculation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-59:** Presuming Comcast is an industry leader on research and development, *see* the PFT of Mr. Glanville at Page 11, Lines 7-8, what does Comcast consider to be the foreseeable steps in developing Vermont's statewide connectivity?

**A.VAN:COMCAST.1-59:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Comcast further objects that this request makes a conclusion not made in the testimony and, furthermore, is vague and ambiguous and calls for speculation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-60:** Does Comcast agree that a statewide PEG access channel is a logical new service? Why or why not.

**A.VAN:COMCAST.1-60:**

See A.VAN:Comcast.1-49. Comcast is willing to entertain discussions with VAN member AMOs about the possible consolidation of AMOs, which received a total of more than \$6.5 million in funding in 2014, given the potential for synergistic savings, synergistic idea sharing, and possible reduction of costs to cable subscribers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-61:** Does Comcast agree that connectivity among AMOs and various Comcast cable systems is a logical new service? Why or why not.

**A.VAN:COMCAST.1-61:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is vague and ambiguous, and calls for speculation.

Without waiving any objection, Comcast responds that this is a philosophical discussion. If the AMOS are willing to consider consolidation, Comcast is willing to consider engaging in such discussions, and potential cost reductions associated therewith.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-62:** Does Comcast agree that connectivity among AMOs and with other cable operators' networks in Vermont to support the exchange of PEG access programming is a logical new service? Why or why not.

**A.VAN:COMCAST.1-62:**

See A.VAN: Comcast.1-61.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-63:** During the term of the Docket 8301 CPG, will Comcast still offer to interconnect, directly or indirectly, with Comcast's Vermont cable systems operated pursuant to Certificates of Public Good to exchange PEG-access programming, both live and recorded, among the companies' systems?

**A.VAN:COMCAST.1-63:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects to the form of the question.

Without waiving any objection, Comcast responds:

There is no requirement under the VPSB Rules or applicable law for Comcast to offer to interconnect, directly or indirectly, with Comcast's Vermont cable systems to exchange PEG-access programming among the companies' systems.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-64:** During the term of the Docket 8301 CPG, will Comcast still offer to interconnect, directly or indirectly, with other cable operators' networks in Vermont to support the exchange of PEG access programming both live and recorded?

**A.VAN:COMCAST.1-64:**

See A.VAN:Comcast.1-63.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-65:** If Comcast does not propose to include statewide PEG access channel support in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Condition 20, please identify and explain the changes in community needs that have led to Comcast's proposed withdrawal of support for these conditions.

**A.VAN:COMCAST.1-65:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request makes a conclusion.

Without waiving any objection, Comcast responds:

At the request of VAN, Comcast enabled digital file sharing between AMOs through provision of funds to VAN to establish the Vermont Media Exchange (VMX). This was in lieu of a viewable PEG access channel, as allowed by Docket 7077 CPG Condition 20. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-66:** If Comcast does not propose to include statewide PEG access channel support in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Condition 20, please explain the barriers to including such conditions in the next CPG?

**A.VAN:COMCAST.1-66:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

At the request of VAN, Comcast enabled digital file sharing between AMOs through provision of funds to VAN to establish the Vermont Media Exchange (VMX). This was in lieu of a viewable PEG access channel, as allowed by Docket 7077 CPG Condition 20. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-67:** Given the current and planned network capabilities developed by Comcast in Vermont, *see* PFT of Mr. Glanville at Page 10, Line 19 through Page 11, Line 12, how capable is the Comcast network of delivering the statewide PEG network functionality contemplated in the Docket 7077 CPG Condition 20?

**A.VAN:COMCAST.1-67:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is vague and ambiguous in that the terms "network capabilities" and "PEG network functionality" are undefined.

Without waiving any objection, Comcast responds:

Comcast has no estimate or study regarding the request. In addition, Comcast complies with its current CPG and its current AMO agreements. Comcast reiterates it provides for the provision of local PEG access programming with 22 partner AMOs across the State of Vermont at a cost that exceeded \$6.5 million in 2014, as outlined in its Cable Operator Annual Report.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**STATEWIDE AMO**

**Existing Docket 7077 CPG Condition 21 states:**

*If the Board has designated an entity to act as a statewide PEG AMO, Comcast shall upon request of the AMO provide as minimum support for the statewide PEG network the capability of transmitting signals from the statewide network to any PEG forward channel and transmitting to the statewide network signals originating on any PEG reverse channel on the cable system. Such a request by the AMO for statewide PEG-network capability is to be made at least one year prior to activation of the statewide channel on a Comcast system. Additionally, Comcast is not obligated to pay for statewide PEG-programming content in addition to its PEG-access obligations.*

**Q.VAN:COMCAST.1-68:** During the term of the Docket 7077 CPG, has the Board designated a statewide PEG AMO?

**A.VAN:COMCAST.1-68:**

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-69:** During the term of the Docket 7077 CPG, has Comcast been asked to provide any support for statewide PEG network capabilities?

**A.VAN:COMCAST.1-69:**

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-70:** Why is a condition contemplating a statewide PEG AMO not included in your proposed Docket 8301 CPG?

**A.VAN:COMCAST.1-70:**

As outlined in VPSB Rule 8.425, authority to designate a statewide PEG AMO rests with the Public Service Board and not with individual cable operators. In addition, Comcast complies with its current CPG and its current AMO agreements. Comcast reiterates it provides for the provision of local PEG access programming with 22 partner AMOs across the State of Vermont at a cost that exceeded \$6.5 million in 2014, as outlined in its Cable Operator PEG Access Annual Report. Further, Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-71:** During the term of the Docket 8301 CPG, does Comcast intend to provide as minimum support for the statewide PEG network the capability of transmitting signals from the statewide network to any PEG forward channel?

**A.VAN:COMCAST.1-71:**

VPSB Rule 8.426 states that requests for PEG capacity and applications that will serve statewide purposes must be submitted by the statewide AMO to the cable operators and will be considered by the Board after consultation with all licensed cable operators (among other requirements). It should be noted that the federal cap for franchise fees is five percent (5%). Across the 22 AMOs where Comcast partners for the provision of local PEG programming, the five percent (5%) cap is paid, as outlined in our Cable Operator PEG Access Annual Report, in an amount that exceeded \$6.5 million in 2014. Any statewide PEG AMO would also have to fall within that five percent (5%) cap, and applicable law. Again, should there be an opportunity for discussion of AMO consolidation in the creation of a statewide AMO that could potentially reduce costs to subscribers, Comcast would be willing to engage in such discussion.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-72:** During the term of the Docket 8301 CPG, does Comcast intend to provide as minimum support for the statewide PEG network the capability of transmitting to the statewide network signals originating on any PEG reverse channel on the cable system?

**A.VAN:COMCAST.1-72:**

See A.VAN:Comcast.1-71.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-73:** If Comcast does not propose to include statewide PEG AMO support in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Condition 21, please explain what indications of changes in community needs have led to Comcast's proposed withdrawal of support for these conditions.

**A.VAN:COMCAST.1-73:**

OBJECTION. The request makes a conclusion and assumption not in testimony. Without waiving any objection, Comcast responds:

As outlined in VPSB Rule 8.425, authority rests with the Public Service Board to dictate the obligations of cable operators with respect to a statewide PEG AMO. It should be noted that the federal cap for franchise fees is five percent (5%). Across the 22 AMOs where Comcast partners for the provision of local PEG programming, the five percent (5%) cap is paid, as outlined in our Cable Operator PEG Access Annual Report, in an amount that exceeded \$6.5 million in 2014. Any statewide PEG AMO would also have to fall within that five percent (5%) cap, and applicable law. Again, should there be an opportunity for discussion of AMO consolidation in the creation of a statewide AMO that could potentially reduce costs to subscribers, Comcast would be willing to engage in such discussion. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-74:** If Comcast does not propose to include statewide PEG AMO support in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Condition 21 please identify and explain the changes in community needs that have led to Comcast's proposed withdrawal of support for these conditions in the Docket 8301 CPG.

**A.VAN:COMCAST.1-74:**

OBJECTION. The request makes a conclusion and assumption not in testimony. Without waiving any objection, Comcast responds:

As outlined in VPSB Rule 8.425, authority rests with the Public Service Board to dictate the obligations of cable operators with respect to a statewide PEG AMO. It should be noted that the federal cap for franchise fees is five percent (5%). Across the 22 AMOs where Comcast partners for the provision of local PEG programming, the five percent (5%) cap is paid, as outlined in our Cable Operator PEG Access Annual Report, in an amount that exceeded \$6.5 million in 2014. Any statewide PEG AMO would also have to fall within that five percent (5%) cap. Again, should there be an opportunity for discussion of AMO consolidation in the creation of a statewide AMO that could potentially reduce costs to subscribers, Comcast would be willing to engage in such discussion. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-75:** What is Comcast's plan for a possible statewide AMO during the term of the Docket 8301 CPG?

**A.VAN:COMCAST.1-75:**

As outlined in VPSB Rule 8.425, authority to designate a statewide PEG AMO rests with the Public Service Board and not with individual cable operators. It should be noted that the federal cap for franchise fees is five percent (5%). Across the 22 AMOs where Comcast partners for the provision of local PEG programming, the five percent (5%) cap is paid, as outlined in our Cable Operator PEG Access Annual Report, in an amount that exceeded \$6.5 million in 2014. Any statewide PEG AMO would also have to fall within that five percent (5%) cap, and applicable law. Again, should there be an opportunity for discussion of AMO consolidation in the creation of a statewide AMO that could potentially reduce costs to subscribers, Comcast would be willing to engage in such discussion.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-76:** Given the interconnected system architecture described in Mr. Glanville's testimony, *see* PFT of Mr. Glanville at Page 19, Lines 11-15, how capable is the Comcast network of delivering the interconnectivity described in Docket 7077 CPG Condition 21? Please explain Comcast's reply.

**A.VAN:COMCAST.1-76:**

OBJECTION. The request is cumulative and duplicative. Asked and answered.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**REMOTE ORINATION SITES (ROS)**

**Existing Docket 7077 CPG Condition 22 states:**

*Comcast shall provide fiber-optic or coaxial-cable drops, capable of two-way service and remote origination service, upon request, to every school, library, and PEG-access studio, and to at least one municipal building in every municipality in which it is obligated to provide cable service, upon request of the school, library, PEG entity or municipality. Comcast may provide the two-way service through a drop that is separate from any drop used to provide cable-television service or high-speed Internet access service to that entity. Comcast shall provide and activate each requested drop within 6 months of receiving a request from the respective school, library, AMO, or municipality, provided, however, that Comcast is able to obtain all necessary approvals and permits pursuant to Rule 3.700. This condition does not require Comcast to provide drops to buildings that are neither passed by nor located within 500 feet of cable plant unless an entity is willing to reimburse Comcast for the incremental cost of the non-standard installation. Comcast shall provide basic cable service at each coaxial drop and shall provide standard installation at no charge. Upon request, Comcast shall provide an entity described in this paragraph with a non-standard installation, provided the entity pays the difference in cost between the standard and non-standard installation.*

**Q.VAN:COMCAST.1-77:** During the term of the Docket 7077 CPG, has Comcast provided fiber-optic or coaxial-cable drops, capable of two-way service and remote origination service to every school, library, and PEG-access studio, and to at least one municipal building in every municipality in which it is obligated to provide cable service, if requested by the school, library, PEG entity or municipality? If not, please explain why not.

**A.VAN:COMCAST.1-77:**

No. As stated in Docket 7077 CPG Condition 22, Comcast is not required to provide drops to buildings that are neither passed by nor located with five hundred (500) feet of cable plant unless the entity is willing to reimburse Comcast for the incremental cost of the non-standard installation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-78:** For each location where remote origination service has been installed, at whose cost was such service installed?

**A.VAN:COMCAST.1-78:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-79:** By what criteria and schedule has Comcast planned for communities' Remote Origination Sites for PEG access to be upgraded to current or emerging technology, including fiber-optic connections and HD and Ultra HD return path capacity, during the term of the Docket 7707 CPG?

**A.VAN:COMCAST.1-79:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast has no current upgrade plans for remote origination sites.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-80:** How has Comcast's network design, upgrades, and rebuilds integrated the requirement to provide two-way service and remote origination service for communities' PEG access channels as required in the Docket 7077 CPG Condition 22?

**A.VAN:COMCAST.1-80:**

Yes, Comcast's network provides two-way cable service, as outlined in Docket 7077 CPG Condition 22. In addition, remote origination service is provided throughout the State of Vermont. The two-way cable service is provided through Comcast's residential cable plant. The remote origination service is provided through separate and distinct fiber and/or fiber-combination-coax remote origination return lines/I-Net.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-81:** In regard to Comcast's Docket 8301 Proposed CPG Condition 18 for communities' remote origination sites, who is responsible under this proposed condition for costs related to establishing new Condition 18 sites beyond maintaining existing locations for remote origination of programming?

**A.VAN:COMCAST.1-81:**

As stated in Proposed CPG Condition 18, entities requiring or requesting a non-standard installation are responsible for paying the incremental cost associated with the non-standard installation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-82:** By what criteria and schedule is Comcast planning for communities' Remote Origination Sites for PEG access to be upgraded to current or emerging technology, including fiber-optic connections and HD and Ultra HD return path capacity, during the term of the Docket 8301 CPG?

**A.VAN:COMCAST.1-82:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast has no current upgrade plans for remote origination sites.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-83:** Please describe in detail the improvements to the picture and sound on Comcast channels that were afforded by the Comcast's Digital Network Enhancement Project in Vermont (*see* PFT of Mr. Glanville at Page 8, Lines 10-14).

**A.VAN:COMCAST.1-83:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-84:** Is all of the PEG programming that originates from Remote Origination Sites around Vermont forced to be converted from digital to analog in order to pass through analog RF modulators to get to Comcast's head-end? If not, please identify all remote origination sites for which PEG programming does not need to be converted.

**A.VAN:COMCAST.1-84:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

No, Comcast does not manage or require AMOs to purchase advanced digital editing suites or other equipment, and has adapted current network systems to the all-digital environment that exists today through encoding systems.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-85:** Is all of the PEG programming that originates from Remote Origination Sites around Vermont that is forced to be converted from digital to analog in order to pass through analog RF modulators to get to Comcast's head-end included in Comcast's claim of providing 100% digital picture and sound as described in the discussion of Comcast's Digital Network Enhancement Project found at PFT of Mr. Glanville at Page 8, Lines 10-14?

**A.VAN:COMCAST.1-85:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects to form of question and assumptions.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-84.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-86:** Please provide a detailed list of all the AMOs in Vermont that are still required to send Comcast their signals via analog RF modulators from their home studios.

**A.VAN:COMCAST.1-86:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects to form of question and assumptions.

Without waiving any objection, Comcast responds:

Comcast does not maintain this information in the ordinary course of business.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-87:** Please provide a list of which AMOs in Vermont are forced to down convert their signals from digital to analog to deliver them to Comcast from ROS sites.

**A.VAN:COMCAST.1-87:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-84.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-88:** Considering all of the AMOs today who are required by Comcast to deliver analog signals to Comcast from one location or another, does Comcast consider its Digital Enhancement Project complete? If so, please explain why Comcast holds such a position.

**A.VAN:COMCAST.1-88:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects to form of question and assumptions, and question requests a conclusion between matters that are not correlated.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-89:** Given the rapidly emerging technology available in IP-based video/audio signal transmission and the cost savings that might provide, why is there no mention in the Docket 8301 Proposed CPG or accompanying testimony of new technologies and how they could be utilized for remote origination sites (*see, e.g.*, PFT of Mr. Glanville at Page 20, Lines 13-20)?

**A.VAN:COMCAST.1-89:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-90:** What emerging technologies is Comcast utilizing for transmission of digital video/audio signals on its networks throughout the United States? Please describe the technologies and the networks where each technology is being used.

**A.VAN:COMCAST.1-90:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Additionally, the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-91:** What applications of new technologies might be applicable to remote origination of signals in Vermont communities?

**A.VAN:COMCAST.1-91:**

OBJECTION. The request calls for speculation. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-92:** What might be the advantages of the use of new technologies, possibly including IP-based signal transmission, to reduce costs and better serve Vermont communities' PEG access needs during the term of the Docket 8301 CPG?

**A.VAN:COMCAST.1-92:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request calls for speculation. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-93:** What undertakings such as field tests or analysis, if any, has Comcast conducted during the term of the Docket 7707 CPG for serving Vermont communities' PEG access remote origination needs through new technologies and what have been the results of these undertakings?

**A.VAN:COMCAST.1-93:**

OBJECTION. The request calls for speculation. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Proposed Docket 8301 CPG Condition 17 states:**

*Subject to the limitations set forth in this paragraph, Comcast shall provide basic cable service to one outlet at every K-12 public school, public library, PEG-access studio, and to at least one municipal building in every municipality in which it is obligated to provide basic cable service under this CPG, upon request of the school, library, PEG entity or municipality. Comcast shall provide a standard aerial installation at no charge to the requesting entity to buildings located within 500 aerial feet of its distribution plant. Entities requiring or requesting a non-standard installation are responsible for paying the incremental cost associated with the nonstandard installation. This condition does not apply to buildings not passed by or located within 500 aerial feet of Comcast's distribution plant.*

**Q.VAN:COMCAST.1-94:** Please define what is meant by "basic cable service."

**A.VAN:COMCAST.1-94:**

OBJECTION. The request calls for legal conclusion. Without waiving any objection, Comcast responds:

As stated in 47 U.S.C. § 543(a)(7)(A), components of the "basic service tier" include all signals carried in fulfillment of the requirements of 47 U.S.C. § 534 and § 535; any public, educational, and governmental access programming required by the franchise of the cable system to be provided to subscribers; and any signal of any television broadcast station that is provided by the cable operator to any subscriber, except a signal which is secondarily transmitted by a satellite carrier beyond the local service area of such station.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-95:** Please explain why this complimentary community service is limited to basic cable service.

**A.VAN:COMCAST.1-95:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-96:** Please define the term “public schools” referred to in Comcast’s Docket 8301 Proposed CPG Condition 17.

**A.VAN:COMCAST.1-96:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board’s Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast’s obligations to provide PEG access channel capacity, facilities, and financial support. The request also calls for a legal conclusion.

Without waiving any objection, Comcast responds:

As defined by 16 V.S.A. § 11(a)(7), “public school” means an elementary school or secondary school operated by a school district.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-97:** Does the term “K-12 public schools” in Condition 17 include Vermont’s approved independent schools?

**A.VAN:COMCAST.1-97:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board’s Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast’s obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request calls for a legal conclusion.

Without waiving any objection, Comcast responds:

As defined by 16 V.S.A. § 11(a)(8), “independent school” means a school other than a public school, which provides a program of elementary or secondary education, or both.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-98:** Does the term "K-12 public schools" include Vermont approved independent schools that serve as the local public high school?

**A.VAN:COMCAST.1-98:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request calls for a legal conclusion.

Without waiving any objection, Comcast responds:

As defined by 16 V.S.A. § 11(a)(7), "public school" means an elementary school or secondary school operated by a school district.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-99:** Please explain why this complimentary community service is limited to K-12 "public" schools.

**A.VAN:COMCAST.1-99:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast also objects that the request calls for a legal conclusion.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-100:** Please define the term “distribution plant” in Condition 17 of the Proposed Docket 8301 CPG. Is this term different than the term “cable plant” used in Docket 7077? If so, how?

**A.VAN:COMCAST.1-100:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

The term “distribution plant” refers to Comcast's plant which can be spliced into at a technically established point on the network, as determined by Comcast engineering which does not impede the signal or other required technical standards of the Comcast network for providing quality service to subscribers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-101:** Are there areas of Comcast's hybrid fiber-optic/coaxial cable plant in Vermont that are not part of the distribution plant? If so, please explain.

**A.VAN:COMCAST.1-101:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

All Comcast subscribers are ultimately serviced from a specified point on the distribution plant.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-102:** Please define the term “non-standard installation” as used in the Docket 8301 Proposed CPG Condition 17.

**A.VAN:COMCAST.1-102:**

For purposes of residential installations, VPSB Rule 8.367 defines a standard installation as installations up to three hundred (300) feet in length (aerial construction). Drops in excess of this length, any concealed wiring or other custom installation work, and all underground drops are considered to be non-standard installations. Using this as a basis, a standard installation for purposes of providing courtesy cable television service is an installation up to five hundred (500) feet in length (aerial construction). Drops in excess of five hundred (500) feet in length (aerial construction), any concealed wiring or other custom installation work, and all underground drops are considered to be non-standard installations.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-103:** Please describe the technical infrastructure build out Comcast would have to undertake in order to provide standard aerial installation to schools, public libraries, PEG-access studios, and municipal buildings. Are these locations generally connected by coaxial cable to the distribution plant or by some other method? Please also describe how these connections are generally made.

**A.VAN:COMCAST.1-103:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Without waiving any objection, Comcast responds:

Requesting parties normally receive a courtesy standard installation without charge to the requesting party, pursuant to A.VAN:Comcast.1-100 and 1-102.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-104:** Do the locations identified in Proposed Condition 17 require an Xfinity cable box or DTA to be able to view cable television programming in the facility? If so, how many complimentary Xfinity cable boxes or DTAs will each school, library, PEG-access studio, or municipal building identified in Proposed Condition 17 be provided with to access this cable television service?

**A.VAN:COMCAST.1-104:**

OBJECTION. The request, as it pertains to schools, libraries, and municipal buildings, is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast makes available up to three (3) courtesy DTAs to requesting schools, libraries, municipal and PEG-access studios along the distribution plant as defined in, but not limited to, A.VAN:Comcast.1-100, 1-102, and 1-103.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-105:** At the beginning of the term of the Docket 7707 CPG did these community facilities require a Comcast cable box or other device to be able to view cable television programming in the facility?

**A.VAN:COMCAST.1-105:**

OBJECTION. The request, as it pertains to schools, libraries, and municipal buildings, is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

No. We believe every cable, satellite customer and regulator across the US, is aware of the transition from analog to digital and the reasons affiliated with the need to have a digital device.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-106:** At the beginning of the term of the Docket 7707 CPG how many locations within each school, library, PEG-access studio, or municipal building could access this complimentary cable television service?

**A.VAN:COMCAST.1-106:**

OBJECTION. The request, as it pertains to schools, libraries, and municipal buildings, is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request, as it pertains to PEG-access studios, is available to VAN and its AMO members in their own records. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense. Comcast further objects that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Proposed Docket 8301 CPG Condition 18 states:**

*Subject to the limitations set forth in this paragraph, Comcast shall provide a video return line designed for and capable of upstream transmission of live cable-casted programming to every K-12 public school, public library, PEG-access studio, and to at least one municipal building in every municipality in which it is obligated to provide cable service under this CPG, upon written request of the designated AMO. Comcast shall provide a standard aerial installation at no charge to the requesting entity to buildings located within 500 aerial feet of INet/return line designated fiber designed for Entities requiring or requesting a non-standard installation are responsible for paying the incremental cost associated with the non-standard installation. Comcast may employ various alternative technologies of its choice to provide live cable-casted programming with adequate signal quality at any requested location, and will consult with the designated AMO concerning the technologies for such live cable-casted programming. Comcast shall provide and activate each requested and qualifying video return line within 6 months of receiving a request from the respective school, library, AMO, or municipality, provided, however, that Comcast is able to obtain all necessary approvals and permits pursuant to Rule 3.700. This condition does not require Comcast to provide video return lines to buildings that are neither passed by nor located within 500 aerial feet of I-Net/return line designated fiber designed for and capable of supporting the upstream transmission of live cable-casted programming unless an entity is willing to reimburse Comcast for the incremental cost of the non-standard installation.*

**Q.VAN:COMCAST.1-107:** Please define the term “public schools” in Comcast’s Docket 8301 Proposed CPG Condition 18.

**A.VAN:COMCAST.1-107:**

OBJECTION. The request is cumulative and duplicative.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-96.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-108:** Does the term “K-12 public schools” referred to in Comcast’s Docket 8301 Proposed CPG Condition 18 include Vermont approved independent schools?

**A.VAN:COMCAST.1-108:**

OBJECTION. The request is cumulative and duplicative.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-97.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-109:** Please explain why this video return capability is limited to K-12 "public" schools.

**A.VAN:COMCAST.1-109:**

Comcast complies with the terms and conditions of its current CPG and applicable law. In addition, the costs outlined in this question are ultimately borne by subscribers causing further upward pressure on their rates.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-110:** Please define the term "I-Net" referred to in Comcast's Docket 8301 Proposed CPG Condition 18.

**A.VAN:COMCAST.1-110:**

"I-Net" means": Institutional Network/return line, infrastructure that is not part of the residential cable system.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-111:** Please define the meaning of the language “I-Net/return line designated fiber designed for and capable of supporting the upstream transmission of live cable-casted programming” as used in Comcast’s Docket 8301 Proposed CPG Condition 18.

**A.VAN:COMCAST.1-111:**

See A.VAN:Comcast.1-110.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-112:** Please provide a detailed list of all I-Nets that currently exist on Comcast systems nationwide including the states, cities, towns, and PEG centers, with I-Net connectivity.

**A.VAN:COMCAST.1-112:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense. Any such records are kept locally, where applicable, across potentially 39 states, requiring a review of over 6,200 franchises agreements nationally. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-113:** How has Comcast's network design, upgrades, and rebuilds incorporated the requirements of remote origination sites as specified in Docket 7707 CPG Condition 22 and in Docket 8301 Proposed CPG Condition 18? Please be specific.

**A.VAN:COMCAST.1-113:**

Comcast believes that its current network design and remote origination architecture is in compliance with the Docket 7077 CPG.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-114:** Specifically, do Comcast's Vermont network design, upgrades, and rebuilds plan for I-Net/return line designated fiber designed for and capable of supporting the upstream transmission of live cable-casted programming support the remote origination sites that have been identified in Docket 7077 CPG Condition 22 and Docket 8301 Proposed CPG Condition 18?

**A.VAN:COMCAST.1-114:**

Comcast respectfully states that it does not understand the meaning of this question but incorporates by reference its response A.VAN:Comcast.1-113.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-115:** Is I-Net/return line designated fiber designed for and capable of supporting the upstream transmission of live cable-casted programming infrastructure built to within 500 aerial feet of current Condition 22 sites and future proposed Condition 18 sites?

**A.VAN:COMCAST.1-115:**

OBJECTION. The request calls for speculation with respect to future proposed sites as costs are ultimately determined on a case-by-case basis.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-116:** Will future Comcast Vermont network design, upgrades, and rebuilds plan for I-Net/return line designated fiber designed for and capable of supporting the upstream transmission of live cable-casted programming to support the remote origination sites that have been identified in Docket 7077 CPG Condition 22 and Docket 8301 Proposed CPG Condition 18? If so, please describe how I-Net/return line design will support remote origination sites.

**A.VAN:COMCAST.1-116:**

There are no planned redesigns, upgrades or rebuilds necessary in the foreseeable future. Federal law is clear that technology transport methods cannot be dictated to a cable provider. That said, Comcast believes that it is in compliance with Docket 7077 Condition 22 and will be in compliance with Docket 8301 Proposed Condition 18.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-117:** Will I-Net/return line designated fiber designed for and capable of supporting the upstream transmission of live cable-casted programming infrastructure be built to within 500 aerial feet of the Docket 8301 Proposed CPG Condition 18 sites? Are there circumstances where they cannot be built to within 500 aerial feet? If so, please describe all such circumstances.

**A.VAN:COMCAST.1-117:**

See A.VAN:Comcast.1-116.

Further, every requesting location has both construction and facility variables that must be considered in any request.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-118:** Please describe “various alternative technologies” that could be used in infrastructure construction in order to satisfy Proposed Condition 18. Could any savings result from the use of these “various alternative technologies”? Please describe why or why not.

**A.VAN:COMCAST.1-118:**

OBJECTION. The request calls for speculation. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds.

See A.VAN:Comcast.1-116.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-119:** Can the “alternative technologies” referenced in Proposed Condition 18 provide adequate signal quality for live cablecasting?

**A.VAN:COMCAST.1-119:**

OBJECTION. The request calls for speculation. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-116.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-120:** What obstacles, if any, to the use of alternative technologies for sending remote origination site signals on the Vermont Comcast network is Comcast currently aware of? Does Comcast believe these obstacles will continue to exist during the eleven-year term of the Docket 8301 CPG, if granted?

**A.VAN:COMCAST.1-120:**

OBJECTION. The request calls for speculation. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-116.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-121:** How can Comcast's network design, upgrades, and rebuilds allow for integration of the use of alternative technologies for the provision of remote origination sites in Proposed Condition 18?

**A.VAN:COMCAST.1-121:**

OBJECTION. The request calls for speculation. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-116.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-122:** How would savings from the use of alternative technologies for remote origination sites benefit Vermont subscribers, PEG-access organizations, and community sites identified in Proposed Condition 18?

**A.VAN:COMCAST.1-122:**

OBJECTION. The request calls for speculation and another assumption of alternative technologies. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Any cost increase or decrease associated with AMO/PEG funding will impact subscriber rates pursuant to 47 U.S.C. § 542(c).

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-123:** If an existing remote origination site requires repair or relocation, which party should be responsible for the cost of the repair or the relocation: Comcast, the town/municipality or the AMO? Please explain your response.

**A.VAN:COMCAST.1-123:**

Repair costs to Comcast's network will be borne by Comcast unless responsibility for damage lies with a third party. Relocation has been and will continue to be considered on a case-by-case basis. Maintenance costs may be subject to pass through to the customer at the discretion of the company as allowed under applicable federal law.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-124:** If an existing remote origination site requires upgrade, which party should be responsible for the cost of the upgrade: Comcast, the town/municipality or the AMO? Please explain your response.

**A.VAN:COMCAST.1-124:**

See A.VAN:Comcast.1-123.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Docket 7077 CPG Condition 25 states:**

*Comcast shall provide AMOs the ability to originate as many simultaneous live PEG programs on any part of its system as there are forward PEG channels on that part of the system. Comcast shall not be obligated to originate any quantity of simultaneous, system-wide broadcasts that exceeds the number of forward PEG channels activated in that part of the system with the smallest quantity of activated forward PEG channels.*

**Q.VAN:COMCAST.1-125:** Do all PEG AMOs currently have the ability to simultaneously originate live programming on all of their channels?

**A.VAN:COMCAST.1-125:**

Yes, Comcast is in compliance with Condition 25.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-126:** How has Comcast's network design, upgrades, and rebuilds integrated the requirement of AMOs having the ability to originate as many simultaneous live PEG programs as there are forward channels?

**A.VAN:COMCAST.1-126:**

See A.VAN:Comcast.1-125.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-127:** Why is a condition to include simultaneous remote origination signals for all PEG channels on Comcast's Vermont systems not included in the Proposed CPG in Docket 8301?

**A.VAN:COMCAST.1-127:**

Comcast believes this provision is not necessary. Every channel required will be cablecast live. If there is live remote connectivity, the transmission feed will be available for live cablecasting on one of the available PEG channels.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-128:** How does the Proposed CPG address the needs addressed by Docket 7077 CPG Condition 25 moving forward?

**A.VAN:COMCAST.1-128:**

See A.VAN:Comcast.1-127.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Docket 7077 CPG Condition 31 states:**

*Upon request of an AMO, Comcast shall provide the AMO an in-house ability to control upstream signals from each remote origination site within the AMO's service territory.*

**Q.VAN:COMCAST.1-129:** How has Comcast's network design, upgrades, and rebuilds integrated the requirement that AMOs have an in-house ability to control upstream signals from each remote origination site within the AMO's service territory?

**A.VAN:COMCAST.1-129:**

Comcast has considered and will consider such requests on a case-by-case basis. Part of such consideration has been and will continue to be the cost of such capability and the impact on subscriber rates.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-130:** Why was a condition to include the AMO's in-house ability to control upstream signals from remote origination sites on Comcast's Vermont systems not included in the Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-130:**

See A.VAN:Comcast.1-129. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-131:** How does the Proposed CPG address these needs moving forward?

**A.VAN:COMCAST.1-131:**

See A.VAN:Comcast.1-129.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**INTERACTIVE PROGRAM GUIDE AND OTHER PEG ACCESS OUTREACH ISSUES**

**Existing Docket 7077 CPG Condition 23 states:**

*At a minimum, Comcast must provide the following PEG access outreach:*

- (1) fund semi-annual, quarter-page advertising in local newspapers promoting PEG access programming and functions and assist AMOs in placing their channel programming in a local newspaper's television listing grid where such a listing is feasible;*
- (2) provide on-screen advertising and promotion of the PEG access channel programming and facilities; provide at least 1 gigabyte GB of space on the Company's [cable-modem-service] server for each PEG access channel for purposes including, but not limited to, posting program listings, information about scheduling the use of the studio production facilities, post-production editing facilities, training, and scheduling time slots for airing programs on the public access channels; and links to local PEG access web sites related to programs on the channel; and*
- (3) allow PEG access groups to access Comcast's electronic programming guide and pay the fee so that the groups can have their schedules listed on that channel. Comcast shall respond to reasonable requests by AMOs to communicate with Comcast's subscribers. Any direct costs incurred by the Company due to such communications that are over and above those normally incurred by the Company shall be borne by the requesting AMO.*

**Q.VAN:COMCAST.1-132:** Has Comcast funded semi-annual, quarter-page ads in local newspapers for AMOs promoting PEG access since the date of Comcast's Docket 7077 CPG? If so, please identify each AMO for which Comcast provided such funding, when the funding was provided and the amount.

**A.VAN:COMCAST.1-132:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Without waiving any objection, Comcast responds:

Yes. Included as Attachment A.VAN:Comcast.1-132 (Advertising Reimbursement) is information regarding advertising reimbursements to AMOs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-133:** Does the existing CPG limit the funding Comcast provides for quarter-page ads to black and white ads only? If Comcast takes the position that it does, please describe the basis for this position.

**A.VAN:COMCAST.1-133:**

The existing CPG is silent on this point. This is a matter which can be addressed in the context of PEG agreement discussions with individual AMOs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-134:** Under Comcast's proposed CPG, Comcast states that it must fund semi-annual, quarter-page advertising in local newspapers promoting PEG access. Will Comcast reimburse AMOs for color quarter-page ads in local newspapers? If not, please describe the basis for this position.

**A.VAN:COMCAST.1-134:**

Comcast and the AMOs have jointly found that color newspaper advertising often can increase costs by multiples of 10 or more. That stated, Comcast has worked with AMOs to reimburse them for advertising.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-135:** Since the date of Comcast's Docket 7077 CPG, has Comcast assisted AMOs in placing their channel programming in local newspaper television listing grid? If so, please produce documents which establish Comcast's assistance in this regard.

**A.VAN:COMCAST.1-135:**

Comcast has not received any requests from AMOs for assistance in placing their channel programming in local newspaper television listing grids.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-136:** Since the date of Comcast's Docket 7077 CPG, has Comcast provided on-screen advertising and promotion of PEG, and provided space on the Company's server for PEG access promotion? If so, please produce documentation which establishes that Comcast has satisfied this requirement. If not, why not?

**A.VAN:COMCAST.1-136:**

The Docket 7077 Condition 23, subsection 2, was negotiated by the predecessor to our CPG. It appears to refer to a type of character generation device that was available and in use during this time.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-137:** Since the date of Comcast's Docket 7077 CPG, has Comcast allowed requests to have AMOs communicate with Comcast subscribers?

**A.VAN:COMCAST.1-137:**

Yes.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-138:** Why have the following conditions been omitted from Comcast's Docket 8301 Proposed CPG?

- (1) the requirement to assist AMOs in placing their channel programming in a local newspaper's television listing grid where such a listing is feasible?
- (2) to provide on-screen advertising and promotion of the PEG access channel programming and facilities?
- (3) to provide at least 1 gigabyte GB of space on the Company's [cable-modem-service] server for each PEG access channel for purposes including, but not limited to, posting program listings, information about scheduling the use of the studio production facilities, post-production editing facilities, training, and scheduling time slots for airing programs on the public access channels?
- (4) to provide links to local PEG access web sites related to programs on the channel?
- (5) to allow PEG access groups to access Comcast's electronic programming guide and pay the fee so that the groups can have their schedules listed?
- (6) to require Comcast to respond to reasonable requests by AMOs to communicate with Comcast's subscribers?

Please respond in detail.

**A.VAN:COMCAST.1-138:**

1. Comcast believes the individual AMOs are best suited to achieve this without Comcast's intervention.
2. Through individual AMO agreements, Comcast makes channels available. Such channels are fully capable of providing for this detail under the management of the AMO.
3. See A.VAN:Comcast.1-136.
4. See A.VAN:Comcast.1-138.2 above.
5. At the time of the CPG effective date, the term "electronic programming guide" had a different meaning than it does today. At that time, Comcast had enabled the carriage of programming on the TV Guide Channel. In addition, Comcast did not require the access groups to pay the fee for this service. Today, said channel does not exist in the same format that it did at the time of the CPG effective date.
6. Comcast is bound by federal privacy regulations but does allow for bill messages in individual AMO agreements.

Also, Comcast believes these conditions are not necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-139:** How does Comcast plan to assist AMOs with outreach under the new CPG? Please respond in detail.

**A.VAN:COMCAST.1-139:**

Comcast is willing to discuss such with VAN and individual AMOs There may exist the opportunity to utilize some of the annual payments by Comcast which totaled more than \$6.5 million in 2014 throughout the state to develop a uniform messaging methodology that will save the AMO's resources.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-140:** How does Comcast define the electronic programming guide ("EPG") described in Condition 23 of its current CPG?

**A.VAN:COMCAST.1-140:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-138.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-141:** Please define and describe Comcast's electronic programming guide as it stood in 2005.

**A.VAN:COMCAST.1-141:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-138.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-142:** Please define and describe Comcast's electronic programming guide or its current successor/equivalent as it stands in 2015.

**A.VAN:COMCAST.1-142:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast offers an Interactive Programming Guide to its customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-143:** Does Comcast recognize a distinction between the EPG and the Interactive Programming Guide ("IPG")? If so, what is the distinction and how does Comcast treat the two services differently?

**A.VAN:COMCAST.1-143:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

With regard to the EPG, please see A.VAN:Comcast.1-138. Comcast offers an Interactive Programming Guide which does not allow for the placement of unique programming, including but not limited to PEG/AMO programming, without substantial cost.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-144:** Does Comcast contend that the requirement to provide AMOs access to the EPG can be met by listing PEG channels on Comcast's TV Guide channels? If so, please explain the basis for Comcast's contention.

**A.VAN:COMCAST.1-144:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-138.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-145:** Since the date of Comcast's Docket 7077 CPG, has Comcast allowed PEG access groups access to Comcast's electronic programming guide? If so, please describe how such access has been allowed. If not, why not?

**A.VAN:COMCAST.1-145:**

Comcast believes it has complied with this CPG requirement as outlined in A.VAN:Comcast.1-138.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-146:** Since the date of Comcast's Docket 7077 CPG, has Comcast paid the fee so that AMO schedules can be listed? If so, please produce documentation which establishes that Comcast has satisfied this requirement. If not, why not?

**A.VAN:COMCAST.1-146:**

Historically, Comcast has paid for this even though it is an AMO requirement.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-147:** What does Comcast call its current version of the Interactive Programming Guide which permits, *inter alia*, the ability of viewers to “DVR” programs, and identify and interact with program schedules and detailed programming information over a multi-day (or, in many instances, multi-week) basis?

**A.VAN:COMCAST.1-147:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast presumes through your question that you are referring to our Interactive Programming Guide, which is a form of transmission technology that federal law prohibits a local franchising authority from mandating.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-148:** Does Comcast currently foresee any changes or improvements to the functionality of the IPG during the eleven (11) year term of the Proposed CPG likely to be issued pursuant to Docket 8301? If so, please describe in detail any and all such anticipated or envisioned changes.

**A.VAN:COMCAST.1-148:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request calls for speculation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-149:** Do the AMOs currently have access to Comcast's currently functioning IPG?

**A.VAN:COMCAST.1-149:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-150:** Based on Comcast's omission in its Proposed CPG of any condition allowing AMOs access to its Interactive Programming Guide is it a fair conclusion that Comcast refuses to grant AMOs access to the IPG? If so, please explain the basis for this position. If not, please explain in detail the extent to which Comcast intends to allow such access.

**A.VAN:COMCAST.1-150:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-151:** Do subscribers in in all Vermont service territories have access to an Interactive Programming Guide?

**A.VAN:COMCAST.1-151:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

No. See A.DPS:Comcast.1-13.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-152:** Why has Comcast invested in its system to provide its currently functioning IPG to its customers?

**A.VAN:COMCAST.1-152:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-153:** Is Comcast's current IPG considered the industry standard in 2015?

**A.VAN:COMCAST.1-153:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-154:** Is it the understanding of Comcast that its Interactive Programming Guide is:

- a. the primary source of information that subscribers use to determine what programming is available?
- b. with regard to an individual program, the primary source for what channel it is on, when it is on, and/or information about its content? and
- c. what subscribers use to record programming if they subscribe to the Digital Video Recorder (DVR) service?

If any of the above replies to this interrogatory are “no” or in the negative, then please describe what other tools or methods subscribers use to identify the information being asked about. Please provide copies of any and all data available to Comcast showing how the Interactive Programming Guide is used.

**A.VAN:COMCAST.1-154:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-155:** Did Comcast consider the impact to its Docket 7077 CPG conditions when implementing the current hybrid fiber optic/coaxial cable network with headend and hub architectural design? If so, please identify each CPG condition which affected Comcast's architecture and describe in detail how Comcast considered each of these CPG conditions when implementing the design. If not, please describe in detail why not.

**A.VAN:COMCAST.1-155:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast believes that it is in compliance with the Docket 7077 CPG Conditions.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-156:** Has the implementation of the headend and hub architectural design allowed Comcast to comply with all of the current CPG conditions?

**A.VAN:COMCAST.1-156:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, see A.VAN:Comcast.1-155.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-157:** Are there any technical barriers to including Vermont AMOs in Comcast's Interactive Programming Guide given the Company's headend and hub architectural design? Please describe these technical barriers in detail.

**A.VAN:COMCAST.1-157:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Without waiving any objection, Comcast responds:

Yes. As noted and discussed on multiple occasions, AMO/PEG channels are unique channels therefore requiring unique construction and placement of unique electronics to enable this feature. Initial estimates would exceed \$3 million, at a minimum, and have a substantial impact on subscriber rates.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-158:** According to the prefiled testimony of Mr. Glanville, Comcast “has substantially complied with all of the material terms and conditions of its current CPG.” Prefiled Testimony (“PFT”) of Mr. Glanville at Page 6, Lines 20-22. Is it Comcast’s position that this statement applies to the entirety of Docket 7077 CPG Condition 23?

**A.VAN:COMCAST.1-158:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board’s Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast’s obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Yes.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-159:** Is Comcast in compliance with the ninth EMCO criterion in Rule 8.214(B) requiring the Board to consider whether Comcast's system is a "logical fit with neighboring systems"?

**A.VAN:COMCAST.1-159:**

OBJECTION. The request calls for a legal conclusion. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-160:** In Comcast's Vermont system, how many different headends push programming guide information to subscribers?

**A.VAN:COMCAST.1-160:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast has seven (7) headends which provide service to its Vermont customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-161:** Please provide a detailed list of the Vermont PEG channels supported by each headend and their individual channel number designations.

**A.VAN:COMCAST.1-161:**

Comcast directs VAN to Section 8 of Comcast's Cable Operator Annual Report for the 2014 calendar year. The annual report, which is a public document, is available at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-162:** Are there headends in Vermont that support PEG channels without any channel conflicts from neighboring territories supported by the same headend? Meaning the channels are the only channel 8 or only channel 15 (those being just two examples) served by that headend.

**A.VAN:COMCAST.1-162:**

No. Also, Comcast directs VAN to Section 8 of Comcast's Cable Operator Annual Report for the 2014 calendar year. The annual report, which is a public document, is available at the PSB.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-163:** Are there any PEG Channels in Comcast's nationwide system that have access to Comcast's Interactive Programming Guide? Please provide a list of those PEG Channels including the state and city or town where they originate, the channel number, and contact information for the entity managing the PEG Channel.

**A.VAN:COMCAST.1-163:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-164:** Please describe how Comcast “having consistently invented, developed, deployed and improved a wide range of new technologies and services,” PFT of Mr. Glanville Page 5, Line 8), has included steps to develop or improve its technologies and services to include Vermont’s PEG channels in its Interactive Programming Guide?

**A.VAN:COMCAST.1-164:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast’s Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board’s Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast’s obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board’s authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-165:** Comcast states that the company “continues to invest in Vermont infrastructure in order to support provision of advanced video services, such as high definition television, video on demand, and digital video recorder (“DVR”) service.” PFT of Mr. Glanville at Page 8, Lines 8-10. Please describe in detail the criteria that Comcast considered when the company decided not to invest in technology to enable Vermont PEG channels to have access to the IPG?

**A.VAN:COMCAST.1-165:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-166:** Comcast also states that in 2012 it completed its Digital Network Enhancement Project in Vermont that “provided customers with more high definition (“HD”) programming, additional digital channels, more On Demand content, and an improved television viewing experience with 100% digital picture and sound.” PFT of Mr. Glanville at Page 8, Lines 12-14. Please describe in detail the criteria that Comcast considered when the company decided not to allow Vermont PEG channels to have access to High Definition channels and the Interactive Program Guide during its Digital Network Enhancement Project?

**A.VAN:COMCAST.1-166:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-167:** Comcast states that “In 2013, Comcast introduced the X1 entertainment system in Vermont” that provides “a single search functionality across live TV, Xfinity On Demand, and DVR content” including a “Talking Guide for visually impaired users” and a “voice-activated remote.” *See* PFT of Mr. Glanville at Page 8, Lines 14-18. Please describe in detail Comcast’s plans to provide the same level of accessibility to public access channels in Vermont, as it does for the other channels in its line up.

**A.VAN:COMCAST.1-167:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board’s Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast’s obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board’s authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast believes that the PEG access funding exceeding \$6.5 million in subscriber fees in 2014 for the provision of PEG access with partner AMOs across Vermont helps provide a high level of accessibility in the provision of PEG access to all of our cable customers across the state.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-168:** On the accessibility page on Comcast's website (<http://www.xfinity.com/accessibility>) it states the "TV is universal. Access should be as well." Mr. Glanville states that "Comcast will not and does not discriminate against any customer in the availability of cable television service." PFT of Mr. Glanville at Page 8, Lines 8-9. It is VAN's understanding that visually impaired subscribers are unable to access PEG content via voice activation (the "Talking Guide") or access other PEG content via the remote. Please either correct VAN's understanding or reconcile comments about universality of access and Mr. Glanville's statement with the non-accessibility to PEG content for the visually impaired.

**A.VAN:COMCAST.1-168:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast will not and does not discriminate against any customer in the availability of cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-169:** How do visually impaired users access the Talking Guide on Comcast's X1 platform?

**A.VAN:COMCAST.1-169:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Instructions are available at: <http://customer.xfinity.com/help-and-support/cable-tv/x1-voice-guidance/>

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-170:** Is there a similar condition in the proposed CPG to continue that outreach on Comcast's Xfinity and X1 Entertainment Operating System Interactive Programming Guide that offers access to X1's large collection of video; single search functionality across live TV, Xfinity On Demand, and DVR content; the Talking Guide for visually impaired users; voice-activated remote; personalized viewing recommendations; and X1 DVR?

**A.VAN:COMCAST.1-170:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Additionally, Comcast believes such things are a form of transmission technology that federal law prohibits a local franchising authority from mandating.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

## **HIGH DEFINITION PEG CHANNELS**

Comcast states that over the term of its current CPG the Company has “consistently invented, developed, deployed and improved a wide range of new technologies and services.” PFT of Mr. Glanville at Page 4, Lines 8-9. Comcast also states that in 2012 it completed its Digital Network Enhancement Project in Vermont that “provided customers with more high definition (“HD”) programming, additional digital channels, more On Demand content, and an improved television viewing experience with 100% digital picture and sound.” PFT of Mr. Glanville at Page 8, Lines 11-14. The following questions are to help identify the opportunities for communities in Vermont to gain access to High Definition PEG Channels, over the eleven-year term of Comcast's Docket 8301 Proposed CPG.

**Q.VAN:COMCAST.1-171:** Does Comcast provide for AMOs to deliver high definition television, video on demand, or DVR service through the Interactive Program Guide on Comcast systems in Vermont?

**A.VAN:COMCAST.1-171:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

No, however customers may utilize their DVR service to record cable television service programming.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-172:** Please identify a timeline of when Comcast began to offer HD programming in Vermont and the approximate dates that Comcast began to carry the HD signals of all the over-the-air must-carry broadcast stations, and those of satellite-delivered channels.

**A.VAN:COMCAST.1-172:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-173:** According to Comcast's published channel line-ups, there are HD channels offered in every tier including Limited Basic. Are there now opportunities for PEG channels to be only in HD in lieu of their current SD channels and still be available to subscribers in all tiers? Please explain Comcast's response.

**A.VAN:COMCAST.1-173:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

No. PEG channels are included in the definition of "basic". If an AMO gives up their SD channel to be only in HD, certain cable television customers would no longer receive PEG programming. This is because there are cable television customers who do not have an HD television set. Also, there are cable television customers, who even though they have an HD television set, choose to not take HD equipment.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-174:** Please list in detail the percentage of subscribers reached by each tier of Comcast's cable television service.

**A.VAN:COMCAST.1-174:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-175:** Please provide the percentage of overall Comcast cable television subscribers who subscribe to High Definition channels.

**A.VAN:COMCAST.1-175:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-176:** Comcast states that it provides a broad range of programming along with HD channel capacity. According to the testimony (100 HD Channels) and channel lineup offered by Comcast in its Vermont systems, *see* Exhibit DMG-6, it appears that more than half the channels offered are on HD. At what point do you think it is reasonable to meet the cable-related needs of communities in Vermont by adding PEG channels to the HD tier?

**A.VAN:COMCAST.1-176:**

OBJECTION. The request calls for speculation. Additionally, the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

See A.DPS:Comcast.1-11.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-177:** Please provide a detailed list of all channels in Comcast's Vermont lineup today that are only offered in standard definition and are without HD counterparts.

**A.VAN:COMCAST.1-177:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast directs VAN to the channel lineup cards filed with Comcast's Petition as Exhibit DMG-6.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-178:** Please provide a detailed list of all Vermont based channels (such as Vermont PBS, WCAX, and etcetera) in Comcast's lineup today, other than PEG channels, which are only offered in standard definition without HD counterparts.

**A.VAN:COMCAST.1-178:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See the channel lineup cards filed with Comcast's Petition as Exhibit DMG-6.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-179:** Please provide a detailed list of all the High Definition PEG Channels on Comcast's systems nationwide including the states, cities/towns, and the PEG organizations where they originate.

**A.VAN:COMCAST.1-179:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-180:** Please describe in detail the technical requirements that must be met by an AMO before it is able to have an HD channel on Comcast's system.

**A.VAN:COMCAST.1-180:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast does not have this information at this time and the information may vary by AMO. When Comcast does provide HD PEG, it will provide such information to individual AMOs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-181:** Is it Comcast's position today that solely providing standalone standard definition PEG channels, without any supporting on-screen programming information, HD PEG channel counterparts, nor DVR or VOD capabilities, would equate to providing Comcast customers in Vermont over the next eleven years with reasonable public, educational, and government access set forth in Board Rule 8.400?

**A.VAN:COMCAST.1-181:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support, and is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-182.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-182:** How does Comcast define “fair and reasonable” stated in it Docket 8301 Proposed CPG Condition 15 when applied to financial, operational and technical support for AMO's?

**A.VAN:COMCAST.1-182:**

Comcast believes that its relationship with AMOs across the State of Vermont is one of partnership. As noted in several responses, last year Comcast provided more than \$6.5 million in financial funding and partnered on a regular basis with AMOs on operational and technical support matters to ensure needs are met. We believe this has been fair and reasonable.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-183:** Does Comcast promote the number of HD Channels that it offers to Vermont subscribers? If so, how?

**A.VAN:COMCAST.1-183:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-184:** Does Comcast intend to designate new HD channels to its lineup over the duration of the eleven-year term of the Docket 8301 CPG?

**A.VAN:COMCAST.1-184:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Yes.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-185:** How does Comcast select the HD channels it offers in its line-up?

**A.VAN:COMCAST.1-185:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-186:** How many additional activated channels does Comcast offer as a result of its Digital Enhancement Network Project?

**A.VAN:COMCAST.1-186:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-187:** How many additional channel positions, activated or otherwise, are on Comcast's system, including numbers with no assigned programming, as a result of its Digital Enhancement Network Project?

**A.VAN:COMCAST.1-187:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

AMOs in Vermont have determined that in order to have an informed discussion about High Definition PEG channels, PEG access to the Interactive Program Guide and other commercial features of Comcast's network and bandwidth, it is imperative for all parties to understand the full picture of what Comcast's bandwidth affords to communities in Vermont and in particular with Comcast's statement that it "maintains a hybrid fiber-optic/coaxial cable network, fully capable of carrying a minimum bandwidth of 750 MHz in all its Vermont systems." PFT of Mr. Glanville at Page 8, Lines 9. In this regard VAN has the following technical questions about Comcast's hybrid fiber-optic/coaxial cable network:

**Q.VAN:COMCAST.1-188:** How much bandwidth is allocated to each digital PEG channel in Vermont compared to each analog PEG channel prior to Comcast's Digital enhancement Project?

**A.VAN:COMCAST.1-188:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Additionally, the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-189:** What is the codec, protocol, and bitrate used to deliver AMO programming on Comcast's fully digital system?

**A.VAN:COMCAST.1-189:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-190:** What are the technical reasons that Comcast is unable to use the full radio frequency bandwidth on the Hybrid Fiber-optic/Coaxial system for digital signals (estimated to be RF frequencies from 5MHz to 1GHz, for a full band of 995MHz)?

**A.VAN:COMCAST.1-190:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-191:** What version(s) of DOCSIS are being used to operate the Hybrid Fiber-optic/Coaxial Physical Layer? Please identify the version being used in each of the PEG AMO service territories as that term is defined in PSB Rule 8.100(CC).

**A.VAN:COMCAST.1-191:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-192:** If there are multiple versions of DOCSIS in use at the CMTS in different head ends, what percentage does each version of DOCSIS currently account for?

**A.VAN:COMCAST.1-192:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

If DOCSIS 3.1 is in use:

**Q.VAN:COMCAST.1-193:** On a generic section of the 750MHz RF band described in the introductory paragraph above Interrogatory 190 how is the bandwidth divided into synchronous or asynchronous DS OFDM channels on the HFC network (e.g., 3 bands of 7,680 subcarriers, with 80 of those in the guard bands or some other division)?

**A.VAN:COMCAST.1-193:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-194:** What is the subcarrier spacing (e.g., 25 kHz, 50 kHz)?

**A.VAN:COMCAST.1-194:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-195:** What is the FFT size (e.g., 8K,4K)?

**A.VAN:COMCAST.1-195:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-196:** What is the FFT duration, (e.g., 40usec, 20usec)?

**A.VAN:COMCAST.1-196:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-197:** How many continuous pilots?

**A.VAN:COMCAST.1-197:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-198:** How many scattered pilots?

**A.VAN:COMCAST.1-198:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-199:** How many PLC subcarriers?

**A.VAN:COMCAST.1-199:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-200:** What is the CP duration?

**A.VAN:COMCAST.1-200:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-201:** How many NCP subcarriers?

**A.VAN:COMCAST.1-201:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-202:** What are the purposes of the aforementioned bonded subcarriers, and for each use case, what is the corresponding channel size in MHz?

**A.VAN:COMCAST.1-202:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-203:** What is the effective FEC code rate?

**A.VAN:COMCAST.1-203:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-204:** What is the statistical distribution of the downstream Cable Modem signal to noise ratio in dB, (mean and standard deviation based on a gaussian model).

**A.VAN:COMCAST.1-204:**

OBJECTION. The request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**ACCESS TO COMMERCIAL FEATURES OF THE CABLE SYSTEM**

In Mr. Glanville's prefiled testimony, he presents a number of details concerning Comcast's investment in the Vermont infrastructure supporting advanced video services, such as high definition television, video on demand and digital video recorder ("DVR") service (*see, e.g.*, PFT of Mr. Glanville at Page 8, Lines 8-10). Comcast states that its Digital Network Enhancement Project was completed in 2012 and that it "provided customers with more high definition ('HD') programming, additional digital channels, more On Demand content, and an improved television viewing experience with 100% digital picture and sound." PFT of Mr. Glanville at Page 8, Lines 12-14. The X1 cloud-based entertainment system is described as providing the world's largest collection of video; a single search functionality across live TV, Xfinity On Demand and DVR content; a Talking Guide for visually impaired users; a voice-activated remote; personalized viewing recommendations; and the X1 DVR with Cloud Technology. *See* PFT of Mr. Glanville at Page 8, Lines 14-19.

**Q.VAN:COMCAST.1-205:** Assuming these are some of the "next-generation services and technologies," PFT of Mr. Glanville at Page 4, Line 4, Comcast anticipates introducing into the Vermont market, please explain which of these commercial features of the cable system will be provided to Vermont subscribers during the term of the Docket 8301 CPG from 2016 to 2027.

**A.VAN:COMCAST.1-205:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-206:** At Page 4, Lines 8-9 of his prefiled testimony, Mr. Glanville states that Comcast “consistently invented, developed, deployed, and improved a wide range of new technologies and services. . . .” Please describe the new technologies and services invented, developed, deployed or improved during the term of Comcast’s existing Docket 7077 CPG.

**A.VAN:COMCAST.1-206:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board’s Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast’s obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board’s authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-207:** Answer 9 of Mr. Glanville's testimony states that the PSB must apply criterion by examining whether Comcast's service has been reasonable in light of community needs. PFT of Mr. Glanville at Page 7, Lines 16-18. How does Comcast determine and measure those community needs? Please produce copies of any and all documents related to Comcast's assessment of community needs.

**A.VAN:COMCAST.1-207:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-208:** In what ways has Comcast's recent investment in its Vermont infrastructure and consequent support of the provision of advanced video services (*see, e.g.*, PFT of Mr. Glanville at Page 8, Lines 8-10):

- a. Served community needs in Vermont?
- b. Benefited PEG access services in Vermont?

**A.VAN:COMCAST.1-208:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is vague and ambiguous.

Without waiving any objection, Comcast responds:

Investments in infrastructure and provision of advanced video services attract and retain video customers; PEG fees collected from those customers directly benefit PEG AMOs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-209:** Given Comcast's commitment to advanced cable services, *see, e.g.,* PFT of Mr. Glanville at Page 8, Lines 8-10; Page 17, Lines 6-13, is the company prepared to provide PEG Access access to these commercial features of the network? If so, please identify which advanced cable services will be rolled out to PEG Access. If not, why not. In responding to this interrogatory, please describe any obstacles to providing PEG channels access to each commercial feature.

**A.VAN:COMCAST.1-209:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Cable Services and other services provided by Comcast are available for purchase by any consumers that are serviceable by Comcast.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-210:** With reference to the PFT of Mr. Glanville at Page 8, Line 14 through Page 9, Line 2, please describe in detail the possible new services PEG channels in Vermont are afforded by Comcast's X1 operating system.

**A.VAN:COMCAST.1-210:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Additionally, the request calls for speculation and does not accurately reflect the testimony.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-209.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-211:** With reference to the PFT of Mr. Glanville at Page 8, Line 14 through Page 9, Line 2, does Comcast consider the cloud-based services afforded by its X1 operating system to be cable television services? Please describe the basis for Comcast's position.

**A.VAN:COMCAST.1-211:**

OBJECTION. The request calls for a legal conclusion. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-212:** How does the Xfinity Interactive Program Guide play a role for subscribers accessing features of the X1 entertainment system?

**A.VAN:COMCAST.1-212:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-213:** How does the Xfinity Interactive Program Guide play a role for subscribers accessing cable television services to support searching for program listings on channels?

**A.VAN:COMCAST.1-213:**

OBJECTION. The request is cumulative and duplicative. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-214:** How does the Xfinity Interactive Program Guide play a role for subscribers accessing cable television services to support recording programs using DVR service?

**A.VAN:COMCAST.1-214:**

OBJECTION. The request is cumulative and duplicative. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-215:** How does the Xfinity Interactive Program Guide play a role for subscribers accessing cable television services to support video-on-demand viewing of programs?

**A.VAN:COMCAST.1-215:**

OBJECTION. The request is cumulative and duplicative. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-216:** With reference to the PFT of Mr. Glanville at Page 8, Lines 14-19, what are Comcast's plans for serving Vermont community needs, including PEG access services, by integrating local content into the X1 entertainment system?

**A.VAN:COMCAST.1-216:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage, and does not accurately describe the testimony. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

PEG/AMO channels are available to X1 customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-217:** With reference to the PFT of Mr. Glanville at Page 8, Lines 16-17, will local content provided through Vermont communities' PEG access services be integrated into the X1 entertainment system? If so, how will local content be so integrated? For example, will this local content be delivered through cable television single search functionality across live TV?

**A.VAN:COMCAST.1-217:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

PEG/AMO channels are available to X1 customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-218:** With reference to the PFT of Mr. Glanville at Page 8, Lines 16-17, how will local content provided through Vermont communities' PEG access services be integrated into the X1 entertainment system to deliver this local content through cable television video-on-demand?

**A.VAN:COMCAST.1-218:**

OBJECTION. The request is cumulative and duplicative. The request also seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

Comcast does not have current plans to do this.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-219:** With reference to the PFT of Mr. Glanville at Page 8, Line 17, how will local content provided through Vermont communities' PEG access services be integrated into the X1 entertainment system to deliver this local content through cable television as DVR content?

**A.VAN:COMCAST.1-219:**

OBJECTION. The request is cumulative and duplicative. The request also seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

PEG access programming is recordable using DVR functionality by X1 customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-220:** With reference to the PFT of Mr. Glanville at Page 8, Line 17, how will local content provided through Vermont communities' PEG access services be integrated into the X1 entertainment system to deliver this local content with the cable television Talking Guide for visually impaired users?

**A.VAN:COMCAST.1-220:**

OBJECTION. The request is cumulative and duplicative. The request also seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-221:** With reference to the PFT of Mr. Glanville at Page 8, Line 18, how will local content provided through Vermont communities' PEG access services be integrated into the X1 entertainment system to deliver this local content with the cable television voice-activated remote?

**A.VAN:COMCAST.1-221:**

OBJECTION. The request is cumulative and duplicative. The request also seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

A generic inquiry of PEG Access will locate channels via the voice activated remote.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-222:** With reference to the PFT of Mr. Glanville at Page 11, Lines 4-12, please identify and explain some of the recent network and product innovation that has come from Comcast Labs?

**A.VAN:COMCAST.1-222:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-223:** Is Comcast Labs currently working to innovate to overcome obstacles Comcast identified in its response to Interrogatories 219-224, above? If Comcast Labs is working on innovation to address any other obstacles in Vermont not described above, please describe those challenges.

**A.VAN:COMCAST.1-223:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense, and does not accurately describe the testimony or interrogatory responses provided by Comcast. Additionally, the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-224:** With reference to the PFT of Mr. Glanville at Page 17, Lines 6-17, does Comcast consider AMOs' access to features such as HD channels and Interactive Program Guides that serve DVRs "reasonable to meet future cable-related community needs and interests"? If not, why not?

**A.VAN:COMCAST.1-224:**

OBJECTION. The request calls for a legal conclusion, and does not accurately describe the testimony. Additionally, the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-225:** With reference to the PFT of Mr. Glanville at Page 17, Line 13 and Page 11, Lines 1-2, how has PEG access in Vermont advanced as a result of Comcast providing the latest technological enhancements along with high value and world-class video and broadband technology?

**A.VAN:COMCAST.1-225:**

OBJECTION. The request is vague and ambiguous. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

The provision of technological enhancements along with high value and world-class video technology serves to both attract and retain cable television customers. PEG access fees assessed on cable television services directly benefit PEG AMOs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-226:** Does Comcast have a plan to make HD available in Vermont to all levels of subscribers? If so, what is Comcast's anticipated roll-out date or, if there is no specific roll-out date, what factors does Comcast consider prior to rolling-out this feature to all subscribers?

**A.VAN:COMCAST.1-226:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

HD is available in Vermont to all levels of cable television subscribers, provided they choose to opt for HD equipment and pay the associated monthly fees.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-227:** Does Comcast in Vermont plan to offer PEG access channels in HD once a certain threshold of a percentage of subscribers is purchasing HD services? If so, what is that threshold of HD subscribers? If not, why not?

**A.VAN:COMCAST.1-227:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

See A.DPS:Comcast.1-11.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-228:** In testimony about the X1 Entertainment Operating System Mr. Glanville stated that "all of these services and more are available in Vermont" and that Comcast "continues to make network enhancements." PFT of Mr. Glanville at Page 11, Lines 9-12. Can Comcast describe what "more" services can be expected and what and when other enhancements will be made?

**A.VAN:COMCAST.1-228:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Additionally, the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-229:** Understanding Comcast's position as a global media and technology company, *see* PFT of Mr. Glanville at Page 10, Lines 19-21, what advances in addressing community needs, including PEG access services, does Comcast's 40G backbone offer to Vermont customers?

**A.VAN:COMCAST.1-229:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense, and does not accurately describe the testimony. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-230:** Mr. Glanville's testimony identifies Comcast's leading role in the industry and the development of services. *See* PFT of Mr. Glanville at Page 11, Lines 4-12. Presuming that position, how has Comcast designed the Vermont system to meet the obligations of the Docket 7077 CPG conditions and the Docket 8301 Proposed CPG conditions to advance the services of PEG Access in Vermont through the use of the commercial features of the Comcast network?

**A.VAN:COMCAST.1-230:**

OBJECTION. The request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense, and does not accurately describe the testimony. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

As noted in prefiled testimony dated September 23, 2015, Comcast has substantially complied with the terms of its CPG.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**FUNDING and SPIKE FUNDING**

**Existing Docket 7077 CPG Condition 24 states:**

*Comcast and each AMO shall reevaluate the digital equipment needs or other PEG access related cable system improvements at least twice during the term of this Certificate. Comcast shall provide additional capital funding for each such re-evaluation or upgrade based upon the criteria of Rule 8.405. If an agreement cannot be reached, the Board will exercise its authority under 30 V.S.A. § 509(a) or Rule 8.405(e) and open an investigation to consider the necessity and amount of the interim upgrade payments.*

**Q.VAN:COMCAST.1-231:** Has Comcast worked with each AMO to reevaluate the digital equipment needs or other PEG access related cable system improvements at least twice since the date of Comcast's Docket 7077 CPG?

**A.VAN:COMCAST.1-231:**

Comcast has worked with AMOs as the AMOs have completed such re-evaluation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-232:** Has Comcast ever provided additional capital funding for each such reevaluation or upgrade based on the criteria of Rule 8.405? If so, please identify each instance where additional capital funding was provided, how much was provided, when it was provided and to which AMO it was provided.

**A.VAN:COMCAST.1-232:**

OBJECTION. The request is available to VAN and its AMO members in their own records.

Without waiving any objection, Comcast responds:

Comcast provides the following list:

<b>AMO</b>	<b>Amount</b>	<b>Date</b>
Falls Area Community Television	\$9,423.00	April 30, 2007
Falls Area Community Television	\$2,428.99	September 23, 2010
LPCTV	\$8,574.25	November 4, 2011
Hardwick Community Television	\$8,800.00	April 23, 2012
LPCTV	\$8,631.00	March 14, 2013
NorthEast Addison Television	\$8,000.00	December 23, 2013

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-233:** Why is this condition omitted from the Proposed CPG?

**A.VAN:COMCAST.1-233:**

VPSB Rule 8.417(E) outlines the process by which AMOs may acquire additional capital funding. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-234:** How does Comcast propose that AMOs acquire additional capital funding for the duration of the Proposed CPG?

**A.VAN:COMCAST.1-234:**

VPSB Rule 8.417(E) outlines the process by which AMOs may acquire additional capital funding.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-235:** Does Comcast anticipate that there may be changes in digital equipment needs or other PEG access related cable system improvements in the next 11 years?

**A.VAN:COMCAST.1-235:**

OBJECTION. The request calls for speculation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-236:** Can Comcast identify how its system has changed since the date of Comcast's Docket 7077 CPG in a way that has affected the delivery of PEG access to its subscribers?

**A.VAN:COMCAST.1-236:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-237:** Does Comcast anticipate that PEG channels will be delivered in High Definition during the term of the Proposed CPG term?

**A.VAN:COMCAST.1-237:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request calls for speculation.

Without waiving any objection, Comcast responds:

See A.DPS:Comcast.1-11.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-238** How is Comcast planning to support AMOs need to invest in upgraded equipment to meet the demands of new and changing technology and delivery?

**A.VAN:COMCAST.1-238:**

VPSB Rule 8.405 outlines the process by which AMOs may request additional funding for upgraded equipment, subject to applicable law. VPSB Rule 8.417(E) provides AMOs with the ability to request additional funding for capital improvements.

Having stated such, Comcast believes that its current funding, which exceeded \$6.5 million in 2014, adequately meets and exceeds such AMO needs.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-239:** Has Comcast considered alternative methods to provide funding for AMOs to meet the changes in technology? If so, please describe any alternative method Comcast has considered.

**A.VAN:COMCAST.1-239:**

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-240:** Why did Comcast not include a condition regarding capital funding in its Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-240:**

As stated in VPSB Rule 8.417(D), negotiation between the cable operator and the AMO is the preferred method for setting the capital contribution for PEG access. Comcast does not believe a condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Charter Docket 7820 CPG Condition 34 states:**

*If requested by an AMO, and subject to applicable law, Charter shall provide, pursuant to a negotiated contract agreement with the AMO(s), reasonable capital funding as required by PSB Rule 8.417(D).*

**Q.VAN:COMCAST.1-241:** Why should Comcast be exempt from this CPG requirement?

**A.VAN:COMCAST.1-241:**

OBJECTION. Comcast objects to the form of the question.

Without waiving any objection, Comcast responds:

As Comcast is obligated to comply with the VPSB Rules and VPSB Rule 8.417(D) addresses the cable operator's obligation to provide AMOs with reasonable capital funding, Comcast is thus not exempt, nor has it requested to be exempt, from providing AMOs with reasonable capital funding, subject to applicable law.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-242:** Please produce records documenting the number of Comcast Vermont cable television subscribers for each of the calendar years 2006 through 2014, inclusively.

**A.VAN:COMCAST.1-242:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

See Comcast's Cable Operator Annual Reports for calendar years 2006 through 2014, which are on file with the Vermont Public Service Board.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-243:** Please produce records documenting Comcast's Vermont cable television subscriber annual ARPUs [Average Revenue Per Unit] for each of the calendar years 2006 through 2014, inclusively.

**A.VAN:COMCAST.1-243:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-244:** Please produce documentation showing Comcast's total Vermont cable television subscriber revenues for each of the calendar years 2006 through 2014, inclusively, showing the aggregate Total Annual Revenue, and what amounts of those figures were attributable to the each of the following: Limited Basic Video Service, Expanded Basic Video Service, Digital Video Service Pay, PPV/VOD, Digital Video Equipment, Ad Sales and Home Shopping Commissions.

**A.VAN:COMCAST.1-244:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage.

Without waiving any objection, Comcast responds:

Comcast directs VAN to the Income Statements filed as part of Comcast's Cable Operator Annual Reports for calendar years 2006 through 2014 with the Vermont Public Service Board. Comcast provides as Attachment A.VAN:Comcast.1-244, the Income Statements filed as part of Comcast's Cable Operator Annual Reports for calendar years 2006 through 2014.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-245:** Please produce documentation showing the total amount of monies Comcast collected from subscribers and paid out to all Vermont PEG AMOs for each of the calendar years 2006 through 2014, inclusively. Please also indicate for each year the dollars that were either one-time "spike payments," or otherwise not annual operating or annual capital payments.

**A.VAN:COMCAST.1-245:**

OBJECTION. The request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is vague and ambiguous.

Without waving any objection, Comcast responds:

Comcast directs VAN to Comcast's Cable Operator PEG Report, which was filed as part of Comcast's Cable Operator Annual Reports for calendar years 2006 through 2014 with the Vermont Public Service Board. Comcast provides Attachment A.VAN:Comcast.1-245, "Comcast Funding for PEG Access Management Organizations", filed as part of its Cable Operator PEG Access Report for calendar years 2006 through 2014.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**LINE EXTENSIONS / UNSERVED TOWNS**

**Existing Docket 7077 CPG Conditions 33 - 43 outline Comcast's requirements with regard to Line Extensions.**

**Q.VAN:COMCAST.1-246:** In Mr. Glanville's testimony he indicates that Comcast has completed line extensions in addition to those completed by 2008 and required by Comcast's CPG (*see* PFT of Mr. Glanville at Page 6, Line 22 through Page 7, Line 2 and Page 18, Lines 7-11). Please describe all line extensions Comcast has completed since the 2008 expansion into Grand Isle County?

**A.VAN:COMCAST.1-246:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-247:** Does this include all of the 357 and 16 miles already identified in your testimony (see Glanville - p.18 lines 8-11)? If not, please describe those line extensions as well.

**A.VAN:COMCAST.1-247:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-248:** Please describe any instances in which customers requesting line extensions contributed to pay for the cost of any line extensions? (*See* PFT of Mr. Glanville at Page 18, Lines 8-10.)

**A.VAN:COMCAST.1-248:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-249:** How were the 16 miles of line extensions that were part of the Vermont Telecommunications Authority grant agreement funded? (*See* PFT of Mr. Glanville at Page 18, Lines 10-11.)

**A.VAN:COMCAST.1-249:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-250:** Please explain why the Docket 8301 Proposed CPG does not include any of the line extensions Conditions 34 through 43.

**A.VAN:COMCAST.1-250:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Conditions 34 through 43 of the Docket 7077 CPG were not included because Comcast fulfilled its line extension obligations, which were inherited from Adelphia, as stated in the Docket 7077 Board Orders issued on October 16, 2008 and April 19, 2010. Furthermore, as stated in VPSB Rule 8.313(L), cable operators are no longer required to perform "house count surveys". Also, Comcast does not believe the conditions are necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-251:** On Comcast's map of its Cable Plant, *see* Exhibit DMG 5-A and Exhibit DMG F, there are three towns in Windham County, namely Marlboro, Halifax and Searsburg, that are shaded in as being part of the Comcast plant. Can Comcast explain why these towns are omitted from the list of municipalities served from Comcast's "PEG Procedures-Outreach to Municipalities, Schools and Libraries" dated 10/16/15?

**A.VAN:COMCAST.1-251:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast does not provide cable television service in the towns of Marlboro, Halifax, and Searsburg, although it is authorized, through the Docket 7077 Certificate of Public Good, to provide cable television service in those towns.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-252:** In relation to Docket No. 7379 or the "North Country Order," *see* PFT of Mr. Glanville at Page 2, Lines 16-20 and Exhibit DMG-4, how has Comcast provided PEG access services to the communities of Albany, Bakersfield, Berkshire, Enosburgh, Fletcher, Franklin, Montgomery, and Richford since 2008?

**A.VAN:COMCAST.1-252:**

Comcast does not provide cable television service in Albany, Fletcher, and Franklin and thus does not have an obligation to provide PEG access in those communities.

Comcast has received an inquiry from Northwest Access Television to become the AMO of record serving Bakersfield, Berkshire, Enosburgh, Montgomery and Richford, and is currently reviewing it. In addition, it should be noted that these communities currently have a programmed access channel.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

## **INSTITUTIONAL NETWORK**

**Existing Docket 7077 CPG Conditions 60 - 65 outline Comcast's requirements with regard to Institutional Networks (I-Nets). These conditions state:**

*60. Comcast, or its duly designated agent, shall develop and submit a proposal within the time provided in a request for proposal ("RFP"), or if no time is specified then within 90 days, in response to any qualified RFP issued by a state or local government agency, educational institution (accredited elementary schools, secondary schools, colleges and universities and libraries open to the general public) or educational or governmental access entity ("institutions") seeking an institutional network for voice, video or data within its franchised area. An RFP should permit a minimum of 90 days for response and shall be deemed qualified if it contains the following information: the specific locations to be linked (which may include interconnection points with other cable systems or telecommunications providers to be determined later); the desired transmission capacity or amount of dark optical fiber; and a description of the desired applications to be operated over the institutional network. Comcast, or its duly authorized agent, shall not be required to construct dedicated facilities for institutional networks, where facilities shared with other services and networks meet the requirements of the institutions. Fulfillment of an RFP involving dark fiber shall not require interconnection of that dark fiber with Comcast's hybrid fiber coaxial grid or with any of the Company's headends, nor shall the institution or the users have access to or rights in those headends. It is understood that Comcast will, at most, lease dark fiber but not sell it. It is understood that Comcast may decline to fulfill an RFP requiring dark fiber if the necessary labor and/or material is unavailable or is not available on customary and satisfactory terms.*

*61. Comcast's obligation with respect to Paragraph 57 will be waived in the event, and only to the extent, that Comcast cannot comply due to events beyond its control such as Force Majeure events as described in this paragraph. Comcast shall diligently perform its obligations under this subparagraph, but conditions may arise that prevent or delay its performance because of causes beyond Comcast's reasonable control including, without limiting the generality of the foregoing, flood, earthquake, hurricane, ice storm, blizzard, fire, explosion, war, riot, civil disturbance, labor disturbance, strike, sabotage, and restraint by court that, by exercise of due diligence and foresight, Comcast could not have been expected to avoid. If Comcast is rendered unable to fulfill any obligations by reason of such causes, it shall be excused from performing for the time and to the extent it is prevented or delayed from so doing, but shall exercise due diligence to correct such inability with all reasonable dispatch.*

*62. Comcast's, or its duly designated agent's, response to a qualified RFP shall include the terms and conditions, including but not limited to rates, tolls or charges, under which it would make available the institutional network to the requesting entity. Charges for institutional networks shall not exceed Comcast's, or its duly authorized agent's, fully-allocated costs, including a rate of return of 11.25%, to provide the network.*

*63. Comcast, or its duly designated agent, shall not charge institutions for construction or extension of facilities used for institutional networks that are required to meet other obligations under its Certificate or provide services to other customers, either directly or through an affiliate. Comcast, or its duly authorized agent, may charge institutions a proportional share of line extensions not otherwise required that will be used for institutional networks but may also be used to serve cable customers.*

*64. If Comcast submits a proposal in response to an RFP for an institutional network in accordance with Paragraph 57 above, and said proposal is accepted by the requesting entity, then Comcast shall be obligated to provide service on the terms of the RFP or pursuant to the contract with the entity.*

*65. Comcast, or its duly designated agent, shall respond 24 hours a day, 7 days per week to outages or degradation of service below contracted service for institutional networks. If a reported problem with an institutional network cannot be corrected immediately, Comcast staff, or its duly designated agent's staff, shall promptly explain the status to the institution in person or via phone and provide the approximate time in which the problem will be resolved. A Comcast representative, or its duly designated agent, will verify with the institution that services are working either in person or via telephone before the trouble call is closed out. Comcast, or its duly authorized agent, shall provide institutions to which it provides institutional networks with a local manager to whom the institution can escalate unresolved problems.*

**Q.VAN:COMCAST.1-253:** Please define the term “institutional network” as referenced in Docket 7077 CPG Conditions 60-65.

**A.VAN:COMCAST.1-253:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-254:** Is the term I-Net generally used to mean the same thing as “institutional network”? If not, please describe the distinction between “institutional network” and “I-Net.”

**A.VAN:COMCAST.1-254:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

The terms “institutional network” and “I-Net” are interchangeable.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-255:** Please detail where in the country that Comcast has cable television franchise agreements that include Comcast operating an institutional network as part of those franchise agreements.

**A.VAN:COMCAST.1-255:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-256:** Please detail the applications operated over those institutional networks.

**A.VAN:COMCAST.1-256:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-257:** Does Comcast lease dark fiber for the use of those institutional networks in those cable television franchise areas where Comcast operates institutional networks for the use of those networks?

**A.VAN:COMCAST.1-257:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-258:** Does Comcast have dark optical fiber in its Vermont network infrastructure?

**A.VAN:COMCAST.1-258:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-259:** Is dark fiber interconnected with Comcast's hybrid fiber coaxial grid in Vermont?

**A.VAN:COMCAST.1-259:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-260:** Is dark fiber interconnected with Comcast's headends in Vermont?

**A.VAN:COMCAST.1-260:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-261:** Is an 11.25% rate of return to provide an institutional network still the acceptable rate for Comcast? If not, what is Comcast's current acceptable rate of return to provide an institutional network?

**A.VAN:COMCAST.1-261:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-262:** Are the institutional network conditions in Docket 7077 CPG consistent with institutional network conditions in other Comcast franchise agreements nationally, including those where Comcast is providing institutional network services at this time?

**A.VAN:COMCAST.1-262:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is overly broad and unduly burdensome in that the request would require Comcast to search for and assemble a voluminous amount of information from its records at a substantial expense.

Without waiving any objection, Comcast responds:

No.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-263:** Comcast's Docket 8301 Proposed CPG does not include conditions for an institutional network in Vermont. Please explain why these conditions were eliminated from the Proposed CPG.

**A.VAN:COMCAST.1-263:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Without waiving any objection, Comcast responds that it does not believe that the conditions are necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-264:** In the PFT of Mr. Glanville, he describes Comcast's pre-eminence as an innovative technology company, including its 40G backbone and its unrivaled video and broadband technology asset portfolio, *see, e.g.*, Page 10, Line 19 through Page 11, Line 2. If this is the case, what stands in the way of providing network connections for Vermont's 22 Comcast AMOs that will enable them to connect live and/or transport and air video files of MPG4 quality in an institutional network style configuration?

**A.VAN:COMCAST.1-264:**

OBJECTION. The request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-265:** In the PFT of Mr. Glanville, he describes Comcast as a leading developer of information and communications, *see, e.g.*, Page 11, Line 4. Please explain whether the Comcast network in Vermont is, or will be, capable of providing institutional network services as described in Docket 7077 CPG Conditions 60-65.

**A.VAN:COMCAST.1-265:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-266:** In the Docket 7077 CPG Condition 21 states:

*If the Board has designated an entity to act as a statewide PEG AMO, Comcast shall upon request of the AMO provide as minimum support for the statewide PEG network the capability of transmitting signals from the statewide network to any PEG forward channel and transmitting to the statewide network signals originating on any PEG reverse channel on the cable system. Such a request by the AMO for statewide PEG-network capability is to be made at least one year prior to activation of the statewide channel on a Comcast system. Additionally, Comcast is not obligated to pay for statewide PEG-programming content in addition to its PEG-access obligations.*

How does this description of statewide PEG network connections differ substantially from an institutional network?

**A.VAN:COMCAST.1-266:**

OBJECTION. The request calls for a legal conclusion. The request is not relevant to any issue to be litigated in this docket. Comcast further objects that the request calls for speculation.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-267:** If Comcast does not propose to include institutional network support in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Conditions 60-65, please explain what indications of changes in community needs have led to Comcast's proposed withdrawal of support for these conditions.

**A.VAN:COMCAST.1-267:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast does not believe the conditions are necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-268:** How has Comcast determined that institutional network support is no longer a need in Vermont, including for state or local government agencies, educational institutions (accredited elementary schools, secondary schools, colleges and universities and libraries open to the general public) or educational or governmental access entities ("institutions")?

**A.VAN:COMCAST.1-268:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-269:** Please describe what Vermont networks you are aware of that serve needs like those served by institutional networks operated by Comcast in other franchise agreement areas around the country.

**A.VAN:COMCAST.1-269:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-270:** If Comcast does not propose to include institutional network support in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Conditions 60-65, please explain what stands in the way of including such conditions in the next CPG?

**A.VAN:COMCAST.1-270:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Without waiving any objection, Comcast responds:

Comcast does not believe the conditions are necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-271:** In the absence of institutional network conditions similar to Docket 7077 CPG Conditions 60-65, how does the Proposed CPG address these needs moving forward?

**A.VAN:COMCAST.1-271:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service, and that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**INTERNET ACCESS**

**Existing Docket 7077 CPG Condition 68 states:**

*Comcast shall provide each AMO and each school, public library, and municipality within its service area with a cable modem and Internet access at no charge. The Internet service provided to an AMO's base production facility shall be commercial-class service.*

**Q.VAN:COMCAST.1-272:** Please explain the different residential Internet services Comcast provides in Vermont.

**A.VAN:COMCAST.1-272:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-273:** Please explain the different business class Internet services Comcast provides in Vermont.

**A.VAN:COMCAST.1-273:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Without waiving any objection, Comcast responds:

See link in question Q.VAN:Comcast.1-280.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-274:** Does Comcast currently offer each AMO and school, public library and municipality within its service area a cable modem and Internet access at no charge?

**A.VAN:COMCAST.1-274:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-275:** What level of Internet service and speeds does Comcast currently provide to AMO's in Vermont? Municipal entities? Schools? Libraries?

**A.VAN:COMCAST.1-275:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-276:** Does Comcast currently provide any Internet or cable services to the State of Vermont, including the Vermont State House?

**A.VAN:COMCAST.1-276:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects because pursuant to federal privacy regulations, Comcast is unable to discuss information regarding services provided to specific subscribers with anyone other than the subscriber or an authorized user on the account. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-277:** Please define “commercial-class service.”

**A.VAN:COMCAST.1-277:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-278:** In Comcast's opinion, is the commercial-class service Comcast currently provides adequate to meet most needs of public entities such as schools and municipalities, and AMOs? If so, please describe why it is adequate or, if not, please describe what service class would be adequate.

**A.VAN:COMCAST.1-278:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-279:** The Proposed CPG makes no mention of providing this service to schools, public libraries or municipalities in its service area. How will Comcast meet this need going forward?

**A.VAN:COMCAST.1-279:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-280:** According to Comcast's website, Comcast offers 6 different business class Internet packages (<http://business.comcast.com/internet/business-internet/plans-pricing>). The Starter business package has listed speeds as low as 16 Mbps down and 3 Mbps and the description doesn't begin to reflect the modern needs of Vermont's PEG organizations that rely heavily on large file sharing, uploads and downloads, via the Vermont MediaExchange, and support constant online activity of all staff and community members working in AMO facilities on a daily basis. Which business class Internet service will Comcast provide to AMOs at no charge under its Proposed CPG?

**A.VAN:COMCAST.1-280:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Additionally, the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-281:** Please provide a detailed list of Internet service and speeds that Comcast provides at no charge to AMOs (or the equivalent) throughout its cable systems in the U.S.

**A.VAN:COMCAST.1-281:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of the Board's authority as the franchising authority for Vermont under the federal Cable Communications Policy Act of 1984. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**NOTIFICATION OF REBUILDS AND UPGRADES**

**Existing Docket 7077 CPG Condition 69 states:**

*Comcast shall provide the Board, the Department, affected municipalities, and affected AMOs with complete descriptions of all rebuilds and upgrades at least 90 days prior to the commencement of construction, and in all cases sufficiently in advance to allow time for meaningful comments and possible integration of those comments into the construction project.*

**Q.VAN:COMCAST.1-282:** Has Comcast been providing the complete descriptions of rebuilds and upgrades to the Board, the Department, affected municipalities, and affected AMOs in a timely manner to allow time for meaningful comments and possible integration of those comments into the construction projects?

**A.VAN:COMCAST.1-282:**

OBJECTION. Comcast objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support (to the extent the question concerns others besides AMOs).

Without waiving any objection, Comcast responds:

Yes.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-283:** In light of Comcast's continued investment in its Vermont infrastructure and the Digital Network Enhancement project that began in 2010, how has Comcast notified the Board, the Department, affected municipalities, and affected AMOs and provided complete descriptions of rebuilds and upgrades in a timely manner to allow time for meaningful comments and possible integration of those comments into the construction project? Please produce copies of notifications of rebuilds and upgrades that were provided to the Board, the Department, affected municipalities and affected AMOs.

**A.VAN:COMCAST.1-283:**

OBJECTION. Comcast objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support (to the extent the question concerns others besides AMOs).

Without waiving any objection, Comcast responds:

The referenced Digital Network Enhancement was not a rebuild or upgrade as outlined under Condition 69.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-284:** Are there examples of instances where concerns or comments of the Board, the Department, affected municipalities and/or affected AMOs were integrated into rebuilds or upgrades? If so, please state what they are.

**A.VAN:COMCAST.1-284:**

OBJECTION. Comcast objects that the request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support (to the extent the question concerns others besides AMOs).

Without waiving any objection, Comcast responds:

During the rebuilds or upgrades that took place this period, Comcast does not believe it was made aware of comments.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-285:** Why is a condition similar to existing Docket 7077 CPG Condition 69 excluded in the Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-285:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds that it does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-286:** Concerning the 2010 Newport system rebuild, were the Board, the Department, affected municipalities, and affected AMOs provided complete descriptions of these rebuilds and upgrades in a timely manner to allow time for meaningful comments and possible integration of those comments into the construction project? Please produce copies of notifications of rebuilds and upgrades that were provided to the Board, the Department, affected municipalities and affected AMOs in connection with the Newport system.

**A.VAN:COMCAST.1-286:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support (to the extent the question concerns others besides AMOs).

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-287:** Are there examples of instances where concerns or comments were integrated into the Newport system construction project? If so, please state what they are.

**A.VAN:COMCAST.1-287:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-284.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-288:** Concerning the 2010 North Country system rebuild, were the Board, the Department, affected municipalities, and affected AMOs provided complete descriptions of these rebuilds and upgrades in a timely manner to allow time for meaningful comments and possible integration of those comments into the construction project? Please produce copies of notifications of rebuilds and upgrades that were provided to the Board, the Department, affected municipalities and affected AMOs in connection with the Newport system.

**A.VAN:COMCAST.1-288:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-289:** Are there examples of instances where concerns or comments were integrated into the North Country system construction project? If so, please state what they are.

**A.VAN:COMCAST.1-289:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

See A.VAN:Comcast.1-284.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-290:** How is the AMO or PEG access generally in the North Country system better able to serve the local communities as a result of the new access to the full array of Comcast services to customers in the North Country system?

**A.VAN:COMCAST.1-290:**

See A.VAN:Comcast.1-225.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Existing Docket 7077 CPG Condition 72 states:**

*At least annually, Comcast must report to the Board and the Department on services that are being provided to customers of Comcast systems in the New England region but that are not available to Vermont customers. If some services are available to one-half or more of Comcast's non-Vermont customers in the New England region that are not offered in Vermont, the Department may petition the Board to require Comcast to either justify the disparity or make those services available here.*

**Q.VAN:COMCAST.1-291:** Are there services that are available to one-half or more of Comcast's non-Vermont customers in the New England region that are not offered in Vermont? If so, please describe each such service.

**A.VAN:COMCAST.1-291:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

As reported to both the PSB and the DPS on April 14, 2015, as of December 31, 2014, Vermont Comcast cable television customers were receiving substantially the same video services as those provided to New England region cable television customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-292:** Has Comcast reported to the Board and the Department on services being provided to customers of Comcast's systems in the New England region but that are not available to Vermont customers?

**A.VAN:COMCAST.1-292:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

As reported to both the PSB and the DPS on April 14, 2015, as of December 31, 2014, Vermont Comcast cable television customers were receiving substantially the same video services as those provided to New England region cable television customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-293:** Has the Department petitioned the Board to require Comcast to either justify the disparity or make those services available here?

**A.VAN:COMCAST.1-293:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

The Department has not petitioned the Board to require Comcast to either justify the disparity or make services available. As reported to both the PSB and the DPS on April 14, 2015, as of December 31, 2014, Vermont Comcast cable television customers were receiving substantially the same video services as those provided to New England region cable television customers.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-294:** Why has existing Docket 7077 CPG Condition 72 been omitted from Comcast's Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-294:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds:

Comcast believes its record of providing Vermont Comcast cable television customers with substantially the same video services as those provided to New England region cable television customers speaks for itself. Comcast does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**VERMONT-RELATED CHANNEL**

**Existing Docket 7077 CPG Condition 71 states:**

*Comcast shall provide a channel with a reasonable amount of Vermont-related programming on its Vermont systems.*

**Q.VAN:COMCAST.1-295:** Please describe the Adelphia Channel (hereinafter referred to as the "Vermont channel") that was operational, including production capacity, in 2005 at the time Comcast's Docket 7077 CPG issued.

**A.VAN:COMCAST.1-295:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-296:** Please describe the Vermont-related programming provided on the Vermont channel in 2005 at the time Comcast's Docket 7077 CPG issued.

**A.VAN:COMCAST.1-296:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-297:** Does Comcast continue to operate that Vermont channel? If so, where in the cable channel lineup can a subscriber find that channel? If not, when did Comcast cease providing that Vermont-related programming channel and describe Comcast's decision-making process to eliminate the channel.

**A.VAN:COMCAST.1-297:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-298:** Does Comcast currently provide a channel with a reasonable amount of Vermont-related programming on your Vermont systems? If so, please identify the channel, describe the Vermont-related programming provided on the channel and identify what percentage of the Vermont-related programming to all other programming shown on the channel.

**A.VAN:COMCAST.1-298:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-299:** What is the criteria for determining if programming is "Vermont-related"?

**A.VAN:COMCAST.1-299:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-300:** How has Comcast fulfilled its obligation under Docket 7707 CPG Condition 71?

**A.VAN:COMCAST.1-300:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is cumulative and duplicative.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-301:** Does Comcast provide any other channels in the country with local statewide state-related programming? If so,

- a. Please provide a list of all such channels including the channel number, area served providing local state-related programming channels that Comcast provides in channel lineups in the nation.
- b. Please identify the level of financial or other support Comcast provides to the operation of each statewide local state-related programming channel.

**A.VAN:COMCAST.1-301:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects that the request is outside the scope of, and not relevant to, the docket for the renewal of Comcast's Certificate of Public Good to provide cable television service.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-302:** Why was a condition to include a channel with a reasonable amount of Vermont-related programming on Comcast's Vermont systems not included in the Docket 8301 Proposed CPG?

**A.VAN:COMCAST.1-302:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support.

Without waiving any objection, Comcast responds that it does not believe the condition is necessary or required.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**Q.VAN:COMCAST.1-303:** If Comcast does not propose to include a channel with a reasonable amount of Vermont-related programming in the Docket 8301 CPG with conditions similar to those in the Docket 7707 CPG Condition 71, please explain what indications of changes in community needs have led to Comcast's proposed withdrawal of support for these conditions.

**A.VAN:COMCAST.1-303:**

OBJECTION. The request is outside the scope of the intervention, as set forth in the Board's Order of March 25, 2015, granting permissive intervention to VAN for purposes related to Comcast's obligations to provide PEG access channel capacity, facilities, and financial support. Comcast further objects to the form of question, including assumptions not contained in testimony.

Person Responsible for Response: Daniel M. Glanville  
Title: Vice President, Government & Regulatory Affairs  
Date: November 18, 2015

**As to objections:**

DATED at St. Johnsbury, Vermont, this 18th day of November, 2015.

*J M U*  
Nancy S. [REDACTED]

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