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WRITER'S DIRECT DIAL

June 5, 2013

RECEIVED

JUN 05 2013

REA

VIA HAND DELIVERY

Frances Liles  
Administrator  
North Carolina Rural Electrification Authority  
120 Penmarc Drive; Suite 104  
Raleigh, NC 27603

**Re: TMC-5, Sub 1 – Non-Confidential TWCIS (NC) Responses to Star TMC's First Data Requests to Time Warner Cable Information Services (North Carolina), LLC**

Dear Administrator Liles:

Transmitted herewith, on behalf of Time Warner Cable Information Services (North Carolina), LLC ("TWCIS (NC)"), are the original and 10 copies of TWCIS (NC)'s Responses to Star TMC's First Data Requests to Time Warner Cable Information Services (North Carolina), LLC.

If any questions should arise in connection with this request, please contact the undersigned.

Very truly yours,

Marcus W. Trathen

cc: Jo Anne Sanford, Arbitrator (w/encl.)(via email)  
Dan Higgins (w/encl.)(via email)  
Julie P. Laine

**NORTH CAROLINA  
RURAL ELECTRIFICATION AUTHORITY  
RALEIGH**

**RECEIVED**

**Docket No. TMC-5, Sub 1**

JUN 05 2013

In the Matter of

Petition of Time Warner Cable Information Services (North Carolina), LLC for Arbitration Pursuant to Section 252(b) of the Communications Act of 1934, as Amended, to Establish Interconnection Agreement with Star Telephone Membership Corporation	)	
	)	
	)	
	)	
	)	TWCIS (NC)'S RESPONSES TO
	)	STAR TMC'S FIRST DATA
	)	REQUESTS TO TIME WARNER
AND	)	CABLE INFORMATION
	)	SERVICES
Petition of Star Telephone Membership Corporation for Suspension or Modification Pursuant to Section 251(f)(2) of the Communications Act of 1934, as Amended	)	(NORTH CAROLINA), LLC
	)	
	)	

Pursuant to the Arbitrator's Procedural Order issued May 2, 2013, in this docket, Time Warner Cable Information Services (North Carolina), LLC ("TWCIS (NC)") hereby responds to Star Telephone Membership Corporation's First Data Requests. TWCIS (NC) is providing these responses subject to its objections filed May 24, 2013.

**TWCIS (NC) RESPONSES TO DATA REQUESTS**

1. Describe in complete and specific detail all aspects of all arrangements you seek to establish with Star TMC for number portability pursuant to Section 251(b) of the Act.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) desires to engage in negotiations with Star pursuant to Section 252 of the Act so that the parties may identify the specific "arrangements" which may be required to interconnect and exchange local traffic with Star. As a general matter, the terms and conditions

of LNP that TWCIS (NC) seeks to establish with Star are standard throughout the telecommunications industry, and are included in TWCIS (NC)'s template interconnection agreement ("ICA") attached as Attachment DR 1-1.1 and its Guidelines for LNP Ordering attached as Confidential Attachment DR 1-1.2.

Respondent: Julie Laine

2. Describe in complete and specific detail all aspects of all arrangements you seek to establish with Star TMC for reciprocal compensation pursuant to Section 251(b) of the Act.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) desires to engage in negotiations with Star pursuant to Section 252 of the Act so that the parties may identify the specific "arrangements" which may be required to interconnect and exchange local traffic with Star. As a general matter, TWCIS (NC) seeks to establish with Star the mutual exchange of telecommunications traffic on a bill-and-keep basis on terms and conditions that are standard throughout the telecommunications industry, and which are included in TWCIS (NC)'s template ICA provided in response to data request number 1.

Respondent: Julie Laine

3. Describe in complete and specific detail all aspects of any other arrangements you seek to establish with Star TMC pursuant to Section 251(b) of the Act.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) desires to engage in negotiations with Star pursuant to Section 252 of the Act so that the parties may identify the specific “arrangements” which may be required to interconnect and exchange local traffic with Star. As a general matter, TWCIS (NC) seeks to establish arrangements for number portability, dialing parity, access to rights-of-way, and the mutual exchange of telecommunications traffic on a bill-and-keep basis. The terms and conditions that TWCIS (NC) seeks to establish with Star are standard throughout the telecommunications industry, and are included in TWCIS (NC)’s template ICA provided in response to data request number 1.

Respondent: Julie Laine

4. If you contend that provision by Star to TWCIS of any of the Section 251(b) interconnection arrangements which TWCIS seeks to establish with Star would not impose requirements on Star that are unduly economically burdensome, then as to each such interconnection arrangement identify all facts and produce all documentation supporting your contentions in that regard.

**RESPONSE:**

See TWCIS (NC)’s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) does not bear the burden of proof in this proceeding. After TWCIS (NC) has the opportunity to review Star’s testimony and conduct discovery, TWCIS (NC) will demonstrate in testimony and at hearing that Star has failed to carry its burden of proof under Section 251(f)(2) with respect to Star’s request to avoid compliance with its basic obligations to provide LNP, dialing parity, access to rights-of-way, and the mutual exchange of telecommunications traffic. TWCIS (NC) states that it has not identified any documents responsive to this request.

Respondent: Julie Laine; Counsel.

5. If you contend that suspension of any obligation of Star to provide any of the Section 251(b) interconnection arrangements requested by TWCIS is not necessary to avoid a significant adverse economic impact on users of Star's telecommunications services, then identify all facts and produce all documentation supporting your contentions in that regard.

**RESPONSE:**

See response to data request number 4.

6. If you contend that suspension of any obligation of Star to provide any of the Section 251(b) interconnection arrangements requested by TWCIS would not be consistent with the public interest, convenience, and necessity, then identify all facts and produce all documentation supporting your contentions in that regard.

**RESPONSE:**

See response to data request number 4.

7. Provide all information and documentation possessed by TWC as to how provision of the interconnection arrangements requested by TWCIS would impact the ability of Star TMC to discharge its responsibilities to provide universal service (as that term is defined in 47 USC § 254(c)) as carrier of last resort service in its service area.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any information or documentation responsive to this request.

Respondent: Julie Laine

8. Provide maps depicting the location of all existing TWC facilities in Star's service area and fully describe all plans TWC has for installing additional facilities to increase the size of any of the areas in Star's service area where TWC offers service.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See TWCIS (NC) Confidential Attachment DR 1-8.

Respondent: Julie Laine

9. For each exchange in Star's service area where TWC owns or leases facilities, state (a) the number of households and businesses in that exchange currently passed by TWC's facilities, (b) the number of households and businesses in that exchange currently receiving service of any kind from TWC, and (c) the number of households and businesses in that exchange currently subscribing to TWC's broadband service?

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See Confidential Attachment DR 1-8 submitted in connection with the Section 251(f)(1) proceeding (submitted May 24, 2010). Additional responsive information, if available, will be produced in a supplemental filing.

Respondent: Julie Laine

10. Describe in full and complete detail all retail and wholesale services which TWC would offer to end users in Star's service area if Star was required to provide local number portability to TWCIS, and fully describe your current non-discounted pricing for each such service.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) seeks to enter into an interconnection agreement with Star for the purpose

of offering retail voice services using VoIP technology, marketed to residential customers as “Home Phone” service and to business customers as “Business Class Phone” service. Each is a retail service that enables end users to place local and long distance telephone calls. TWCIS (NC) intends to offer its retail VoIP services as regulated telecommunications services in North Carolina, and no longer intends to offer the services on an unregulated basis through its affiliate TWC Digital Phone LLC. TWCIS (NC) and its affiliates plan to transition TWC Digital Phone LLC’s existing voice customers to TWCIS (NC), and this transition will be complete before TWCIS (NC) and Star begin exchanging local traffic pursuant to an interconnection agreement.

See Confidential Attachment DR 1-10. See also <http://www.timewarnercable.com> for a full description of service offerings.

Respondent: Julie Laine

11. Produce copies of all agreements TWC or TWCIS is party to with any Telecommunications Carrier, Competing Local Provider, Cable service provider, Information Service provider, or other person or entity, that relates to provision of any one or more of the following in Star’s service area: local exchange service; interconnection; the exchange of Telecommunications traffic; the exchange of Information Service traffic; the exchange of VoIP traffic; reciprocal compensation; local number portability or dialing parity.

**RESPONSE:**

See TWCIS (NC)’s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any agreements responsive to this request with the exception of the wholesale agreement produced in the dismissed rural exemption proceeding. As explained in response to data request number 10, TWCIS (NC) will not rely on the wholesale agreement with TWC Digital Phone LLC to provide retail voice services in Star’s service territory.

See TWCIS (NC) Confidential Attachment DR 1-3 submitted in connection with the Section 251(f)(1) proceeding (submitted May 27, 2010).

Respondent: Julie Laine

12. As to each North Carolina incumbent local exchange company ("ILEC") with which TWCIS or any other third-party intermediary wholesale service provider acting on behalf of TWC has established local number portability arrangements in order to facilitate TWC's efforts to offer its "Digital Phone" and/or "Business Class Phone" VoIP services:
  - (a) Identify each such North Carolina ILEC and state the date on which TWC first provided service under the TWCIS/TWC business model in that ILEC's service area;
  - (b) State the number of access lines served by that ILEC as of the date TWC first provided service in that ILEC's service area; and
  - (c) State the number of access lines served by TWC in that ILEC's service area as of the dates one, three and five years after the date TWC first provided such service in that area.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See Confidential Attachment DR 1-12. See TWCIS (NC) Confidential Attachment DR 1-13 submitted in connection with the Section 251(f)(1) proceeding (submitted May 24, 2010).

Respondent: Julie Laine

13. As to each ILEC that is a Rural Telephone Company (as that term is defined in 47 USC § 153 (44)) ("RTC") in any State other than North Carolina with which TWCIS or any other third-party intermediary wholesale service provider acting on behalf of TWC has established local number portability arrangements in order to facilitate the efforts of TWC to offer its "Digital Phone" and/or "Business Class Phone" VoIP services:
  - (a) State the name and address of each such Rural Telephone Company;
  - (b) State the number of access lines served by that Rural Telephone



Company as of the date TWC first provided service under the TWCIS/TWC business model in that Rural Telephone Company's service area; and

- (c) State the number of access lines served by or through the TWCIS/TWC business model in that Rural Telephone Company's service area as of the date one year, two years, three years and five years after the date TWCIS first provided such service in that area.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013.

Respondent: Counsel

- 14. What net access line change do you project for Star after each of one, two, three and five years if TWCIS is permitted to establish number portability arrangements with Star, and state the basis for all such projections in full and complete detail.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any information or documentation responsive to this request with the exception, to the extent applicable, of the projections provided in the dismissed rural exemption proceeding. TWCIS (NC) is unable to make any projections until it has the opportunity to review Star's direct testimony, conduct discovery of Star, and develop expert testimony.

Respondent: Julie Laine

- 15. What net access line change do your project for Star after each of one, two, three and five years if TWCIS interconnects with Star, but Star is not required to establish number portability arrangements with TWCIS, and state the basis for all such projections in full and complete detail.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any information or documentation responsive to this request with the exception, to the extent applicable, of the projections provided in the dismissed rural exemption proceeding. TWCIS (NC) is unable to make any projections until it has the opportunity to review Star's direct testimony, conduct discovery of Star, and develop expert testimony.

Respondent: Julie Laine

16. State TWC's projections as to the number of end user customers in Star's service area that will receive a VoIP communications service through TWC or a TWC affiliate in the next 5 years, as follows:

- (a) How many of these projected customers are expected to be business customers?
- (b) How many of these projected customers are expected to be residential customers?
- (c) Provide all documents and/or workpapers supporting your responses.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any information or documentation responsive to this request with the exception of the projections, to the extent applicable, provided in the dismissed rural exemption proceeding. TWCIS (NC) is unable to make any projections until it has the opportunity to review Star's direct testimony, conduct discovery of Star, and develop expert testimony.

Respondent: Julie Laine

17. Please provide the following information:

- (a) Identify any state commission decision of which TWC is aware that selectively suspended an ILEC's duty to provide LNP as to any TWC affiliate or any entity not affiliated with TWC, or arbitrated an interconnection agreement between any parties that did not provide for provision by the ILEC of LNP service.
- (b) State whether TWC would offer its "Digital Phone" and "Business Class Phone" VoIP services in Star's service area if the Authority determined that it was appropriate to suspend any obligation of Star to provide LNP or any other Section 251(b) interconnection arrangement to TWCIS for 1, 2, 3 or more years, and provide the reason(s) for your response.
- (c) If your response to the previous questions is yes, please provide TWC's estimate as to its take rate for its "Digital Phone" and its "Business Class Phone" VoIP services in Star's service area if the NCREA were to suspend any obligation of Star to provide LNP or any other Section 251(b) interconnection arrangement to TWCIS for a period of 1, 2, 3 or 5 years.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

With regard to (b), TWCIS (NC)'s present intention (which is subject to change based on evolving business considerations) is to launch its voice services in Star's service area regardless of any suspension of Star's LNP obligations once the parties interconnect their networks for purpose of exchanging local traffic pursuant to a negotiated or arbitrated ICA. TWCIS (NC) has not yet had any occasion to determine whether it would offer service if one or more of Star's other Section 251(b) obligations were suspended.

With regard to (c), TWCIS (NC) has not identified any information or documentation responsive to this request. TWCIS (NC) is unable to make any estimate until it has the

opportunity to review Star's direct testimony, conduct discovery of Star, and develop expert testimony.

Respondent: Julie Laine

18. State whether TWC's "Digital Phone" and "Business Class Phone" VoIP services would be offered in Star's service area on a stand-alone or a la carte basis, or would they only be offered in a bundle with other services and, if offered in Star's service area on a stand-alone or a la carte basis so, what the stand-alone price would be for all such services?

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWC's Home Phone and Business Class Phone products will be offered in Star's service area on both a stand-alone and bundled basis.

For pricing information currently in existence, see response to data request number 10.

Respondent: Julie Laine

19. On a municipality-by-municipality basis, if available, otherwise on the smallest geographical basis available, provide the take rate for services offered by TWC as to business and residential premises passed by TWC facilities in:

- (a) Those areas of North Carolina served by independent ILECs (for purposes of these data requests, the term "independent ILECs" means those ILECs which are not former Regional Bell Operating Companies).
- (b) Those areas of Virginia, South Carolina, and Tennessee served by independent ILECs.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See Confidential Attachment 2-11 submitted in connection with the Section 251(f)(1) proceeding (submitted August 20, 2010) and Confidential Attachment DR 1-12 in response to data request number 12 above.

Respondent: Julie Laine

20. Please describe the socio-economic demographic of TWC's current and target customers in the areas served by TWC in North Carolina, and provide copies of all studies, workpapers, surveys and other information possessed by TWC (including your partners, affiliates, parents, subsidiaries, etc.) that describe the social and economic profile of Time Warner's customers and target customer base.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any documents responsive to this request. TWCIS (NC) further states that it serves a wide variety of "socio-economic demographics" and that Time Warner Cable<sup>1</sup> does not target potential retail customers based on any particular "socio-economic demographic."

Respondent: Julie Laine

21. With regard to customers subscribing to TWC's "Digital Phone" or "Business Class Phone" VoIP services, please provide:

- (a) The percentage of such customers that did not port their ILEC telephone number to TWC from the Rural Telephone Company serving them when they became a TWC customer and the percentage of such customers that did port their ILEC telephone to TWC.

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<sup>1</sup> "Time Warner Cable" is used to refer generally to any or all of the affiliates of TWCIS (NC) currently operating in North Carolina (or another state where the context so indicates) and includes, but is not limited to, TWCIS (NC)'s cable operator and broadband affiliates.

- (b) The total number of such non-porting customers and the percentage of such non-porting customers to total TWC digital VoIP service customers per Rural Telephone Company, per year, for TWC nationally.
- (c) The percentage of such customers that did not port their ILEC telephone number to TWC from an ILEC that is not a Rural Telephone Company serving them when they became a TWC customer and the percentage of such customers that did port their ILEC telephone number to TWC.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

Responsive information will be produced in a supplemental filing.

Respondent: Julie Laine

22. Please provide the total number of retail VoIP communications services customers TWC has within the State of North Carolina, the percentage of those retail customers which have retained and are using their prior telephone number and the percentage of customers which have been provided and are using new telephone numbers provided directly or indirectly to them by TWC. For the customers which have been provided and are using new telephone numbers provided directly or indirectly by TWC, what percentage of these customers transferred service from an existing incumbent local exchange carrier and what percentage are telephone service customers or new lines which have been provided a telephone number for the first time?

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See Confidential Attachment DR 1-12. Additional responsive information, if available, will be produced in a supplemental filing.

Respondent: Julie Laine

23. What percentage of TWC's customers in North Carolina pay the full, non-discounted retail rate for: TWC's "Digital Phone" VoIP service, "Business Class Phone" VoIP service, cable television service, and high-speed Internet service?

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

Responsive information will be produced in a supplemental filing.

Respondent: Julie Laine

24. Please describe in full and complete detail all incentives and promotional offers that TWC currently makes or has previously made available in areas of North Carolina in which TWC has an interconnection agreement ("ICA") with an ILEC to incent customers to choose TWC as their communications service provider and switch their service to TWC, during the 12 months following implementation of that ICA.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

For information regarding certain promotions currently in place, see Attachment DR 1-

24. Additional responsive information will be produced in a supplemental filing.

Respondent: Julie Laine

25. Please describe in full and complete detail all criteria TWC uses to determine whether to extend cable television service and VoIP communications services into areas in North Carolina not presently served by TWC?

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

**BEGIN TWCIS (NC) CONFIDENTIAL** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] **END TWCIS (NC) CONFIDENTIAL**

Respondent: Julie Laine

26. What percentage of persons or entities requesting "Digital Phone" or "Business Class Phone" VoIP service from TWC are denied service by TWC?

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) states that, as a result of Star's refusal to comply with its obligations to interconnect and exchange local traffic, TWCIS (NC) has been required to deny voice services to all consumers located within Star's service territories in North Carolina. Elsewhere in North Carolina, Home Phone and Business Class Phone are offered to all homes and businesses passed by Time Warner Cable's network where the network is operationally ready. TWCIS (NC) has not identified any other information or documents responsive to this request.

Respondent: Julie Laine

27. Please provide TWC's most recently filed Form FCC 477(s) covering the census tracts and Zip codes in Bladen, Duplin, Cumberland, Columbus and Sampson Counties, North Carolina.



**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See Confidential Attachment DR 1-27.

Respondent: Julie Laine

28. Please provide all documents in the possession of TWC or its affiliates or subsidiaries which contain data, studies, analyses and/or reports on the effect of the availability of number portability on the marketing, sale, penetration rates, take rate, and/or market share of TWC's "Digital Phone" and/or "Business Class Phone" VoIP services and similar service offerings, including assessments of consumer preferences and reactions to the availability or non-availability of LNP.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) has not identified any documents responsive to this request.

Respondent: Julie Laine

29. Please provide copies of any and all terms of use or customer service agreements that may or will apply to customers intended to be served by TWC with either TWC's "Digital Phone," "Business Class Phone" or other VoIP services within Star TMC's service area.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

TWCIS (NC) states that the terms and conditions applicable to subscribers of Home Phone and Business Class Phone are available on the Time Warner Cable website at the addresses provided below.

- <http://help.twcable.com/policies.html>
- <http://www.twcbc.com/corporate/termsandconditions.html>
- <http://www.twcbc.com/corporate/termsandconditions.html>

Respondent: Julie Laine

30. Please state in full and complete detail the basis on which you denied, in your Response to Petition of Star Telephone Membership Corporation Pursuant to 47 USC § 251(f)(2) filed on May 7, 2013, the factual matters alleged in paragraphs 16, 18, 20, 23 of Star TMC's Petition.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

With regard to paragraph 16 and 18 of Star's Petition, TWCIS (NC) denies that Section 251(f)(2) authorizes state commissions to suspend Section 251(b) obligations as result of competition and denies that competition is adverse to the public interest. TWCIS (NC) further denies that evidence to be adduced by Star related to TWCIS (NC)'s proposed service offerings would result in the type of harm from which Section 251(f)(2) offers relief.

With regard to paragraph 20, TWCIS (NC) denies this allegation to the extent it alleges that TWC is under any obligation to extend its facilities to any particular portions of Star's service area. TWCIS (NC) intends to offer its Home Phone and Business Class Phone to all customers within its footprint in Star's territory on non-discriminatory rates and terms as described in response to data request number 26.

With regard to paragraph 23, TWCIS (NC) denies the allegations to the extent Star alleges that the *Sprint v. Star TMC* Section 251(f)(1) proceeding has any legal or factual relevance to this Section 251(f)(2) proceeding, and denies that the decision of Arbitrator Moore has any continuing effect even in the *Sprint v. Star TMC* case, much less in this proceeding.

Respondent: Counsel

31. Please provide copies of all documents which you rely on to support any of your responses to any of Star's Data Requests, and all documents identified in your responses to Star's Data Requests.

**RESPONSE:**

See TWCIS (NC)'s objections to this request filed on May 24, 2013. Without waiving its objections, TWCIS (NC) responds as follows.

See Attachments and Confidential Attachments.

Respondent: Counsel

Dated: June 4, 2013

**TIME WARNER CABLE  
INFORMATION SERVICES  
(NORTH CAROLINA), LLC**

By: \_\_\_\_\_



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Its Attorneys

**CERTIFICATE OF SERVICE**

The undersigned, of the law firm Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that he has served a copy of the foregoing **Responses of Time Warner Cable Information Services (North Carolina), LLC to Star Telephone Membership Corporation's First Set of Data Requests** via electronic mail to Daniel Higgins at [dhiggins@bdppa.com](mailto:dhiggins@bdppa.com).

This 4th day of June, 2013.



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Marcus W. Trathen