

Maureen O. Helmer  
Partner

September 7, 2018

**VIA ELECTRONIC MAIL**

New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**Joint Petition of Charter Communications, Inc. and Time Warner Cable Inc. for Approval of a Transfer of Control of Subsidiaries and Franchises; for Approval of a Pro Forma Reorganization; and for Approval of Certain Financing Arrangements.**  
**Case: 15-M-0388**

**Re: Charter's Request for Extension of Time to file Applications for Rehearing**

Dear Chair Rhodes and Commissioners of the Public Service Commission:

On July 27, 2018, the Commission issued an Order Confirming Missed June 2018 Compliance Obligation and Denying Good Cause Justification (the "*July Compliance Order*")<sup>1</sup> and an Order Denying Petitions for Rehearing and Reconsideration and Revoking Approval (the "*Revocation Order*")<sup>2</sup> (collectively, the "July Orders").

Pursuant to Pub. Serv. L. § 22, any applications for rehearing of the *July Compliance Order* or of the *Revocation Order* were initially due within thirty days of the orders, *i.e.* by Monday, August 27, 2018, "unless the Commission for good cause shown shall direct."<sup>3</sup> On August 22, 2018, the Commission acted pursuant to Pub. Serv. L. § 22 to extend Charter's deadline to seek rehearing of both July Orders until September 10, 2018. Charter respectfully requests that the Commission further extend the deadline to seek rehearing of both July Orders to October 10, 2018.

Good cause exists to further extend the deadlines for rehearing. Charter and the Department have been involved over the past few weeks in productive dialogue regarding the July Orders as well as the related special proceeding initiated by the Commission in the Supreme

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<sup>1</sup> Case 15-M-0388, Order Confirming Missed June 2018 Compliance Obligation and Denying Good Cause Justification (July 27, 2018).

<sup>2</sup> Case 15-M-0388, Order Denying Petitions for Rehearing and Reconsideration and Revoking Approval (July 27, 2018).

<sup>3</sup> Pub. Serv. L. § 22.

Court pursuant to the *July Compliance Order*. As part of that dialogue, Charter has been assembling additional information regarding broadband deployment efforts in New York for the Department's and the Commission's review. A further extension would allow additional time for discussions between Charter and the Department before the initiation by Charter of additional Commission or court proceedings. Additional proceedings before the Commission and/or the courts would have the potential to divert the resources of both Charter and the Department from discussions regarding the July Orders, and could have the effect of making it more difficult to resolve the issues raised by the July Orders without litigation.<sup>4</sup>

In order to ensure that this request does not delay other measures Charter would soon need to initiate to protect its rights to administrative and judicial review, we respectfully request that the Commission act upon this request by noon on Monday, September 10, 2018.

If you have any questions with regards to this request, please do not hesitate to contact the undersigned. We appreciate Your Honors' attention to this matter.

Very truly yours,

*/s/ Maureen O. Helmer*

Maureen O. Helmer  
*Counsel for Charter Communications, Inc.*

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<sup>4</sup> This request for an extension of these deadlines is without prejudice to Charter's ability to seek relief, either from the Commission or otherwise, from the *Revocation Order* and the *July Compliance Order*.