Joint Petition of

TIME WARNER CABLE INC.

and

COMCAST CORPORATION

For Approval of a Holding Company Level Transfer of Control

Case 14-M-0183

Statement of Comcast Corporation and Time Warner Cable Inc. in Further Support of Trade Secret Designations

Comcast Corporation (“Comcast”) and Time Warner Cable Inc. (“Time Warner Cable”) (collectively, the “Companies”), by and through their undersigned counsel, respectfully provide this Statement in Further Support of the trade secret designations filed by the Companies in the above-referenced case. For the reasons that follow, the information and material identified below – and redacted in the attached versions of the Companies’ responses to Department of Public Service Staff interrogatories – constitute trade secrets that must continue to be excepted from disclosure under pursuant to Sections 87 and 89 of the N.Y. Public Officers Law (POL) and Title 16, Section 6, of the N.Y. Code of Rules and Regulations.

I. Background

On June 17, 2014, Mr. Gerald Norlander, Executive Director of the Public Utility Law Project of New York, Inc., issued a POL request for disclosure of “[t]he responses of Comcast
and Time Warner to each staff interrogatory, to date.”¹ As of that date, the Companies had served responses to three sets of Department Staff Information Requests (the “Responses”). Because the Responses contain confidential commercial and trade secret information, the Companies filed the Responses pursuant to a request for exception from disclosure under the POL and the Commission’s Rules.² POL Section 89(5)(a)(3) states that such information “shall be excepted from disclosure and be maintained apart by the [Commission] from all other records until fifteen days after the entitlement to such exception has been finally determined or such further time as ordered by a court of competent jurisdiction.”³

After receiving the Norlander disclosure request, the Companies reviewed their responses to Staff’s interrogatories to determine if their requests for exception from disclosure could be narrowed. While certain information and materials provided contain highly sensitive trade secret information that must be excepted from disclosure under the POL, the Companies determined that certain other information does not necessarily need to be treated as trade secret material. Thus, the Companies provide herewith redacted versions of the Responses that may be publicly

¹ See Email Correspondence from Hon. David Prestemon, Administrative Law Judge, to Mr. Gerald Norlander, acknowledging request (dated June 24, 2014).

² See Letter from Andrew M. Klein, Counsel for Comcast, to Donna Giliberto, Records Access Officer (dated May 30, 2014) (requesting trade secret exemption for the Companies responses to Staff’s First Set of Interrogatories and Document Requests); Letter from Andrew M. Klein, Counsel for Comcast, to Donna Giliberto, Records Access Officer (dated June 2, 2014) (requesting trade secret exemption for the Companies responses to Staff’s Second Set of Interrogatories and Document Requests); Letter from Andrew M. Klein, Counsel for Comcast, to Hon. David Prestemon, Administrative Law Judge (dated June 12, 2014) (requesting trade secret exemption for the Companies’ supplement responses to Staff’s Second Set of Interrogatories and Document Requests); Letter from Andrew M. Klein, Counsel for Comcast, to Hon. David Prestemon, Administrative Law Judge (dated June 16, 2014) (requesting trade secret exemption for the Companies’ responses to Staff’s Third Set of Interrogatories and Document Requests).

disclosed. However, as fully explained below, the redacted information as well as the entirety of each of the Exhibits identified below constitute confidential commercial and trade secret information that, if disclosed, would cause substantial competitive harm to the Companies, and therefore must be excepted from disclosure.

II. Further Statement in Support of Trade Secret Designations

The POL permits the Commission to deny public access to records that are “trade secrets or are submitted to an agency by a commercial enterprise or derived from information obtained from a commercial enterprise and which if disclosed would cause substantial injury to the competitive position of the subject enterprise.”4 The Commission’s rules further provide that “a trade secret may consist of any formula, pattern, device or compilation of information which is used in one’s business, and which provides an opportunity to obtain an advantage over competitors who do not know or use it.”5

The factors that the Commission considers in determining trade secret status include “(i) the extent to which the disclosure would cause unfair economic or competitive damage; (ii) the extent to which the information is known by others and can involve similar activities; (iii) the worth or value of the information to the person and the person’s competitors; (iv) the degree of difficulty and cost of developing the information; (v) the ease or difficulty associated with obtaining or duplicating the information by others without the person’s consent; and (vi) other statute(s) or regulations specifically excepting the information from disclosure.”6

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5 16 NYCRR § 6-1.3(a).
6 16 NYCRR § 6-1.3(b)(2).
In general, the redacted trade secret information and the Exhibits identified below include, without limitation, information and details concerning (i) the current operations and future business plans of the Companies, (ii) strategic information concerning their products and services, (iii) strategic investment plans, (iv) customer and service location information, and (v) performance data. This highly sensitive information has not been publicly disclosed and is not expected to be known by others. Moreover, given the highly competitive nature of the industries in which Comcast and Time Warner Cable compete, disclosure of these trade secrets would cause substantial injury to the Companies’ competitive positions—particularly since the Companies do not possess reciprocal information about their competitors. In further support of the Companies’ request for exception from disclosure over such trade secrets, the specific grounds for each piece of information redacted in versions of the Responses attached hereto is provided below.

A. Response to DPS-6 and DPS-52

The response to DPS-6 contains information concerning Time Warner Cable’s operations as they relate to projects developed in conjunction with New York State. While the projects may

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7 The existence of competition in the communications industries within which Comcast and Time Warner Cable operate has been well-established in prior Commission proceedings. See, e.g., Case 03-C-1220, Report: Competitive Analysis of Telecommunications in NY; and Case 05-C-0616, Proceeding on the Motion of the Commission to Examine Issues Related to the Transition to Intermodal Competition in the Provision of Telecommunications Services, Statement of Policy on Further Steps Toward Competition in the Intermodal Telecommunications Market and Order Allowing Rate Filings (issued April 11, 2006) and DPS Staff White Paper, “Telecommunications in New York: Competition and Consumer Protection,” (issued September 21, 2005); Case 03-C-0971, Proceeding on Motion of the Commission to Consider the Adequacy of Verizon New York Inc.’s Retail Service Quality Improvement Processes and Programs, Ruling on Protective Order and Access by Competitors to Allegedly Confidential Information (February 23, 2007); Matter 09-01904 – 2010 Customer Service Annual Report for All Time Warner Cable New York Cable Systems, Determination of Appeal of Trade Secret Determination (issued August 26, 2011); Department of Public Service Staff, Report on Verizon Service Quality – Second Quarter 2013 (filed Session of August 15, 2013).
in general be publicly known, Time Warner Cable’s operations with respect to such projects have not been publicly disclosed, and thus are not expected to be known by third-parties. Such information if disclosed would cause substantial injury to the competitive position of the Time Warner Cable, because the information would give competitors information concerning Time Warner Cable’s operations and strategies that competitors could use for their competitive advantage by, for example, employing the same or competing strategies.

The response to DPS-6 also contains information concerning Comcast’s business plans and strategies relating to set-top box technologies. These technologies are not yet fully developed and have not been disclosed to the public, and thus constitute trade secrets. The disclosure of the redacted information would give Comcast’s competitors insight into Comcast’s confidential plans and strategies, and thus would afford them an unfair competitive advantage that would be detrimental to Comcast. Competitors could utilize such information to develop or accelerate the development of competitive responses to these technologies.

Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies by permitting competitors to learn of the Companies’ confidential business plans and strategies, the redacted information qualifies for trade secret status and must be excepted from disclosure.

B. Response to DPS-7

The response to DPS-7 concerns Comcast’s handling of customer requests for an unlisted service, and how Comcast handles customer inquiries related to this subject matter. The information provided in this response is kept confidential by Comcast and has not been publicly disclosed. If disclosed, Comcast’s competitors may attempt to use this trade secret information in comparative advertising or other marketing materials, while the lack of reciprocal information
for Comcast’s competitors would make it difficult if not impossible to obtain equivalent insight, make comparative determinations, or defend against inaccurate comparisons. Thus, since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Comcast, the redacted information qualifies for trade secret status and respectfully must be excepted from disclosure.

C. Responses to DPS-8, DPS-9, DPS-10, DPS-11, DPS-13, DPS-18, DPS-20, DPS-21, DPS-22, DPS-28, DPS-31, DPS-32, DPS-36, DPS-40, DPS-41, DPS-45, and DPS-48

The redacted information in these responses contains information concerning Comcast’s future business plans with respect to particular subject matters. Comcast’s future business plans are kept confidential by the company and are generally not publicly disclosed. If disclosed, the redacted information would allow competitors to understand or deduce Comcast’s future business plans and develop their own plans accordingly. As such, the information could potentially be used by competitors to Comcast’s disadvantage, particularly since Comcast does not possess details concerning the future business plans of its competitors. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Comcast, the redacted information qualifies for trade secret status and respectfully must be excepted from disclosure.

D. Response to DPS-12 and 12-2

The response to DPS-12 and Exhibit 12-2 contain information concerning the New York schools and libraries served by Time Warner Cable, as well as information concerning Comcast’s future business plans to serve such entities. This information is kept confidential by Time Warner Cable and has not been disclosed to the public. If disclosed, such information
would provide the Companies’ competitors with detailed information about the location of, and services provided to, these entities, as well as Comcast’s future business plans to provide such services. As such, the information could potentially be used by competitors to market their services to these customers, and thus disadvantage the Companies – particularly since they do not possess comparable details concerning their competitors’ provision of such services. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies, the redacted information in the response to DPS-12 and the entirety of Exhibit 12-2 qualify for trade secret status and respectfully must be excepted from disclosure.

E. Response to DPS-14

The response to DPS-14 contains specific details of Time Warner Cable’s current build-out plans to rural areas of New York, as well as Comcast’s future business plans in this area. The information also contains anticipated financial expenditures for Time Warner Cable’s build-out plans. Such information has not been publicly disclosed. If disclosed, such information would provide competitors with detailed information concerning the Companies build-out plans as well as insight into Time Warner’s cost structure, which competitors could use unfairly to the Companies’ disadvantage. For example, a competitor might offer promotions or divert capital resources in response to Time Warner’s build-out plans. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies, the redacted information qualifies for trade secret status and respectfully must be excepted from disclosure.
F. Response to DPS-15

The response to DPS-15 contains information concerning Time Warner Cable’s operations as they relate to projects funded by federal or state programs. While the projects in general are publicly known, Time Warner Cable’s operations with respect to such projects have not been publicly disclosed, and thus are not expected to be known by others. Such information, if disclosed, would cause substantial injury to the competitive position of the Time Warner Cable, because the information would give competitors information concerning Time Warner Cable’s operations and strategies that competitors could use for their competitive advantage by, for example, employing the same or competing strategies. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Time Warner Cable by permitting competitors to learn of the Time Warner Cable’s confidential business plans and strategies, the redacted information qualifies for trade secret status and respectfully must be excepted from disclosure.

G. Response to DPS-17 and Exhibit 17

The response to DPS-17 and Exhibit 17 contain information concerning the Companies’ current operations and staffing levels in New York, as well as Comcast’s future business plans concerning post-merger operations and employee levels. This information is kept confidential by the Companies and has not been publicly disclosed, and is thus not expected to be known by others. Further, it would not be possible for a third-party for to independently develop such a compilation of information without the Companies’ consent. Such information if disclosed would cause substantial injury to the competitive position of the Companies, because it would give competitors unfair insight into the manner in which the Companies staff and manage their operations in New York. A competitor might use this information, for example, to inform their
own operating strategies. Since such information is not available to the public and disclosure of
the information would result in substantial competitive injury to the Companies, the redacted
information in DPS-17 and Exhibit 17 qualifies for trade secret status and respectfully must be
excepted from disclosure.

**H. Response to DPS-19 and Exhibits 19-1 through 19-17**

The response to DPS-19 and Exhibits 19-1 through 19-17 contain the Companies’
detailed customer and service quality data. This information is kept confidential by the
Companies and is not publicly disclosed, and is thus not expected to be known by others. The
redacted passages contain detailed, disaggregated customer and service data that could not be
obtained or independently developed by a third-party without the Companies’ consent. Such
information, if disclosed, would cause substantial injury to the competitive positions of the
Companies. Competitors could use this information unfairly, for example, in detailed targeted
marketing campaigns, or to guide their own service levels in particular areas. Such
considerations are heightened by the fact that the Companies do not have reciprocal information
for the Companies’ competitors, which would make it difficult if not impossible to obtain
equivalent insight, make comparative determinations, or defend against inaccurate comparisons.
Given that such information is not available to the public and disclosure of the information
would result in substantial competitive injury to the Companies, the redacted information in
DPS-19 and Exhibits 19-1 through 19-17 qualifies for trade secret status and respectfully must be
excepted from disclosure.

**I. Responses to DPS-24 through DPS-27 and Exhibits 24 through 27**

Exhibits 24, 25, 26 and 17, which were submitted as part of the Companies’ responses to
DPS-24, DPS-25, DPS-26 and DPS-27, contain detailed information and performance statistics
relating to the Companies’ call centers in New York and the Northeast. This information is kept confidential by the Companies and has not been publicly disclosed, and is thus not expected to be known by others. The information contains detailed information concerning the Companies’ operations and services that could not be obtained or independently developed by a third-party without the Companies’ consent. Such information, if disclosed, would cause substantial injury to the competitive position of the Companies, because the information would give competitors unfair insight into the Companies’ operations and could potentially be used by competitors or other third-parties to the Companies’ disadvantage – particularly since the Companies not have reciprocal information relating to its competitors. For example, competitors could attempt to use the performance statistics to inform their own call center activities or to engage in comparative advertising, while the lack of reciprocal information for the Companies’ competitors would make it difficult if not impossible to obtain equivalent insight, make comparative determinations, or defend against inaccurate comparisons. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies, the redacted information in DPS-24 through DPS-27 and the entirety of Exhibits 24-27 warrant trade secret status and respectfully must be excepted from disclosure.

J. Response to DPS-30

The response to DPS-30 includes information concerning Comcast’s handling of cybersecurity issues associated with its Xfinity Home service. The redacted language contains information concerning Comcast’s operations that is kept confidential by Comcast and has not been publicly disclosed, and is thus not expected to be known by others. Such information if disclosed would cause substantial injury to the competitive position of Comcast, because such information would give competitors insight into Comcast’s operations and could potentially be
used unfairly to inform competitors own cyber-security practices. For example, competitors could attempt to implement strategies similar to those described in the response that they otherwise would not, or could use this information unfairly in comparative advertising. Protection of such information from public disclosure is also of importance from the consumer and public safety standpoints.\textsuperscript{8} Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Comcast, and other potential harm, the redacted information in DPS-30 qualifies for trade secret status and the Commission and respectfully must be excepted from disclosure.

\textbf{K. Response to DPS-33 and Exhibits 33-1 and 33-2}

Exhibits 33-1 and 33-2, which were submitted as part of the response to DPS-33, contain information concerning Time Warner Cable’s projects funded by NYSERDA. While the projects in general are publicly known, the information contained in the exhibits has not been publicly disclosed, and thus are not expected to be known by others. Such information if disclosed would cause substantial injury to the competitive position of the Time Warner Cable, because the information would give competitors information concerning Time Warner Cable’s operations and financial information relating to these projects that competitors could use for their competitive advantage. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Time Warner Cable by permitting competitors to learn of the Time Warner Cable’s operations, the redacted information qualifies for trade secret status under the standards established by statute and the Commission and respectfully must be excepted from disclosure.

\textsuperscript{8} This information may properly be considered critical infrastructure information, which is specifically protected from disclosure under the POL. See, e.g., N.Y. POL §§ 87(2)(i) and 89(5)(1-a).
L. Responses to DPS-34 and DPS-35

The responses to DPS-34 and DPS-35 contain information concerning Comcast’s operations and future business plans relating to avoidance of truck rolls and vehicle fleets. The redacted language contains information concerning Comcast’s operations and future plans that is kept confidential by Comcast and has not been publicly disclosed, and is thus not expected to be known by others. Such information if disclosed would cause substantial injury to Comcast’s competitive position, because the information would give competitors insight into Comcast’s operations and could potentially be used by competitors or other third-parties to its disadvantage – particularly since Comcast not have reciprocal information relating to its competitors. For example, the competitors could attempt to implement similar plans as described in the response that they otherwise would not. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Comcast, the redacted information in DPS-34 qualifies for trade secret status and respectfully must be excepted from disclosure.

M. Response to DPS-37 and Exhibit 37

Exhibit 37, which was submitted as part of the Companies’ response to DPS-37, contains information setting forth the number of subscribers to Time Warner Cable’s “Everyday Low Price” broadband service. This information is kept confidential by Time Warner Cable and has not been public disclosed, and is thus not expected to be known by others. Moreover, a third-party would have no ability to independently develop this compilation of information without Time Warner Cable’s consent. Such information if disclosed would cause substantial injury to Time Warner Cable’s competitive position, because the information would give competitors insight into the market for Time Warner Cable’s broadband service and thereby provide
competitors with an undue advantage – particularly since Time Warner Cable does not have reciprocal information about its competitors’ services. Moreover, it could have an effect on investors’ perception of the value of Time Warner Cable. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Time Warner Cable, the information in Exhibit 37 qualifies for trade secret status and respectfully must be excepted from disclosure.

N. Response to DPS-38

The response to DPS-38 contains information relating to the number of Wi-Fi hotspots that Time Warner Cable has deployed in New York, as well as Comcast’s future business plans in this area. This information is kept confidential by the Companies and has not been publicly disclosed, and is thus not expected to be known by others. Moreover, a third-party would have no ability to independently develop the compilation of information concerning the number of Time Warner Cable’s Wi-Fi hotspots without Time Warner Cable’s consent. Such information if disclosed would cause substantial injury to the competitive position of the Companies, because the information would give competitors insight into the Companies’ current operations and future business plans and could potentially be used by competitors or other third-parties to the Companies’ disadvantage. For example, competitors could use this information to inform their own investment into Wi-Fi as well as the areas where they choose to deploy that investment, particularly since the Companies do not have reciprocal information relating to their competitors. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies, the redacted information in the response to DPS-38 qualifies for trade secret status and respectfully must be excepted from disclosure.
O. Response to DPS-42 and DPS-47

The responses to DPS-42 and DPS-37 contain information concerning the Companies’ operations relating to the Emergency Alert System. This information is kept confidential by the Companies and has not been publicly disclosed, and is thus not known by others. Such information if disclosed would cause substantial injury to the competitive position of the Companies, because the information would give competitors insight into the Companies’ operations and could potentially be used by competitors or other third-parties to the Companies’ disadvantage – particularly since the Companies do not have reciprocal information relating to their competitors. For example, competitors could implement similar operational techniques based on this information that they otherwise would not. Moreover, the Companies prefer not to publicly disclose this information, because it may be used by a mal-intentioned individual or group in an effort to disrupt an emergency alert.\(^9\) Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies, the redacted information in the responses to DPS-42 and DPS-47 qualifies for trade secret status and respectfully must be excepted from disclosure.

P. Response to DPS-43

The response to DPS-43 contains information concerning the number of Comcast’s “Internet Essentials” customers in New York, as well as Comcast’s future business plans for the “Internet Essentials” program. This information is kept confidential by Comcast and has not been publicly disclosed, and is thus not known by others. Furthermore, a third-party would have no ability to obtain or develop Comcast’s customer numbers without Comcast’s consent. Such

\(^9\) As such, information concerning emergency alert systems may be properly considered critical infrastructure information, which is specifically protected from disclosure under the POL. See, e.g., N.Y. POL §§ 87(2)(i) and 89(5)(1-a).
information if disclosed would cause substantial injury to the competitive position of Comcast, because the information would give competitors insight into the market for Comcast’s “Internet Essentials” service and thereby provide competitors with an advantage over Comcast – particularly since Comcast does not have reciprocal information about its competitors’ services. For example, competitors could alter their business strategies, service offerings or pricing to target Comcast customers for acquisition based on this information. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Comcast, the redacted information in the response to DPS-43 qualifies for trade secret status and respectfully must be excepted from disclosure.

Q. Response to DPS-44 and Exhibits 44-1 and 44-2

The response to DPS-44 and Exhibits 44-1 and 44-2 contain information concerning the Companies’ operations and customers in relation to cellular backhaul service. Exhibits 44-1 and 44-2 specifically identify the cell sites currently being served by Time Warner Cable in New York and the sites that are currently pending. This information is kept confidential by the Companies and has not been public disclosed, and is thus not expected to be known by others. Further, a third-party would have no ability to independently develop such information without the Companies’ consent. Such information if disclosed would cause substantial injury to their competitive position, because the information would give competitors insight into the Companies’ customers, facilities and operations as they relate to cellular backhaul services and thereby provide competitors with an advantage over the Companies – particularly since the Companies do not have reciprocal information about its competitors. For example, competitors could alter their business strategies, services and offerings, or target customers for acquisition,
based on this information. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies, the redacted information in the response to DPS-44 and the entirety of Exhibits 44-1 and 44-2 warrant trade secret status and respectfully must be excepted from disclosure.

R. Response to DPS-46 and Exhibit 46

Exhibit 46, which was submitted as part of the response to DPS-46, contains specific details of Time Warner Cable’s current broadband deployment plans in New York. In particular, the information contains the specific details about such plans, including the franchise area, county, total miles of deployment, number of premises passed and the completion or planned completion date. Such information is kept confidential by Time Warner Cable and has not been publicly disclosed, and is thus not expected to be known by others. Such information if disclosed would cause substantial injury to the competitive position of Time Warner Cable, because the information would give competitors insight into Time Warner Cable’s operations, strategies and future plans, which competitors could use to gain a competitive advantage – particularly since Time Warner Cable does not have reciprocal information about its competitors’ deployments and plans. For example, competitors could alter their deployment plans to certain locations based on this information to obtain a competitive advantage. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to Time Warner Cable, the redacted information warrants trade secret and respectfully must be excepted from disclosure.

10 Given the importance of cellular communications in emergency situations, information concerning the locations of the cell sites where Time Warner Cable provides cellular backhaul service may also be considered critical infrastructure information, which is specifically protected from disclosure under the POL. See, e.g., N.Y. POL §§ 87(2)(i) and 89(5)(1-a).
S. Response to DPS-49, DPS-50 and DPS-51 and Exhibits 49 and 50

Exhibits 49 and 50, which were submitted as part of the responses to DPS-49, DPS-50 and DPS-51, contain information regarding the Companies’ promotional rates for service in various locations within their respective footprints – as well as competitive intelligence concerning competitor offerings. This compilation and competitive analysis are not publicly available. Significant time and expense would be required for a third-party to even attempt to replicate this information, such that Exhibits 49 and 50 would be valuable to competitors, and if disclosed would give competitors an advantage over the Companies by providing them with information concerning the Companies’ broadband speeds, tiers and promotional pricing, and information of other competitors, that would not otherwise be obtainable without the expenditure of significant resources and efforts. Since the information is not available to the public, contains competitive intelligence, and would be difficult for a third-party to duplicate without significant effort and expense, the compilations of information in Exhibits 49 and 50 warrant trade secret status and respectfully must be excepted from disclosure.

T. Response to DPS-52

The response to DPS-52 contains information concerning the Companies’ business plans and strategies relating to set-top box technologies. This information is kept confidential by the Companies and has not been publicly disclosed, and is thus not expected to be known by others. Such information if disclosed would cause substantial injury to the competitive position of the Companies, because the information would give competitors insight into the Companies’ business plans and strategies and could potentially be used by competitors or other third-parties to the Companies’ disadvantage – particularly since the Companies do not have reciprocal information relating to their competitors. For example, competitors could use the information to
deploy similar plans and strategies that they otherwise would not. Since such information is not available to the public and disclosure of the information would result in substantial competitive injury to the Companies by permitting competitors to learn of the Companies’ confidential business plans and strategies, the redacted information warrants trade secret status and respectfully must be excepted from disclosure.

Dated: July 10, 2014

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