

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED
03/30/26
04:59 PM
A2507016

Joint Application of Charter Communications, Inc., Charter Communications Holdings, LLC, and Cox Enterprises, Inc. for Approval Pursuant to Public Utilities Code Section 854 of the Indirect Transfer of Control of Cox California Telcom, LLC (U-5684-C).

Application 25-07-016

RESPONSE TO ADMINISTRATIVE LAW JUDGE INQUIRY

[PUBLIC VERSION]

Pursuant to the March 18, 2026 *Administrative Law Judge's Fifth Ruling Directing Filing of Additional Information Within 10 Days* ("ALJ Ruling"), Charter Communications, Inc. and Charter Communications Holdings, LLC (collectively, "Charter") respectfully submit the following responses to the inquiries raised in the ALJ Ruling.

As described in the July 30, 2025 Joint Application ("Joint Application")¹ submitted by Charter, Cox Enterprises, Inc. ("CEI"), and Cox California Telcom, LLC (U-5684-C) ("Cox California") (collectively, the "Joint Applicants") requesting Commission approval of the indirect transfer of control (the "Transfer") of Cox California and in Charter's subsequent responses to data requests from intervenors and the Public Advocate's Office in this proceeding, the Transfer and broader combination of Charter and Cox Communications, Inc. ("Cox") under common ownership (the "Transaction") will bring numerous benefits to California consumers, businesses, and the public, as discussed comprehensively below.²

¹ A.25-07-016, Joint Application of Charter Communications, Inc., Charter Communications Holdings, LLC, and Cox Enterprises, Inc. for Approval Pursuant to Public Utilities Code Section 854 of the Indirect Transfer of Control of Cox California Telcom, LLC (U-5684-C), at 22 (July 30, 2025) ("Joint Application").

² Throughout this response, Charter has included citations to its responses provided in discovery to demonstrate that it has made responses to similar queries from intervenors and Cal Advocates throughout the proceeding, and that this information is available to them.

Charter respectfully notes that Cox California, which provides wireline voice and enterprise services only and does not provide standalone cable, mobile, or residential internet services, is the sole public utility subject to the Joint Application.³ Although the Transfer does not directly implicate the broadband, mobile, and video services offered by the Cox subsidiaries that are not parties to the Transfer, Charter believes that unifying the resources and experience of both Charter and Cox will make the combined company a stronger competitor across all lines of service, including the voice and enterprise services that are directly implicated by the Transfer, as well as broadband, mobile, and video services in the context of the broader Transaction.⁴

Question 4.1 Reduced Customer Bills

Many of the speakers at the public participation hearings described that they supported the proposed transaction because their bills would be reduced by thousands or hundreds of dollars every year.

- a. Describe the specific dollar amount customers should expect their post-merger bills will be reduced monthly, quarterly, and annually.*
- b. Describe how customers will be able to see the difference in the amount owed on their post-merger bills and how they will understand that the amount of money owed is less than it otherwise would have been.*
- c. Will all future customer promotions and planned offerings be available to all post-merger customers irrespective of geographic location?*
- d. Describe the quarterly report that Commission and Legislature will receive, that will detail the bill reduction and amount of money saved by customers of the post-merger company.*

³ The Joint Applicants have not sought any action from the Commission with respect to any other entity except for Cox California. Joint Application at 6-7, 12, 22; *see also* A.25-07-016, Response to Administrative Law Judge Inquiry, at 3-5 (Dec. 10, 2025) (“Response to Third ALJ Inquiry”).

⁴ The ALJ Ruling directs Charter to provide additional information about the significant public benefits associated with the Transfer and Transaction, as well as additional responses to specific questions related to the significant support expressed by participants at Public Participation Hearings (“PPHs”) that the Commission held during the month of February. In other instances, the questions posed in the ALJ Ruling relate to specific concerns raised by PPH participants and asks Joint Applicants to address those issues. By providing the responses below, Charter does not concede that broadband, mobile, and video services are within the scope of this proceeding. Nonetheless, without waiving these objections, and to facilitate the Commission’s timely review of the Joint Application, Charter submits the following responses and exhibits, which illustrate how the Transfer and broader national Transaction will benefit consumers in California, bringing more innovation and investment into the State, better value for customers through more affordable service offerings, and a stronger competitor in the marketplace.

- e. Describe how customers on higher cost plans will be identified and transitioned to lower cost plans. Detail the timeline for that identification and transition to be completed.*

Response to Question 4.1

As demonstrated in the Joint Application and in responses to data requests from intervenors and the Public Advocate’s Office in this proceeding, and as reflected in commenters’ statements at the PPHs, the Transaction will positively impact the pricing of broadband, mobile, and video services for Cox customers who chose Charter packages. Depending upon the service selected and the combination of products the customer chooses, subscribers can save hundreds or even a thousand dollars per year.⁵

- a. Describe the specific dollar amount customers should expect their post-merger bills will be reduced monthly, quarterly, and annually.*

There are many variations of products, service tiers, and offerings. The amount that customers should expect to save will vary based upon the services selected and combinations thereof contained in the bundle they choose. For example, a customer who has a family will save more depending upon the number of mobile lines they choose to accommodate their family. Savings may also vary between tiers of home broadband service or the type of video package the customer selects. Whether the customer takes wireline voice service or any number of other offerings, such as in-home WiFi and video customer premises equipment, may also impact the savings they can expect to see. As a result, Charter cannot present a definitive savings amount per customer on a monthly, quarterly, and annual basis as the question contemplates, but instead we

⁵ See, e.g., Joint Application at 22-31; Opening Testimony of Adam Falk, Senior Vice President, State Government Affairs, Charter Communications, Inc. on Behalf of Joint Applicants, at 15-19 (Jan. 30, 2026) (“Opening Testimony of Adam Falk”); Charter’s Response to The Utility Reform Network Data Request 002, Question No. 8 (Jan. 30, 2026); Charter’s Response to California Emerging Technology Fund Data Request No. 1, Question No. 1 (Feb. 5, 2026).

provide below, representative information about specific areas that Cox customers would expect to see savings if they chose a Charter package.

As illustrated across Charter’s filed testimony, including by Dr. Keating, Mr. Falk, and Mr. Andreski, and in various discovery responses,⁶ and in more detail below, the Transfer, together with the Transaction, will result in substantial savings for California customers. Both today and after the Transaction, Charter has and will continue to have every incentive to offer consumers low prices and better value in a marketplace that is growing increasingly competitive, including competition from fixed-wireless, satellite, and fiber providers.⁷ Charter continues to act on those incentives, offering additional savings for its existing and prospective customers alike. For example, when Charter announced the first-of-its-kind Customer Commitment, it also announced speed increases for customers on certain plans; these increases applied automatically and at no charge,⁸ and resulted in Charter’s flagship internet offering *increasing* from speeds of 300 Mbps to 500 Mbps while *decreasing* from a non-promotional rate of \$87.99 (for the legacy 300 Mbps

⁶ See Charter’s Response to Cal Advocates Data Request 06, Question No. 4 (Jan. 9, 2026); Charter’s Response to Cal Advocates Data Request 07, Question No. 2 (Feb. 3, 2026); Charter’s Response to Cal Advocates Data Request 08, Question No. 10 (Feb. 10, 2026); Charter’s Response to California Emerging Technology Fund Data Request No. 1, Question No. 18 (Feb. 5, 2026); Charter’s Response to The Utility Reform Network Data Request 002, Question No. 8 (Jan. 30, 2026); Charter’s Response to The Utility Reform Network Data Request 004, Question No. 19 (Mar. 11, 2026).

⁷ See, e.g., Rebuttal Testimony of David Andreski, Senior Vice President, Marketing Analytics, Charter Communications, Inc. on Behalf of Joint Applicants, at 2-3 (Mar. 4, 2026) (“Rebuttal Testimony of David Andreski”); Charter’s Response to The Utility Reform Network Data Request 004, Question No. 19 (Mar. 11, 2026); Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 20 (Mar. 16, 2026); see Opening Testimony of Bryan Keating, Founding Partner, Econic Partners, LLC on Behalf of Joint Applicants, at 6-7 (Jan. 30, 2026) (“Opening Testimony of Bryan Keating”).

⁸ See Press Release, Charter Communications, *Spectrum Announces Unprecedented Customer Commitment, Free Internet Speed Lifts, New Bundled Pricing and Unveils New Brand Platform ‘Life Unlimited’* (Sept. 16, 2024), <https://corporate.charter.com/newsroom/spectrum-announces-unprecedented-customer-commitment>.

“Spectrum Internet” offering) to a non-promotional rate of \$85 (for the current 500 Mbps “Spectrum Internet Premier” offering).

As previously noted, Charter’s overarching strategy is to offer better-value packages and pricing options that encourage customers to select a new Spectrum plan voluntarily rather than forcing them off plans they currently enjoy. Consistent with this approach, and as Charter has stated in its Joint Application and responses to data requests, existing Cox customers will have the *option* to remain on their current Cox plans, if they choose.⁹ Charter reiterates that making prices low for all customers is core to Charter’s philosophy, and, as a direct result of the Transaction, Cox customers will have the *option* to select from among Charter’s wide range of affordable services.¹⁰ In other words, Charter plans to provide existing Cox customers with the *choice* to select one of Charter’s better-value packages, and the *ability* to remain on the plan they currently enjoy if they prefer, which Charter believes is the best way to help ensure all of the combined company’s customers remain satisfied.

With respect to a specific dollar amount that customers *could* save, Charter notes that, as a result of its most powerful value pledges to date, Charter currently guarantees new customers \$1,000 in savings in their first year if they switch their mobile service from AT&T, T-Mobile, or Verizon to at least two Spectrum Mobile Unlimited lines and transfer their internet service from any provider to Spectrum Internet Advantage or a higher-speed tier.¹¹ Similarly, as described in

⁹ See Charter’s Response to Cal Advocates Data Request 08, Question No. 10 (Feb. 10, 2026); *see also* Joint Application at 23; Charter’s Response to Cal Advocates Data Request 06, Question No. 4 (Jan. 9, 2026).

¹⁰ Charter clarifies that all pricing described in this and other responses to this ALJ Ruling, unless otherwise stated, is based on current prices as of the date of this response. Pricing is subject to change in the ordinary course of business in light of marketplace conditions, including costs, competitive offerings, and customer demand.

¹¹ As discussed further in Charter’s discovery responses to The Utility Reform Network and Center for Accessible Technology. Charter’s Response to The Utility Reform Network Data Request 004, Question No. 19 (Mar. 11, 2026); Charter’s Response to Center for Accessible Technology Data Request No. 002,

Dr. Keating’s Testimony, and Mr. Falk’s and Mr. Andreski’s Rebuttal Testimony, in various discovery responses, and in more detail below, Charter offers customers a better value across both its standalone and bundled offerings for customers switching to Charter.¹² This includes, for example, providing customers with access to Internet Gig plus two Spectrum Mobile Unlimited Lines bundles for home and mobile broadband services, resulting in potential savings of \$1,000 or more per year off of a customer’s total price¹³ as compared to many of Charter’s competitors’ bundled connectivity options:¹⁴

Question 20 (Mar. 16, 2026) (citing Press Release, Charter Communications, *Spectrum Guarantees \$1,000 Savings in the First Year for Customers Who Flee the Big 3* (Feb. 24, 2026), <https://corporate.charter.com/newsroom/spectrum-guarantees-1000-dollars-in-first-year-savings-to-flee-big-3>).

¹² Rebuttal Testimony of David Andreski, at 5 and 9; *see also* Opening Testimony of Bryan Keating, at 25; Rebuttal Testimony of Adam Falk, Senior Vice President, State Government Affairs, Charter Communications, Inc. on Behalf of Joint Applicants, at 2 (Mar. 4, 2026) (“Rebuttal Testimony of Adam Falk”); Charter’s Response to The Utility Reform Network Data Request 004, Question No. 19 (Mar. 11, 2026); Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 20 (Mar. 16, 2026).

¹³ The “total price” reflects the promotional prices shown for internet and mobile lines, plus applicable taxes and fees. The “persistent rate” reflects the non-promotional price.

¹⁴ Charter clarifies that all pricing described in this and other responses to this Data Request, unless otherwise stated, is based on current prices as of the date of this response. Pricing is subject to change in the ordinary course of business in light of marketplace conditions, including costs, competitive offerings, and customer demand, and Charter cannot, as a result, make specific commitments about future pricing or speeds at this time.



Internet Speed ¹⁵	1 Gbps	1 Gbps	1 Gbps	Up to 1 Gbps	170 – 498 Mbps
Marketed Availability	100% of footprint	20% of mobile footprint	17% of mobile footprint	Capacity Dependent	Capacity Dependent
Internet Limitations	--	--	--	Interference and reliability; compatibility with vMVPDs ¹⁶	De-prioritization ¹⁷ Interference and reliability; compatibility with vMVPDs ¹⁸
Internet Price ¹⁵	\$40	\$52	\$59.99	\$60 ¹⁹	\$45
Mobile Price (2 Lines) ¹⁵	\$60	\$131.98	\$125	\$125	\$140
Mobile Taxes and Fees ²⁰	--	\$12.97	\$14.67	\$14.67	\$11.10
Total Price²¹	\$100	\$196.95	\$199.66	\$199.67	\$196.10
Persistent Rate	\$145	\$206.95	\$214.66	\$199.67	\$196.10

Importantly, current Cox customers will, as a result of the Transaction, gain *access* to potential savings across fixed broadband, mobile, video, and bundled services. To take just a few examples from Mr. Falk’s and Mr. Andreski’s rebuttal testimony and responses to the discovery

¹⁵ The plan comparisons used in this chart were selected based on internet download speed (Spectrum Gig, AT&T 1 Gig, Fios 1 Gig, Verizon 5G Home Ultimate, T-Mobile 5G Home Internet Rely) and comparable mobile plans (Spectrum Mobile Unlimited Plus, AT&T Unlimited Extra EL, Verizon Unlimited Plus, T-Mobile Experience More). Verizon 5G Home Ultimate speeds vary by address. Internet price includes modem and Wi-Fi router. Auto-pay discounts are included. Prices are from company websites as of January 20, 2026.

¹⁶ According to Verizon’s website as of January 20, 2026, “5G Home Internet service may not be compatible with some live TV streaming services. You can verify compatibility with your live TV streaming service provider.”

¹⁷ According to T-Mobile’s website as of January 20, 2026: “As of May 8, 2024, T-Mobile Internet customers who exceed 1.2TB of data usage for the current billing cycle are Internet Heavy Data Users who will be prioritized last on the network.”

¹⁸ According to T-Mobile’s website as of January 20, 2026: “Streaming services that rely on IP address for specific location data to deliver live TV are not compatible with T-Mobile Home Internet. This includes Hulu Live and Sling Live TV.”

¹⁹ Verizon’s cheapest fixed wireless access plan (5G Home), which offers speeds up to 300 Mbps (varies by location), is priced at \$35/month when combined with a Verizon mobile plan. This \$35 plan combined with two mobile lines of Verizon’s Unlimited Plus plan has a monthly price (including taxes and fees) of \$174.67 (promotion and persistent rate) and well above Charter’s bundle rate of \$100 at promotion and \$145 (persistent) as presented in this chart.

²⁰ Taxes and fees for AT&T, Verizon, and T-Mobile are based on HarrisX Billing Snapshots calculation of average taxes and fees charged to postpaid accounts.

²¹ The “total price” reflects the promotional prices shown for internet and mobile lines, plus applicable taxes and fees. The “persistent rate” reflects the non-promotional price.

requests of the Center for Accessible Technology, The Utility Reform Network, and California Emerging Technology Fund:²²

- **Fixed Broadband.** Charter charges the same or lower introductory promotional prices for standalone broadband plans, relative to Cox. For example:²³
 - Charter’s introductory, promotional pricing is \$50/month less for its 1 Gbps broadband offering, and \$45/month less for its 500 Mbps broadband offering compared to Cox, which would result in savings of \$600 and \$540 annually, respectively.²⁴
 - Charter’s persistent, non-promotional prices for its standard residential internet service offerings are also lower than Cox’s comparable offerings. Specifically, Charter charges \$19/month less for its 1 Gbps plan and \$9/month less for its 500 Mbps plan compared to Cox, which would result in savings of \$228 and \$108 annually, respectively.²⁵

²² See, e.g., Charter’s Response to California Emerging Technology Fund Data Request No. 1, Question No. 1 (Feb. 5, 2026); see also *infra* at nn. 23-36.

²³ Rebuttal Testimony of David Andreski, at 5-6; see also Rebuttal Testimony of Adam Falk, at 11.

²⁴ Spectrum, *Spectrum Internet*[®], <https://www.spectrum.com/internet> (last visited Mar. 28, 2026); Cox, *Cox High-Speed Internet Plans and Pricing*, <https://www.cox.com/residential/internet.html> (last visited Mar. 28, 2026). Comparisons are based on advertised monthly prices. Charter clarifies that all pricing described in this and other responses to this ALJ Ruling, unless otherwise stated, is based on current prices as of the date of this response. Pricing is subject to change in the ordinary course of business in light of marketplace conditions, including costs, competitive offerings, and customer demand.

²⁵ Spectrum, *Residential Broadband Services and Pricing*, <https://www.spectrum.com/policies/spectrum-broadband-disclosure> (last visited Mar. 30, 2026); see also Rebuttal Testimony of David Andreski, at 5-6; Rebuttal Testimony of Adam Falk, at 11.

- **Mobile.** Spectrum Mobile’s plans are almost always less expensive than Cox’s (and offer better non-price terms, such as higher premium data allowances and hotspot data).

Both companies offer pay-as-you-go and unlimited plans:²⁶

- For pay-as-you-go plans, Cox’s price is lower only for the first GB (\$15 compared to Spectrum’s \$20) but is significantly more expensive for subsequent GBs of data (\$15 per GB for Cox compared to \$5 per GB for Spectrum). For a pay-as-you-go customer that uses 5 GB of data per month, it would cost a Cox customer \$75 per month, compared to \$40 per month from Charter. This would result in savings of \$420 annually for a customer that chooses a pay-as-you-go plan from Charter.
- For unlimited plans, both of Charter’s options offer lower prices and higher premium data allowances than Cox. Specifically, Charter offers \$30 per line for 30 GBs of premium data or \$40 per line for 50 GBs of premium data, while Cox offers \$45 per line for only 20 GBs of data.²⁷ For a Cox customer, that means they can save \$15 per line per month with a Charter offering (saving the customer \$180 annually per line), and that customer gets 10 GBs more premium data allowances each month than from Cox. Moreover, Charter’s unlimited plans all include hotspot data, its Unlimited Plus customers get double the

²⁶ Rebuttal Testimony of David Andreski, at 7-8 (citing Opening Testimony of Bryan Keating at 33); *see also* Rebuttal Testimony of Adam Falk, at 11; Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 19 (Mar. 16, 2026); Charter’s Response to The Utility Reform Network Data Request 004, Question No. 18 (Mar. 10, 2026); Charter’s Response to California Emerging Technology Fund Data Request No. 1, Question No. 1 (Feb. 5, 2026).

²⁷ Cox mobile data is throttled after 20 GB of usage. Cox provides multi-line discounts its mobile service, *e.g.*, charging \$40 a line for two unlimited mobile lines.

hotspot data compared to Cox, and Spectrum residential plans include taxes and fees in the advertised rates.

- **Video.** Video consumers also stand to benefit from the fact that Charter generally offers customers greater value at lower prices than Cox. For example:²⁸
 - The Spectrum TV Platinum plan has an advertised price of \$145 per month for one year (\$175 per month standard rate), and includes 230+ channels and access at no additional cost to HBO Max, ESPN Unlimited, Hulu, Disney+, Paramount+ Premium, Peacock Premium with Ads, FOX One, AMC+ with Ads, Tennis Channel, and ViX Premium with Ads streaming services.²⁹ In contrast, the Cox Contour TV Ultimate plan has an advertised price of \$189 per month for a package with a similar number of channels, but that does not include all of the streaming services included in the Charter Spectrum TV packages.³⁰
 - The combined retail price of these streaming services included in Charter's Spectrum TV packages is currently up to approximately \$138 per month that customers receive without additional charge, whereas the combined retail price of the streaming services included in Cox's Contour TV packages is up to \$75 per month.³¹

²⁸See Rebuttal Testimony of David Andreski, 8-9.

²⁹ Pricing available at Spectrum, *Spectrum TV*[®], <https://official.spectrum.com/sem/video> (last visited Mar. 28, 2026).

³⁰ Additional information available at Cox, *Cox Streaming and Traditional TV Plans*, <https://www.cox.com/residential/tv.html> (last visited Mar. 28, 2026).

³¹ See Spectrum, *Seamless Entertainment: Solving for Value & Utility* (as of Mar. 13, 2026), <https://corporate.charter.com/spectrum-seamless-entertainment-value-chart.pdf>. TV Platinum residential customers will receive a value of up to \$138 in included streaming services. *Id.* n.1.

- So, not only is the comparable Charter Spectrum TV package cheaper by \$44 per month, but it also provides up to an additional \$63 per month greater value on streaming services than customers can currently receive on a Cox package.
- **Bundles.** Consumers also stand to gain from *even more favorable* pricing if they select Charter’s bundled service offerings, and depending on the specific services selected, these offerings currently provide customers with guaranteed pricing for up to three years.³² For example:³³
 - Charter offers a 1 Gbps home internet (Spectrum Internet Gig) plus two unlimited lines of mobile wireless service for \$100 per month for the first two years, which increases to \$145 per month by year five, constituting a significant discount off the standard retail rate for these products. A comparable plan from Cox (1 Gbps home internet plus two unlimited mobile wireless lines) would cost \$170 per month at the standard *promotional*, introductory rate for these products.³⁴
 - Charter offers 500 Mbps home internet (Spectrum Internet Premier) for \$30 per month for two years (down from \$50 per month for standalone) when bundled with Spectrum TV Select Signature at \$100 per month, for a total of \$130 per month.³⁵ Cox’s introductory, promotional pricing for its Go Even Faster 500 Mbps plan is at \$85 per month (the same price as a standalone) when bundling

³² Charter’s Response to Cal Advocates Data Request 07, Question No. 2 (Feb. 3, 2026); *see also* Response to Third ALJ Inquiry at 8.

³³ *See* Rebuttal Testimony of David Andreski, at 9-10.

³⁴ *See* Opening Testimony Bryan Keating, at 28-29.

³⁵ Packages, Spectrum.com, <https://www.spectrum.com/packages> (Select Internet and TV) (last visited Mar. 30, 2026).

with Contour TV Preferred at \$145 per month (also the same price as a standalone), for a total of \$230 per month.³⁶

- Charter currently offers a “Free Internet Forever” plan to new customers who choose four mobile lines (with at least two ported lines) at a non-promotional price of \$30 per month per line (\$120 per month total) with access to internet service at Charter’s Spectrum Internet Advantage tier for free (*i.e.*, at no additional cost) forever.³⁷ For just \$20 more per month, customers can access Charter’s Internet Gig tier forever.³⁸ On a *promotional basis*, a comparable plan from Cox (1 Gbps service plus four mobile lines) would cost at least \$210 currently.³⁹

As a direct benefit of the Transaction, Cox customers will have access to significantly less expensive alternatives than they did prior to the Transaction, and will gain even more favorable pricing if they select Charter’s bundled service offerings.⁴⁰

b. Describe how customers will be able to see the difference in the amount owed on their post-merger bills and how they will understand that the amount of money owed is less than it otherwise would have been.

³⁶ See Opening Testimony of Bryan Keating, at 36-37.

³⁷ This offer is available to any residential customers. Offer requires purchase of four Unlimited Mobile lines, two of which must be ported, and all of which must be maintained to receive free Internet promotion. To be eligible, a customer must order Internet Advantage or above plus four Unlimited Spectrum Mobile lines (and at least two phone numbers must be transferred). For additional information on this limited-time offer, which is subject to change, please visit: <https://www.spectrum.com/packages/best-deals/free-internet-forever>.

³⁸ See *id.*

³⁹ See Cox, *Cox Mobile Plans & Pricing*, <https://www.cox.com/residential/mobile/cell-phone-plans.html> (last visited Mar. 28, 2026).

⁴⁰ Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 20 (Mar. 16, 2026).

Existing Cox customers who choose one of Charter's consumer-friendly, affordable plans see savings reflected on their bill for the new service they selected, relative to the amount they previously owed before switching to a Spectrum offering, as shown on prior bill statements. Additionally, customers can contact Charter with any questions they may have, so that Charter can help ensure the customer has a complete understanding of available options, with the goal of identifying the service offering(s) most responsive to each customer's needs and maximizing overall value for that individual customer. Charter also currently maintains a public landing page dedicated to ensuring that customers understand their bills and know what to expect upon receiving them.⁴¹ Within that landing page, customers can download a sample bill, which provides an itemized list to guide the customer on how to read their bill and ensure they understand the information included.

c. Will all future customer promotions and planned offerings be available to all post-merger customers irrespective of geographic location?

Charter offers consistent non-promotional retail rates for its residential internet offerings across its service footprint;⁴² as explained further in Charter's filed testimony and discovery responses, this ensures that all of Charter's customers today, and customers across the combined company's territory after the close of the Transaction, benefit from having access to the same standard residential retail rates irrespective of the geographic location of the individual customer.⁴³

⁴¹ Spectrum, *Understanding Your Bill*, <https://www.spectrum.net/support/account-and-billing/understanding-your-statement-bill> (last visited Mar. 28, 2026). Bill statements will also reflect savings from bundled services.

⁴² Information about Charter's standard residential retail broadband services and pricing is available here: <https://www.spectrum.com/policies/spectrum-broadband-disclosure>.

⁴³ See Response to Third ALJ Inquiry at 1-2, 6; Opening Testimony of Adam Falk, at 18:9-19.2; Rebuttal Testimony of Adam Falk, at 10:4-5; Rebuttal Testimony of David Andreski, at 5:7-9; Charter's Response to The Utility Reform Network Data Request 002, Question No. 8 (Jan. 30, 2026); Charter's Response to Center for Accessible Technology Data Request 002, Question No. 14 (Mar. 16, 2026).

Expanding this consistent pricing model throughout the combined company’s footprint is a benefit that “flows directly from the Transaction and would not occur but for the Transaction.”⁴⁴

As previously noted, Charter uses promotional pricing strategies from time to time to attract new customers and to retain and expand its subscriber base.⁴⁵ This includes offering a standard promotional discount of \$35 per month on standalone residential broadband offerings for a twelve-month period, as well as bundled promotions that provide greater discounts depending on the number of services a new customer takes. As stated earlier, Charter also recently launched a Free Internet for Life promotion for new customers who purchase four Spectrum Mobile lines.⁴⁶ Some of Charter’s most aggressive promotional pricing programs—such as Charter’s offer of 1 Gbps plus two mobile lines for \$100—are available everywhere.

Some individual, non-uniform promotional offerings exist. For example, Charter maintains promotional rates for which only low-income customers are eligible or are only available for new customers. As another example, “back to school” promotions may be available only within zip codes surrounding university campuses to attract college students.⁴⁷ While Charter cannot, as a result, commit that *all* future customer promotions will be available to *all* post-Transaction customers, Charter can confirm that all eligible Cox subscribers will have the option to take Charter’s consumer-friendly, affordable plans and all of our uniform promotional offerings for which they may qualify, irrespective of the customer’s geographic location. Accordingly, the

⁴⁴ Rebuttal Testimony of Adam Falk, at 10.

⁴⁵ Response to Third ALJ Inquiry at 9; Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 14 (Mar. 16, 2026).

⁴⁶ This offer is available to any residential customers. To be eligible, a customer must order Internet Advantage or above plus four Unlimited Spectrum Mobile lines (and at least two phone numbers must be transferred). For additional information on this limited-time offer, which is subject to change, please visit: <https://www.spectrum.com/packages/best-deals/free-internet-forever>.

⁴⁷ This “back to school” seasonal offer is time-limited and not currently active.

Transaction will result in customers in Cox's footprint gaining access to these more innovative and competitive products.

d. Describe the quarterly report that Commission and Legislature will receive, that will detail the bill reduction and amount of money saved by customers of the post-merger company.

Charter and Cox are both highly experienced and established providers that operate across large multi-state footprints, including in California, with long-standing successful operations and histories of regulatory compliance in the State. Charter complies with all relevant and applicable reporting requirements. Charter does not see the need to provide the type of reports contemplated by this Question, nor is it aware of any similar reporting obligation in recent analogous transfer of control proceedings involving telecommunications providers.⁴⁸

⁴⁸ See, e.g., *In re Joint Application of Charter Communications, Inc.; Charter Fiberlink CA-CCO, LLC (U6878C); Time Warner Cable Inc.; Time Warner Cable Information Services (California), LLC (U6874C); Advance/Newhouse Partnership; Bright House Networks, LLC; and Bright House Networks Information Services (California), LLC (U6955C) Pursuant to California Public Utilities Code Section 854 for Expedited Approval of the Transfer of Control of both Time Warner Cable Information Services (California), LLC (U6874C) and Bright House Networks Information Services (California), LLC (U6955C) to Charter Communications, Inc., and for Expedited Approval of a Pro Forma Transfer of Control of Charter Fiberlink CA-CCO, LLC (U6878C)*, D.16-05-007, 2016 Cal. PUC LEXIS 255; *In re Joint Application of Sprint Communications Company L.P. (U-5112-C) and T-Mobile USA, Inc., a Delaware Corporation, for Approval of Transfer of Control of Sprint Communications Company L.P. Pursuant to California Public Utilities Code Section 854(a)*, D.20-04-008, 2020 Cal. PUC LEXIS 529; *In re Application of Frontier Communications Corporation, Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California Inc. (U 1024 C), and Frontier Communications of the Southwest Inc. (U 1026 C) for Approval that its Corporate Restructuring is Exempt from or Compliant with Public Utilities Code Section 854*, D.21-04-008, 2021 Cal. PUC LEXIS 177; *In re Joint Application of TracFone Wireless, Inc. (U 4321 C), América Móvil, S.A.B. de C.V., and Verizon Communications Inc. for Approval of Transfer of Control of TracFone Wireless, Inc. Pursuant to Public Utilities Code Section 854*, D.21-11-030, 2021 Cal. PUC LEXIS 564; *In re Joint Application of Verizon Communications Inc., Frontier Communications Parent, Inc., Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California Inc. (U 1024 C), Frontier Communications of the Southwest Inc. (U 1026 C), Frontier Communications Online and Long Distance Inc. (U 7167 C), and Frontier Communications of America, Inc. (U 5429 C) for Approval of the Transfer of Control of Frontier California Inc. et al. to Verizon Communications Inc. Pursuant to California Public Utilities Code Section 854*, D.26-01-023, 2026 Cal. PUC LEXIS 23.

- e. Describe how customers on higher cost plans will be identified and transitioned to lower cost plans. Detail the timeline for that identification and transition to be completed.*

As noted above, and in the Joint Application and various discovery responses, Cox subscribers will have the *option* to take Charter’s consumer-friendly, affordable plans, or, if they prefer, to keep their existing plans.⁴⁹ No Cox customers will be forcibly migrated to new plans as the companies combine. This is consistent with Charter’s strategy of offering better-value packages and pricing options that encourage customers to select a new Spectrum plan voluntarily rather than forcing them off plans they currently enjoy. Although Charter has not made final determinations regarding timing, Charter confirms that it intends to make all of Charter’s consumer-friendly, affordable plans, including its bundled home internet and mobile wireless plans, available in Cox’s California service territory, and expects to introduce Spectrum offerings within Cox’s service areas within six months to a year of closing of the Transaction.

Question 4.2 Reimbursement for Service Interruption

The public expects that the post-merger company will provide reimbursement for service outages. Detail the current Charter and Cox policies for customer reimbursements in various outage situations.

- f. Detail the policy to be offered to customers by the post-merger company for internet service, cable television service, Voice over Internet Protocol telephone service, and mobile service.⁵⁰*
- g. Describe how customers will be informed of the post-merger policy and the timeline for that identification and transition to be completed.*

Response to Question 4.2

The combined company will provide credit for service outages in accordance with applicable law and regulatory requirements, including General Order (“GO”) 133-D requirements and various voluntary policies and commitments it has implemented to better serve its customers,

⁴⁹ See *supra* note 9.

⁵⁰ The numbering to the subparts of Question 2 follows the numbering in the ALJ Ruling.

and also plans to comply with all applicable customer credit rules set to take effect under the GO 133-E requirements on January 1, 2027.⁵¹ In September 2024, Charter implemented the Customer Commitment across its footprint, including in California. As discussed in the Joint Application,⁵² Charter’s submitted testimony,⁵³ and in discovery responses to the intervenors and Public Advocate’s Office,⁵⁴ the Customer Commitment is a proactive pledge to try to keep customers connected 100% of the time, promptly resolve issues when they arise, and take responsibility if something goes wrong.

The Customer Commitment applies to all of Charter’s service offerings—broadband, mobile, video, and voice—not just to CPUC-regulated services. Additionally, the Customer Commitment represents an internal effort to hold Charter to a higher standard of customer accountability. Charter strives, through this commitment, to provide a superior level of service to customers than those offered by competitors to differentiate the company’s products and services from our rivals. The Customer Commitment, however, is not intended as a substitute for those enforceable obligations, such as GO 133-D and GO 133-E, applicable to all regulated service providers in California, including Charter in its capacity as a VoIP service provider in the State.

⁵¹ *Order Instituting Rulemaking Proceeding to Consider Amendments to General Order 133*, D.25-09-031, 2025 Cal. PUC LEXIS 455.

⁵² See Joint Application at 18.

⁵³ See Rebuttal Testimony of Greta Kim, Group Vice President, Customer Service, Charter Communications, Inc. on Behalf of Joint Applicants, at 2-8 (Mar. 4, 2026) (“Rebuttal Testimony of Greta Kim”); Opening Testimony of Adam Falk, at 8.

⁵⁴ See Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 5 (Mar. 16, 2026); Charter’s Response to The Utility Reform Network Data Request 004, Question Nos. 34-37 (Mar. 11, 2026); Charter’s Response to Cal Advocates Data Request 03, Question No. 16 (Oct. 8, 2025); and Charter’s Response to Cal Advocates Data Request 05, Question No. 9 (Dec. 11, 2025); see also Response to Administrative Law Judge Inquiry, at 9 (Feb. 17, 2026).

The Customer Commitment has four pillars: (1) reliable connectivity, (2) transparency at every step, (3) exceptional service, and (4) always improving, with the goal of ensuring consistent quality service across Charter’s entire footprint.

As speakers at the PPHs noted, Charter offers customer credits when it does not live up to the customer promises reflected in the Customer Commitment.⁵⁵ Those include credits:

- (1) For Qualifying outages;⁵⁶
- (2) When a customer avails themselves of Charter’s 30-day money-back guarantee;⁵⁷
- (3) When a new customer requests an appointment for an installation within a day of a new order, and Charter is unable to offer professional installation either the same or next day;⁵⁸

⁵⁵ See, e.g., Public Participation Hearing, Reporters’ Transcript at 288:3-289:20 (Feb. 25, 2026) (“Feb. 25, 2026 PPH Tr.”) (Steve Sanchez, Riverside County Councilman expressing support for the Transaction based in part on the “tangible protections” it will provide for consumers, including “outage credits” and “service reliability commitments”); *id.* at 297:2-23 (Taylor Brown, for State Senator Megan Dahle, expressing support for the Transaction, citing Charter’s “clear commitments to outage credits and rapid service restoration, including same-day technician dispatch when requested before 5:00”); *id.* at 414:17-415:23 (Nicholas Adcock, President and CEO of the Greater Riverside Chambers of Commerce, expressing support for the Transaction and noting that Charter’s “focus on service reliability and customer satisfaction, including maintaining US-based call centers, providing credits for outages exceeding two hours, and offering same-day technician dispatch underscores its dedication to delivering the pinnacle of service Californians can trust”).

⁵⁶ For purposes of the Customer Commitment, Charter defines an “outage” as (1) an incident that directly or indirectly prohibits three or more subscribers from using services and/or critical components of a service, or (2) any degradation to service that is sufficiently severe as to render services practically unusable (*e.g.*, frequent intermittent failures). Service interruptions impacting a subscriber (*e.g.*, in-home only problems) are not defined as an “outage.” In addition, service interruptions resulting from power outages, natural disasters, and overnight scheduled maintenance are not eligible for Customer Commitment credits. If a customer experiences a service interruption due to a qualifying outage that lasts for more than two hours, the customer is eligible for a credit for one full day of service.

⁵⁷ If a customer is not satisfied with their Spectrum service within the first 30 days, Charter will provide the customer with their money back. For full terms and conditions associated with Charter’s 30-day money-back guarantee, please visit: <https://www.spectrum.com/policies/guarantee-new>.

⁵⁸ A customer is eligible for a credit if the customer requests a professional installation within a day of the customer’s order for a same-day or next-day appointment, and a same-day (*i.e.*, prior to 5 p.m.) or next-day appointment does not occur. In that circumstance, a customer can receive a one-day credit for each day a professional installation is not available.

(4) When a customer calls Charter, a technician appointment is required to resolve a service issue, a customer requests either a same-day (*i.e.*, for requests made prior to 5 p.m.) or next-day appointment, and Charter is not able to dispatch a technician within that timeframe;⁵⁹ and

(5) When there is a mismatch between the customer's order confirmation and their bill.⁶⁰

In addition to the credits offered under the Customer Commitment, Charter may from time-to-time offer other voluntary credits for service impacted by other events, such as natural disasters. This was the case during the 2025 wildfires in Southern California, during which Charter gave credits in certain instances to customers who were without Spectrum service as a result of the fires.⁶¹ As previously stated, Charter has also generally met and exceeded the minimum standards in its GO 133-D reporting and plans to comply with all applicable customer credit rules set to take effect under the GO 133-E requirements on January 1, 2027.⁶²

⁵⁹ A customer is eligible for a credit if the customer calls Charter, a technician appointment is required to resolve the service issue, a customer requests either a same-day (*i.e.*, for requests made prior to 5 p.m.) or next-day appointment, and Charter is not able to dispatch a technician within that timeframe. In that circumstance, a customer is eligible to receive a credit for the number of days missed on the services that are impacted by the service issue.

⁶⁰ A customer is eligible for a credit if the price provided to the customer upon ordering service (sent in a confirmation email) does not match the price on the customer's first (or next) billing statement. In that circumstance, a customer can receive a monthly recurring credit for the difference, for 12 consecutive months. For example, if the customer's bill is \$3.67 more per month than their order confirmation email, they will receive a monthly credit of \$3.67 for 12 consecutive months.

⁶¹ Charter also committed \$2.5 million to assist in wildfire relief efforts in Southern California, including \$500,000 in total cash contributions to be split between the Los Angeles Fire Department Foundation, American Red Cross Los Angeles Region, and the California Fire Foundation; \$1 million committed to support small businesses in the Los Angeles area through the Spectrum Community Investment Loan Fund; and \$1 million in in-kind public service announcement ("PSA") airtime to support nonprofit organizations in their wildfire relief efforts. *See* Press Release, Charter Communications, *Spectrum Commits \$2.5 Million to Wildfire Relief Efforts* (Jan. 14, 2025), <https://corporate.charter.com/newsroom/spectrum-commits-to-southern-california-wildfire-relief-efforts>.

⁶² *Order Instituting Rulemaking Proceeding to Consider Amendments to General Order 133*, D.25-09-031, 2025 Cal. PUC LEXIS 455; *see also* Rebuttal Testimony of Greta Kim, at 6-7.

Additional details regarding Spectrum's Customer Commitment can be found at: <http://spectrum.com/our-customer-commitment>. More information about Charter's customer commitment accomplishments can be found at <https://corporate.charter.com/newsroom/spectrum-marks-one-year-of-industry-first-customer-commitment-accomplishments>.⁶³

f. Detail the policy to be offered to customers by the post-merger company for internet service, cable television service, Voice over Internet Protocol telephone service, and mobile service.

The policy offered by Charter for internet, cable television, Voice over Internet Protocol telephone, and mobile services will follow the same adherence to law and regulation, along with application of the various voluntary policies outlined earlier in response to Question 4.2 above. As highlighted in the Joint Application⁶⁴ and in Charter's responses to data requests from intervenors and the Public Advocate's Office in this proceeding,⁶⁵ a direct benefit of the Transaction is that Charter's Customer Commitment will be extended to the Cox footprint, including in California. Charter has no current plans to change its Customer Commitment post-Transaction.⁶⁶ The company intends to extend it in the Cox areas under the same voluntary terms that it offers the Customer Commitment elsewhere throughout its footprint today, and to no greater

⁶³ With respect to Cox's current policies, Charter respectfully refers the Commission to Cox's response to the ALJ Ruling Question 4.2.

⁶⁴ See Joint Application at 18, 35.

⁶⁵ See also Charter's Response to Center for Accessible Technology Data Request 002, Question No. 5 (Mar. 16, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 34-37 (Mar. 11, 2026); Charter's Response to Cal Advocates Data Request 03, Question No. 16 (Oct. 8, 2025); and Charter's Response to Cal Advocates Data Request 05, Question No. 9 (Dec. 11, 2025).

⁶⁶ See also Charter's Response to Center for Accessible Technology Data Request 002, Question No. 5 (Mar. 16, 2026); and Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 34-37 (Mar. 11, 2026).

or lesser extent than it exists throughout the other areas served by Charter in California and across the country.⁶⁷

g. Describe how customers will be informed of the post-merger policy and the timeline for that identification and transition to be completed.

Charter intends to communicate to Cox customers about the extension of the Customer Commitment through a variety of means, which may include, but may not be limited to mass media, inbound customer service channels, and other sales and marketing channels (such as customer portals), and direct communications such as bill statement messages. The exact timing of when such outreach, marketing, communications, and awareness tactics will be employed depends on how quickly legacy Cox systems and processes can be updated to align with current Charter practices. Charter cannot, at this time, provide definitive information or make specific determinations about future timing, but it does expect to integrate these policies within one year after closing the Transaction.

Question 4.3 Broadband Infrastructure Deployment

Public commenters indicated that the post-merger company would connect unserved and underserved communities to high quality, affordable internet to unlock transformative educational, health, and economic potential not yet seen by these unserved and underserved communities. Public commenters also demanded that the Commission require that the post-merger company connect unserved and underserved communities to high quality, affordable internet services to ensure that the post-merger company provided that transformative effect on communities across the State of California.

- a. Detail the plans, by quarter, for the geographic identification for, and construction of, infrastructure build-out that will connect currently unserved California communities. Detail the plans, by quarter, for the geographic identification for, and construction of, infrastructure build-out that will connect currently underserved California communities.*
- b. Detail all planned incremental last-mile broadband infrastructure investments for the next five years that are not part of state or federal grant funding applications.*

⁶⁷ See also Charter's Response to Center for Accessible Technology Data Request 002, Question No. 5 (Mar. 16, 2026); and Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 34-37 (Mar. 11, 2026).

- c. *Describe the plan to reach out to, and collaborate, with, community organizations within the currently unserved community in advance of connection. Describe the plan to reach out to, and collaborate, with, community organizations within the currently underserved community in advance of connection.*
- d. *Describe the plan to connect and collaborate with the local elected representatives of the currently unserved communities in advance of connection. Describe the plan to connect and collaborate with the local elected representatives of the currently underserved communities in advance of connection.*
- e. *Provide an outline of the Quarterly Report that the Commission will receive describing the progress the post-merger company is making towards meeting its new infrastructure construction commitments to unserved communities, including timelines for identification, infrastructure build-out, and unserved and underserved community service interconnection, and local community & elected official outreach regarding service interconnection build-out planning and development.*

Response to Question 4.3

- a. ***Detail the plans, by quarter, for the geographic identification for, and construction of, infrastructure build-out that will connect currently unserved California communities. Detail the plans, by quarter, for the geographic identification for, and construction of, infrastructure build-out that will connect currently underserved California communities.***

As discussed in its response to a data request from the California Emerging Technology Fund, Charter does not have quarterly plans for geographic identification or infrastructure build-out to connect unserved or underserved California communities because all locations in Charter's footprint are either already serviceable by Charter or part of a provisional award in connection with California's Broadband Equity, Access, and Deployment ("BEAD") program. Accordingly, build-out plans from Charter would be duplicative and result in Charter making investments to compete against entities that received up to 75% (or potentially higher) subsidies to bring broadband to these formerly unserved or underserved areas.⁶⁸

⁶⁸ Charter's Response to the California Emerging Technology Fund Data Request No. 1, Question No. 18 (Feb. 5, 2026).

Under California’s BEAD 2.0 “Benefit of the Bargain” subgrantee selection process, the Commission identified approximately 340,000 locations across the State as either “unserved” or “underserved” (as those terms are defined in the BEAD Program rules) and, therefore, eligible for BEAD funding. Of that total, Charter identified approximately 6,000 locations within its California service territory that were eligible for funding, as published in the Commission’s Final Proposal data submitted to the National Telecommunications and Information Administration (“NTIA”) for approval on December 19, 2025. Charter subsequently reported more than 1,100 of those locations as serviceable in its most recent Federal Communications Commission Broadband Data Collection filing.⁶⁹ In other words, fewer than 5,000 locations within Charter’s California service territory remained “unserved” or “underserved” by the time the Commission conducted its BEAD subgrantee selection process.⁷⁰

As noted in the Commission’s BEAD Final Proposal, every BEAD-eligible location—within Charter’s California service territory—is covered by a provisional award. As a result, there are no households within the Charter service territory in California that are expected to be unserved or underserved.⁷¹ Consequently, this Question is not applicable, because there will be no remaining “unserved California communities” located within Charter’s footprint, given that every BEAD-eligible location was included in a provisional award in connection with California’s BEAD program. Build-out plans from Charter would be duplicative, and, as noted above, would result in Charter making investments to compete against entities that received up to 75% (or

⁶⁹ Charter’s Response to California Emerging Technology Fund to Data Request No. 01, Questions Nos. 1–18 (Feb. 5, 2026).

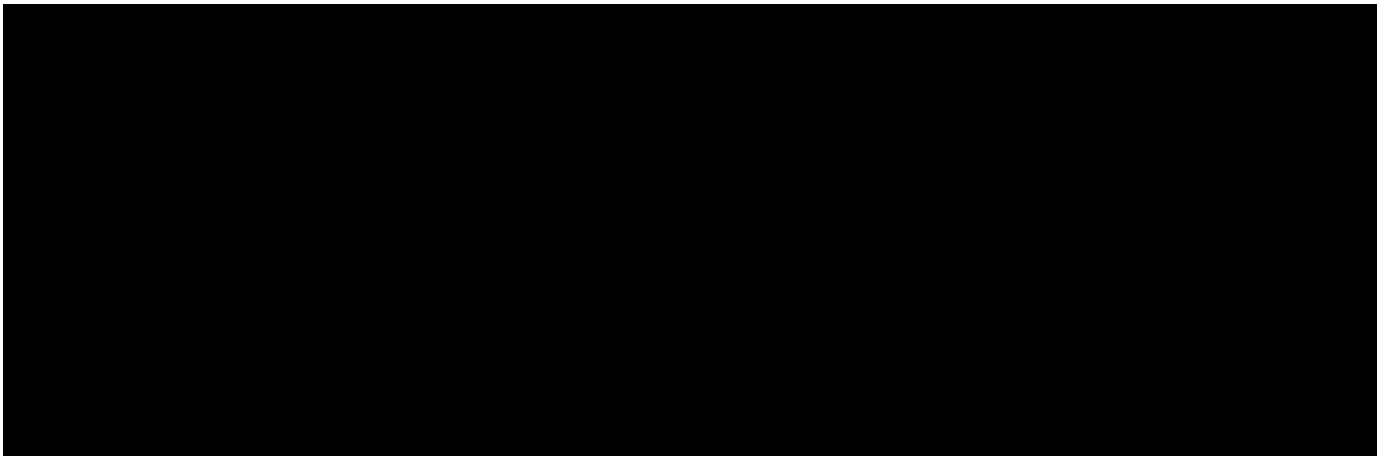
⁷⁰ *Id.*

⁷¹ *Id.* (citing Commission, Broadband Equity, Access, and Deployment (BEAD) Program Final Proposal DRAFT, at 3 (Dec. 2025), <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/broadband-implementation-for-california/bead/final-proposal/appendix-a-final-proposal/rev-1-final-proposal/ca-bead-final-proposal-20--v3-20251212-clean.pdf>).

potentially higher) subsidies to bring broadband to these formerly unserved and underserved areas that, as NTIA has previously recognized, “present significant barriers for service, as evidenced by the lack of existing high-speed Internet infrastructure even after decades of state and federal efforts to expand broadband deployment in these areas.”⁷²

Although Charter does not have quarterly plans for geographic identification or infrastructure build-out to connect unserved or underserved California locations, Charter has continued to invest significantly in its infrastructure, including nearly \$6 billion in California technology and infrastructure from 2020-2024⁷³ and more than \$1.1 billion in 2025. Charter provided a breakdown of its capital investment from the five-year period between 2020 and the end of 2024 in its discovery response to the Center for Accessible Technology:

[BEGIN CONFIDENTIAL]



⁷² *Tailoring the Application of the Uniform Guidance to the BEAD Program; Request for Comments*, Notice, 88 Fed. Reg. 42918, 42921 (NTIA July 5, 2023).

⁷³ See Joint Application at 25.

⁷⁴ Upgrades to Charter’s headends and other equipment to facilitate increased data speeds and resolving network contention.

⁷⁵ Extensions of Charter’s network Fiber and Hybrid Fiber Coaxial plant to both residential and business customers.

⁷⁶ Costs associated with business-as-usual plant replacement.

[END CONFIDENTIAL]⁸²

This investment is consistent with the statement the ALJ Ruling cited, which expressed support for the Transaction because it would enable the combined company to “deploy greater capital investment” in “infrastructure upgrades” to “continue to enhance [b]andwidth” and network capacity.⁸³ Charter is also currently in the process of undertaking a major initiative to evolve its

⁷⁷ Costs associated with development, software licenses, and deployment of customer-facing applications.

⁷⁸ Costs associated with the replacement or enhancement of non-network assets (*e.g.*, back-office systems, vehicles, tools, etc.).

⁷⁹ Labor and materials used to install residential and business customers.

⁸⁰ Internet, Wi-Fi, and video equipment placed in customers’ homes.

⁸¹ The amount includes costs associated with the upgrade of processes and technology that, while not all located in California, directly benefits California customers by allowing Charter to offer enhanced products and services carried over Charter’s extensive network. The amount also includes Charter’s investment in its new corporate headquarters.

⁸² Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 3 (Mar. 16, 2026).

⁸³ Feb. 25, 2026 PPH Tr., at 334:1-335:16 (Comments of Erik Bruvold, CEO, San Diego North Economic Development Council & Economic Development Organization).

network, including through the investment of approximately [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] in California alone over the past three years associated with Charter's network evolution process.⁸⁴

b. Detail all planned incremental last-mile broadband infrastructure investments for the next five years that are not part of state or federal grant funding applications.

As discussed above in response to Question 4.3(a), Charter does not expect there to be any households within its service territory in California that remain unserved or underserved, as a result of the BEAD program.⁸⁵ While Charter has other last-mile broadband infrastructure investments planned, and Charter continues to invest heavily in its network in California (*see* response to Question 4.3(a), *supra*), the company interprets this Question to be asking about incremental last-mile funding to unserved and underserved locations, which is the context of the other questions in the ALJ Ruling. Accordingly, this Question is not applicable, insofar as any previously unserved locations and underserved locations will now be covered by heavily subsidized last-mile broadband infrastructure grant awards through the BEAD program.

c. Describe the plan to reach out to, and collaborate, with, community organizations within the currently unserved community in advance of connection. Describe the plan to reach out to, and collaborate, with, community organizations within the currently underserved community in advance of connection.

Charter maintains a staff of government affairs professionals throughout the State who manage relationships with local officials, community organizations, and other state and local

⁸⁴ Charter's Response to The Utility Reform Network Data Request 004, Question No. 4 (Mar. 10, 2026).

⁸⁵ Moreover, the California Advanced Services Fund ("CASF") Broadband Infrastructure Grant Account can supplement BEAD, and support additional deployment of at least 100/20 Mbps, if and as needed. *See* generally Commission, *CASF Broadband Infrastructure Grant Account*, <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/california-advanced-services-fund/casf-infrastructure-grant> (last visited Mar. 28, 2026).

constituencies, including tribal governments. These individuals work directly within Charter's communities and municipalities on any number of issues and regularly communicate and attend meetings with community organizations across Charter's California footprint, which include, but are not limited to, regional broadband consortia, business councils, tribal representatives, local governments, and nonprofits. To the degree that any such community members have questions for Charter, either about its service offerings generally or this Transaction specifically, Charter's government affairs team is, of course, ready to provide such information, as it has consistently done in the ordinary course of its business.

As described in response to Questions 4.3(a) and (b), because no households within Charter's service territory are expected to remain unserved or underserved, Charter does not have specific plans for geographic identification or infrastructure build-out to connect previously unserved or underserved California communities. Charter anticipates that BEAD program subgrantees will reach out to, and collaborate with, community organizations as appropriate in connection with fulfilling their subsidized projects.

d. Describe the plan to connect and collaborate with the local elected representatives of the currently unserved communities in advance of connection. Describe the plan to connect and collaborate with the local elected representatives of the currently underserved communities in advance of connection.

Please see Charter's responses to Questions 4.3(a) through (c).

e. Provide an outline of the Quarterly Report that the Commission will receive describing the progress the post-merger company is making towards meeting its new infrastructure construction commitments to unserved communities, including timelines for identification, infrastructure build-out, and unserved and underserved community service interconnection, and local community & elected official outreach regarding service interconnection build-out planning and development.

As discussed in response to Questions 4.3(a) through (c), Charter does not have quarterly plans for geographic identification or infrastructure build-out to connect unserved or underserved

California communities because all unserved and underserved locations in Charter’s footprint have been included in a provisional award in connection with California’s BEAD program. As a result, quarterly reporting from Charter on that topic would not be a meaningful source of information. For new developments, Charter works collaboratively with local community and elected officials to plan for infrastructure investment and to obtain necessary permits and other authorizations for access to the right of way. Those new developments are also added to future versions of the FCC’s National Broadband Map, which provides a dataset of locations in California and across the United States where broadband internet access service either is or could be installed, and is updated every six months.⁸⁶

Although Charter would comply with all relevant and applicable reporting requirements, Charter notes that it *already* provides the Commission with granular serviceability data at an individual location level, consistent with Public Utilities Code Sections 281.6 and 5895. Further, for the reasons stated above, additional reporting would not be applicable, insofar as Charter does not have any specific plans for “unserved and underserved community service interconnection” as referenced by this Question.

Question 4.4 Wholesale Access

California providers of communications services to wholesale customers adhere to a set of basic expectations. Members of the California public made comments to the Commission to make sure that the post-merger company would adhere to the state’s expectations that it would provide nondiscriminatory pricing and access to its network upon request.

- a. *Detail all currently applicable Charter and Cox policies.*
- b. *Provide the post-merger company policy detailing how it meets the expectations of California wholesale customers, including what steps are being taken to ensure that rural communities continue to have reliable access to internet services.*

⁸⁶ See, e.g., FCC, *What’s on the National Broadband Map* (last updated Nov. 25, 2025), <https://help.bdc.fcc.gov/hc/en-us/articles/13532984820379-What-s-on-the-National-Broadband-Map>.

Response to Question 4.4

a. Detail all currently applicable Charter and Cox policies.

Charter, through its affiliates, may offer certain services⁸⁷ to California business and enterprise customers on a wholesale basis.

Wholesale customers negotiate service arrangements that fit their individualized business needs and strategies.⁸⁸ These service offerings are not standardized, have been deregulated in light of the dynamic and competitive nature of the marketplace, and are generally offered on a private carriage basis rather than as a common carrier. For example, as distinct from wholesale telecommunications services cited in the ALJ ruling, middle-mile data transport services offered on a private carriage basis are not certificated or otherwise regulated by the Commission, nor are they subject to other legal or regulatory obligations requiring that those services be made available to all potential purchasers regardless of whether such arrangement is mutually advantageous.⁸⁹

As a general policy, Charter may offer data transport to retail mobile and wireline internet service providers where a mutually beneficial arrangement can be reached. However, because

⁸⁷ These include, but are not limited to, wholesale connectivity to enterprise locations, as well as backhaul and data transport services (such as sales to mobile and wireline providers which, in turn, use those services to provide services to their own end-user customers).

⁸⁸ To the extent any putative purchaser of wholesale middle-mile transport services has an expectation of access to Charter's network on a common carriage basis, such expectation is inconsistent with the applicable legal and regulatory environment.

⁸⁹ See Response to Third ALJ Inquiry at 4 ("the Commission has held that 'Internet service is classified for state and federal regulatory purposes as an 'information service' and [] state commissions such as the California Public Utilities Commission *do not have jurisdiction over information services* even if the providers also provide 'communications services' that are subject to state regulation," quoting *In re Arthur G. Peterson, Complainant, vs. Verizon California, Inc. (U1002C) and Pacific Bell Telephone Company, dba AT&T California (U1001C), Defendants*, D.13-12-005 at 2, 2013 Cal. PUC LEXIS 677, at *2 (emphasis added) (footnotes omitted)). Although federal law provides for nondiscriminatory interconnection obligations for incumbent local exchange carriers, the judiciary has expressly rejected the regulation of broadband middle-mile services in this manner as it relates to broadband internet services, including middle mile services. 47 U.S.C. § 251; see *In re MCP No. 185*, 124 F.4th 993, 1003-09 (6th Cir. 2025) (finding that broadband internet service is an "information service," and that classifying broadband as a "telecommunications service" subject to Title II regulation is unlawful).

these services are not regulated telecommunications offerings nor are they subject to other legal or regulatory obligations requiring that those services be made available to all potential purchasers regardless of whether such arrangement is mutually advantageous, neither Charter nor other similarly situated companies generally hold themselves out to the public as offering wholesale services to all requesting parties upon identical terms (*i.e.*, “nondiscriminatory pricing and access to its network upon request”); rather, Charter works with its customers to identify mutually beneficial business opportunities (and reserves the right, as a matter of policy, to not do so in the absence of such mutually beneficial opportunities).

Charter is aware that providers who undertake certain subsidized infrastructure deployment projects supported by public grant funds may, as a condition of accepting public funding to complete those projects, agree to conditions requiring the recipient to offer data transport and backhaul services over those facilities on an “open access” or nondiscriminatory basis to other providers. Charter has not participated in public infrastructure grant programs with such requirements within its California footprint.

b. Provide the post-merger company policy detailing how it meets the expectations of California wholesale customers, including what steps are being taken to ensure that rural communities continue to have reliable access to internet services.

Please see the response to Question 4.4(a), above, for an explanation of how Charter meets the expectations of enterprise customers, including wholesale customers. The Joint Applicants do not anticipate changes to the currently applicable practices as a result of the Transaction, and the combined company will continue to work with its current and prospective wholesale customers, to address customers’ business needs and strategies in a mutual, negotiated agreement.

Question 4.5 Low Income Plans

A significant number of public commenters stated that under current rules, customers had to drop their internet access plan for 30 days in order to become eligible to apply for a low-income or income-qualified plan.

- a. Provide Charter and Cox's the current policies that detail how a customer secures access to a low-income or income-qualified plan.*
- b. Provide the post-merger company policy and eligibility requirements for a customer to secure a low-income or income-qualified plan.*
- c. Detail the parameters of the post-merger company's low-income or low-income qualified plan, including how to secure it, its terms and conditions, and how to cancel service.*
- d. Detail the post-merger company's affordable access plan designated for seniors.*
- e. Identify the post-merger company's geographic availability for low income and senior-focused plans. Additionally, provide a colour-coded heat map.*
- f. Provide an outline of the reporting template that will be delivered to the Commission, Communications Division, and the Legislature, detailing the population usage of the low-income & income-qualified plans, the senior-focused access plans, and the geographic locations of the usage of those plans.*

Response to Question 4.5

- a. Provide Charter and Cox's [...] current policies that detail how a customer secures access to a low income or income-qualified plan.***

As described in Charter's submitted testimony⁹⁰ and in discovery responses to the intervenors and the Public Advocate's Office in this proceeding,⁹¹ as a result of the Transaction, eligible Cox subscribers will gain access to Charter's full range of customer-friendly, market-rate offerings as well as its low-cost offerings,⁹² including: (i) Spectrum Internet Assist ("SIA"), with

⁹⁰ See Opening Testimony of Adam Falk, at 27-29; Rebuttal Testimony of Adam Falk, at 2, 9-10, 20; Rebuttal Testimony of David Andreski, at 4, 15-23; Rebuttal Testimony of Tony Guevara, Senior Vice President, Inbound and Outbound Sales, Charter Communications, Inc. on Behalf of Joint Applicants, at 2-4 (Mar. 4, 2026) ("Rebuttal Testimony of Tony Guevara").

⁹¹ See Charter's Response to California Emerging Technology Fund Data Request No. 1, Question No. 3, (Feb. 5, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question No. 18 (Mar. 10, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 16, 17, and 19 (Mar. 11, 2026); Charter's Response to Cal Advocates Data Request 01, Question Nos. 9-10 (revised Oct. 9, 2025).

⁹² As noted above, a household where a member is eligible to receive assistance under one of the following programs—National School Lunch Program ("NSLP"); Community Eligibility Provision of the NSLP; or

maximum speeds of 50 Mbps download and 10 Mbps upload, priced at \$25 per month; (ii) Discounted SIA, with maximum speeds of 50 Mbps download and 10 Mbps upload, priced at \$15 per month; and (iii) Spectrum Internet Advantage, with maximum speeds of 100 Mbps download and 20 Mbps upload, priced at \$30 per month for the first year and \$50 per month thereafter. SIA and Spectrum Internet Advantage are currently available to eligible new residential customers (*i.e.*, a customer that has had no Spectrum services within the past 30 days).

A household where a member is eligible to receive assistance under one of the following programs—National School Lunch Program (“NSLP”); Community Eligibility Provision (“CEP”) of the NSLP; or Supplemental Security Income—can qualify upon completing enrollment online. Qualifying customers who do not complete enrollment online for SIA at the discounted rate of \$15 may still be able to subscribe at a rate of \$25.⁹³

In addition, Charter has been approved to participate in the California LifeLine Home Broadband Pilot (the “Broadband Pilot Program”). As part of Charter’s participation, Charter will also provide to qualifying customers a credit of up to \$20 per month on Spectrum internet service and an additional \$10 off a customer’s total monthly bill when Spectrum internet is paired with either Spectrum home phone or mobile service. Charter is currently approved by the Commission to offer the Broadband Pilot Program discount on all the following internet plans: Internet

Supplemental Security Income—can qualify upon completing enrollment online. Qualifying customers who do not complete enrollment online for SIA at the discounted rate of \$15 may still be able to subscribe at a rate of \$25. Charter uses a variety of methods to market these three programs towards customers or potential customers within Spectrum’s service territory who may qualify. These include email outreach, direct mail, bill statements, flyers, and static banners on Spectrum.com and Spectrum.net—Charter’s websites for potential and existing customers, respectively.

⁹³ All Spectrum services are subject to applicable terms and conditions and are subject to change. Charter’s Residential General Terms and Conditions of Service are publicly available at <https://www.spectrum.com/policies/residential-general-terms-and-conditions-of-service-dec2023>. An additional charge for installation may apply. Spectrum Advanced Wi-Fi may be added for an extra cost; Security Shield is currently included with Advanced Wi-Fi.

Advantage, Internet Premier, Internet Gig, and Internet 2 Gig. Further, qualifying customers may also “stack” the Broadband Pilot Program discount with discounts available under the federal Lifeline program within the relevant areas of Charter’s California service territory.

As just a few examples:⁹⁴

- **Standalone Internet Advantage:** Existing households who receive the Broadband Pilot Program discount can obtain standalone Internet Advantage for as low as \$10 per month if they are still within the promotional period on their internet plans, or \$30 per month if they have already stepped up to a non-promotional price.
- **Bundled Internet Advantage:** If a household is within the promotional period in a bundle with Internet Advantage and two qualifying Spectrum Mobile lines—the first of which will also be discounted under the Broadband Pilot Program—its internet service could be fully covered by the Broadband Pilot Program.
- **Bundled Internet Premier:** Similarly, where an existing household has Internet Premier with a qualifying Spectrum Mobile bundle, Internet Premier would cost only \$10, and customers would also receive an additional discount on the first mobile line.

Separately, while still pending, Charter is also currently seeking approval to participate using still-popular legacy plans, including its legacy low-income plan, to ensure that customers can participate—regardless of whether they have chosen one of Charter’s current offerings or remain on their existing plan. These legacy offerings, if and when approved, will further expand the pool of Charter customers eligible for Broadband Pilot Program discounts, evidencing

⁹⁴ Please see Charter’s approved Pilot Election Advice Letters for Charter Fiberlink CA-CCO, LLC, Time Warner Cable Information Services (California), LLC, and Bright House Networks Information Services (California), LLC for full details. See Commission, *Telecommunications Advice Letter Search*, https://apps.cpuc.ca.gov/apex/f?p=505:1:::1:P1_BRANCH,P1_TITLE:T,-Telecommunication (last visited Mar. 28, 2026).

Charter's commitment to ensuring customers who are happy with their current plans can stay on those plans and have access to these new discounts.⁹⁵

Following the close of the Transaction, Charter expects that Cox customers will be able to gain access to the Broadband Pilot Program, which they do not have today, as Charter plans to expand participation in the combined company's footprint. Upon securing any necessary Commission approvals, customers in the Cox territory who choose a Charter Spectrum plan as described above, and those customers who qualify for the LifeLine discount program⁹⁶ will be able to obtain the credit of up to \$20 on internet service and \$30 on internet when bundled with mobile service, and will be able to apply the discount toward any of Charter's approved plans.

b. Provide the post-merger company policy and eligibility requirements for a customer to secure a low-income or income-qualified-plan.

Please see the response to Question 4.5(a), above. All eligible Cox subscribers will have the option to take Charter's consumer-friendly, affordable plans, including SIA and Spectrum Internet Advantage, when Charter introduces Spectrum pricing and packaging in Cox's California service territory. As described in Charter's submitted testimony⁹⁷ and discovery responses to the intervenors and the Public Advocate's Office in this proceeding,⁹⁸ Charter confirms that it intends

⁹⁵ With respect to Cox's current policies that detail how a customer secures access to a low-income or income-qualified plan, Charter respectfully refers the Commission to Cox's response to the ALJ Ruling Question 4.5.

⁹⁶ Customers are eligible to enroll in California LifeLine based on the customer's or a member of the customer's household's income or participation in certain programs, including Medicaid or Medi-Cal; *See* General Order (GO) 153, Section 5.1.5.

⁹⁷ *See* Opening Testimony of Adam Falk, at 27-29; Rebuttal Testimony of Adam Falk, at 2, 9-10; Rebuttal Testimony of David Andreski, at 4, 15-23; Rebuttal Testimony of Tony Guevara, at 2-4.

⁹⁸ *See also* Charter's Response to Center for Accessible Technology Data Request 002, Question Nos. 19 and 21 (Mar. 16, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 16 and 19 (Mar. 10, 2026); Charter's Response to California Emerging Technology Fund Data Request No. 1, Question No. 20 (Feb. 5, 2026); and Charter's Response to Cal Advocates Data Request 01, Question Nos. 9-10 (revised Oct. 9, 2025).

to continue to provide customers with the best value for their individual needs and preferences at the most competitive prices.⁹⁹ However, Charter reiterates that existing Cox customers will also have the option to remain on their current Cox plans, if they choose.¹⁰⁰ Additionally, Charter plans to allow Cox customers to take one of the Spectrum plans under the Broadband Pilot Program, by meeting the eligibility requirements applicable to California LifeLine.¹⁰¹

c. Detail the parameters of the post-merger company's low-income or low-income qualified plan, including how to secure it, its terms and conditions, and how to cancel service.

Please see the responses to Questions 4.5(a) and (b), above. Charter has no current plans to change the relevant service terms as a result of the Transaction. As described in Charter's submitted testimony¹⁰² and in discovery responses to the intervenors and the Public Advocate's Office in this proceeding,¹⁰³ for qualifying California low-income customers, Charter currently offers the following plans:

⁹⁹ Charter clarifies that all pricing described in this and other responses to this ALJ Ruling, unless otherwise stated, is based on current prices as of the date of this response. Pricing is subject to change in the ordinary course of business in light of marketplace conditions, including costs, competitive offerings, and customer demand.

¹⁰⁰ See Charter's Response to Cal Advocates Data Request 08, Question No. 10 (Feb. 10, 2026); see also Joint Application at 23; Charter's Response to Cal Advocates Data Request 06, Question No. 4 (Jan. 9, 2026).

¹⁰¹ With respect to Cox's current policies that detail how a customer secures access to a low-income or income-qualified plan, Charter respectfully refers the Commission to Cox's response to the ALJ Ruling Question 4.5.

¹⁰² See Opening Testimony of Adam Falk, at 27-29; Rebuttal Testimony of Adam Falk, at 2, 9-10, 20; Rebuttal Testimony of David Andreski, at 4, 15-23; Rebuttal Testimony of Tony Guevara, at 2-4.

¹⁰³ See also Charter's Response to California Emerging Technology Fund Data Request No. 1, Question Nos. 1, 3, and 13 (Feb. 5, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question No. 18 (Mar. 10, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 16-17 (Mar. 11, 2026); Charter's Response to The Utility Reform Network Data Request 002, Question Nos. 5-6 (Jan. 30, 2026); Charter's Response to Cal Advocates Data Request 01, Question No. 9 (revised Oct. 9, 2025); Charter's Response to Cal Advocates Data Request 02, Question No. 16 (revised Nov. 20, 2025); Charter's Response to Cal Advocates Data Request 08, Question Nos. 4-7 (Feb. 10, 2026).

- **SIA**, with maximum speeds at 50 Mbps download and 10 Mbps upload, priced at \$25 per month.
- **Discounted SIA**, with maximum speeds at 50 Mbps download and 10 Mbps upload, priced at \$15 per month.
- **Spectrum Internet Advantage**, with maximum speeds at 100 Mbps download and 20 Mbps upload, priced at \$30 per month for a 12-month promotional period, and then steps up to a non-promotional, persistent rate of \$50 per month thereafter.

SIA and Discounted SIA are offered at standalone, non-promotional rates. Spectrum Internet Advantage is offered both on a standalone basis and as part of bundled options. As noted above, on a standalone basis, Spectrum Internet Advantage is priced at \$30 per month for a 12-month promotional period, and then steps up to a non-promotional, persistent rate of \$50 per month thereafter. When purchased as part of a bundled offering (*i.e.*, when a customer selects internet, in addition to a combination of qualifying video and/or mobile products), Charter currently offers Spectrum Internet Advantage at a bundle discount of \$20 per month for two to three years, depending on the offerings the customer selects, which then steps up to the non-promotional rate of \$50 thereafter. In addition, as noted above, Charter currently offers a “Free Internet Forever” plan to new customers who choose four mobile lines (with at least two ported lines) at a non-promotional price of \$30 per month per line (\$120 per month total) with access to internet service at Charter’s Spectrum Internet Advantage tier for free (*i.e.*, at no additional cost) forever;¹⁰⁴ for

¹⁰⁴ This offer is available to any residential customers. Offer requires purchase of four Unlimited Mobile lines, two of which must be ported, and all of which must be maintained to receive free Internet promotion. To be eligible, a customer must order Internet Advantage or above plus four Unlimited Spectrum Mobile lines (and at least two phone numbers must be transferred). For additional information on this limited-time offer, which is subject to change, please visit: <https://www.spectrum.com/packages/best-deals/free-internet-forever>.

just \$20 more per month, customers who choose four mobile lines can access Charter’s Internet Gig tier forever.¹⁰⁵

While Charter does not have a formal written “policy” document specific to its low-income plans, all Spectrum services are subject to applicable service terms and conditions and are subject to change. Charter’s Residential General Terms and Conditions of Service are publicly available at <https://www.spectrum.com/policies/residential-general-terms-and-conditions-of-service-dec2023>. Charter does not require annual contracts for any of its low-income plans. SIA includes a standard modem at no charge; Spectrum Advanced Wi-Fi may be added for an extra cost; Security Shield¹⁰⁶ is currently included with Advanced Wi-Fi. An additional charge for installation may apply. Charter does not impose early termination fees, and customers may cancel service or change their plan through Charter’s standard customer service channels.¹⁰⁷

d. Detail the post-merger company’s affordable access plan designated for seniors.

As noted in Charter’s response to Question 4.5(a) above, a household where a member is eligible to receive Supplemental Security Income can qualify for SIA. Although SIA is not *limited* to seniors, eligible seniors who complete enrollment for Discounted SIA are able to access it at a discounted rate of \$15. In addition, seniors who are not eligible for SIA may be eligible for a Broadband Pilot Program plan offering as described above.

¹⁰⁵ *See id.*

¹⁰⁶ *See, e.g.,* Charter, *Spectrum Security Shield*, <https://www.spectrum.com/internet/wifi-service/spectrum-advanced-wifi/security> (last visited Mar. 28, 2026).

¹⁰⁷ Additional information regarding cancellation options can be found at: <https://www.spectrum.net/support/account-and-billing/change-or-cancel-service>.

As discussed further in Charter’s response to Question 4.7(c) below and in Charter’s submitted testimony¹⁰⁸ and its discovery responses to the Center for Accessible Technology and The Utility Reform Network,¹⁰⁹ Charter supports digital literacy and technology access for seniors through its Spectrum Smart Device Training for Seniors program. This initiative focuses on enhancing digital literacy and fostering community among seniors by providing the skills and tools to navigate the digital world confidently.¹¹⁰ In California, Charter recently announced that Bridge the Digital Divide, a California nonprofit dedicated to helping seniors bridge the gap in technology access, was among its 2025 Spectrum Digital Education grantees. Human I-T, a Pasadena, California-based nonprofit, was also named a grantee, and will use Charter’s funding to distribute refurbished laptops to low-income seniors in Southern California and to provide access to tech support and a digital literacy course on artificial intelligence basics.

e. Identify the post-merger company’s geographic availability for low income and senior-focused plans. Additionally, provide a colour-coded heat map.

As detailed in Charter’s response to Question 4.5(b), above, Charter offers its plans across its entire footprint, and plans to make SIA, Spectrum Internet Advantage, and the Broadband Pilot Program available to all eligible Cox subscribers when it introduces Spectrum pricing and packaging in Cox’s California service territory. Please see **Attachment 5** for a color-coded heat map of the geographic availability of low-income and senior-focused plans under the combined company, which represents the entirety of the combined Charter and Cox service territories.

¹⁰⁸ See Opening Testimony of Adam Falk, at 30-31.

¹⁰⁹ See Charter’s Response to Center for Accessible Technology Data Request 002, Question No. 22 (Mar. 16, 2026); and Charter’s Response to The Utility Reform Network Data Request 004, Question No. 22 (Mar. 11, 2026).

¹¹⁰ For example, Charter has hosted hands-on smart device training sessions aimed at seniors 65 or older in the greater Los Angeles area, in partnership with the OCA-Asian Pacific American Advocates, Cyber Seniors, and the Chinatown Service Center, drawing nearly 100 seniors to multiple free classes.

- f. Provide an outline of the reporting template that will be delivered to the Commission, Communications Division, and the Legislature, detailing the population usage of the low-income & income-qualified plans, the senior-focused access plans, and the geographic locations of the usage of those plans.*

Charter and Cox are both highly experienced and established providers that operate across large multi-state footprints, including in California, with long-standing successful operations and histories of regulatory compliance in the State. Charter complies with all relevant and applicable reporting requirements. Charter does not see the need to provide the type of reports contemplated by this Question, nor is it aware of any similar reporting obligation in recent analogous transfer of control proceedings involving telecommunications providers.¹¹¹

Question 4.6 Public, Educational, and Governmental Access (PEG) Channels

Public speakers indicated that current PEG channels received substandard treatment that does not meet the terms of the Public Utilities Code or needs of modern society.

- a. List all PEG channels that broadcast over Standard Definition (SD) or High Definition (HD), indicate whether the channel's programming is currently listed in Charter's or Cox's electronic or digital program guides, and detail the amount of annual funding each channel is provided.*
- b. Submit copies of all current policies in place related to the provision of service for PEG channels.*
- c. Describe the post-merger company policies for PEG channels including quality of stream, inclusion of scheduling on electronic guides, and fees.*
- d. Describe how the post-merger company's policies comply with Public Utilities Code Section 5870.*

Response to Question 4.6

- a. List all PEG channels that broadcast over Standard Definition (SD) or High Definition (HD), indicate whether the channel's programming is currently listed in Charter's or Cox's electronic or digital program guides, and detail the amount of annual funding each channel is provided.*

As a threshold matter, Charter does not believe that the record reflects any consensus that public, educational, and governmental access ("PEG") channels receive any "substandard

¹¹¹ See *supra* note 48.

treatment”; this is particularly evident, given Charter’s estimate that only approximately one percent of participants at the PPHs even mentioned any PEG concerns *at all* (and of those, all but one individual speaker represented the same participant organization).¹¹² Of note, the vast majority of PEG programming is currently available to non-subscribers through various distribution mechanisms; for example, the internet offers a significant variety of non-cable delivery mediums for accessing PEG channel programming at home, including municipal websites, YouTube, and other social media platforms. Notably, the proliferation of many alternative distribution options readily available to consumers today also means that most consumers now subscribe to streaming video services that are not obligated to, and consequently do not, carry PEG programming on their platforms.

That notwithstanding, Charter designates PEG channel capacity for the local communities it serves in California, collects and remits PEG fees, engages with any such local community that expresses an interest in delivering PEG channels to Charter in a high-definition (“HD”) format, and implements such carriage in a manner consistent with the applicable requirements of the Digital Infrastructure and Video Competition Act (“DIVCA”) and applicable local ordinances and federal law.¹¹³ Under DIVCA, local communities *may* by ordinance establish a fee to support PEG channel facilities (“PEG fees”).¹¹⁴ Although Charter collects and remits such PEG fees, it does

¹¹² Five hearing participants addressed PEG in total. Two speakers at the February 12, 2026 PPH and two speakers at the February 25, 2026 PPH addressed PEG issues, and all four work for or are affiliated with Pasadena Media. An additional speaker that is affiliated with the Oceanside Community Television Station addressed PEG concerns on February 25.

¹¹³ Cal. Pub. Util. Code § 5870. Charter notes that PEG programming is related to cable television service which is not at issue in the Transfer. Cox California does not provide cable television services; even if it did, DIVCA controls the transfer of cable franchises, and requires *only* notice to the Commission for a transfer of control of a state video franchise. Cal. Pub. Util. Code § 5840(m).

¹¹⁵ Charter has made a good-faith effort to accurately indicate whether an individual channel’s programming data is currently listed in Charter’s electronic programming guide; however, because any specific programming data would be provided by the PEG originator directly to the third-party entity that maintains

not exercise any control over, nor have specific insight into, how those PEG fees may be individually allocated to a PEG channel or otherwise distributed to individual entities that may operate PEG channels on behalf of that local community. Additionally, Charter notes that DIVCA does not require a state video franchise holder to list a PEG channel's programming in an electronic program guide, and the existence and availability of specific programming data is dependent on the PEG channel content originator. To the extent that the originator of PEG programming expresses interest in supplying such programming data, Charter permits the originator to provide such data to a third-party entity that maintains and delivers electronic program guide information to Charter for distribution over its cable system.

Please see **Confidential Attachment 6**, which identifies the number of PEG channels currently carried by Charter in California by franchise area, the signal format in which they are delivered and carried, whether programming data is listed in Charter's electronic programming guide,¹¹⁵ and the PEG fees that Charter collects and remits within its video service territory in California.¹¹⁶

b. Submit copies of all current policies in place related to the provision of service for PEG channels.

and delivers electronic program guides to Charter, Charter has not individually verified the accuracy of each response for each channel listed.

¹¹⁵ Charter has made a good-faith effort to accurately indicate whether an individual channel's programming data is currently listed in Charter's electronic programming guide; however, because any specific programming data would be provided by the PEG originator directly to the third-party entity that maintains and delivers electronic program guides to Charter, Charter has not individually verified the accuracy of each response for each channel listed.

¹¹⁶ As noted above, Charter does not exercise any control over how the PEG fees that it collects and remits to a local entity are individually allocated or otherwise apportioned; accordingly, the fees that Charter collects and remits to a local entity may not be a direct representation of the amount of annual funding each channel is actually provided, as contemplated by this Question.

Section 5870 of the California Public Utilities Code establishes a set of governing policies applicable to PEG channels that, *inter alia*, obligate state video franchise holders (“VFHs”) to designate up to three PEG channels within a local community¹¹⁷ and abide by applicable technical standards.¹¹⁸ Federal law prohibits cable operators from exercising any editorial control over any public, educational, or governmental use of these channels.¹¹⁹ In accordance with DIVCA, as noted above, local communities *may* by ordinance establish a fee to support PEG channel facilities, which is generally capped by statute at not more than 1 percent of a VFH’s gross revenues from the operation of video service within the jurisdiction of the local community.¹²⁰ Charter collects and remits such fees where applicable. Charter does not, following the passage of DIVCA, operate any PEG studios in California. The local entities that operate PEG channels within Charter’s video service territory in California are responsible for the operation and provision of the PEG channels listed therein; consequently, Charter is not aware of any responsive policies related to the provision of PEG channels in California. As noted above, Charter designates PEG channel capacity for the local communities it serves and collects and remits PEG fees in accordance with all applicable requirements of DIVCA, local ordinances, and law.

c. Describe the post-merger company policies for PEG channels including quality of stream, inclusion of scheduling on electronic guides, and fees.

See Charter’s response to Question 4.6(a), above. Charter is and remains willing to engage with any such local community that expresses an interest in delivering PEG channels to Charter in an HD format and implements such carriage in a manner consistent with the applicable

¹¹⁷ Cal. Pub. Util. Code § 5870(c)(1).

¹¹⁸ *See, e.g., id.* § 5870(b).

¹¹⁹ 47 U.S.C. § 531(e).

¹²⁰ Such ordinances expire, and may be reauthorized, upon the expiration of the state franchise. Cal. Pub. Util. Code § 5870(n); Cal. Pub. Util. Code § 5860.

requirements of DIVCA. In specific response to this Question, Charter does not anticipate that the combined company will change any applicable policies referenced by this Question as a result of the Transaction, and Charter will continue to comply with all applicable requirements of DIVCA.

d. Describe how the post-merger company's policies comply with Public Utilities Code Section 5870.

See Charter's response to Questions 4.6(a), (b), and (c) above.

Question 4.7 Benefits to Local Communities

Many public commenters described how Charter and Cox positively embedded themselves into local communities and spent significant amounts of funds on programs that directly benefited community members and community organizations. Describe, in detail, how the post-merger company is even better for communities than the legacy set by Charter and Cox's community funding:

- a. Provide an overview of the size of Charter and Cox's current community benefits organizations.¹²¹ Describe the current methodology for considering and then funding community organizations.*
- b. Provide a chart detailing each expenditure for calendar year 2024 and 2025.*
- c. Describe the size of the post-merger company's community benefits program.*
- d. Provide a description as to how the post-merger company will determine its community benefit expenditures on a quarterly basis for 5 years into the future.*
- e. Provide an outline of the report that will be delivered to the Commission and the Legislature on a quarterly basis that details the community benefits organization's expenditures.*

Response to Question 4.7

As described in Charter's submitted testimony¹²² and in discovery responses to the intervenors and the Public Advocate's Office in this proceeding,¹²³ Charter is committed to

¹²¹ Spectrum Community Assist [*sic*] and Cox's equivalent program in California.

¹²² See Opening Testimony of Adam Falk, at 30-35; Rebuttal Testimony of Adam Falk, at 17-24, 26.

¹²³ See also Charter's Response to Center for Accessible Technology Data Request 002, Question Nos. 10, 22-26 (Mar. 16, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question No. 20 (Mar. 10, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 21 and 24-26 (Mar. 11, 2026); and Charter's Response to California Emerging Technology Fund Data Request No. 1, Question Nos. 12 and 20 (Feb. 5, 2026).

improving communities and impacting lives where its customers and employees live and work, including through signature philanthropic and employee engagement programs in California and across its footprint.¹²⁴ The combined company will be better positioned to serve those communities than either company operating independently for at least three reasons. *First*, customers and communities in the former Cox California service territory will gain access to Charter’s existing community benefit programs—described in detail below—that are currently available within Charter’s service area. Charter expects to identify additional opportunities to expand its programs and partnerships as it integrates Cox’s California communities into its service area. *Second*, Charter has committed to providing a \$50 million grant to establish a foundation to provide support in the communities where the combined company operates, including in California. This commitment is complementary to many of Charter’s other, existing philanthropic programs. *Third*, separate and apart from this \$50 million grant to establish a foundation, Charter intends to make an initial \$5 million contribution to establish an employee relief fund that assists employees experiencing financial hardship (the “Employee Relief Fund”) in all geographies where Charter operates, including California.¹²⁵

a. Provide an overview of the size of Charter and Cox’s current community benefits organizations. Describe the current methodology for considering and then funding community organizations.

As referenced by this Question, and as described in Charter’s submitted testimony¹²⁶ and in discovery responses to the intervenors and the Public Advocate’s Office in this proceeding,¹²⁷

¹²⁴ See also Response to Administrative Law Judge Inquiry, at 8-11 (Feb. 17, 2026).

¹²⁵ With respect to Cox’s current community benefits organizations, Charter respectfully refers the Commission to Cox’s response to the ALJ Ruling Question 4.7.

¹²⁶ See Opening Testimony of Adam Falk, at 32-33; Rebuttal Testimony of Adam Falk, at 18-19, 26.

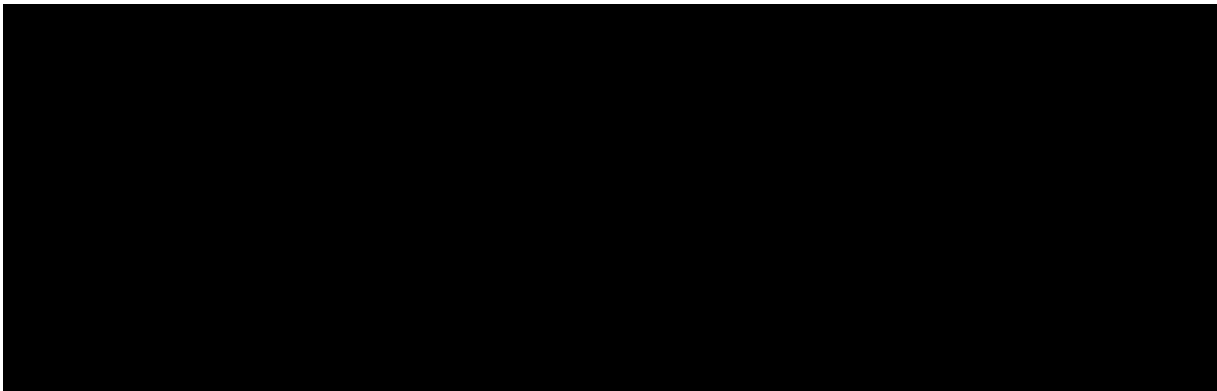
¹²⁷ See also Charter’s Response to Center for Accessible Technology Data Request 002, Question Nos. 10, and 22-27 (Mar. 16, 2026); Charter’s Response to The Utility Reform Network Data Request 004, Question No. 20 (Mar. 10, 2026); Charter’s Response to The Utility Reform Network Data Request 004, Question

Charter launched Spectrum Community Center Assist (“SCCA”) in late 2021, and SCCA is now a signature philanthropic initiative to revitalize community centers in rural and urban areas and to invest in job training programs in communities across Charter’s 41-state footprint. SCCA is by no means Charter’s only philanthropic endeavor, but the one specifically referenced in Question 4.7 of the ALJ Ruling and therefore the primary subject of this response.

Through SCCA, Charter supports improvements to the physical condition of community centers, enhancing both the space and the programs that provide job skills training for rural and urban communities. Initial SCCA grants are \$50,000 per organization. Grantees are 501(c)(3) organizations within Charter’s service area selected using a rigorous vetting process that includes virtual interviews and onsite visits. Organizations can seek renewed funding each year by submitting a proposal describing, among other things, the organization’s program, purpose, and metrics. To date, Charter has launched 62 community center partnerships, totaling more than \$10 million in contributions.

Within California specifically, Charter’s SCCA contributions in each of the past five calendar years have totaled over \$1 million, as shown in the table below:

[BEGIN CONFIDENTIAL]



Nos. 21 and 24-26 (Mar. 11, 2026); and Charter’s Response to California Emerging Technology Fund Data Request No. 1, Question Nos. 12 and 20 (Feb. 5, 2026).

[END CONFIDENTIAL]

One example of Charter's SCCA partnerships in California is with the Mexican American Opportunity Foundation's LA Center, where grant funding supports the socio-economic advancement of California's greater Latino community through programs in early childhood education and family services, job training, and senior lifestyle development. Charter's support includes more than \$100,000 in financial contributions, computer donations, a Smartboard, gigabit internet service, and employee time providing free workshops on topics like resume writing and interview skills.¹²⁸

b. Provide a chart detailing each expenditure for calendar year 2024 and 2025.

Please see **Confidential Attachment 7** for details about Charter's SCCA contributions in or benefiting California in 2024 and 2025. Charter provided similar information in its discovery responses to the intervenors and Public Advocate's Office in this proceeding.¹²⁹ **Confidential Attachment 7** is not an exhaustive compilation of all charitable giving by Charter throughout its footprint and instead refers to the specific community benefit program referenced in the ALJ Ruling.¹³⁰

c. Describe the size of the post-merger company's community benefits program.

¹²⁸ Charter respectfully refers the Commission to Cox's response to the ALJ Ruling Question 4.7 for information about Cox's current community benefits organizations.

¹²⁹ Charter has provided detailed information about these and other programs to intervenors and the Public Advocate's Office in discovery. *See, e.g.*, Response to Center for Accessible Technology Data Request 002, Question Nos. 23 and 26 (Mar. 16, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 25-26 (Mar. 11, 2026); and Charter's Response to California Emerging Technology Fund Data Request No. 1, Question No. 20 (Feb. 5, 2026).

¹³⁰ Charter respectfully refers the Commission to Cox's response to the ALJ Ruling Question 4.7 for information about Cox's expenditures for calendar years 2024 and 2025.

Please see the response to Question 4.7(a), above. As discussed above, and as described in Charter's discovery responses to the intervenors,¹³¹ a direct benefit of the Transaction is Charter has committed to provide a \$50 million grant to a corporate foundation that promotes community leadership and support across the combined company's service area. Charter has also committed to make an additional \$5 million investment to establish an employee relief fund.

As comprehensively detailed in Charter's submitted testimony,¹³² Charter supports economic development and social impact programs across its footprint, including in social justice communities in California. Beyond SCCA, these include:

Spectrum Digital Education

Through the Spectrum Digital Education program, which is aimed at closing the digital literacy gap, Charter supports nonprofits that use connectivity to enhance the lives of community members through skills training and access to technology. Working together to advance digital inclusion and empower the future, Spectrum Digital Education grants are awarded in local communities across Charter's service area. In California, Charter recently announced that Bridge the Digital Divide, a California nonprofit dedicated to helping seniors bridge the gap in technology access, was among its 2025 Spectrum Digital Education grantees. Human I-T, a Pasadena, California-based nonprofit, was also named a grantee, and will use Charter's funding to distribute refurbished laptops to low-income seniors in Southern California and to provide access to tech support and a digital literacy course on artificial intelligence basics. In total, Charter has

¹³¹ Charter's Response to Center for Accessible Technology Data Request 002, Question Nos. 10, and 22-26 (Mar. 16, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question No. 20 (Mar. 10, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 21 and 24-26 (Mar. 11, 2026); and Charter's Response to California Emerging Technology Fund Data Request No. 1, Question Nos. 12 and 20 (Feb. 5, 2026).

¹³² See Opening Testimony of Adam Falk, at 30-35; Rebuttal Testimony of Adam Falk, at 17-24, 26.

contributed approximately \$2 million in cash and in-kind support over the past five years to digital-literacy initiatives in California through Spectrum Digital Education grants. Charter anticipates awarding \$1 million in Spectrum Digital Education grants in 2026.

Charter selects Spectrum Digital Education grantees by soliciting and reviewing requests for proposals from eligible organizations. Eligible organizations are 501(c)(3) organizations that are within Spectrum's service area. An internal committee reviews all applications and recommends recipients, with final approval made by company leadership. Grants range between \$5,000 and \$50,000 per organization.

Spectrum Smart Device Training for Seniors

Another of Charter's innovative digital-literacy programs is Spectrum Smart Device Training for Seniors, aimed at empowering older adults through technology. This initiative focuses on enhancing digital literacy and fostering a sense of community among seniors by providing the skills and tools to navigate the digital world confidently. For example, Charter has hosted hands-on smart device training sessions aimed at seniors 65 or older in the greater Los Angeles area, in partnership with the OCA-Asian Pacific American Advocates, Cyber Seniors, and the Chinatown Service Center, drawing nearly 100 seniors to multiple free classes. Charter partners with local organizations that serve seniors to host trainings. Charter also provides funding to a training partner, Cyber Seniors, to facilitate the sessions.

Spectrum Employee Community Grants

Spectrum Employee Community Grants are designed to assist nonprofit organizations with which Charter employees have relationships and that provide critical human services to communities, such as food pantries, homeless shelters, and job placement programs. Through this program, Charter provides additional support to community organizations where its employees

volunteer their time and talent and has supported hundreds of organizations across its footprint. In California alone, between 2021 and 2025, Charter has supported more than 40 individual organizations and provided almost \$300,000 in financial support.

Spectrum Community Investment Loan Fund

The Spectrum Community Investment Loan Fund (the “Loan Fund”) provides loans through community development financial institutions (“CDFIs”) to small businesses whose goods and services help meet core needs in communities within Charter’s 41-state footprint. These long-term investments positively impact local economies with growth capital, new job creation, and stronger businesses. To date, the Loan Fund has committed more than \$33 million in loan capital, capacity grant donations, and in-kind contributions to 16 CDFIs covering 20 states.

Since the Loan Fund’s first commitments, approximately five years ago, Charter has made investments totaling \$4.8 million in CDFIs—as well as \$200,000 in capacity grants to further support these partners—that have been and will continue to allocate capital to small businesses in California and other states in its footprint. Of this, \$2 million is specifically earmarked for small businesses that were impacted by the 2025 Los Angeles wildfires. The CDFIs in which Charter has invested continue to make loans to small businesses in Charter’s operating network in California. In addition, including recycled funds and leverage provided by California iBank programs, the Loan Fund has financed approximately 200 loans to small businesses, totaling \$4.9 million, which have created or retained approximately 400 jobs throughout California communities. These jobs were created or retained in a wide range of industries, including educational services, healthcare, arts and entertainment, hospitality and food services, and retail, to name a few.

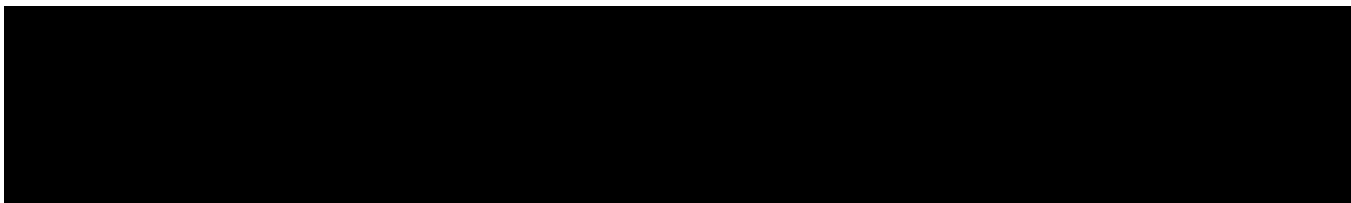
Charter anticipates that after the Joint Application is granted, the Loan Fund will make additional investments in CDFIs that focus on California, and these investments will be expanded due to the Transfer. Charter also expects to allocate significant capital to small businesses in regions such as San Diego, Irvine, and Santa Barbara. This new capital will bolster local economies, create new jobs, and improve the well-being of communities served, as the original California-focused commitments have done, and continue to do.

Broadband Field Technician Apprenticeship Program

Over the past five years, Charter has invested approximately [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] in the Broadband Field Technician Apprenticeship Program (“BFTAP”) in California alone. As detailed in the Falk Opening Testimony, the BFTAP is available to employees in California and across the company’s footprint, providing career-progression opportunities through classroom, online, and on-the-job training at no cost to employees. It also enables qualified veterans to receive GI Bill benefits in addition to their pay while enrolled.

Charter encourages every newly hired field technician to enroll in the BFTAP, regardless of veteran status. In California, approximately [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] Charter employees have completed the BFTAP since 2021. The table below reflects the number of field technicians who have completed the BFTAP in California from 2021 to 2025. Charter’s success in reaching the veteran population has contributed each year to Charter’s decision to continue funding and maintaining the BFTAP.

[BEGIN CONFIDENTIAL]



[REDACTED]

[END CONFIDENTIAL]

The overwhelming majority of employees who completed the BFTAP in California over the past five years remain employed by Charter, totaling [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [END CONFIDENTIAL]¹³³

Beyond the philanthropic programs described above, Charter made additional community-based contributions through its government affairs organization. During 2025 alone, we donated an additional \$135,000 to 24 different charitable organizations, including:

- Just Us 4 Youth
- LA's Best
- Los Angeles South Hope Foundation
- Mexican American Opportunity Foundation
- Jacobs-Cushman San Diego Food Bank
- DIY Girls

¹³³ With respect to Cox's current community benefits organizations, Charter respectfully refers the Commission to Cox's response to the ALJ Ruling Question 4.7.

- United Way of Tulare County
- Community Solutions for Children
- Court Appointed Special Advocates (Imperial County Children & Families – CASA)

Of note, we also collaborated with a wide variety of community organizations on events, highlighting each program’s priorities and amplifying impact through news and social media coverage.

- San Diego Futures Foundation and Spectrum hosted an event to help seniors in Carlsbad learn key digital skills, develop a basic understanding of technology, and acquire the necessary tools required to avoid online scams.
- Brotherhood Crusade, the Los Angeles Urban League and Spectrum celebrated Black History Month at events highlighting community members, their personal journey to success, key workforce development initiatives, and entrepreneurship.
- Somos Familia Valle, Human-IT and Spectrum partnered to distribute laptops to youth in the San Fernando Valley. Together with these partner organizations, Charter helped ensure households and individuals in this area of need have access to the devices needed to thrive in a digital world.
- Charter partnered with the Altadena Chamber of Commerce to uplift and support the small business community most impacted by the 2025 California wildfires. Charter provided grants as well as a cash donation.

In addition, Charter has established programs that reflect its commitment to developing a skilled and diverse workforce and creating career pathways for young professionals in the communities it serves. These include:

Spectrum Scholars. Charter’s Spectrum Scholars program is an award-winning annual scholarship and career-development program and is currently accepting applications for its 2026 program today. Through Spectrum Scholars, Charter offers college juniors with demonstrated financial need and a minimum 3.0 GPA, \$20,000 (\$10,000 will be disbursed at the beginning of the Scholar’s junior year and \$10,000 will be disbursed at the beginning of their senior year), a guaranteed 10-week paid summer internship opportunity, professional development through a structured engagement strategy that includes skills and career-readiness training, and mentorship through an assigned employee that provides Spectrum Scholars guidance throughout the program. Since the Spectrum Scholars program launched in 2020, Spectrum has welcomed over 90 scholars and invested more than \$2 million in the program.¹³⁴

Spectrum Internships. Spectrum’s broader internship program places hundreds of students in 10-week internships each summer across the organization, providing hands-on experience and professional networking opportunities in the telecommunications industry. Similar to its Spectrum Scholars program, Charter launched its Spectrum Internship program in 2020. Since that time, the program has transitioned 333 interns into full-time Spectrum employees.¹³⁵

- d. Provide a description as to how the post-merger company will determine its community benefit expenditures on a quarterly basis for 5 years into the future.***

¹³⁴ See Press Release, Charter Communications, *Spectrum Opens Applications for Sixth Class of Spectrum Scholars* (Jan. 12, 2026), <https://corporate.charter.com/newsroom/spectrum-opens-applications-for-sixth-class-of-spectrum-scholars>.

¹³⁵ See Press Release, Charter Communications, *From Spectrum Intern to Employee: A Path to Success* (July 31, 2025), <https://corporate.charter.com/newsroom/spectrum-internship-program-provides-interns-with-a-path-to-success>.

As described in Charter's submitted testimony¹³⁶ and in discovery responses to the intervenors and the Public Advocate's Office in this proceeding,¹³⁷ Charter has not yet made final determinations regarding how the combined company will determine its community benefit expenditures for the next five years. Charter anticipates responding to new opportunities and programs that may arise in the future but do not exist today and expects that response to include additional contributions and investments as it identifies new or expanded opportunities with communities and organizations in Cox territories that will become part of the combined company's service area.

e. Provide an outline of the report that will be delivered to the Commission and the Legislature on a quarterly basis that details the community benefits organization's expenditures.

Although Charter would comply with all relevant and applicable reporting requirements, including with respect to the combined company's community benefits expenditures, Charter is not aware of any statutory or regulatory reporting obligation requiring the type of reporting contemplated by this Question, nor of any similar reporting obligation in recent analogous transfer of control proceedings involving telecommunications providers.¹³⁸ In addition, Charter is not aware of a mechanism for the Legislature to officially receive a report of this sort, which would fall outside of the specific reports that the Legislature has directly mandated, nor is Charter aware of any comparable transaction-specific condition that mandated similar reporting directly to the Legislature.

¹³⁶ See Rebuttal Testimony of Adam Falk, at 17-24.

¹³⁷ See Charter's Response to Center for Accessible Technology Data Request 002, Question No. 25 (Mar. 16, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question No. 27 (Mar. 10, 2026); Charter's Response to The Utility Reform Network Data Request 004, Question Nos. 25-26 (Mar. 11, 2026).

¹³⁸ See *supra* note 48.

Respectfully submitted this 30th day of March, 2026, in San Francisco, California.

/s/ Zeb C. Zankel

Zeb C. Zankel
Jenner & Block LLP
525 Market Street, 29th Floor
San Francisco, CA 94105
Tel: (628) 267-6812
Email: ZZankel@jenner.com

Camillie Landrón
Carolyn Small
Jenner & Block LLP
515 S. Flower Street, Suite 3300
Los Angeles, CA 90071
Tel: (213) 239-5100
Email: CLandron@jenner.com
Email: CSmall@jenner.com

*Counsel for Charter Communications, Inc. and
Charter Communications Holdings, LLC*