

September 26, 2022

Nancy S. Malmquist
Tel: (802) 473-4249
NMalmquist@drm.com

Via ePUC

Holly R. Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620-2701

Re: **Petition of Charter Fiberlink VT-CCO, LLC for designation as an Eligible Telecommunications Carrier to receive Rural Digital Opportunity Fund Auction (Auction 904) support for voice and broadband services:
Case No. 21-0041-PET**

Dear Mrs. Anderson:

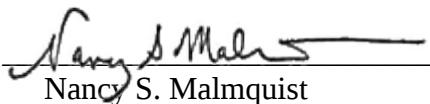
Charter Fiberlink VT-CCO, LLC ("Charter Fiberlink") has been designated an Eligible Telecommunications Carrier (ETC) by this Commission and authorized for Rural Digital Opportunity Fund (RDOF) support by the Federal Communications Commission (FCC) in fifteen census blocks in Vermont. Charter Fiberlink and its affiliates will use the RDOF support to deploy network in order to offer high-speed internet services and voice services to approximately 77 locations within the RDOF area.

In accordance with Ordering Paragraph 3(b) in the Commission's Order dated April 21, 2021, in the above-referenced matter, as amended by Order dated December 14, 2021, Charter Fiberlink hereby submits its marketing plan for its RDOF area in Vermont.

Please contact me with any questions. Thank you for your assistance in this matter.

Very truly yours,

DOWNS RACHLIN MARTIN PLLC
Attorneys for Charter Fiberlink VT-CCO, LLC

By: 
Nancy S. Malmquist

Enclosure

cc: Ms. Tiffany Smink
Mr. Michael Chowaniec

21606397.1

CHARTER FIBERLINK VT-CCO, LLC
MARKETING PLAN
FOR ITS ETC-DESIGNATED AREA IN THE
STATE OF VERMONT

Submitted in Compliance with
Public Utility Commission
Order dated April 21, 2021
Case No. 21-0041-PET

I. General

Charter Fiberlink VT-CCO, LLC (“Charter Fiberlink”) with its affiliates (collectively, “Charter”) will offer the following services in Charter Fiberlink’s ETC-designated service area: (1) voice telephony; (2) broadband Internet access services; and (3) Lifeline voice and broadband Internet services.

II. Marketing Efforts

A. Company Website

Charter markets services under the name Spectrum. General information about all of Charter’s services can be found on the Spectrum website at www.spectrum.com.

Charter Fiberlink’s Local and Intrastate Interexchange Services Price Guide (“Price Guide”) is available to the public at www.spectrum.com/policies/telephone-tariff under the section header “Vermont.” Information regarding the rates, terms, and conditions for Charter Fiberlink’s Lifeline Telephone Service appears in Section 5.1 of the Price Guide.

Information regarding voice service offered by a Charter Fiberlink affiliate that will be available in Charter Fiberlink’s ETC-designated areas is available to the public at: <https://www.spectrum.com/policies/terms-of-service> under the header “Spectrum Voice.”

Information about the rates, terms, and conditions for Spectrum Internet service offered by a Charter Fiberlink affiliate that will be available in Charter Fiberlink’s ETC-designated area is available to the public at: <https://www.spectrum.com/internet>.

Information about Charter Fiberlink and its affiliates’ participation in the RDOF and Lifeline programs is available to the public at:

Spectrum.com/cp/build?cmp=dotnet_build_2021 (“[Spectrum Rural Internet Availability | Get Spectrum In Your Area](http://Spectrum.com/cp/build?cmp=dotnet_build_2021)”), and

Spectrum.net/support/voice/lifeline-phone-credit-landing (“How to Qualify for Lifeline with Spectrum | Spectrum Support”).

B. Other Marketing Materials

In addition to the website information described above, Charter anticipates that within Charter Fiberlink's ETC-designated service area Charter will advertise its services directly to each RDOF location via U.S. Mail as network is deployed and services are available to those locations. This will enable the advertising of services only available in the RDOF area, particularly Lifeline services, to be appropriately targeted to those locations where the services are available. In addition, Charter Fiberlink will advertise its Lifeline service offerings through interactive voice response (IVR) messaging when consumers call into customer support and through notices in annual bill messages that will also be targeted geographically.

With respect to the frequency of these marketing efforts, the company website and the IVR messaging, once launched should be available at all times. The direct mailers will be sent around the time of initial launch of service availability, and the bill messages will be sent annually.

As to the language for these materials, Charter's marketing materials are published in English by default. Charter also provides certain information in Spanish. For example, on the Spectrum.com website, many of the pages have a link in the upper right-hand corner that allow a viewer to toggle the page content language between English and Spanish. Similarly, there is an option to hear Charter's IVR messaging in Spanish. Charter may publish its marketing materials in other languages as appropriate. Further, Charter's marketing materials will use clear and plain language when describing the required services and the terms under which they are offered.

Given the relatively small size of Charter Fiberlink's ETC-designated area, it will be important to limit any distribution of marketing materials for Charter's Lifeline service offerings to those community institutions within the designated area. Charter will further evaluate those opportunities as it launches its services within the area. Coordinating outreach efforts with other ETCs may be similarly challenging, and Charter has no immediate plans to do so. Charter may consider engaging in such cooperative efforts as part of its future marketing efforts if that can be done in a manner that will not cause customer confusion regarding availability of Charter's Lifeline services.