

Maureen O. Helmer
Partner

August 17, 2018

VIA ELECTRONIC MAIL

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

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

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

**Re: Charter's Request for Extension of Deadline in Ordering Clause No. 4 of July
27, 2018 Order and Request for Extension of Time to file Applications for
Rehearing**

Dear Chair Rhodes, Commissioners of the Public Service Commission, and Secretary Burgess:

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

Among other requirements, the *Revocation Order* directs Charter to "file a plan with the Secretary to the Commission within 60 days of the issuance of this Order, consistent with the discussion in this Order,"³ regarding the discontinuation of services in New York. The

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

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

³ *Revocation Order* at 29.

Revocation Order indicates that the deadlines therein may be extended “[i]n the Secretary’s sole discretion” upon a written request including a justification for the extension.⁴

Pursuant to Pub. Serv. L. § 22, any applications for rehearing of the *July Compliance Order* or of the *Revocation Order* must be made within thirty days of the order, *i.e.* by Monday, August 27, 2018, “unless the Commission for good cause shown shall direct.”⁵

Good cause exists to extend both deadlines. Granting a short extension would allow time for discussions between Charter and the Department before the initiation by Charter of additional Commission or court proceedings. Charter accordingly respectfully requests that the Commission pursuant to Pub. Serv. L. § 22 extend by 14 days from August 27, 2018 to September 10, 2018 the deadline to seek rehearing of both July 27, 2018 orders, and further requests that the Commission, or the Secretary, extend pursuant to ordering clause 6 of the *Revocation Order* by 14 days from September 25, 2018 to October 9, 2018 the requirement that Charter submit a plan in accordance with ordering clause No. 4 thereof.⁶

In order to ensure that this request does not delay other measures Charter would soon need to initiate to protect its rights to administrative and judicial review, we respectfully request that the Secretary provide a response by 1pm EDT on Monday, August 20, 2018 to Charter’s request to modify the deadline for the filing of the plan in accordance with ordering clause No. 4 of the *Revocation Order*, and further request that the Commission act by the close of business on Wednesday, August 22 upon Charter’s request to extend the date by which to file for Rehearing.

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

Very truly yours,

/s/ Maureen O. Helmer

Maureen O. Helmer
Counsel for Charter Communications, Inc.

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⁴ *Id.*

⁵ Pub. Serv. L. § 22

⁶ This request for an extension of these deadlines is without prejudice to Charter’s ability to seek relief, either from the Commission or otherwise, from the *Revocation Order* and the *July Compliance Order*.