

### Solution Cover Sheet

Name of Respondent Organization New England Cable & Telecommunications Assn., Inc. (NECTA)			
Mailing Address 10 Forbes Rd., Suite 440W	City/Town Braintree	State MA	Zip Code 02184
Telephone (781) 843-3418	Fax (781) 849-6267	Respondent Web Address www.necta.info	
Name of Primary Contact (Individual) Paul R. Cianelli			
Primary Contact Title President	Contact e-mail address pcianelli@necta.info	Direct Telephone # (781) 843-3418	
Which of the following best describes the respondent: (You must select at least one)			
<input type="checkbox"/> Broadband Service Provider <input type="checkbox"/> Government Organization <input type="checkbox"/> Equipment Manufacturer <input type="checkbox"/> Non-profit Organization <input type="checkbox"/> Equipment Vendor <input type="checkbox"/> Owner of Physical Assets (please specify Asset: _____)		<input type="checkbox"/> Network or Systems Integrator <input type="checkbox"/> Interested Individual <input type="checkbox"/> Investor/Venture Capital <input type="checkbox"/> Consultant <input checked="" type="checkbox"/> Advocacy Group <input type="checkbox"/> Other (please specify Other: _____)	
Brief Description of Organization (please outline previous experience with broadband deployment and/or provision of broadband services)			
The New England Cable & Telecommunications Association, Inc. (NECTA) is a six state regional trade association representing essentially all independent cable companies. In Massachusetts, we represent Charter Communications, Comcast, and Time Warner Cable.			
List of anticipated partner organizations			



***New England Cable & Telecommunications Association, Inc.***

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**Comments of the New England Cable & Telecommunications Assn., Inc.**

The New England Cable & Telecommunications Association, Inc. (NECTA) is a regional trade association representing substantially all independent cable telecommunications companies. In Massachusetts NECTA represents Comcast, Charter Communications, Cox Communications and Time Warner Cable. NECTA hereby submits its response to the Massachusetts Broadband Institute's (MBI) "WESTERN MASSACHUSETTS Call for Solutions" by offering the following broadband principles:

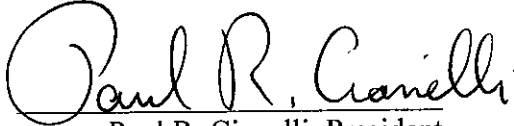
- I. The MBI Should Focus on Promoting Broadband Deployment to Unserved Citizens in Unserved Areas. The cable telecommunications industry has consistently supported the primary objective of Governor Patrick's legislative initiative which is to spur the deployment of broadband in areas of western Massachusetts that lack broadband service. In light of the fact that broadband service is available from multiple providers to 97% of the citizens of the Commonwealth, NECTA believes that the MBI must focus its attention on addressing the issue of broadband availability in areas of western Massachusetts that are currently unserved.

No portion of the limited \$40 million bond funding should be used to unfairly subsidize second and third broadband providers in areas where private risk capital already have been invested to provide broadband service. Scarce capital must not be siphoned off from rural western Massachusetts citizens that are unserved by an existing broadband provider. The Legislature has made it clear that "[t]he first priority of the institute shall be to assess and improve conditions in the commonwealth's communities that have no broadband access." Mass. Gen. Laws c. 40J, sec. 6B(b).

- II. The MBI Should Remain Technologically Neutral. It appears that the Call for Solutions is technologically neutral and we applaud the MBI for carefully crafting the document in that manner.
- III. Conditions. The MBI should not attempt to attach conditions such as so-called net neutrality and the like to any lease. The same rules and policy considerations should apply to all broadband providers equally; to do otherwise would create unnecessary roadblocks to deployment.

- IV. Content. The MBI, as the lessor of any fixed assets, should not attempt to control or influence content. Whether it is broadband, cable or telephony, it would be a slippery slope for a governmental agency to get involved in content for any reason.

Respectfully submitted,

  
Paul R. Cianelli, President

Dated: December 18, 2008