

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

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

Application No. 25-07-016

**SUPPLEMENTARY TESTIMONY OF TRACY
ROSENBERG**

Tracy Rosenberg
Executive Director
Media Alliance
2830 20th Street, Suite 201
San Francisco CA 94110
Tel: (415) 746-9475
Email: tracy@media-alliance.org

Dated March 30, 2026

I. Statement of Qualifications and Purpose of Testimony

Tracy Rosenberg has been the Executive Director of Media Alliance, a Northern California democratic communications advocacy nonprofit founded in 1976 and located in San Francisco, CA. In this capacity, she has written, researched and organized about the media system and the communication rights of people since 2007. Particular areas of interest have included media concentration and its impact on the cost of services and the diversity of information flows, and access to high-speed broadband and fiber to participate fully in modern society. In addition, Ms. Rosenberg has been a board member for the Western Region of the Alliance for Community Media since 2020, which is the association of Public, Educational and Governmental Channels (PEG) and is currently the chair of the Western Region's Public Policy Committee and has a personal and professional interest in the health of these important community media centers, which provide crucial local news, event coverage and job skill training in communities across California.

The purpose of this supplementary testimony is to respond to the ALJ's ruling of March 18, 2026. In that ruling, the ALJ opened this window for supplementary testimony and stated:

Members of the public who spoke at the PPHs in front of the assigned Commissioner's Office and Administrative Law Judge (ALJ) made clear that their support for the pending transaction stemmed from their clearly articulated expectations as to how the merged entity would treat them and their communities. Commenters at the PPHs expressed that their expectations are high that the proposed transaction will result in significant public benefits throughout California. The Commission must consider if the proposed transaction sets the future merged company on a path to meet the applicable criteria in the Public Utilities Code and, importantly, meets and exceeds the expectations set forth by the public.¹

In the March 18 ruling the ALJ asked for additional testimony from the applicants addressing a number of particular subjects. The ALJ also invited parties to submit supplementary testimony on the particular subjects cited in the ruling. As a party to the proceeding, Media Alliance is taking this opportunity to submit supplementary testimony on Item 4.6 – Treatment of Public,

¹ ALJ Ruling 3-18-26 Proceeding A.25-07-016

Educational and Government Channels (PEG).

In so doing, we do not waive our ability to address other relevant topics relating to market competition and pricing disparities in our Opening Brief later in the proceeding schedule. We also proffer with this testimony several two documents as exhibits relating to the above subject into the record. We hope that by presenting them in this supplementary testimony and serving them upon the service list, that it would then be procedurally appropriate to address these documents at the appropriate time during the evidentiary hearings scheduled for April 20-24.

II – There is Ample Evidence That The Applicants Have Provided Substandard Treatment of PEG Channels That Is Not Compliant With the Public Utilities Code Or The Needs of Modern Society

PEG channels are mandated community benefits that are provided to local communities as part of the compensation for a cable franchise. The channels provide three sets of services: the televising of public governmental meetings on the cable system, including city and council bodies, school boards and civic information sessions, educational programming and community access to the cable system. On the state level, the provision of PEG channels is governed by section 5870 of the Public Utilities Code.

It is important to mention in this context that the now 20 year old death spiral of commercial local news coverage, primarily but not only print newspapers, has elevated the need for these centers to provide hyper local civic news and information in California communities. When cable franchises improperly withhold support, charge unwarranted service fees, degrade content signals and hide the public channels from easy access, they damage the communities they are supposed to be serving.

We would like to enter into the record of the proceeding two documents. The first is a 2021 document titled “Spectrum Enterprise PEG Product Brief” (Exhibit 1). This document was presented by various Charter Cable sales staff to PEG channel operators in Southern California. It purports to create a pricing structure for the transmission of content on the designated PEG

channels by local municipalities and non-profit channel operators in both standard definition and high definition.

The second document we would like to enter into the record of the proceeding is an invoice from applicant Cox to PEG channel KOCT in Oceanside CA for monthly network connection in the amount of \$429.68 billed in November of 2025 (Exhibit 2).

Section 5870 of the Public Utilities Code states in Section F that the franchise holder bears the responsibility for the transmission of the content and states in Section H that the cost of the interconnection shall be borne by the holder of the franchise.²

It is our understanding that the PEG channel in Long Beach is also being charged for network connection, and that in several California cities, including Capitola, Charter has entirely refused to pay the 1% PEG support fee when requested by the municipality to do so and has made the specious claim that the PEG support fee described in Section 5870 of the Public Utilities Code is a tax under Proposition 26 that needs to be submitted to the voters prior to enactment. This is not the case, but the funds have been denied to the community despite the cities request for multiple years.

We appreciate the ALJ's recognition of the customer service complaints received at the public participation hearings earlier this year related to substandard treatment of the PEG channels by the applicants. We would underline that the audiences that watch PEG channels are the consumers who watch and pay for all the other cable channels and when the channels are defunded, degraded and hidden, the customers are not getting what they are paying for. We look forward to more discussion with the applicants about their delivery of these mandated community benefits to audiences in Southern and Central California. If permitted, we hope to initiate some of that conversation at the April evidentiary hearings.

It is our belief that adherence to state law, as well as commitment to serving the

² https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=PUC&division=2.5.&title=&part=&chapter=&article=

communities in their footprint as abundantly as possible, must be a condition of any merger authorization or merger settlement. The local news and information crisis is as salient to this proceeding as the digital divide. It is necessary for the applicants to do their designated part to assist with problems besetting the California communities they serve.

We hope the Commission, and the applicants, will give serious consideration to merger/settlement conditions that will assure the following from the merged companies going forward:

- Full compliance with Section 5870 of the Public Utilities Code
- Payment of all PEG support fees requested by municipalities
- No invoicing for interconnection services for PEG community benefit channels
- Equilateral status in all channel guides, menus and access functions with all other channels in the cable system for PEG community benefit channels
- No degrading of channel content to a lower transmission standard than that received from the operator with the commensurate loss of legibility and a clear visual picture

As the ALJ eloquently stated in the March 18 ruling, community benefits must meet the needs of modern society.

Respectfully,

s/s Tracy Rosenberg
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Media Alliance
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San Francisco CA 94110
Tel: (415) 746 -9475
Email: tracy@media-alliance.org

Dated March 30, 2026

EXHIBIT 1

Public, Educational and Governmental (PEG) Access Channel Transport



Our PEG transport service enables public, educational and governmental organizations to broadcast local programming or content that informs or educates local constituents. Delivered over a dedicated and private Ethernet connection, our PEG Channel transport service provides an efficient and effective communication avenue to deliver your programming to us for transmission to our subscribers in your community. PEG channel transport is available with standard definition (SD) or high definition (HD) options.

Features

- Video encoding with video delivery over dedicated and private Ethernet connectivity.
- High definition or standard definition video options.
- End-to-end support for video transport from your location to local Spectrum Cable subscribers.

Pricing tables (excludes applicable taxes*)

PEG transport rates**	MTM	1-year	2-year	3-year	4-year	5-year	7-year
10 MB Ethernet UNI ¹ for SD Video MRC ²	\$405	\$390	\$360	\$325	\$310	\$295	\$295
20 MB Ethernet UNI for HD Video MRC	\$470	\$450	\$415	\$375	\$355	\$340	\$340
10 MB/20 MB Ethernet UNI (SD or HD) NRC ³	\$250	\$250	\$250	\$250	\$250	\$250	\$250

- PEG transport rates require two Ethernet UNIs. One UNI connects Subscriber Network Premises (Z-loc) and one connects Spectrum Enterprise Network (A-loc).

PEG channel one-time setup charge

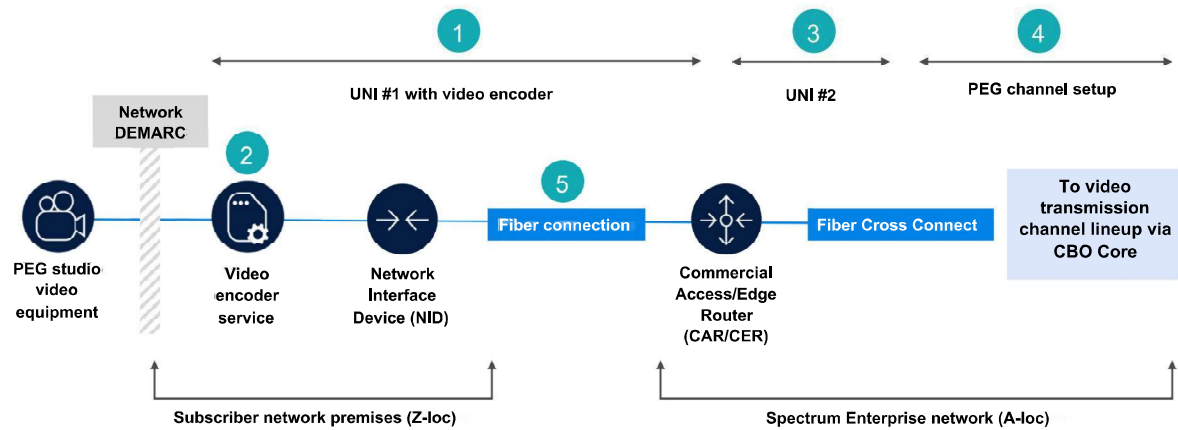
SD-Serial Digital Interface NRC	\$925
HD-Serial Digital Interface NRC	\$4,850

- PEG channel setup charge includes network provisioning, encoding, aggregation, monitoring and channel insertion into the programming guide.

Video encoder service rates	MTM	1-year	2-year	3-year	4-year	5-year	7-year
MRC	\$1,622	\$135	\$70	\$45	\$35	\$25	\$20
NRC	\$85	\$85	\$85	\$85	\$85	\$85	\$85

- Service supports analog CVBS⁴ video signal natively or SDI video signal, service is capable of both standard definition and high definition video streams.
- Video encoder service charges not required if subscriber has Spectrum Enterprise Video Encoder Service currently in place.

PEG Channel Pricing Example (3-year term) for SD-Serial Digital Interface PEG Channel over 10 MB Ethernet UNI:



	MRC	NRC
 UNI #1, 10 MB EVPL:	\$325	\$250
 Video encoder service:	\$45	\$85
 UNI #2, 10 MB EVPL:	\$325	\$250
 PEG channel setup:	\$0	\$925
TOTAL CHARGES:	\$695	\$1,510

Acronym key

¹**UNI:** User Network Interface connection is the logical demarcation point between Subscriber Network Premises (Subscriber) and Spectrum Enterprise network location (Service Provider), Ethernet UNIs are defined in Metro Ethernet Forum Technical Specification (MIEF 13).

²**MRC:** Monthly Recurring Charge.

³**NRC:** Non-recurring Charge.

⁴**CVBS:** Composite Video Broadcast Signal.

* Pricing may vary. Restrictions may apply. Subject to change without notice.

* * Additional fiber construction charges may apply.

Learn more

enterprise.spectrum.com

About Spectrum Enterprise

Spectrum Enterprise, a part of Charter Communications, Inc., is a national provider of scalable, fiber technology solutions serving America's largest businesses and communications service providers. The broad Spectrum Enterprise portfolio includes networking and managed services solutions: Internet access, Ethernet access and networks, Voice and TV solutions. Spectrum Enterprise's industry-leading team of experts works closely with clients to achieve greater business success by providing solutions designed to meet their evolving needs. More information about Spectrum Enterprise can be found at enterprise.spectrum.com.

[illegible]

EXHIBIT 2

(NOT FOR PAYMENTS)
DEPARTMENT # 102288
PO BOX 1259
OAKS, PA 19456
6400 0340 DY RP 01 11022025 YYNNNNNN 01 976966



KOCT-PEG
MASTER ACCOUNT
3038 INDUSTRY ST STE 101
OCEANSIDE CA 92054-4871

November 01, 2025

Page 1 of 4

Contact Us:

 www.coxbusiness.com/chat
 coxbusiness.com

Account Number **001 3410 141125401**
Cox PIN 7022
Service Address STE 101
3038 INDUSTRY ST
OCEANSIDE, CA 92054-4871

Account Summary as of Nov 1, 2025

Previous Balance	\$429.68
Payment Received - Oct 22	\$-429.68
Remaining Previous Balance	\$0.00
New Charges: Nov 1, 2025 - Nov 30, 2025	
Networking Services	\$425.00
Taxes, Fees and Surcharges	\$4.68
New Charges	\$429.68
Total Due By Nov 22, 2025	\$429.68



Thank you for being a Cox Business Paperless Customer!



Thank you for GOING GREEN by receiving a Paperless Bill and for using EasyPay from Cox!

November 01, 2025 bill for KOCT-PEG

Account Number **001 3410 141125401**
Service at STE 101
3038 INDUSTRY ST
OCEANSIDE, CA 92054-4871

****Auto Payment On Your Due Date - Do Not Send Payment****

Total Due By Nov 22, 2025 **\$429.68**

COX BUSINESS
PO BOX 53214
PHOENIX, AZ 85072-3214

03410001541141125401480042968

November 01, 2025 **Bill for KOCT-PEG**Account number **001 3410 141125401**

Page 2 of 4

Acct # 141125401 KOCT-PEG
STE 101
3038 INDUSTRY ST
OCEANSIDE, CA 92054-4871

Monthly Services Nov 1 - Nov 30**Networking Services****Ethernet Services***Circuit Occurrence: 001*

Circuit Not Available

Circuit Description: Not Available

Metro E-10Mb UNI Intrastate \$425.00

Circuit Occurrence: 002

Circuit Not Available

Circuit Description: Not Available

EVC Standard Intrastate 0.00

Total Ethernet Services \$425.00**Total Networking Services \$425.00****Total Monthly Services \$425.00****Taxes, Fees and Surcharges****Networking Services Taxes, Fees and Surcharges****Fees and Surcharges**

State Regulatory Fee \$4.68

Total Fees and Surcharges \$4.68**Total Networking Services Taxes, Fees and Surcharges \$4.68****Total Taxes, Fees and Surcharges \$4.68****Total for Service Account \$429.68**

Acct # 069451904 KOCT
1175 N CUYAMACA ST
EL CAJON, CA 92020-1805

Monthly Services Nov 1 - Nov 30**Monthly Services cont.****Networking Services****Ethernet Services***Circuit Occurrence: 001*

Circuit Not Available

Circuit Description: Not Available

Metro E-10Mb UNI Intrastate \$0.00

Circuit Occurrence: 002

Circuit Not Available

Circuit Description: Not Available

EVC Standard Intrastate 0.00

Total Ethernet Services \$0.00**Total Networking Services \$0.00****Total Monthly Services \$0.00****Total for Service Account \$0.00****Total New Charges \$429.68****News from Cox**

Keep it simple with paperless billing and EasyPay. With paperless billing, you'll receive an email notification each month when your bill is available to view online. EasyPay allows you to automatically pay your bill each month using a bank account, credit card or debit card. Sign up for both in MyAccount.

Customer Information**Questions? Call us. We're happy to help.**

619-269-2000

Billing, Payment Policies and Fees:

Cox Business bills all customers in advance for monthly recurring charges and in arrears for non-recurring charges such as On Demand/pay-per-view and long distance. Payment in full is due to Cox by the "Due By" date indicated on your statement. If payment is not received by this date, your bill will become past due and may be subject to additional fees, such as late payment charges, electronic reactivation fees, or returned payment fees. Payment of your Cox bill confirms your subscription to services and the possession of Cox owned equipment

Payment Options

Online: Visit www.coxbusiness.com to register for 24-hour online access or make payments to your account.

Mail: Detach this coupon and send it with your check or money order. Please include your account number on your check. Make your checks payable to Cox Communications. Allow 7 days for processing.

In Person: Visit www.coxbusiness.com for a list of Cox Authorized Payment Centers.



November 01, 2025 **Bill for KOCT-PEG**

Account number **001 3410 141125401**

Page **3** of 4

Customer Information cont.

listed on your bill.

When you provide a paper, electronic check or electronic fund transfer (EFT) as payment, you authorize Cox to process your payment as a traditional check transaction or to make a one-time EFT from your account. An EFT may debit your account as soon as the same day you make your payment. Payments returned unpaid for any reason will incur a returned payment fee of up to \$25.00, or the maximum allowed by state law. By using a credit card, debit card, paper check or an electronic check to make a payment, you agree that, if your payment is returned unpaid, you expressly authorize a one-time electronic fund transfer from your account for the amount of the payment plus any returned payment fees. If payment is not received by the "Due By" date indicated on your statement, a late payment charge may be assessed on your account.

Your Privacy Rights as a Cox customer: At Cox, we take your privacy seriously. For more information, please visit www.cox.com/privacy.

Billing Dispute and Resolution: If you have any questions or disagree with any portion of your bill, please contact us at the phone number on this statement no later than 60 days from the due date indicated.





Power's out. Wifi's still on.

When the power goes out, your Internet doesn't have to. Stay online and maintain operations during outages and service interruptions with Cox Business Net Assurance.



Uninterrupted service

Keep your business running with up to 4 hours of back-up battery power during outages.*



Simple setup

Net Assurance is installed by our experts and automatically provides backup Internet when required.



Proactive updates

Stay ahead with notifications about the status of the primary and backup networks.



Call **877-982-5903**
or **scan** to sign up today.

www.cox.com/netassurance

*Service available in failover situations only. ITE Router, Uninterruptible Power Supply (UPS) and modem provided by Cox; remains property of Cox and must be returned to Cox upon termination of service to avoid additional charges. Speeds vary and are not guaranteed, and connection speed may be affected when using LTE. Max backup download speed is 10 Mbps. Not all services (including but not limited to Self-Install, Dedicated Internet, Multiple Static IP or CIDR Blocks, 3rd Party Internet (out of footprint), CBSS, Managed Wifi, and Voice Manager) are subject to backup. Only equipment connected to the UPS with Surge Protection has access to backup power. Backup speeds may not support video products, including video surveillance and TV service. Duration of backup battery runtime depends on multiple factors, including equipment, configuration, battery age, and temperature. All services and plans subject to Cox Business General Terms (including mandatory arbitration provisions), Cox Business Acceptable Use Policy (including Cox's right to terminate service for abuse of network), and other policies: cox.com/policies. Customer must have Cox Business Internet or Cox Fiber Internet. Other restrictions and limitations apply.
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