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Via First-Class Mail & E-mail

[*ellen.golde@dpuc.ri.gov*](mailto:ellen.golde@dpuc.ri.gov)

Ellen Golde, Division Administrative Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. D-25-18, Joint Application of Charter Communications, Inc, Cox Enterprises, Inc. and Cox Communications, Inc. to Transfer Control of CATV Certificates and for Approval for CoxCom, Inc. to Participate in Financing Transactions

Dear Ms. Golde:

On behalf of Ocean State Media Group, f/k/a the Rhode Island PBS Foundation (“RIPBS”), and pursuant to Rule 1.17 of the Rhode Island Division of Public Utilities and Carriers Rules of Practice and Procedure, please find enclosed for filing with the Division an original and four (4) copies of the RIPBS’s Motion to Intervene in the above docket.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Adam Ramos', written over a white background.

Adam M. Ramos
aramos@hinckleyallen.com

Enclosures

cc: Mary-Catherine Armstrong, Ocean State Media Group

**STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

IN RE JOINT APPLICATION OF CHARTER
COMMUNICATIONS, INC., COX ENTERPRISES, INC.,
AND COX COMMUNICATIONS, INC. TO TRANSFER
CONTROL OF COXCOM, LLC'S SERVICE AREAS 1-8
CERTIFICATES OF AUTHORITY TO OPERATE AND
FOR COXCOM, LLC TO PARTICIPATE IN
FINANCING ARRANGEMENTS

Docket No. D-25-18

OCEAN STATE MEDIA GROUP'S MOTION TO INTERVENE

Ocean State Media Group, f/k/a the Rhode Island PBS Foundation ("RIPBS") hereby moves under Rule 1.17 of the Rhode Island Division of Public Utilities and Carriers (the "Division") Rules of Practice and Procedure to intervene in the above-captioned proceedings. Intervention is necessary for RIPBS to protect its unique interest as the State of Rhode Island's primary provider of public, education, and government ("PEG") access studios. This proceeding will directly impact RIPBS's interests and existing parties do not adequately represent those interests. RIPBS's intervention also is in the public interest because the nature of RIPBS's PEG access services are public services that benefit the State as a whole. Accordingly, RIPBS respectfully requests that the Division permit it to intervene in this proceeding.

I. Factual Background

The Division is statutorily required to make PEG access studios available. *See* R.I. Gen. Laws § 39-19-6.1. PEG access studios provide public, educational, and governmental access to free video production facilities, equipment, staffing, and airtime on local cable television. These studios enable community members, schools, and local governments to create and broadcast their own programming. RIPBS is a domestic non-profit corporation and the State of Rhode Island's primary provider of PEG access studios.

RIPBS manages the day-to-day operations of PEG access studios that are not actively managed or operated by an existing cable television certificate holder. RIPBS's responsibilities include providing at least five fixed studios statewide that are equipped for full-color production and transmission of live, videotape, and film television programs on specially designated access channels, and furnished with specific studio/control, editing, and playback equipment. *See* 815-RICR-10-05-1.14. RIPBS must also provide and maintain specific mobile and/or portable television production equipment for use by residents in the production of programming for specially designated access channels. *Id.*

RIPBS funds the operation and maintenance of its PEG access studios through the PEG access and interconnect fees ("PEG Access Fees") it receives from CATV operators, such as Cox, which then pass those costs through to their cable subscribers. Cable subscribership, however, has steadily and significantly declined in recent years, which impacts the revenues available for RIPBS to successfully operate and maintain its PEG access studios. Accordingly, RIPBS has developed an annual reconciliation process to adjust the PEG Access Fees charged to cable subscribers by CATV operators to fund this important public service. *See* Docket No. D-22-11, Order Nos. 24464, 24823, 25423.

II. Legal Standard

Rule 1.17 governs intervention in Division proceedings and provides "any person" with the right to intervene if their interest in the proceeding "may be directly affected and . . . is not adequately represented by existing parties and as to which movants may be bound by the Division's action in the proceeding," or is "in the public interest." 815-RICR-00-00-1.17(B)(1)(b)-(c).

III. Argument

RIPBS's interest in this proceeding is in the public interest and is not adequately represented by any existing parties. RIPBS is not a consumer of Cox's services, nor is RIPBS a typical corporate partner or competitor with Cox. Instead, RIPBS is a steward of public access programming for the majority of Rhode Islanders that Cox is obligated to fund through payment of PEG Access Fees. As such, RIPBS has a strong and unique interest in ensuring (1) that the proposed transaction between Cox and Charter Communications will not negatively impact the PEG Access Fees RIPBS currently receives from Cox, (2) that Charter intends to continue Cox's practice of providing access to its cable channels to air RIPBS's public interest content, and (3) that Charter is committed to operating its future Rhode Island subscription services in a manner that adequately funds and supports PEG access studios in Rhode Island.

RIPBS therefore believes its intervention is necessary to protect both the public interest, as PEG access studios are a statutorily mandated public good, as well as its unique interests as the manager and operator of those studios.

IV. Conclusion

For these reasons, RIPBS respectfully requests that the Division grant its Motion to Intervene to allow it to protect its unique interest in preserving and maintaining PEG access studios in Rhode Island.

Respectfully submitted,

OCEAN STATE MEDIA GROUP,

By its attorneys,

A handwritten signature in blue ink, appearing to read "Adam M. Ramos", is positioned above a solid horizontal line.

Adam M. Ramos (#7591)

Katherine B. Savage (#9793)

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