

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



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7-26-16
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Application of Charter Communications, Inc.
for Rehearing of Resolution T.17515.

A. 16-07-003
(File July 11, 2016)

**MOTION FOR PARTY STATUS OF
COX COMMUNICATIONS CALIFORNIA LLC**

Pursuant to Rule 1.4 of the California Public Utilities Commission Rules of Practice and Procedure, Cox Communications California LLC (Cox CA) submits this motion for party status in A. 16-07-003, Application of Charter Communications, Inc.’s for Rehearing of Resolution T-17515 (“Application”). Concurrently with this motion, Cox CA is submitting comments in response to the Application.

I. Request for Party Status

In April 2016, Cox CA submitted challenges to certain applications that Peoples Self Help Housing submitted to the infrastructure subaccount of the Broadband Public Housing Account (“PSHH Applications”). In its challenge, Cox CA showed that it has deployed its network and is serving customers living in the publicly supported housing communities (“PSCs”) identified in the PSHH Applications. Cox CA challenged the PSHH Applications on grounds similar to those that Charter submitted in its challenge to other BPHA applications, and which were denied when the Commission approved Resolution T-17515.

After the Commission adopted Resolution T-17515, the Communications Division (“CD”) denied Cox CA’s challenge to the PSSH Applications based on Resolution T-17515 (“CD Letter”), which is attached hereto as Exhibit 1. CD denying Cox CA’s challenge based on

Resolution T-17515 directly impacts Cox CA, including its rights under California Public Utilities Code, Section 281.¹ If Charter's Application is not granted, then Cox CA will be denied its rights under Section 281 to submit meaningful challenge BPHA applications.

Additionally, since it does not appear that CD will issue a resolution addressing the PSHH Applications, it is reasonable and appropriate for Cox CA to seek modification of Resolution T-17515 in this proceeding since that resolution was the basis for CD denying Cox CA's challenge. Further, in its response to the Application, which is being filed concurrently with this Motion, Cox CA respectfully requests similar relief that Charter requests, namely that the Commission direct CD to deny the PSHH Applications and other substantively similar challenges submitted in the future.

The contentions that Cox CA raises in this motion and its response to the Application are reasonably pertinent to the issues already presented by Charter in the Applications and Cox CA will be directly impacted by the Commission's decision, and thus, the Commission should grant Cox CA party status.

II. Conclusion.

For all the reasons set forth above, Cox respectfully requests the Commission grant this motion and thereby, grant Cox CA party status.

Dated: July 26, 2016

Esther Northrup
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Respectfully submitted.
/s/ Margaret L. Tobias

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¹ All references herein are to the California Public Utilities Code, unless otherwise stated.

Exhibit 1

Communications Division Letter, July 1, 2016

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 1, 2016

Margaret L. Tobias
Attorney for Cox Communications California, LLC.
marg@tobiaslo.com

Subject: ***Cox Communications' April 25, 2016 Challenges to CASF Public Housing Account Projects.***

Dear Ms. Tobias:

Based on Resolution T-17515 (issued on June 10, 2016), the Communications Division (CD) denies Cox Communications' challenges for the following projects since the reasons stated in the challenges provided were not supported in D.14-12-039 or in P.U. Code Section 281(h).

Applicant	Project	Address	St	City	Zip
Peoples' Self-Help Housing	Casas Las Granadas	21 E Anapamu	CA	Santa Barbara	93101
Peoples' Self-Help Housing	Chapel Court	681 Ash Ave	CA	Carpinteria	93101
Peoples' Self-Help Housing	Dahlia Court	1300 Dahlia CT	CA	Carpinertia	93013
Peoples' Self-Help Housing	Dahlia Court II	1305 Dahlia CT	CA	Carpinteria	93013
Peoples' Self-Help Housing	Isle Vista Apartments	6660 Abrego RD	CA	Isla Vista	93117
Peoples' Self-Help Housing	Jardin de las Rosas	510 N Salsipuedes St	CA	Santa Barbara	93010
Peoples' Self-Help Housing	Ladera Street Apartments	322 Ladera St	CA	Santa Barbara	93101
Peoples' Self-Help Housing	Storke Ranch Apartments	6842 Phelps Rd	CA	Goleta	93117
Peoples' Self-Help Housing	Victoria Hotel	24 E Victoria St	CA	Santa Barbara	93101
Peoples' Self-Help Housing	Victoria Street Bungalows	210 W Victoria	CA	Santa Barbara	93101
Peoples' Self-Help Housing	Villa La Esperanza	131 S Kellog Ave	CA	Goleta	93117

Please contact CD analyst Bill Goedecke at (415) 355-4999 (William.Goedecke@cpuc.ca.gov) or me if you have any questions.

Sincerely,

Robert Wullenjohn, Program Manager
Broadband, Video, and Market Branch
Communications Division

Cc: Davis Foley, People's Self-Help Housing
Michael Amato, CD Acting Director
Selena Huang, Program and Project Supervisor, CASF
Bill Goedecke, Analyst, CASF
Stacie Castro, Attorney, CASF