LAURA M. MILLER | Counsel

REGEIVED

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July 16, 2019

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Via FedEx Overnight Mail

BOARD OF PUBLIC UTILITIES

JUL 17 2019

Aida Camacho-Welch, Secretary

TRENTON, NJ

CMS

egal DAG

CABLELO)

Board of Public Utilities

BOARD OF PUBLIC UTILITIES

44 South Clinton Avenue

TRENTON, NJ

3rd Floor, Suite 314

Trenton, NJ 08625

CE19070827

Re:

In the Matter of the Petition of Time Warner Cable New York City LLC, 1/k/a Charter Communications, for a Renewal Certificate of Approval to Continue to Construct, Operate and Maintain a Cable Television System in and for the Borough of Palisades Park, County of Bergen, State of New Jersey

Our File No. 41008.1000

Dear Secretary Camacho-Welch:

Enclosed herewith please find the original and eleven (11) copies of the Verified Petition and Verification filed on behalf of Time Warner Cable New York City LLC, 1/k/a Charter Communications ("Charter"), along with three (3) copies of Charter's public Application for Renewal of a Certificate of Approval ("Application"), with respect to the above-referenced matter. Said copies of the Application have been redacted so as to protect certain confidential information contained therein. Confidential copies of the Application are being submitted simultaneously under separate cover, along with Charter's request for confidential treatment, pursuant to N.J.A.C. 14:1-12 et seq.

Kindly file the Petition and Application and please return the extra copy of this letter, the Petition and the Application stamped "RECEIVED" in the self-addressed, stamped envelope provided herein.

Thank you for your kind consideration. Should you have any questions or require additional information, please do not hesitate to contact us.

Very truly yours,

Laura M. Miller aura M. Miller For the Firm

LMM/dp

cc/w/enc. Lawanda R. Gilbert, Director (via FedEx)

Nancy J. Wolf, Administrative Analyst 4 (via FedEx) Stefanie A. Brand, Director (via first class mail)

Gina S. Kim, Borough Clerk (via first class mail

Rodney S. Capel, Vice President, State Government Affairs (via email)

REGENTED CASE MANAGEMENT

JUL 172019

BOARD OF PUBLIC UTILITIES TRENTON, NJ

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES OFFICE OF CABLE TELEVISION & TELECOMMUNICATIONS

SCARINCI & HOLLENBECK, LLC 1100 Valley Brook Avenue P. O. Box 790 Lyndhurst, New Jersey 07071 (201) 896-4100 Attorneys for Petitioner

RECEIVED MAIL ROOM

JUL 17 2019

BOARD OF PUBLIC UTILITIES

Time Warner Cable New York City LLC, l/k/a Charter Communications TRENTON, NJ

Our File No. 41008.5000

IN THE MATTER OF THE PETITION OF TIME WARNER CABLE NEW YORK CITY LLC, I/k/a CHARTER COMMUNICATIONS, FOR A RENEWAL CERTIFICATE OF APPROVAL TO CONTINUE TO CONSTRUCT, OPERATE AND MAINTAIN A CABLE TELEVISION SYSTEM IN AND FOR THE BOROUGH OF PALISADES PARK, COUNTY OF BERGEN, STATE OF NEW JERSEY

VERIFIED PETITION

Docket No.

Time Warner Cable New York City LLC, I/k/a Charter Communications (hereinafter "Charter" or "Petitioner"), hereby petitions the Honorable Board of Public Utilities (the "Board"), pursuant to 47 <u>U.S.C.</u> §546, <u>N.J.S.A.</u> 48:5A-15, -16, and -17, <u>N.J.A.C.</u> 14:18-13.6 and <u>N.J.A.C.</u> 14:17-6.6, for a Renewal Certificate of Approval to continue to construct, operate and maintain its cable television system ("System") in the Borough of Palisades Park, Bergen County, New Jersey ("Palisades Park" or the "Borough").

In support of its Petition, Charter states as follows:

COUNT ONE

- 1. Charter is a duly organized limited liability company formed under the laws of the State of Delaware, and maintains its principal local offices at 200 Roosevelt Place, Palisades Park, New Jersey 07650.
- 2. Pursuant to N.J.S.A. 48:5A-1 et seq., Charter is a cable television company subject to the jurisdiction of the Office of Cable Television & Telecommunications ("OCTV&T") and the Board.
- 3. The Petitioner, through wholly-owned subsidiaries, is 100% owned by Charter Communications, Inc., a publicly traded corporation and the parent company of all of the "Charter" cable television entities throughout the country. Charter Communications, Inc. is the nation's second largest cable television company, serving more than 26 million subscribers.
- 4. Petitioner provides cable service to fourteen (14) municipalities in Northern New Jersey (the "Bergen System") pursuant to municipal consent ordinances issued by said municipalities and Certificates of Approval issued by the Board with respect thereto.¹
- 5. Charter has continued to provide safe, adequate and proper cable television service in the municipalities it serves since its acquisition of the Bergen System.
- 6. Pursuant to N.J.S.A. 48:5A-17(a) and (b) and -28(c), on or about September 1, 1977, in Docket No. 776C-6288, the Board issued a Certificate of Approval to Vision Cable Television Company ("Vision Cable") to construct, operate and maintain the System in the Borough. A copy of said Certificate of Approval is on file at the OCTV&T.

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¹ The Bergen System is comprised of the municipalities of Cliffside Park, Edgewater, Englewood, Englewood Cliffs, Fairview, Fort Lee, Leonia, Little Ferry, Moonachie, Palisades Park, Palisades, Palisades Park and Teterboro in Bergen County, and Guttenberg in Hudson County.

- 7. Pursuant to N.J.S.A. 48:5A-15 and -16, on or about June 29, 1987, in Docket No. CE86101161, the Board issued a Renewal Certificate of Approval to Vision Cable for the continued construction, operation and maintenance of the System in the Borough. A copy of said Renewal Certificate is on file at the OCTV&T.
- 8. On or about March 13, 1995, in Docket No. CM94110531, the Board approved the transfer of the System from Vision Cable to Time Warner Entertainment-Advance/Newhouse Partnership ("TWE-A/N").
- 9. On or about January 31, 2001, in Docket No. CM00080556, the Board approved the transfer of the System from TWE-A/N to TWFanch-One Co., d/b/a Time Warner Cable ("TWFanch"). Said transfer was part of an internal reorganization and was from one Time Warner Cable controlled entity to another.
- 10. Pursuant to N.J.S.A. 48:5A-15 and -16, on or about July 29, 2009, in Docket No. CE09040343, the Board issued a Renewal Certificate of Approval to TWFanch for the continued construction, operation and maintenance of the System in the Borough. A copy of said Renewal Certificate is on file at the OCTV&T.
- 11. On or about December 31, 2009, pursuant to an Order of Approval dated December 17, 2009, in Docket No. CM09080719, Time Warner Entertainment Company, L.P., d/b/a Time Warner Cable ("TWE"), succeeded to the rights of TWFanch with respect to ownership and operation of the System. Said transfer was part of an internal reorganization and was from one Time Warner Cable controlled entity to another.
- 12. On or about September 30, 2012, pursuant to an Order of Approval dated September 13, 2012, in Docket No. CM12030252, Time Warner Cable New York City LLC, d/b/a Time Warner Cable ("TWCNYC"), petitioner herein, succeeded to the rights of TWE with

respect to ownership and operation of the System. Said transaction was part of an internal reorganization and was from one Time Warner Cable controlled entity to another.

- 13. On or about May 18, 2016, pursuant to authorization set forth in an Order of the Board dated March 31, 2016, in Docket No. CM15070770, TWCNYC became a wholly-owned indirect subsidiary of Charter Communications, Inc.
- 14. Pursuant to N.J.S.A. 48:5A-1 et seq. and N.J.A.C. 14:18-13.3(a)3, on or about July 26, 2017, TWE submitted an Application for Renewal of Municipal Consent (hereinafter the "Municipal Application") to the Borough to continue to construct, operate and maintain the System in the Borough.
- 15. On or October 23, 2018, a public hearing was held by the Borough with respect to Petitioner's Municipal Application, during which all interested persons desiring to be heard were so heard.
- 16. On or about December 19, 2018, the Borough adopted Ordinance No. 2018-18 (the "Ordinance") granting to Petitioner renewal of its Municipal Consent ("Renewal of Municipal Consent") to continue to construct, operate and maintain the System in the Borough. A copy of said Ordinance is annexed hereto as **Exhibit A**.
- On or about March 4, 2019, Charter filed its formal acceptance of the terms and conditions of the Renewal of Municipal Consent granted by the Borough, pursuant to N.J.S.A. 48:5A-24. A copy of said letter of acceptance is annexed hereto as Exhibit B.
- 18. The information pertaining to Petitioner on file with the OCTV&T, together with the information contained in Petitioner's Municipal Application and its Application for Renewal of a Certificate of Approval ("COA Application"), simultaneously filed herewith, all of which is

adopted by reference thereto, establishes the requisite criteria for the continued construction, ownership, operation and management of the System in Palisades Park by Charter.

- operation of the System. Further, as indicated in the Municipal Application, the COA Application and other information on file with the OCTV&T, Charter possesses the necessary financial responsibility and ability to perform efficiently the proposed services and those services which may be required by the public convenience and necessity during the renewal period. The public convenience and necessity generally support the appropriateness of the issuance of a renewal Certificate of Approval to Petitioner.
- 20. Petitioner has complied, and will continue to comply, with all rules, regulations and laws applicable to the construction, operation and maintenance of the System and will continue to provide safe, adequate and proper cable television service in Palisades Park and the other municipalities in which it serves.

COUNT TWO

- 21. Charter repeats paragraphs 1 through 20 of COUNT ONE as if set forth fully hereinafter.
- 22. As set forth in the COA Application and other information on file at the OCTV&T, the System operated by Charter in the Borough is part of the Bergen System, a larger regional cable television system serving numerous other municipalities contiguous to and surrounding the Borough.
- 23. As also set forth in the COA Application and other information on file at the OCTV&T, the Borough represents an integral part of the Charter regional cable system serving portions of the counties of Bergen and Hudson. In addition, the demographics of the Borough,

as well as its location and other factors, mandate that cable television service be provided by Charter as part of the Bergen System.

- 24. The Borough portion of Bergen System is necessary for the continued provision of safe, adequate and economical cable television service to the citizens and residents of the Borough and the larger Bergen System generally. Further, continuation of Charter's operating authority in the Borough will avoid an unreasonable duplication of services that would otherwise be detrimental to the development of adequate cable television service.
- 25. Charter is entitled to a renewal of its Certificate of Approval for the Borough, pursuant to the provisions of Section 17(b) of the New Jersey Cable Television Act, N.J.S.A. 48:5A-1 et seg.
- 26. Charter believes that a Renewal Certificate of Approval for the Borough is necessary and proper for the public convenience and will serve the public interest for reasons which include, inter alia, the following:
- a. The grant of a Renewal Certificate of Approval to Charter will ensure the continued provision of cable television service to the residents of the Borough;
- b. The services to be provided by Charter as set forth in its COA Application are of great benefit to the citizens and residents of the Borough;
- c. The financial strength and technical expertise of Charter are more than adequate to continue to construct, operate and maintain its cable television system in the Borough; and
- d. Charter, its officers and its directors, have vast experience in all aspects of cable television. In particular, they possess and represent the highest degree of technical and engineering competence, significant administrative experience and a demonstrated

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responsiveness to community needs. In addition to the Borough, Charter and its affiliates hold Certificates of Approval or other authorization to construct, operate and maintain cable television systems in 41 states throughout the U.S.

WHEREFORE, it is requested that this Honorable Board of Public Utilities issue to Time Warner Cable New York City LLC, l/k/a Charter Communications, a Renewal Certificate of Approval to continue to construct, operate and maintain a cable television system in and for the Borough of Palisades Park.

Respectfully submitted,

SCARINCI & HOLLENBECK, LLC Attorneys for Petitioner Time Warner Cable New York City LLC, l/k/a Charter Communications

By: Laura M. Miller

Laura M Miller

Dated: 6/7, 2019

STATE OF NEW JERSEY BOARD OF PUBLIC UTILITIES OFFICE OF CABLE TELEVISION & TELECOMMUNICATIONS

SCARINCI & HOLLENBECK, LLC
1100 Valley Brook Avenue
P. O. Box 790
Lyndhurst, New Jersey 07071
(201) 896-4100
Attorneys for Petitioner
Time Warner Cable New York City LLC, 1/k/a Charter Communications
Our File No. 41008.1000

IN THE MATTER OF THE PETITION OF TIME WARNER CABLE NEW YORK CITY LLC, I/k/a CHARTER COMMUNICATIONS, FOR A RENEWAL CERTIFICATE OF APPROVAL TO CONTINUE TO CONSTRUCT, OPERATE AND MAINTAIN A CABLE TELEVISION SYSTEM IN AND FOR THE BOROUGH OF PALISADES PARK, COUNTY OF BERGEN, STATE OF NEW JERSEY

VERIFICATION

Docket No.

Rodney S. Capel, hereby certifies as follows:

- I am Vice President, State Government Affairs, of Charter Communications, Inc., indirect parent of Time Warner Cable New York City LLC, I/k/a Charter Communications, Petitioner in the within matter.
- 2 I am familiar with the nature and contents of the Verified Petition to which this Verification is annexed.
- 3 The allegations of the Verified Petition are true and accurate to the best of my knowledge, information and belief.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Rodney S. Capel

Dated: 7/11, 2019

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BOROUGH OF PALISADES PARK BERGEN COUNTY, NEW JERSEY

ORDINANCE #2018-18

AN ORDINANCE GRANTING MUNICIPAL CONSENT TO THE RENEWAL OF A FRANCHISE TO TWFANCH-ONE CO., TO CONSTRUCT, OWN, OPERATE AND MAINTAIN A CABLE TY SYSTEM

WHEREAS, the purpose of this Ordinance is to establish Cable Television and Telecommunication Services for the Borough of Palisades Park; and

BE IT ORDAINED by the Mayor and Council of the Borough of Palisades Park as follows:

WHEREAS, on or about May 26, 1977, the Borough of Palisades Park (sometimes the "Borough or "Palisades Park") granted its municipal consent for a non-exclusive franchise to Vision Cable Television Company (hereinafter "Vision Cable"), to own, operate and maintain a cable television and cable communications system ("System") within the Borough of Palisades Park, County of Bergen, State of New Jersey; and

WHEREAS, on or about May 12, 1986 the Borough renewed Vision Cable's Municipal Consent to continue to own, operate, and maintain the System in the Borough; and

WHEREASS, on or about March 13, 1995, in Docket #CM94110531 the NJ Board of Public Utilities ("Board") approved the transfer of the System from Vision Cable to Time Warner Entertainment Advance/Newhouse Partnership ("TWE-A/N"); and

WHEREAS, on or about January 31, 2001, in Docket #CM00080556, the Board approved the transfer of the System from TWE-A/N to TWFanch-one Co., d/b/a Time Warner Cable; and

WHEREAS, on or about December 31, 2009, pursuant to an Order of Approval dated December 17, 2009, in Docket No. CM09080719, Time Warner Entertainment Company L.P., d/b/a Time Warner Cable, succeeded to the rights of TWFanch-One with respect to ownership and operation of the cable television system serving the Borough. Said transfer was part of an internal reorganization and was from one Time Warner Cable-controlled entity to another; and

WHEREAS, on or about September 30, 2012, pursuant to an Order of Approval dated September 13, 2012, in Docket No. CM12030252, Time Warner Cable NYC LLC, the current franchisee ("Company"), succeeded to the rights of Time Warner Entertainment Company L.P. with respect to ownership and operation of the cable television system serving the Borough. Said transfer was part of an internal reorganization and was from one Time Warner Cable-controlled entity to another; and

WHEREAS, by application for Renewal of Municipal Consent filed with the Borough on July 26, 2017 ("Application"), Company has sought issuance of the Borough's Municipal Consent for the renewal of said franchise; and

WHEREAS, the Borough Council has considered such Application and has conducted a public hearing on October 23, 2018, after proper public notice pursuant to the terms and conditions of the NJ Cable Television Act (as hereafter defined) and the Regulations adopted by the Board of Public Utilities; and

WHEREAS, the Borough has determined that Company possesses the necessary legal, technical, character, financial and other qualifications to support this renewed grant of Municipal Consent.

NOW, THEREFORE BE IT ORFDAINED, by the Mayor and Council of the Borough of Palisades Park, County of Bergen, State of NJ, as follows:

1. INTRODUCTORY PROVISIONS/PURPOSE OF THE ORDINANCE/APPLICATION

The Borough hereby grants to the Company its non-exclusive consent to place in, upon, along, across, above, over and under the highways, streets, alleys, sidewalks, public ways, and public places in the Borough poles, wires, cables, underground conduits, manholes and other conductors and fixtures necessary for the maintenance and operation in the Borough of a cable television system and cable communications system.

All of the written commitments contained in the written Application for Renewal of Municipal Consent, and any amendments thereto, filed by the Company, except as modified herein, are to be considered binding upon the Company as the current terms and conditions of this Renewal of Municipal Consent, subject to change in the ordinary course of business. Said Application shall be made a part hereof by reference thereto, subject to the limitations set forth herein and except to the extent that same, may conflict with State or federal law.

2. DEFINITIONS

For the purposes of this Ordinance, the following terms, phrases, words and their derivations shall have the meaning given herein. Such meaning or definition of terms is supplemental to those definitions given under federal law, including but not limited to those of the Federal Communications Commission, FCC Rules and Regulations 47 C.F.R. Subsections 76.1 et seq., and the Communication Act of 1934 at 47 U.S.C. §521 et seq., as amended and the Cable Television Act N.J.S.A 48:5A-1 et seq. and shall in no way be construed to broaden, alter, or conflict with federal or state definitions:

- a. "Board" is the New Jersey Board of Public Utilities.
- b. "Borough" is the Borough of Palisades Park, County of Bergen, State of NJ.
- c. "OCTV" is the Office of Cable TV within the Board of Public Utilities.
- d. "Company" is Time Warner Cable NYC LLC, an indirect subsidiary of Charter Communications. Inc., the grantee of rights under this Ordinance.
- e. "Act" or "Cable Television Act" is Chapter 186 of the General Laws of NJ, and subsequent amendment thereto, Section 48:5A-1 et seq.

3. STATEMENT OF FINDINGS

A public hearing concerning the consent herein granted to the Company was held after proper public notice pursuant to the terms and conditions of the Act. Said hearing having been held and fully open to the public, and the Borough having received all comments regarding the qualification of the Company to receive this consent, the Borough hereby finds the Company possesses the necessary legal, technical, character, financial and other qualifications and that the Company's operating and construction arrangements are adequate and feasible.

4. DURATION OF FRANCHISE

The consent herein granted shall expire fifteen (15) years from the date of expiration of the Certificate of Approval issued by the Board.

5. FRANCHISE FEE

Pursuant to the terms and conditions of the Cable Television Act, the Company shall, during each year of operation under the consent granted herein, pay to the Borough three and one-half percent (3.5%) of the

gross revenues from all recurring charges in the nature of subscription fees paid by subscribers for its cable television reception service in the Borough.

6. TERRITORY

The consent granted herein to the Company shall apply to the entirety of the Borough and any property hereafter annexed by the Borough by law.

7. EXTENSION OF SERVICE

The Company shall be required to proffer service along any public right-of-way to any person's residence or business located in those areas of the franchise territory described herein, in accordance with the proposal for the provision of services as described in the Application. Any additional extension of the system will be made in accordance with the Company's line extension policy.

8. CONSTRUCTION REQUIREMENTS

<u>Restoration:</u> In the event that the Company or its agents shall disturb any pavement, street, surfaces, sidewalks, driveways or other surfaces in the natural topography, the Company shall at its sole expense restore and replace such places or things so disturbed in as good condition as existed prior to the commencement of said work.

Relocation: If at any time during the period of this consent, the Borough shall alter or change the grade of any street, alley or other way or place, the Company, upon reasonable notice by the Borough, shall remove, re-lay and relocate its equipment at the expense of the Company.

<u>Temporary Removal of Cables:</u> The Company shall temporarily move or remove appropriate parts of its facilities to allow for the moving of buildings, and machinery, or in other similar circumstances. The expense shall be borne by the party requesting such action, except when requested by the Borough, in which case the Company shall bear the cost.

Removal or Trimming of Trees: During the exercise of its rights and privileges under this franchise, the Company shall have the authority to trim trees upon and overhanging streets, alleys, sidewalks and public places of the Borough so as to prevent the branches of such trees from coming in contact with the wires and cables of the Company. Such trimming shall be only to the extent necessary to maintain proper clearance for the Company's facilities.

9. LOCAL OFFICE

During the term of this franchise, and any renewal thereof, the Company shall maintain a local business office (or agent) for the purpose of receiving, investigating and resolving all complaints regarding the quality of service, equipment malfunctions and similar matters. Such local business office shall be open during normal business hours, and in no event less than 9:00 am to 5:00 pm, Monday through Friday.

10. MUNICIPAL COMPLAINT OFFICER

The Office of Cable Television is hereby designated as the complaint officer for the Borough, pursuant to N.J.S.A. 48:5A-26(b) and amendments thereto.

All complaints shall be received and processed in accordance with N.J.A.C. 14:17-6.5 and amendments thereto.

11. PERFORMANCE BOND

During the franchise, the Company shall provide a surety bond to the Borough, which bond shall be in the amount of \$25,000.00. Such bond shall be to insure the faithful performance of all undertakings of the Company as represented in its Application of Municipal Consent.

12. RATES

The rates of the Company shall be subject to regulation as appropriate in accordance with federal and state laws.

13. LIABILITY INSURANCE

The Company agrees to maintain and keep in full force and effect at its sole expense at all times during the term of this consent, sufficient liability insurance naming the Borough as an insured and insuring against loss by any such claim, suit, judgment, execution or demand in the minimum amount of \$1,000,000 for bodily injury or death per occurrence, and \$500,000 for property damage per occurrence.

14, EMERGENCY USES

The Company shall be required to abide by applicable federal requirements regarding the Emergency Alert System (EAS). The Company shall in no way be held liable for any injury suffered by the Borough or any other person, during an emergency, if for any reason the Borough is unable to make full use of the System as contemplated herein.

15. FORCE MAJEURE

Notwithstanding any other provisions of this Ordinance, the Company shall not be liable for any delay in the performance of, or failure to perform, in whole or in part, its obligations pursuant to this Ordinance due to strike, unavailability of materials or equipment, war or act of war (whether an actual declaration of war is made or not), insurrection, riot, civil disturbance, sabotage or vandalism, customer tampering or interference, act of public enemy, accident, fire, flood or other events, to the extent that such causes or other events are beyond the control of Company.

16. MUNICIPAL LIABILITY

The Company hereby agrees to indemnify and hold the Borough, including its agents and employees, harmless from any claims or damages resulting from the negligent actions of the Company in constructing, operating or maintaining the Cable System. The Borough agrees to give the Company written notice of its obligation to indemnify the Borough within ten (10) days of receipt of a claim or action pursuant to this section. Notwithstanding the foregoing, the Company shall not be obligated to indemnify the Borough for any damages, liability or claims resulting from the willful misconduct or negligence of the Borough or for the Borough's use of the cable system.

17. SUBJECT TO LAW

This Consent shall be subject to applicable state and federal laws.

SEVERABILITY

If any section, subsection, sentence, clause, phrase or portion of this Ordinance is for any reason held invalid or unconstitutional by any court or federal or state agency of competent jurisdiction, such portion shall be deemed a separate, distance and independent provision and such holding shall not affect the validity of the remaining portions hereof.

EFFECTIVE DATE.

This Ordinance shall become effective upon adoption, final approval and publication, pursuant to law.

Approved:

ines Rotundo, Mayor

Attest:

Gina S. Kim. Borough Clerk

First Reading: Second Reading: November 27, 2018 December 19, 2018



Paul Abbott

Vice President Local Government Affairs & Franchising

March 4, 2019

Honorable Mayor James Rotundo and Members of the Borough Council Borough of Palisades Park 275 Broad Avenue Palisades Park, NJ 07650

Re: Time Warner Cable New York City LLC

Dear Mayor Rotundo and Members of the Borough Council:

Time Warner Cable New York City LLC, I/k/a Charter Communications ("TWCNYC"), is in receipt of a copy of Ordinance No. 2018-18, adopted by the Governing Body on December 19, 2018, granting renewal of municipal consent to TWCNYC to continue to operate and maintain a cable television system in the Borough of Palisades Park.

Please accept this letter as TWCNYC's formal acceptance of the terms and conditions of Ordinance No. 2018-18. As you are aware, the next step is for us to petition the New Jersey Board of Public Utilities for issuance of a Renewal Certificate of Approval.

On behalf of TWCNYC, I thank you for your kind attention and consideration. We look forward to a continued mutually beneficial relationship with the Borough.

Sincerely,

Paul Abbott