



New England Cable & Telecommunications Association, Inc.

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**WRITTEN COMMENTS OF THE NEW ENGLAND CABLE &
TELECOMMUNICATIONS ASSOCIATION, INC. ON
REPORT OF THE COMMISSION ON FISCAL STABILITY AND ECONOMIC
GROWTH**

March 21, 2018

Good afternoon Chairs, Vice Chairs, Ranking Members, and esteemed Members of the Appropriations, Commerce, Finance, Revenue, Bonding and Planning and Development Committees. My name is Tim Wilkerson, and I am Vice President and General Counsel for the New England Cable and Telecommunications Association (“NECTA”).

NECTA is a five-state regional trade association representing substantially all private cable telecommunications companies in Connecticut, Massachusetts, New Hampshire, Rhode Island, and Vermont, as well as, some associate member content providers like A&E, AMC, Bloomberg TV, and NESN. All NECTA cable members have a physical presence in Connecticut, including two Fortune® 100 companies, Charter Communications, which is headquartered in Stamford, and Comcast with a Regional New England headquarters in Berlin and a subsidiary, NBC Sports, headquartered in Stamford, as well as, privately held Cox Communications and Atlantic Broadband. NECTA’s cable members have collectively invested \$2 billion over the past seven years developing state of the art networks in Connecticut and employing thousands of residents.

The NECTA membership has reviewed the findings and recommendations of the Commission on Fiscal Stability and Economic Growth and we have serious concerns about the specific proposal that would provide the state and/or municipalities with the authority to “charge fees for the use of public rights of way[.]” (See PROPOSALS on page 59 and 85). Specifically, our position is that where a company, like our NECTA members, already pay for the right to use the public right-of-way through existing fees or otherwise should exempt from this provision.

Historically, Connecticut has adopted a modern, light-touch regulatory regime over the telecommunications/broadband marketplace that has spurred robust competition leading to a wide array of advanced residential and business consumer video, broadband, voice, and wireless offerings from service providers at lower costs. As a result of this policy approach to the state’s telecommunications regulation and tax laws, the network quality and diversity of products offered in Connecticut is virtually unparalleled.

Connecticut is a national leader in broadband which is driving the digital economy, in part, due to the stability of its tax and regulatory environment on telecommunications services. Today, NECTA members are focusing on three goals: continuing to innovate and invest in our state-of-the-art networks; closing the digital divide; and remaining competitive by providing products and services that effectively meet consumer demand. Telecommunications providers already pay a host of taxes and fees to operate in Connecticut. There is a significant risk that the imposition of new taxes and fees on the public rights of way from entities that already pay such fees would create an unintended disincentive for further innovation and enhanced investment/deployment.

For all of the above reasons, NECTA respectfully expresses its serious concerns about any imposition of municipal fees for the use of public rights of way.

Respectfully,

Dated: March 21, 2018

Timothy O. Wilkerson
Vice President & General Counsel