

A. Basic Service

1. Please list the basic service rates. If more than one tier is offered, use a separate sheet for each tier.

	<u>Installation Charge</u>	<u>Monthly Rate</u>
SERVICE TIER: ECONOMY BASIC		
Residential		
First TV Outlet	\$35.00	\$8.00
Custom Installation per fished wall	\$35.00	N/A
Additional TV Outlets	N/A	N/A
FM	N/A	N/A
Converter Deposit	NONE	NONE
Converter Rental	NONE	NONE
First set		
Additional sets		
Relocation	\$35.00	N/A
Reconnection		
Computer	\$10.00	N/A
Physical	\$20.00	N/A
VCR Connection		
Standard, w/initial installation	FREE	N/A
Separate trip	\$35.00	N/A
2nd Converter, w/initial installation	\$10.00	\$6.50
Separate trip	\$45.00	\$6.50
Disconnection	FREE	N/A
Change in Service		
with out service call	\$10.00	N/A
with service call	\$35.00	N/A
Parental Control (Deposit: <u>NONE</u> )		
First set	FREE	FREE
Additional sets	FREE	FREE
Remote Control (Additional Remote)		
First set	NONE	\$2.95
Additional sets	NONE	\$2.95
Volume Control Option	N/A	N/A
Apartments - Bulk Rate	negotiable	
Commercial	see following	
Government, Educational, & Public Facilities	FREE (as described in text)	
Additional Charges (see following page)		

	<u>Installation Charge</u>	<u>Monthly Rate</u>
SERVICE TIER: SUPER BASIC		
Residential		
First TV outlet (FREE installs for 90 days)	\$35.00	\$6.95 (additional)
Additional TV outlets, each (FREE installs for 90 days)	\$35.00	\$ 6.95
Custom Installation per fished wall	\$35.00	N/A
FM (FREE at the time of initial install)	\$35.00	\$ 2.95
Converter Deposit	NONE	NONE
Converter Rental	NONE	NONE
First set		
Additional sets		
Relocation	\$10.00	N/A
Reconnection		
Computer	\$10.00	N/A
Physical	\$20.00	N/A
VCR Connection		
Standard, w/initial installation	FREE	N/A
Separate trip	\$35.00	N/A
2nd Converter, w/initial installation	\$10.00	\$6.50
Separate trip	\$45.00	\$6.50
Disconnection	FREE	N/A
Change in Service		
with out service call	\$10.00	N/A
with service call	\$35.00	N/A
Parental Control (Deposit: <u>NONE</u> )		
First set	FREE	FREE
Additional sets	FREE	FREE
Remote Control (Additional Remote)		
First set	NONE	\$ 2.95
Additional sets	NONE	\$ 2.95
Volume Control Option	(additional)	\$ 1.00
Apartments - Bulk Rate	negotiable	
Commercial	see following page	
Government, Educational, & Public Facilities	FREE as described in text	
Additional Charges (see following page)		

	<u>Installation Charge</u>	<u>Monthly Rate</u>
<b>Additional Charges</b>		
Service Calls, cable-related	FREE	N/A
Service Calls, not cable-related	\$35.00	N/A
Service Calls, remote repair	\$30.00	N/A
Transfer within Town	\$35.00	N/A
<b>Long Drops:</b>		
Beyond 200 aerial feet	\$ .50 per foot	N/A
Beyond 100 underground feet	\$ 1.00 per foot	N/A
Lost or Unrepairable Converter	\$250.00	N/A
Damaged Converter	up to \$150.00	N/A
Lost or Unrepairable Remote	\$ 50.00	N/A
Damaged Remote	up to \$ 25.00	N/A
Return Check Charge	\$ 15.00	
A/B Switch		
w/initial installation	\$10.00	FREE
separate trip	\$30.00	FREE

An A/B switch is required for certain VCR connection options. Please refer to the brochure "VCR Installation Options" at the end of this section.

If a subscriber wishes to have an underground drop installed where the residence could be served by an aerial drop, Nashoba will make this service available at our cost. The customer will be advised of the cost before the work is done.

Please note that installation charges are not cumulative; in other words, installation is \$35.00 (after the free 90 day period) regardless of how many services or tiers are selected.

Commercial Rates

Nashoba will treat motels, hotels, and nursing homes as residences and will charge, on a per room basis, the same monthly service rates as those offered to other residential subscribers. Nashoba is willing to negotiate bulk rate discounts with these subscribers, based on quantity of installations or other considerations, on a case-by-case basis. Residents of mobile homes will be charged the same monthly service and installation rates as other residents are offered.

Commercial Installation Charges

First outlet	\$50.00
Additional outlets up to five	\$25.00/each
Additional outlets of six or more	\$10.00/each
Reconnection of outlet	\$50.00
Relocation of outlet	\$20.00
Drops beyond	
200 feet aerial	\$ 1.00/foot
100 feet underground	\$ 2.00/foot
Cable Stereo/FM/Service	\$20.00

Commercial Monthly Charges

Economy Basic Service	not available
Super Basic Service	\$75.00
Additional Set	\$30.00
Sports Pac* (includes super basic, remote control, NESN, and SportsChannel)	\$135.00
Additional Set with Sports Pac	\$35.00

\*Note: Nashoba's agreements with premium services may restrict Nashoba's ability to offer the service on a commercial basis, in which case Nashoba will abide by our contract with the programming supplier.

Nashoba reserves the right to amend the above rates with 30 days' notice.

2. Does the applicant intend to charge extra for subscriber hookups based on distance from the trunk line or other criteria? If the answer to the foregoing question is "yes," and the additional charge will be based solely on distance from the trunk line, state the charge per foot or yard. If other criteria will be considered in determining the additional charge, describe the criteria and the costs to subscribers.

Cable service will be provided at no extra installation cost to all residences located within 200 feet of the aerial distribution lines (located at the nearest street) or within 100 feet of underground distribution lines. For residential subscribers, rates and charges for excess footage will be \$0.50 per foot beyond 200 aerial feet and \$1.00 per foot beyond 100 underground feet. Commercial rates are shown on the previous page.

In any such event, Nashoba will provide the service applicant with a detailed estimate of such installation costs and obtain the applicant's acceptance thereof before any work is performed.

3. Please describe the conditions, if any, under which any of the rates listed in response to question 1 above may be waived or discounted.

Nashoba offers various discounts and promotional price reductions which vary from time to time depending on our marketing plans. We reserve the right to offer free or reduced price services in Belmont but have not proposed specific discounts in this application, except as noted in our response to question 5., below.

4. Will the applicant commit to maintain initial rates for a certain period of time and/or commit to limit subsequent rate increases? Please describe.

Although the Cable Communications Policy Act of 1984 makes it impossible for a town to enforce any rate freeze promises, we nonetheless commit to maintain our basic service rates for two years at the levels proposed in this application. It has been Nashoba's policy to hold rates to their initial levels for two years from the date the system is energized in other towns we serve, and we plan to do the same in Belmont.

5. Does the applicant intend to provide free or discounted installation for any period? Please describe.

Nashoba will waive all installation charges for 90 days from the time the potential subscriber is first contacted. As noted earlier, we also reserve the right to offer free or discounted installation during special promotional periods throughout the license period.

Nashoba does not charge for VCR connections in conjunction with cable service, as we feel that use of a VCR can greatly enhance a subscriber's enjoyment of cable service. We will connect a VCR without additional installation charge to any television set for which a subscriber has purchased service. As noted earlier under "Additional Charges," there may be a one-time equipment charge for an A/B switch if the customer chooses certain installation options that require the use of this device.

6. Does the applicant intend to provide free or discounted installation for senior citizens or handicapped individuals? Please describe.

Same as above (question 5).

7. Will subscribers be able to purchase converters? If so, indicate the cost of the converters and their availability to subscribers.

Converters will not be available for purchase.

B. Pay Service

1. Please indicate installation, monthly rates and second set rates for all pay services. Indicate any conditions under which installation charges may be waived or discounted. Will the applicant commit to maintain initial rates for a period of time and/or commit to limit subsequent rate increases?

<u>Service</u>	<u>First Set</u>	<u>Additional Set</u>
Home Box Office	\$9.95	No Charge
Cinemax	\$9.95	No Charge
The Disney Channel	\$9.95	No Charge
Showtime	\$9.95	No Charge
Home Theatre Network Plus	\$9.95	No Charge
Bravo	\$9.95	No Charge
SportsChannel	\$9.95	No Charge
New England Sports Network	\$9.95	No Charge
The Movie Channel	\$9.95	No Charge
The Playboy Channel	\$9.95	No Charge

Installation rates are included with Basic/Super Basic service, and there is no additional charge to install premium services.

Because the rates charged for pay services depend to a great extent upon the cost of those services to the cable operator, we have not projected rate freezes or limits on rate increases herein. However, our policy in existing systems has been to limit rate increases as much as possible, since we are well aware that subscribers consider rates to be an important factor in their decisions regarding cable service.

### c. Other Rates

1. Please describe studio and equipment use, rates, leased channel rates and advertising rates by noncommercial and commercial users.

(See below)

2. Please describe any and all special rates or discounts.

Rates for studio and equipment use and advertising rates have not yet been precisely determined; however, rates for the use of production facilities will be similar to those set forth in the rate card found in Section VII, part E. The rate for leased access is \$75 per half hour of cablecast time; this rate may be discounted for volume users.

3. Please provide a chart of projected rates for the 15-year license period. Explain the underlying assumptions and the reasons for the projected rate increases.

Please refer to pro formas in Section II ("Financial Projections") for 15-year rate projections.

Our rate increase rationale is based on the assumption required by the Issuing Authority Report, i.e., a four percent inflation rate compounded annually. However, in view of our two year proposed rate freeze, we have not increased rates in the second year of operation, but have assumed an eight percent rate increase in the third year in order to be consistent with the four percent per year figure.

A. Privacy

1. Please describe your privacy of information policy and how it is enforced.

Subscriber Rights of Privacy

Nashoba has developed an extensive set of precautions and company policies designed to protect our subscribers' right to privacy. The operation of a state-of-the-art cable system involves significant privacy issues, and we feel it is our responsibility to ensure that Belmont's cable system remains a source of entertainment, information, and communication, and is not used as a form of intrusion by our company, the government, or any other entity.

As new technologies and services are developed--home security, banking, and shopping, among others--the protection of subscriber privacy will become an even more important issue. Therefore, we have included subscriber privacy protections in our licenses with other communities and propose to do the same if awarded the Belmont license.

Nashoba subscribes to the New England Cable Television Association Code of Privacy, a copy of which follows.

Further, we would also note that both common law and federal statutory law provide protection against the invasion of privacy, and we will ensure that our employees and our subscribers are made aware of this fact.

In addition to the foregoing, it shall be the general policy of Nashoba to consider all information held about our subscribers to be absolutely confidential. Other than information needed for billing or service purposes, no information shall be collected from or about subscribers without their express permission, subject to their right of refusal.

Our in-house billing computer offers additional protection for our subscribers. Because we do not use an outside billing service (such as CableData), information about our subscribers is not made available to outside billing services whose policies regarding privacy rights may not meet Nashoba's standards.

Because it is our practice not to make available to any third parties any information regarding our subscribers, a service such as HBO or Showtime who wishes to provide information to our subscribers is required to send such information to us so that we may distribute it without disclosing our subscribers' names and addresses to third parties.

#### SUBSCRIBER RIGHTS OF PRIVACY

Nashoba Communications hereby subscribes to the New England Cable Television Association Inc. Code of Privacy and as such the company agrees to the following obligations:

- a. The cable television system shall explain to its subscribers the information gathering functions of the cable communications services being provided.
- b. The cable television system shall maintain adequate safeguards to ensure the physical security and confidentiality of any subscriber information.
- c. The cable television system subscriber agreements shall include the following:
  - o Individual subscriber viewing or responses may be recognized only where necessary to permit billing or to render a subscriber service. Any such information will be kept strictly confidential unless publication is an inherent part of the service (e.g., announcing a game show prize winner).
  - o No other individualized information concerning viewing or responses will be developed unless the subscriber has been advised in advance and given adequate opportunity not to participate.
- d. The cable television system may develop bulk (non-individual) data concerning subscriber services for use in developing new services or improving existing services. The cable television system will not make such bulk data available to third parties--whether affiliated or nonaffiliated with the cable television system--without insuring that the identity of individuals is not ascertainable from the data provided.

- e. The cable television system will refuse requests to make any individual subscriber information available to government agencies in the absence of legal compulsion, i.e., court order, subpoena. If requests for such information are made, the cable television system will promptly notify the subscriber prior to responding if permitted to do so by law.
- f. Subscribers may examine and copy any information developed by the cable television system pertaining to them at the cable company's premises upon reasonable notice and during regular business hours. Copying costs shall be borne by the subscriber. The cable television system shall correct such records upon a reasonable showing by the subscriber that information contained therein is inaccurate.
- g. Any individual subscriber information will be retained for only as long as is reasonably necessary, e.g., to verify billing.
- h. Subscriber mailing lists shall not be made available to third parties--whether affiliated or nonaffiliated with the cable television system--without first providing subscribers with the opportunity to have names removed from such lists.
- i. The cable television system shall comply with applicable Federal and State laws respecting subscriber privacy and shall adhere to applicable New England Cable Television Association, Inc.'s code of conduct which promote or enhance subscriber privacy.
- j. Third parties who participate in providing services to cable television system subscribers shall be required to adhere to the New England Cable Television Association, Inc.'s Code of Privacy and all cable television system arrangements regarding such services shall specifically incorporate this Code of Privacy by reference.
- k. The cable television system and the New England Cable Television Association, Inc. shall continuously review and update its Code of Privacy to keep current with technological changes and new applications.

2. Describe in detail the measures that will be taken on an ongoing basis to inform subscribers of their privacy rights and of the type of information that is being collected about them.

In our initial and in all subsequent sales efforts, Nashoba's sales representatives will inform all prospective subscribers of their right to privacy, and Nashoba's policy concerning subscribers' right to privacy. This information will also be periodically cablecast on one of Belmont's local channels. It is Nashoba's policy to collect from subscribers only that information which is necessary to provide cable service, i.e., name, address and which cable services are being bought. This and any other information gathered about subscribers is considered confidential, as detailed in Nashoba's privacy policy.

3. Describe the remedies the applicant will make available to subscribers for breach of their privacy of information. Detail procedures for privacy complaint resolution.

We propose the following procedure for the handling of any complaints relative to invasion of subscriber privacy:

- a. Any subscriber who believes that his or her right to privacy has been violated should make a written or verbal complaint to the Nashoba office in Belmont.
- b. Any complaint that cannot be promptly and completely resolved by a customer service representative shall receive the immediate attention of our General Manager.
- c. In the unlikely event that a complaint cannot be resolved by our General Manager, we recommend that a hearing be scheduled before the Issuing Authority or its designated representatives as soon as possible. The Issuing Authority is empowered to decide the case and enforce any remedies provided for in the final license.
- d. Finally, subscribers who remain unsatisfied with local decisions will have recourse to a court of law, since, as stated above, Massachusetts law provides for criminal sanctions against any party that violates state laws against wiretapping and similar acts.

Following is a copy of the Privacy Rights Notice which Nashoba provides to all subscribers.

# Nashoba Cable



## Cable Television Subscribers Privacy Rights Notice

The federal Cable Communications Policy Act of 1984 contains certain provisions regarding the collection and maintenance of personally identifiable information by cable television operators. In accordance with those provisions, this cable system collects and maintains personally identifiable information concerning subscribers. That information includes billing records; service maintenance and repair records; premium service subscription information; marketing information and subscriber complaints.

Unless otherwise noted, all personally identifiable information is used solely for the normal business purpose of offering and rendering cable television service to you. Some persons have access to such information when necessary in connection within our business. Access is as often as necessary and may be on a day-to-day basis. Those people include cable system employees; cable system sales agents; businesses which provide services to the cable system, such as our accountants, billing and collection services, program and program guide providers where applicable; program services which will periodically audit subscription information and representatives of the franchising authority. The cable system will not maintain such information after it is no longer necessary for carrying on our business.

As a subscriber, you may review any personal information held by us which pertains to you if you give us a reasonable period of time to locate and, if necessary, prepare the information for review. (Preparation is sometimes necessary to avoid disclosure of information relating to other subscribers.) If you wish to review your personal information, please contact us by letter to arrange for a review. The review will be at our local system business office. You may request correction of any errors in personal information which we collect or maintain pertaining to you.

Federal law prohibits the cable system from collecting any personally identifiable information other than information necessary to carry on our business or to detect theft of services, unless you consent.

To the extent that we are permitted to collect personally identifiable information, we are permitted to disclose such information only to the extent necessary to conduct our business. In addition, the law allows us to disclose your name and address for non-cable related mailing lists or other purposes unless you tell us you do not wish us to disclose it. However, such disclosures of names and addresses may not be in a form that discloses the extent or type of any use you make of services we provide, nor may it disclose the nature of any transaction you make over the cable system. If you do not wish to have your name and address disclosed even in this limited manner, or if you wish to limit the circumstances in which we will disclose it, please obtain, fill out and return a "Nondisclosure of Name and Address Form" from our local business office.

Except as indicated in the preceding paragraph, we may not disclose personally identifiable information without your consent, unless we are required to do so by court order. If we are served with a court order requiring disclosure of personally identifiable information concerning a subscriber, we will inform the subscriber before any information is released. Under some circumstances, a governmental entity may seek a court order to obtain personally identifiable information from the cable system concerning a cable subscriber. The subscriber must be given an opportunity to contest issuance of such an order.

Any person aggrieved by any act of a cable operator in violation of these federal limitations on the collection and disclosure of personally identifiable information may bring a civil action in a United States District Court to enforce the limitations.



B. Equal Employment Opportunity

1. Please describe in detail your equal employment opportunity policy. Provide plans for compliance with all federal, state, and local laws pertaining to discrimination, equal employment opportunity programs and affirmative action programs. Describe your policies on hiring and utilization of minorities and women in search committees, in announcing and filling vacancies and in contracting. (See below).
2. Describe employment policies that will enhance the applicant's efforts to hire and assist in career advancement for minorities and women (e.g., targeting advertisement of employment training opportunities to women's groups; and commitment to ongoing training and educational reimbursement programs).

Questions 1. and 2. above are answered in detail in the following pages, which set forth Nashoba's Equal Employment Opportunity Program.

NASHOBA COMMUNICATIONS EQUAL EMPLOYMENT OPPORTUNITY  
PROGRAM

General Policy

It is Nashoba's policy to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin, sex, age, or disability in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training, and termination.

It is also our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin, sex, age, or disability.

Subject to our policy on equal employment opportunity, we attempt whenever possible to hire people from the community where they will be working. Therefore, Harvard residents will receive preference for jobs in the Harvard cable system when all other considerations are equal.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, Nashoba has developed an Equal Employment Opportunity Program which includes the following elements:

Responsibility for Implementation

Nashoba's General Manager is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons who make employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training, and termination of employees to ensure that such decisions are made without regard to race, color, religion, national origin, sex, age, or disability. Management performance in making this policy effective is reviewed annually by the Managing General Partner.

The Managing General Partner periodically reviews each employment category where there is little or no minority or female representation to determine whether our program is operating effectively in that area.

### Policy Dissemination

To ensure that all members of Nashoba's staff are aware of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts are made:

- o Nashoba's employment application form includes a notice in bold type informing prospective employees that discrimination because of race, color, religion, national origin, sex, age, or disability is prohibited and that they may notify the FCC or any other appropriate agency if they believe they have been discriminated against.
- o We post appropriate notices informing applicants and employees that we are an Equal Opportunity Employer and of their right to notify the FCC or any other appropriate agency if they believe they have been the victims of discrimination.

### Recruitment

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration in filling job vacancies, Nashoba uses the following recruitment procedures:

- o We attempt to maintain systematic contacts with a variety of women's, minority, and human relations organizations, leaders and spokespersons to encourage the referral of qualified minority and female applicants.
- o In addition to these organizational contacts, we use only those services, including state employment agencies, which refer candidates without regard to race, color, religion, national origin, sex, age, or disability.
- o When we recruit prospective employees from educational institutions, such recruitment efforts include schools and colleges with significant minority group and female enrollments.

- o Any help-wanted advertisements always include a notice that Nashoba is an Equal Opportunity Employer and contain no indication, either explicit or implied, of a preference for one sex or another.
- o We place employment advertisements in media which have significant circulation and are of interest to minorities and women.
- o We encourage present employees to refer minority and female candidates for existing and future job openings.
- o We notify the Managing General Partner in charge of equal employment opportunity matters, in writing of all job openings as far in advance as possible (and no later than five (5) days after a vacancy occurs) so that he may refer minorities and women applicants for the position.

#### Training

Nashoba recognizes that training, both on-the-job and informal, can be an important factor in the ability of our employees to advance to better paying jobs. The head of each department periodically assesses possibilities for on-the-job training within scope of normal operations and, where on-the-job training proves feasible, employees with interest and potential to qualify for better paying jobs are offered on-the-job training opportunities. Minority group persons and women are encouraged to take advantage of such opportunities.

#### Promotion

It is Nashoba's policy to provide promotions on a nondiscriminatory basis. Further, to ensure that minorities and women receive due consideration for promotional opportunities, special effort is taken to encourage minorities and women to qualify and apply for advancement.

## Other Employment Practices

Nashoba is constantly alert to ensure that all aspects of our policies and actions with respect to our employees and applicants for employment are undertaken and carried out in a nondiscriminatory manner. The following are examples of our efforts:

- o All staff members who make decisions relating to hiring and promotion are instructed personally by Nashoba's Managing General Partner that minority groups and female applicants are to be considered without discrimination.
- o Any tests used in making hiring decisions are based on ability and competence in skills relevant to the job to be performed and do not have the effect of discrimination against minority group persons or women.
- o There are no jobs for which we consider age or sex to be a bona fide occupational qualification.
- o Nashoba makes reasonable accommodation to the religious needs of employees where such accommodation can be made without creating hardship in the conduct of our business. We consider prospective employees without regard to their religious beliefs except where it is evident from the prospective employee's description of his or her availability that his or her unavailability for work because of religious observances would create a hardship for Nashoba in the conduct of business.
- o Married women and married men are treated equally. We have no rules that differentiate among married persons on the basis of sex.
- o There are no separate lines of progression or separate seniority lists based on sex. We make no distinction between light and heavy jobs that would operate as a form of classification of sex.

- All facilities and privileges of employment are available without regard to race, religion, sex, color, national origin, age, or disability.
- We regularly inventory all jobs. Rates of pay and fringe benefits for employees who perform essentially the same function are substantially equivalent.
- Whenever there is an opportunity for overtime work, all qualified employees in the department are notified.
- The Managing General Partner personally reviews the demotion, layoff, and termination of each and every person employed by Nashoba. Each employee so affected is provided with a written statement of the reason or reasons for such action.
- No pre-employment inquiries are made, whether by means of an employment application or otherwise, which express, directly or indirectly, any specifications with respect to race, religion, color, national origin, sex, age, or disability.

#### Handling of Complaints

- Any employee who believes he or she has been discriminated against should bring this complaint directly to the attention of the Managing General Partner, who will schedule a hearing on the matter and issue a written statement regarding the company's proposed resolution of the complaint.
- Any employee who remains dissatisfied with the resolution of a complaint relative to discrimination will be advised of his or her right under law to pursue the matter before the Massachusetts Commission Against Discrimination and the Equal Employment Opportunity Commission.

3. Have any complaints of employment discrimination been lodged against the applicant? If so, describe for each complaint when and where it occurred, the nature of the complaint and the resolution or current status thereof.

No complaint of discrimination in employment practices has ever been lodged against any Nashoba Communications entity. We are very proud of this record, and we feel it reflects a commitment to equal employment opportunity which exists not only in our written policies, but in practice.



Proof of Performance

Nashoba will perform interim proof-of-performance testing at the completion of both the Residential and Institutional networks. These interim tests will be performed in accordance with the parameters set forth in this section and will be compiled and provided to the Issuing Authority. Final proof-of-performance will be made at the extremities of each district of both the Residential and Institutional networks following these same test procedures.

Nashoba's proof-of-performance test plan is set forth below in this section. This includes the right of the Issuing Authority or its representative to witness all interim and final proof-of-performance tests and be notified at least two weeks prior to such tests.

This protocol will meet at least the FCC technical standards of 47 CFR Part 76, Subpart K.

While the FCC preempts local and state law on the issue of technical standards (see Appendix), it is in the interest of the cable television operator to produce the highest fidelity pictures possible with the least amount of interference. Quality reception is, after all, one of the major selling points of our product. If it is less than what it could or should be, the likelihood is that this will be reflected in the form of lower revenues and unhappy subscribers.

Our track record in producing superior pictures and in far exceeding FCC minimum technical standards is demonstrated by the excellent signal quality produced by both our Middlesex County and Danvers systems.

### System Performance

#### General

Nashoba will conduct proof-of-performance testing in accordance with the test procedures contained in the Appendix, as well as the test procedures required by the FCC pursuant to 47 C.F.R. Paragraph 76, Subparagraph K, to demonstrate that:

- o The equipment provided has been properly installed in the system.
- o The system has been correctly balanced.
- o The equipment and system meet certain performance specifications.

Testing will be performed by experienced Nashoba personnel who are well qualified in equipment and system performance testing and who will use approved test equipment that has been calibrated using equipment measurements traceable to the National Bureau of Standards. The Issuing Authority is invited to send personnel to witness testing and verify test data and results. The Issuing Authority will be given at least 30 days notice prior to the conducting of tests by Nashoba (except for the interim tests described above, in which case the notice shall be at least 14 days).

Photographic recording of test data and calibration information will be used for documenting system performance. Photographs reduce documentation errors, provide permanent records, and facilitate comparison of system operation in subsequent testing.

Nashoba will submit one copy of the test report to the Issuing Authority or its designee.

### Test Plan

We may wish to adopt specific test plans for Belmont; however, the general proof-of-performance testing will include at a minimum the test locations listed below and will be performed at the frequencies indicated.

Locations for system tests will be as follows:

- o Output test points of last trunk station of longest system cascade.
- o Output test point of last extender amplifier fed by last trunk station of longest cascade.
- o One other point chosen by the Issuing Authority or its designee.

### Forward System Tests

- o Signal level of all channels in the bandpass of the system.
- o Frequency response across the bandpass of the system.
- o Carrier-to-noise at five designated channels.
- o Carrier-to-cross modulation at five designated channels.
- o Carrier-to-second order at two designated channels.
- o Carrier to composite beat (CWCB) at five designated channels with CW carriers and full channel loading.

- o Carrier-to-hum modulating at highest and lowest channels.
- o System radiation - across the bandpass as stated in Test Procedure No. 8. (See Appendix).
- o Signal level variation over a 24 hour period using a stable carrier injected at the headend.

#### Reverse Systems Tests

- o Signal level of all channels in the bandpass of the system.
- o Frequency response across the bandpass of the system.
- o Carrier-to-noise at two designated channels whenever applicable.
- o Carrier-to-cross modulation at two designated channels whenever applicable.
- o Carrier-to-second order at one designated channel.
- o Carrier-to-third order at one channel.
- o Carrier-to-hum modulation at highest and lowest channels.
- o System radiation - across the bandpass as stated in test procedure No. 9. (See Appendix).
- o Signal level variation using a stable carrier injected at the furthest amplifier from the headend over a 24 hour period.

System maintenance is the key to system performance and equipment life. Therefore Nashoba will undertake a preventive maintenance program consistent with both the equipment manufacturers' recommendations and good engineering practices.

First, system performance will be monitored daily to insure the delivery of the finest quality picture to the subscribers. As

part of an ongoing quality review program, Nashoba's management will establish a routine schedule of procedures and then will monitor the performance of the system by reviewing daily service reports, by checking completed maintenance schedules and by viewing reception. Technical staff will prepare weekly reports on outages, trouble calls and signal leakage detailing date, time, cases and corrective action taken. Also, on a weekly basis, comparative charts will be prepared showing trouble calls and subscribers on the same chart as a function of time. Management will also review installation practices in randomly selected locations throughout the system. Daily routine maintenance will begin right after the system is built.

### Schedule and Procedure for Amplifier Inspection

#### Status Monitoring

Utilizing the C-Cor computer controlled status monitoring system, we can check critical operational parameters of lock stations on the supertrunk and the I-Net on the continuous basis. These critical parameters are:

- o Output ACC pilot level
- o Output data carrier level (115 MHz)
- o Raw DC (AC) voltage into trunk station
- o DC (B+) voltage at each trunk station
- o DC current into forward and reverse sections of the trunk amplifier
- o Temperature inside the trunk
- o Reverse switch status
- o Fail-safe by-pass status
- o Trunk lid closed
- o Performance of standby power supplies, including AC power on, battery power on, battery cut-off warning
- o Performance of the fail-safe by-pass system.

If the data (or alarm) indicate fault conditions, a maintenance crew will be dispatched directly to the amplifier source of the trouble.

### Physical Inspection

Bi-annually, Nashoba will examine the physical condition of each trunk and line extender station including mounting hardware, station hardware and bonding material. We will check for tightness of entry fittings, center seizures and cracks or kinks in the sheath at drop loop bends. We will also check inside the station for moisture contamination, tightness of modules and/or chassis and the conditions of the gaskets. Between stations, we will check for broken lashing wires, improper lashing and other violations of the system's construction practice.

### Electrical Inspection

Bi-annually, Nashoba will measure and record AC and DC levels at the appropriate test point to determine that each amplifier in the system is operating within designed powering conditions. We will measure and record input levels of pilots in the spectrum analyzer mode. We will check for proper values of pads and/or equalizers. We will measure and record the output levels of the pilots and check for response flatness in the remote lock mode. The total peak-to-valley, in dB, must not exceed  $1 + N/10$  for all trunk stations and  $1 + N/8$  for all distribution stations, where N equals the total number of amplifier modules in cascade from the headend. (Example: a 14 + 1 cascade should not exceed  $1 + 14/10$  or 2.4 dB total peak-to-valley; the 14th trunk amplifier should not exceed  $1 + 14/10$  or 2.4 dB total peak-to-valley.) Also, the variance across any standard 6 MHz TV channel must not exceed 1 dB.

### Reporting Procedure

Bi-annually, we will photograph the frequency response of any amplifier. We will indicate the absolute calibration of one vertical line on the photographs. We will also photograph the responses at 2 dB/CM vertical sensitivity with frequency markers on, and include the photographs with the weekly report. Using the same techniques, we will photograph the response of the most extreme amplifier for every trunk run and include it in the report for the week of its maintenance. We will include input/output pilot levels, pad and equalizer values, AC and DC levels, cascade depth, amplifier number and approximate temperature on all photographs.

### At System Extremities

We will measure the carrier-to-noise ratio for the highest and lowest channels on a monthly basis to pinpoint performance changes. In addition, each month we will take proof-of-performance readings at at least three extremities to monitor system performance. If for any reason these tests show changes from the original performance reading, a more frequent photographing schedule may be adopted and corrective action taken.



15. Describe the technical standards the system will comply with and fill out the following form.

Distribution (per cable)

	<u>Headend to Subscriber</u>	<u>Subscriber to Headend</u>
Available transmission band	50-450 MHz	5-30 MHz
Longest trunk cascade	12 amps	12 amps
Longest LE amp. cascade	1 bridger amp, 2 line extenders	
Maximum TV channel loading	60	4
AGSC spacing - trunk (thermal level control)	21 dB	10.5 dB
- feeders (thermal level control)	26 dB	15 dB

Number of amplifiers contributing noise on each return trunk:  
approx. 60 if all return amps activated simultaneously; exact  
number will depend on final system design.

Calculated headend to subscriber performance for longest  
cascade:

C/N	46.9 dB	>58 dB
C/CTB	52.8	N/A
C/2nd Order	>60 dB	>60 dB
C/Cross-mod (at amp 12)	53.4	N/A
C/Echo less than 1 u sec	>20 dB	>20 dB
C/Echo greater than 8 u sec	>40 dB	>40 dB
Chroma delay - lowest frequency	5 n sec.	5 n sec.

16. Describe the performance and maintenance tests and procedures that will be utilized. The following questions relate to performance testing.

- a. Will tests be performed upon completion of construction of the entire system (including the institutional network)?

(X) Yes      ( ) No

b. Will the tests demonstrate compliance (within 2dB) with the overall performance figures proposed in the section on Overall System Technical Performance above?

(X) Yes ( ) No

c. Will the C/CTB tests be performed with CW carrier in accordance with NCTA 008-0477 (pages 24-25) fully loaded as indicated in the proposed tables in the section on Channel Allocation?

(X) Yes ( ) No

d. If the answer to any of the foregoing is "no," provide a full explanation of such answer or answers below. N/A

e. Will the intermediate performance tests be performed upon completion of parts of the system prior to connecting subscribers?

(X) Yes ( ) No

If the answer to the foregoing question is "yes," what will be the approximate size of such intermediate areas tested? 25 miles

B. System Design

	<u>Aerial Miles</u>	<u>Underground Miles</u>
1. Distribution Plant	59	40
Institutional Network	10	<1
Plant from Belmont to headend	N/A	N/A

(Please see maps at the end of this section.)

2. Please describe the equipment to be utilized by manufacturer, type and model number.

Following is information regarding the equipment we expect to use in the Belmont system. We reserve the right to substitute equipment of comparable quality and capability if in our opinion such substitution would maintain or improve the overall quality of the system.

## Cable:

Aerial: Trilogy Cable Mc2

Underground: Trilogy Cable Mc2, JB

Drop: Belden RG-6 Trishield, Belden RG-11 Trishield

## Trunk Amplifiers:

Line Extenders: C-Cor E507

Power Suppliers and System: Data Transmission Devices  
MP60-12  
Powervision 113 (standby)

Splitters: C-Cor, S550

Subscriber Taps: Eagle, 550

Connectors: LRC, K series

Converters: Jerrold Starcom VI+ Model DP-5, fully addressable

Satellite Receive Stations:  
(also indicate the number of earth stations provided and the satellite(s) they will receive)

2 Andrews, 4.5  
Galaxy 1, Satcom F3R, Satcom 4, Telstar 303

Testing:

(2) SAM 1 (450 MHz field strength meter)  
SAM 3 (digital programmable 450 MHz field strength meter)

TDR (Time Domaine Reflectometer)  
Wavetech System Sweep Generator, 1855/65  
IFR A-7550 Spectrum Analyzer

Other:

Tower: Rohn

Air Conditioner: Carrier

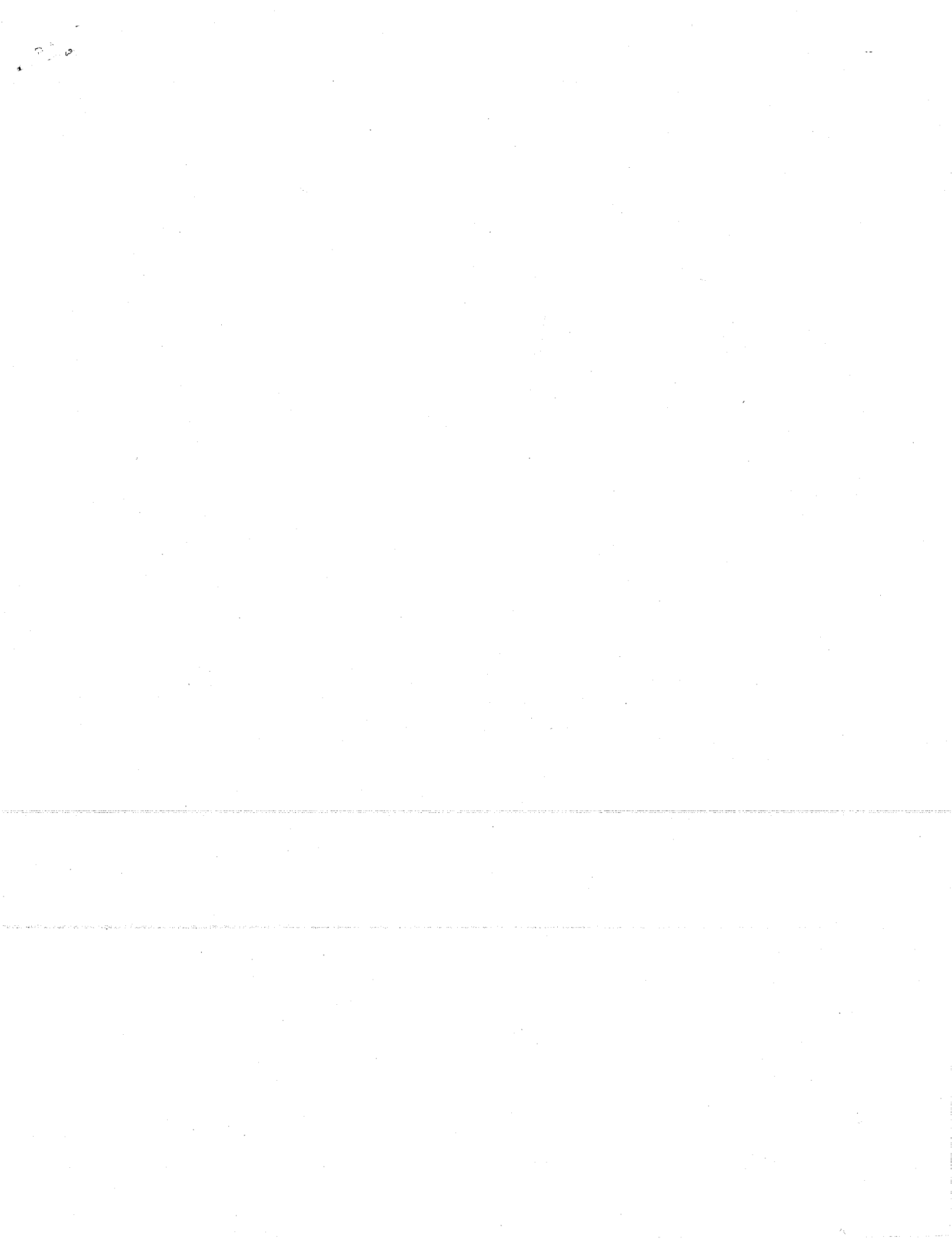
Modulator, Processors: Jerrold

Emergency Override: Jerrold

FM Processing Equipment: Catel

Automatic Switching Equipment: Tele-engineering

Character generators: Texscan



2. 45  
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