



August 8, 2008

The Honorable John D. Dingell, Chairman
The Honorable Joe Barton, Ranking Member
United States House of Representatives
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington D.C. 20515

The Honorable Edward J. Markey, Chairman
The Honorable Cliff Stearns, Ranking Member
United States House of Representatives
Subcommittee on Telecommunications and the Internet
Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington D.C. 20515

Dear Chairman Dingell, Ranking Member Barton, Chairman Markey, and Ranking Member Stearns:

Thank you for your letter of August 1, 2008, which Glenn Britt has asked me to answer on behalf of Time Warner Cable (TWC). As indicated below in our responses to your specific questions, we do not engage in targeted Internet advertising based on consumers' search queries, web surfing, or related aspects of their Internet usage. In the interest of being complete, however, we are pleased to provide additional information about our Road Runner high-speed Internet access service as well as our incidental activities as a web site publisher.

Responses to Specific Questions

- 1. Has your company at any time tailored, or facilitated the tailoring of, Internet advertising based on consumers' Internet search, surfing, or other use?**

TWC does not engage in targeted Internet advertising based on consumers' search queries, web surfing, or related aspects of their Internet usage in connection with our Road Runner high-speed Internet access service. To provide a more complete understanding of our practices in providing Road Runner and as a web site publisher, we provide the following additional information.

One of the primary functions of TWC's Road Runner service is to take customers to the web addresses, or URLs, that they enter in their web browsers. Occasionally, customers type in an erroneous URL for a web site that does not exist (usually because of mistyping). In such cases, the Road Runner service provides an error message that suggests potential links that the customer may have intended to enter and also provides links to sponsored advertising based on predictive judgments about the erroneous URL that was entered. TWC contracts with Yahoo! to provide this functionality, and we understand that Yahoo! has received its own letter from the Committee and will respond directly concerning its business practices.

TWC also provides broadband connectivity for some non-facilities-based Internet service providers (ISPs), including Earthlink and AOL (which in turn is owned by Time Warner Inc., from which TWC is currently being spun off). We understand that these ISPs also have received letters from the Commission and will respond directly concerning their business practices.

Finally, TWC is also a publisher of web sites. Like other web site publishers, TWC has contracted with third parties, including Google, to provide search functions on its Road Runner and other web sites. TWC also contracts with third parties such as Platform A/Advertising.com to sell display advertising on its Road Runner web pages. (Platform A/Advertising.com is owned by AOL.) To a limited extent, TWC places some of its own display ads on its web sites. In doing so, TWC does not target ads based on consumers' search queries, web surfing, or the like. As is customary among web site publishers, TWC relies on cookies to avoid repeating a single display ad too frequently and relies on users' IP addresses to prevent consumers from seeing out-of-market ads.

- 2. Please describe the nature and extent of any such practice and if such practice had any limitations with respect to health, financial, or other sensitive personal data, and how such limitations were developed and implemented.**

Not applicable.

- 3. In what communities, if any, has your company engaged in such practice, how were those communities chosen, and during what time periods was such practice used in each? If such practice was effectively implemented nationwide, please say so.**

Not applicable.

- 4. How many consumers have been subject to such practice in each affected community, or nationwide?**

Not applicable.

- 5. Has your company conducted a legal analysis of the applicability of consumer privacy laws to such practice? If so, please explain what that analysis concluded.**

Not applicable.

- 6. How did your company notify consumers of such practice? Please provide a copy of the notification. If your company did not specifically or directly notify affected consumers, please explain why this was not done.**

Not applicable.

- 7. Please explain whether your company asked consumers to “opt in” to the use of such practice or allowed consumers who objected to “opt out.” If your company allowed consumers who objected to opt out, how did it notify consumers of their opportunity to opt out? If your company did not specifically or directly notify affected consumers of the opportunity to opt out, please explain why this was not done.**

Not applicable

- 8. How many consumers opted out of being subjected to such practice?**

Not applicable.

- 9. Did your company conduct a legal analysis of the adequacy of any opt-out notice and mechanism employed to allow consumers to effectuate this choice? If so, please explain what that analysis concluded.**

Not applicable.

- 10. What is the status of consumer data collected as a result of such practice? Has it been destroyed or is it routinely destroyed?**

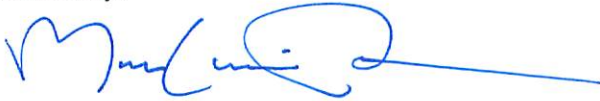
Not applicable.

- 11. Is it possible for your company to correlate data regarding consumer Internet use across a variety of services or applications you offer to tailor Internet advertising? Do you do so? If not, please indicate what steps you take to make sure such correlation does not happen. If you do engage in such correlation, please provide answers to all the preceding questions with reference to such correlation. If your previous answers already do so, it is sufficient to simply cross-reference those answers.**

TWC does not correlate data regarding consumer Internet use across different services or applications to target Internet advertising, and we do not have systems in place that make it possible to do so.

We appreciate the opportunity to assist the Committee in its inquiry into Internet advertising practices, and we look forward to working with you on this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marc Lawrence-Apfelbaum", with a long horizontal line extending to the right.

Marc Lawrence-Apfelbaum
Executive Vice President, General Counsel
and Secretary