

From: [Jagadeesh Sivadasan](#)
To: [FOIA](#)
Subject: Electronic FOIA (E-FOIA) Request Form
Date: Thursday, February 05, 2015 12:13:59 PM

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Jagadeesh Sivadasan Requests:
To: The Office of Communications & Industry Information, FCC:

Dear Sir/Madam:

I am writing to withdraw my earlier FOIA request 2015-142, and submit a new FOIA request for the release of survey data across several years of the Cable Price Survey with details below. The data will be used for non-commercial academic research which will benefit the public interest.

In particular, we are studying the competitive effects of deregulation in the market for cable television between 2005 and 2008 in 19 states of the U.S. These reforms of the franchising process significantly eased entry into local markets by providing a single state-wide franchise to companies desirous of providing service. Using data from the Warren's Factbook and adopting a difference-in-differences approach, we find that prices for "Basic" service declined by about 6 percent following the reforms whereas prices for "Expanded Basic" service were relatively unchanged. We also undertook a sample-split (triple differences) test that distinguishes between communities located next to overbuilders and communities that did not have an overbuilder nearby. We find that local markets which faced a greater threat of entry because of the proximity of an overbuilder experienced larger declines in prices, as well as increases in number of subscribers, for both "Basic" and "Expanded Basic" services.

Reviewers of our work at a top-rated academic journal strongly urged us to obtain additional data to verify that our results were not being driven by potential data quality concerns with respect to the Warren's data.

Accordingly, we are requesting the FCC to provide us with the micro (community-level/ county-level) data that the FCC collected through its surveys of cable industry prices in years 2004 to 2010, both years inclusive. Specifically, we would like to know: the (1) price and (2) number of subscribers offered for (a) the "Basic" and (b) "Expanded Basic" tiers of service for each community that the FCC surveyed in any of these seven years, with information about the geographic location.

Need for geographic identifiers: It is essential for us to have community-level identifiers because, as explained above, we found the strongest pro-competitive effects of the deregulation in communities close to overbuilt communities within states where the deregulation reforms took place. Thus in our analysis of the FCC data, we wish to specifically analyze communities located next to overbuilt communities, and this is not possible without geographic identifiers. For example, we find that WideOpenWest LLC, one of the largest overbuilders, has a presence in Wayne County, Michigan and we would like to distinguish between the effects of the deregulation in communities near the overbuilder from other communities in the state where no overbuilders are located close by.

Need for data on number of subscribers: We request data on number of subscribers for two reasons. One, if the price declines were indeed meaningful, we should see this manifest in the form of changes in the number of subscribers. Two, and more importantly, the estimate of potential consumer welfare gains from lower prices depend crucially on the number of subscribers impacted by the price decline.

Strong policy and public-interests benefits from our research:

We believe that our analysis will be valuable to an informed discussion and debate around the regulation of cable TV in this country. The reforms that we study, allowing for the provision of a single state-wide franchise, represent the most significant change in public policy in this area since the Telecommunications Act of 1996. However, until our initial study using the Warren's data, there has been little systematic evaluation of their effects, and the anecdotal evidence that exists suggests a mixed picture. Our evaluation is particularly relevant for policy makers, as this reform is yet to be adapted in all states of the U.S.

In addition to providing results of direct policy interest, studying these reforms provides a unique opportunity to examine the effects of a reduction in barriers to entry on incumbent behavior. As several FCC reports (e.g. FCC 05-13 pg. 19 & FCC 07-206 pg. 22) note, the largest declines in prices arise in the event of a direct head-to-head competition between wireline providers. Our study will shed light on whether the increase in threat of entry following the enactment of these franchising reforms also provide a sufficient incentive for incumbents to reduce prices and/ or improve channel line-up. We can furthermore compare the resulting improvement in consumer welfare with the gains in consumer welfare that arise from direct head-to-head wireline competition.

To summarize, our work will help inform state policy makers craft welfare-enhancing reforms and assist the FCC in serving the public interest. We request that any associated fees be categorized appropriately.

Thank you for your assistance, and please do not hesitate to contact me if further information is necessary to complete this request.

Sincerely,
Jagadeesh Sivadasan

Under section 623(k) of the Communications Act of 1934, as amended by the Cable Television Consumer Protection and Competition Act of 1992 (Cable Act), the FCC is required to publish annually a statistical report on average rates charged by cable operators for basic service, other cable programming, and cable equipment. Data from the surveys referred to above are used in constructing these annual reports on cable industry prices. The data from the 2004 and 2005 surveys were used in generating the 2006 report (FCC 06-179). The data from years 2005, 2006, 2007, and 2008 were used in constructing the 2008 report (DA 09-53) while data from years 2008 and 2009 were used in constructing the 2009 report (DA 11-284). Lastly, data from years 2009 and 2010 were used in constructing the 2010 Report (DA 12-377).

Maximum Fee: 500

Is the requester entitled to a restricted fee assessment? Yes

If Yes Give Reasons for Inspection: My collaborator and I are employed by educational institutions (Collaborator - Sutirtha Bagchi at Villanova University & myself - Jagadeesh Sivadasan at the University of Michigan, Ann Arbor) and we seek to obtain these data for purposes of academic research. We certify that any information obtained through this Freedom of Information request will not be used for furthering commercial interests for either of us. We are furthermore prepared to share the analysis based on these data with the FCC.

Any Additional Information and/or Comments: We kindly request the data in database format, if possible as this will be very helpful to us for undertaking statistical analysis of the data. Please feel free to call me if you have any questions about this request.

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