

Whereas, we believe in full disclosure of Charter’s and indirect lobbying activities and expenditures to assess whether Charter’s lobbying is consistent with its expressed goals and in stockholders’ best interests.

Resolved, the stockholders of Charter request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by Charter used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. Charter’s membership in and payments to any tax-exempt organization that writes and endorses model legislation.
4. Description of management’s decision-making process and the Board’s oversight for making payments described in sections 2 and 3 above.

For purposes of this proposal, a “grassroots lobbying communication” is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. “Indirect lobbying” is lobbying engaged in by a trade association or other organization of which Charter is a member.

Both “direct and indirect lobbying” and “grassroots lobbying communications” include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee or other relevant oversight committees and posted on Charter’s website.

Supporting Statement

Charter spent \$58,985,000 from 2010 – 2019 on federal lobbying. This does not include state lobbying expenditures, where Charter also lobbies but disclosure is uneven or absent. For example, Charter had at least 310 lobbyists in 28 states in 2019 (followthemoney.org) and spent \$1,595,285 on lobbying in New York for 2017 and 2018.

Charter serves on the board of NCTA - The Internet & Television Association, which spent \$160,250,000 on lobbying from 2010 – 2019, and is a member of Broadband for America, which was behind a campaign that “misappropriated names and personal information as part of a bid to submit more than 1.5 million statements favorable to their cause” to the FCC on net neutrality.¹ Charter does not disclose its memberships in, or payments to, trade associations, or the amounts used for lobbying. And Charter does not disclose membership in or contributions to tax-exempt organizations that write and endorse model legislation, such as belonging to the American Legislative Exchange Council (ALEC).

We are concerned that Charter’s lack of lobbying disclosure creates reputational risks when its lobbying contradicts company public positions. For example, Charter states that it is committed to an open internet, yet NCTA lobbied against net neutrality.² And Charter’s ALEC membership has drawn press scrutiny,³ and over 110 companies have publicly left ALEC.

¹ <https://www.buzzfeednews.com/article/jsvine/net-neutrality-fcc-fake-comments-impersonation>

² <https://readsludge.com/2018/06/11/today-net-neutrality-officially-dies/>

³ <https://www.prwatch.org/news/2018/11/13428/att-drops-alec-hosting-hate-speech>

We believe the reputational damage stemming from this misalignment harms long-term value creation by Charter, which has been named to several “America’s Most Hated Companies” lists.⁴ Therefore, we urge Charter to expand its lobbying disclosure.

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https://buffalonews.com/business/local/how-can-spectrum-one-of-americas-most-hated-companies-justify-rate-hikes/article_7c1377a0-5a58-59f3-95c0-170e43210ac2.html