# Comcast Rebuttal Playbook – Kitsap County

# 1) "We've upgraded Kitsap's network."

- 1998 Kitsap Comprehensive Plan: TCI was obligated to upgrade to 54 channels and lay fiber; serving 15,156 households [ref].
- 1994 Franchise Agreement: Framework for service, PEG, interconnect, and upgrade provisions [ref].
- No public record of a countywide modern rebuild (redundancy, failover) since Comcast took over.

# 2) "The 2024 outage was just a random cut — that happens to everyone."

- News reports document Kitsap-wide impacts.
- Bainbridge Island Library kept service only because it's on KPUD fiber a public network [ref].
- One cut shouldn't take out much of a county if redundancy existed.

#### 3) "We invested heavily across Washington."

- Fine, but Kitsap is the question.
- Comprehensive plan shows obligations, outage shows fragility.
- If Comcast rebuilt here, they can show engineering records.

# 4) "We brought multi-gig and DOCSIS mid-split to Kitsap."

- These are spot expansions, not a countywide rebuild.
- Legacy coax still fragile, outage proves it.

#### 5) "We've complied with franchise obligations."

- 1994 franchise lays out future upgrade provisions and oversight [ref].
- Ask: where is county's acceptance of completed upgrades and redundancy docs?

#### 6) "Ownership history is complicated."

- 2001: AT&T; Broadband acquired Northland Bainbridge system [ref].
- 1994: TCI franchise covered unincorporated county, 15-year term [ref].
- 1998: County appendix shows TCI 15,156 households; Northland 980 [ref].

### 7) "If we leave, who serves Kitsap?"

- During 2024 outage, KPUD-connected facilities stayed online.
- Public broadband already proven resilient.

#### **Suggested One-Liners**

- "Kitsap told the cable operator to lay fiber and upgrade back in 1994–1998. Show us the county's acceptance that those upgrades were completed." [ref]
- "If the plant were modern and redundant, a single line cut wouldn't knock out so much of the county." [ref]
- "The last clear county record shows 15,156 households with fiber/channel upgrade obligations; where's the proof of a rebuild since?" [ref]

# **Keep Out (Until Sourced)**

- Exact dollar counts of Comcast statewide spend \*in Kitsap\*.
- Any claim that \*every\* household was out in 2024 stick with "much of the county."