KNOLOGY®

Phone Internet Cable

August 8, 2008

Hon. John D. Dingell, Chairman
U.S. House of Representatives
Committee on Energy and Commerce
Washington, DC 20515-6115

Hon. Joe Barton, Ranking Member
U.S. House of Representatives
Committee on Energy and Commerce
Washington, DC 20515-6115

Hon. Edward J. Markey, Chairman
U.S. House of Representatives
Subcommittee on Telecommunications
and the Internet
Washington, DC 20515-6115

Hon. Cliff Stearns, Ranking Member
U.S. House of Representatives
Subcommittee on Telecommunications
and the Internet
Washington, DC 20515-6115

RE: Internet Advertising Inquiry

Gentlemen:

Thank you for your August 1, 2008, letter related to the practice of tailoring Internet advertising based upon consumers' Internet search, surfing, or other use. I am pleased to respond on behalf of Knology, Inc.

Knology is a small competitive broadband provider operating predominantly in tier 2 and tier 3 markets. Knology provides Internet connectivity, cable television, and telephone service to small cities, towns and rural areas in Georgia, Alabama, Florida, Tennessee, South Carolina, Iowa, Minnesota, and South Dakota. Knology works hard to ensure that it remains a trusted name in the communities it serves, as well as to its employees, business partners, and competitors. As a result of this focus, we received the Better Business Bureau's Torch Award in Marketplace Ethics in 2006, selected among more than 1000 North American entrants.

Knology recently worked with NebuAd in a trial of NebuAd's behavioral advertising system. Knology does not have the technical capability to implement such a system, and can not and does not otherwise correlate its customers' Internet use in order to deliver targeted advertising.

Before starting the NebuAd trial, we endeavored to understand NebuAd's system and its guarantees of privacy for our customers. Importantly for us, the NebuAd system can not correlate any data it processes or interest summaries it constructs with our customers' personal information. Knology did not provide NebuAd access to any Knology system which stores personally identifiable information, and did not otherwise provide to NebuAd any personally identifiable information from those systems. In

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working to understand the NebuAd system, we learned that the NebuAd system processes Internet surfing data automatically to construct summaries of users' online commercial interests, which it then utilized to deliver targeted advertisements. The information was anonymous and could not be traced to a particular customer. After the web surfing data is processed, it is permanently destroyed. The interest summaries are regularly and systematically destroyed after their predefined life spans of days or weeks.

After we and our legal team reviewed the NebuAd system and the processes in place to ensure our customers' privacy, we and our legal team felt comfortable that our customers' privacy would be appropriately safeguarded. We believe that Knology's testing of the NebuAd system was consistent with the FTC's proposed principles for behavioral advertising.

We notified customers of the NebuAd trial and their ability to opt out through our Customer Service Agreement. This Agreement is posted on-line on Knology's website, as well as provided to customers when initiating service with Knology. The specific notice in Knology's Customer Service Agreement, posted in advance of the trial, read as follows:

> *Knology will partner with a third party to deliver or facilitate delivery of advertisements to our users while they are surfing the web. These advertisements will be based on those users' anonymous surfing behavior while they are online. This anonymous information will not include those users' name, email address, telephone number, or any other personally identifiable information. By opting out, You will continue to receive advertisements as normal; except these advertisements will be less relevant and less useful to you. If You would like to opt out, go to:*
>
> http://nebuad.com/privacy/optout.php

The method and content of the notice were required by NebuAd as part of our testing agreement.

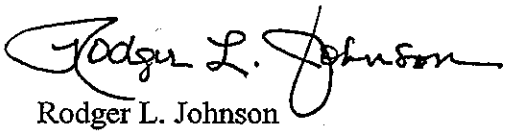
Our test of the NebuAd system began, on a limited basis, in January 2008 in West Point, Georgia, chosen due to its physical proximity to Knology's headquarters and the technical group responsible for the product test. The trial slowly expanded to Columbus, Georgia in February 2008, and to Augusta, Georgia in March 2008. The bulk of the trial was not executed until late April and early May when it was tested in Panama City, Florida and Knoxville, Tennessee, and in June 2008, when it was tested in a small part of our Huntsville, Alabama market.

Knology discontinued the trial in all markets on July 14, 2008, in order to study the issues raised about the NebuAd system by your Committee, privacy advocates, and others. After we discontinued our test last month, we were assured by NebuAd that it had destroyed all interest summaries created during the testing period. Our systems did not receive data from NebuAd or any information on interest summaries or targeted

advertising during or after the trial and, therefore, we are unable to quantify how many customers actually received targeted advertising as a result of the trial.

Our customers' privacy is of paramount concern at Knology, and we welcome the Committee's efforts to bring clarity to this quickly evolving area. If we can be of further assistance, please let us know.

Sincerely,



Rodger L. Johnson
Chairman of the Board and CEO
Knology, Inc.