

# Exhibit C

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April 14, 2016

***Protected Settlement Communication  
Fed. Rule Evidence 408***

**VIA FEDEX**

Jeffrey Kramp  
Executive VP, General Counsel, and Secretary  
RCN Telecom Services, LLC  
650 College Road East  
Suite 3100  
Princeton, NJ 08540

**Re: *Infringement of BMG Rights Management (US) LLC's copyrights on  
RCN's network***

Dear Mr. Kramp:

This firm represents BMG Rights Management (US) LLC ("BMG") in intellectual property litigation and related matters. We write concerning the infringement of BMG's copyrights using the RCN network.

As you know, BMG, through Rightscorp, has for years notified RCN of pervasive infringement of BMG's copyrights through its network. Rightscorp has sent RCN infringement notices and summary letters, detailing instances of infringement. The notices included the date and time of the infringement, the IP address and port number associated with the infringer, the hash value of the infringing content, and more. In addition, Rightscorp has emailed and called RCN, including calling Mr. Holanda twice, regarding the infringement through its network. Rightscorp has sent letters to RCN, including to Messrs. Holanda, Murphy, and Kramp, requesting to meet about the infringement. And Rightscorp has provided RCN with access to a Dashboard that allows RCN to view both historic and real time infringement of BMG's copyrighted works on its network. As a result, RCN has knowledge of the pervasive infringement of BMG's copyrights using its network. Yet, RCN has ignored Rightscorp's repeated requests for RCN to address the infringement.

The evidence shows that RCN is allowing repeat infringers to use its network to continue their infringement of BMG works even after RCN has been notified of their specific instances of infringement. Since Rightscorp began monitoring BMG's copyrights, it has identified millions

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of instances of infringement involving thousands of BMG copyrighted works using the RCN network. RCN's knowledge and allowance of unchecked infringement to occur using its network makes it liable for secondary copyright infringement and actual or statutory damages as high as \$150,000 per infringed work.

We are hopeful that a resolution of this ongoing and damaging infringement can be reached. To that end, we suggest the parties meet to discuss a settlement that would include a means of preventing or limiting future infringement and appropriate compensation to BMG.

We would appreciate your response by April 28, 2016.

Nothing in this letter is intended to waive any of BMG's rights, all of which are expressly reserved.

Sincerely,



Michael J. Allan

cc: Keith Hauprich, Esq.