

the 1992 Act,¹⁰ and they do not address a number of issues and areas that should be addressed. The standards adopted by the Commission must be quantitative and measurable in order to have meaning and enforceability.

The chart attached to these comments (Attachment A) compares the NCTA standards to consumer protection standards to which cable systems of various sizes in eight jurisdictions¹¹ have agreed. Local Governments believe that the Commission should consider such regulations in crafting its customer service standards. As the chart shows, the NCTA standards are, for the most part, considerably less stringent than those in place in several jurisdictions in a number of significant areas -- such as telephone service requirements, walk in office hours, handling of service calls, service call scheduling, service of outages and billing disputes.

In addition, out of the 29 standards outlined on the chart, the NCTA standards address only 12.

¹⁰ See House Report at 36.

¹¹ The information in the attached chart is based upon ordinances and franchise agreements provided to Local Governments by various franchising authorities. The standards for the District of Columbia were proposed by the franchising authority. The attached chart also compares the NCTA standards to the standards promulgated by the New York State Commission on Cable Television, which is the agency responsible for overseeing cable television in the State of New York.

Significant issues, such as customer service representative/employee identification, credits for missed service calls, outages and reception problems and resolution of service-related disputes, are not addressed at all in the NCTA standards.

2. Commission Standards Should Contain Specific Definitions

The NCTA standards are also vague. There are a number of terms, as the Commission noted in its NPRM, that require very tight definitions. For example, the term "normal business hours" is used in the NCTA standards to describe the period during which company representatives are to be available to respond to customer telephone inquiries. Normal business hours for a service industry should not be the same as general office hours. The term needs to be defined with much greater specificity. The hours should be stated with specificity (e.g., between the hours of 8 a.m. to 7 p.m. on weekdays and specific weekend hours).

Another example of a definitional problem evident in the NCTA standards is the reference to response time. For example, Section 2.B of the NCTA standards requires a cable operator to "respond to service interruptions promptly and in no event later than 24 hours." Other service problems are to be "responded to within 36 hours during the normal work week." It is not clear whether,

under this standard, if a customer service representative or employee takes information from the subscriber by telephone of the service problem within the requisite period or contacts the subscriber without attempting to correct the service problem during the requisite period, the cable operator has complied with the standard. On the other hand, the standard could be interpreted to require the cable operator to correct the service problem within the requisite period. Any standards adopted by the Commission should not contain such ambiguity.

Another ambiguity is worth noting in the NCTA standards. Section 2.C provides that the appointment window for installations and service calls shall be in the morning, afternoon or all day during normal business hours. If a cable operator provides installations all day during normal business hours, and does not allow an alternative of morning or afternoon windows, it appears that it will be in compliance with the standard. Such a result does not protect consumers or give them a choice.

3. Local Governments' Recommended Standards

A second chart attached to these comments (Attachment B) briefly describes what Local Governments believe should be the appropriate customer service standards to be adopted by the Commission in each area

addressed in Attachment A.¹² Local Governments believe that the attached standards, in abbreviated form, are more comprehensive than those of the NCTA and will ensure a reasonable level of customer service.

The attached standards are also more specific than the NCTA standards. For example, they do not use vague terms like "normal business hours" to describe the period during which company representatives must respond to customer telephone inquiries. That term does not account for the fact, as the Commission notes in the NPRM, that the highest levels of television viewing occur outside of "normal business hours." In fact, each of the jurisdictions listed in Attachment A has a more comprehensive standard in place, providing for extended hours of availability and/or answering or automated response services on a 24-hour (and sometimes toll-free) basis. Thus, the NCTA standard does not adequately address the difficulties that subscribers have had in communicating with their local cable operators, which, as the Commission notes in the NPRM, citing the legislative history of the 1992 Act, have been an area of consumer discontent.

¹² Local Governments intend to submit a more refined set of standards together with an appropriate definitions section to the Commission with its reply comments, after it has received the comments of others.

The Commission's rules, as recommended by Local Governments in Attachment B, should allow subscribers to receive credits for cable service in the event the cable operator fails to keep a scheduled installation or service repair appointment,¹³ as several cable operators have agreed to do in jurisdictions listed in the chart attached hereto. The provisions for credit to cable subscribers provide significant incentives to cable operators to be prompt and not to unduly inconvenience subscribers.

Local Governments urge the Commission to ensure that the rules it adopts will be specific enough to ensure uniformity and ease of compliance and enforcement by cable operators and local franchising authorities, respectively.

4. Administration by Local Franchising Authorities

In the NPRM, the Commission seeks comment on whether it is appropriate for local authorities to be responsible for setting time frames in which to comply with standards, oversee compliance and determine how

¹³ Local Governments urge the Commission to consider the implications for a subscriber if a cable operator fails to keep a scheduled installation or service repair. Often a subscriber takes time off work to meet the installer or repair person. A credit for cable service is very little compensation for the amount of time and frustration experienced by a cable subscriber in those circumstances.

compliance should be measured, establish penalties for violations of the standards or impose specific billing and collection procedures.

Local Governments believe that it is not only appropriate but essential for local franchising authorities to be responsible in these areas. Such an approach is consistent with local franchising authorities' historic and continuing role in overseeing the franchising process and the cable operator's compliance with the terms and conditions of the franchise. This role is contemplated by the Cable Act in other key areas, such as renewal.¹⁴ As a practical matter, most franchises establish penalties for violations of provisions of the franchise, which include a cable operator's obligation to comply with applicable law. And many franchises contain default and revocation provisions for a cable operator's failure to so comply. It is imperative that franchising authorities continue to have these remedies available, and be able to

¹⁴ Section 626(c)(1) of the 1984 Act allows a cable operator to consider whether the "cable operator has substantially complied with the material terms of the existing franchise and with applicable law." In addition, Section 626 of the 1984 Act directs local franchising authorities to consider at renewal whether the "quality of the operator's service, including . . . response to consumer complaints and billing practices . . . has been reasonable in light of community needs." 47 U.S.C. § 626(c)(1)(B).

exercise such remedies if a cable operator fails to meet its customer service obligations.

B. Relationship of Commission Standards to Other Provisions of 1992 Act

In the NPRM, the Commission seeks comment on the impact of the billing refund provisions in Section 8 of the 1992 Act on other provisions of the 1992 Act, specifically the rate rollback and refund provisions in Section 3 and the subscriber bill itemization provision in Section 14 of the 1992 Act.

Local Governments believe that the customer service standards adopted by the Commission pursuant to Section 8 can easily be administered in a manner consistent with the regulations established pursuant to Section 623(C)(2)(c) of the Communications Act, as amended by the 1992 Act, regarding rollbacks and refunds of rates for cable programming services. The Commission should ensure that its rate regulation rules as well as its consumer protection standards will enhance the local franchising authorities' ability to fashion a wide range of remedies with maximum discretion to ensure that the purposes of the 1992 Act are realized. Similarly, the customer service standards established by the Commission should allow franchising authorities maximum discretion to impose specific billing and refund procedures. The customer service standards and procedures to be

established by the Commission do not constitute rate regulations and should not be limited by the rules promulgated by the Commission pursuant to Section 3 of the 1992 Act.

At the same time, however, the Commission standards adopted pursuant to Section 8 of the 1992 Act should address more than rollbacks and refunds of rates. Section 8 requires the Commission to establish requirements governing communications between the cable operator and the subscriber regarding standards governing billing and refunds; this mandate is considerably broader than the requirement in Section 3. The Commission standards adopted pursuant to Section 8 should include, but not be limited to, provisions addressing billing dispute procedures and requiring a minimum time frame after which a bill has become overdue before which a late charge may be imposed, limitations on the amount of late charges and credits for service outages and missed service calls.

With regard to subscriber bill itemization, which is permitted by Section 622(c) of the Communications Act, as amended by the 1992 Act, Local Governments urge the Commission to adopt customer service requirements to ensure that subscribers have full, complete and accurate information.

Often cable operators characterize franchise fees payable to local franchising authorities on a subscriber's bill as a tax levied on the subscriber's service by the franchising authority, as opposed to a percentage of the cable operator's gross revenues received in connection with its operation of the cable system in the particular jurisdiction. Local Governments believe that this type of presentation on a subscriber's bill is extremely misleading.

Local Governments must be authorized to review subscriber bills to ensure that the information provided to subscribers is not misleading. Local Governments urge the Commission to adopt consumer protection standards to ensure that cable operators itemize each service and/or equipment provided to a subscriber and that all aspects of a subscriber's bill, including the itemization of those amounts permitted by the 1992 Act to be itemized, be direct, clear, easily understandable, and not misleading.¹⁵

¹⁵ Attached as Attachment C to these comments is a Statement of Policy issued by the New York State Commission on Cable Television ("CCT") addressing this issue in detail. The CCT recently proposed adopting a rule to prohibit the practice of characterizing franchise fees on subscribers' bills as a direct charge levied on subscribers. See Notice of Proposed Rulemaking released November 14, 1992 in Docket No. 90389-A.

C. Minimum Service Ranges Approach

Local Governments urge the FCC not to adopt minimum service obligations based on certain characteristics of a cable system or service ranges within which franchising authorities and cable operators may negotiate. First, such an approach would not be consistent with the statute. Under the 1992 Act, a franchising authority may establish standards that exceed those established by the Commission. A "range" approach suggests a Commission-controlled "upper" limit.

Second, as discussed in Section II.A.1 of these comments, it is crucial for the Commission to adopt a reasonably strong set of specific protection standards to ensure cable subscribers a high quality level of cable service. A range of minimum service obligations would not adequately ensure that cable subscribers receive an acceptable level of service and it would require each of the 8,000 or so franchising authorities to hold hearings to determine which specific rules to adopt.

Third, as discussed in Section II.E of these comments, under the 1984 Act, franchising authorities could establish and enforce customer service standards. Yet, as Congress noted in the legislative history of the 1992 Act, customer service is a significant problem. If

the Commission were to adopt a "minimum" approach, the result would likely be that customer service would continue to be a significant problem and that one of the key purposes of the 1992 Act would not be effectuated.

D. Benchmark Approach

Local Governments urge the Commission to establish a tough benchmark of customer service standards that cable operators must be required to meet. The requirement that the cable operator would be required to adhere to the Commission standards would be subject to the three exceptions described above: e.g., the franchising authority determines to waive the FCC standards in favor of less stringent standards; more stringent standards are already in place; or a franchising authority promulgates more stringent or different standards. Such an approach -- following a single benchmark of standards, but subject to the enumerated exceptions -- would allow the Commission's standards to be tailored to meet the needs of local communities by the local community, where appropriate. It would also allow those entities in the best position to determine those needs -- local franchising authorities -- the ability to enforce and waive, if necessary, the federal requirements, with ultimate oversight authority resting with the Commission.

In the NPRM, the Commission also seeks comments on whether an escalating benchmark that would increase the "service minimums" over time is appropriate. Local Governments strongly urge the Commission not to adopt such an approach in its rules. Such an approach is a variation of the service minimums approach, which Local Governments do not believe will ultimately ensure a high quality level of customer service. Such a transition by federal fiat is not necessary.

Instead, the Commission may wish to consider a transition period during which the Commission standards become applicable to cable systems. One approach may be that the Commission rules would allow franchising authorities to grant, for a limited duration, based upon a showing of need by the cable operator, waivers of the applicability of specific rules until such time as the cable operator can comply with such rule(s). Any such waiver should not exceed one year. Such an approach would provide flexibility, would not unduly burden cable operators, and would not compromise the purposes of the 1992 Act.

IV. CONCLUSION

The Local Governments believe the approach proposed herein will ensure high quality customer

service to cable subscribers throughout the country,
and, at the same time, will provide several mechanisms
to ensure that cable operators will not be unduly
burdened.

Respectfully submitted,

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Date: January 11, 1993

ATTACHMENT A

CUSTOMER SERVICE STANDARDS

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD						
Customer Service Representatives (Working hours)	At least 12 customer service representatives available from 8:00 a.m. to 5 p.m.	Offices must be staffed a minimum of 50 hours per week, with at least 9 hours per weekday and 5 hours per Saturday.	Office must be able to respond to consumers a minimum of 54 hours per week.	Listed number should be available at all hours of day and night.	Must have toll-free number, and must be answered 24 hours a day.	Must have local telephone number available 24 hours a day, 7 days a week.
Customer service Representatives (after hours)	2 customer service representatives available from 5-7 p.m. and 8 a.m. - 5 p.m., Saturdays. Answering service other hours; service will notify technician if outage occurs.	Toll-free lines answered 24 hours either by staff or by answering service.	Telephone lines either adequately staffed or with answering capability, providing at least emergency referral information operational 24 hours a day.		Must be answered 24 hours per day.	Telephone service must be available 24 hours a day, seven days a week.

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD						
Telephone service time requirements	Hold time - less than 3 minutes. Abandonment rate - less than 20%. Busy signals - less than 15%.	Must have at least 90% responsiveness to calls at normal calling volume, meaning only 10% busy signal or delay over 1 minute.	Calls must be answered on average within 30 seconds 90% of time. Busy signals may be received a maximum of 3% of the time.	All calls answered in 4 rings by person or machine. Maximum 2 minutes hold. Abandonment rate of no more than 10%.	Minimum number of busy signals or delays possible.	85% of all calls answered within 2 minutes. Not more than 15% of calls on hold over 30 seconds shall be lost.
Walk-in office hours	Must be conveniently located, and open 8 a.m. to 7 p.m. weekdays, and 8 a.m. to 5 p.m. Saturdays	Office must be open at least 50 hours per week, with at least 9 hours per weekday and 5 hours per Saturday.	Franchise office must be able to respond to customers a minimum of 8 hours per weekday and 4 hours on Saturday.		Must have office open minimum 40 hours per week, staffed so that customers will not wait more than 15 minutes.	Must have a business office open 8 a.m.-6 p.m. Monday - Friday, Saturday 9 a.m.-6 p.m.
Customer complaint and service handling reports.	Cable operator must prepare monthly reports, including average on-hold time, abandonment percentage, and total calls per month.	Per franchisees, cable operator's annual reports must summarize complaints and telephone response statistics.		Cable operator must prepare summary of service calls and actions taken annually. Monthly report on phone calls must be provided.		Cable operators must prepare an annual report on number of phone lines, time in which calls are answered, and percentage of calls lost.
Customer service representative/employee identification			During construction, all construction personnel and equipment shall be clearly identified with the name and telephone number of the franchisee and any subcontractors.	Cable operators must identify themselves by name, and technicians must wear badges.		

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD						
Handling of service calls	Must be investigated within 24 hours and resolved as promptly as possible.	Must be acknowledged within 24 hours. Service interruption repairs must be completed within 24 hours and all other calls within 72 hours. No charge allowed for repair work unless subscriber neglects or abuses equipment.	Requests must be acknowledged within 24 hours. Verification, and if possible, resolution, must occur within 48 hours, but in any case resolution must be completed within 1 week.	Action must be taken on all non-major calls the next business day and repairs completed within 48 hours. Action on major problems must be commenced immediately.	Must be acknowledged within 48 hours, off premises repairs must be completed within 24 hours; all others within 72 hours. No charge allowed in absence of subscriber negligence or abuse.	All repair calls must be responded to within 24 hours either by telephone or by a visit to the premises. Company must resolve 80% of all repair calls within 48 hours.
Service call scheduling	Appointments must be scheduled morning, afternoon or all day.	Appointments must be made either at a specific time or within a 4 hour block.	Appointments must be made within 4 hour blocks.	Subscriber must be told whether appointment is in "a.m." or "p.m."	Appointments must be made either at a specific time or within a 4 hour block.	Company must notify if call is to be made in morning, afternoon or evening.
Credit for missed service calls			If company misses a service appointment, the subscriber must receive a \$10 credit upon subscriber request.			

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD						
Service interruption for system repair	To extent possible, work is to be performed between 4 a.m. and 6 a.m.		Interruptions greater than 4 hours may be scheduled only after city and subscribers have been given 48 hours notice.	Any service may be interrupted for repair between 1 a.m. and 7 a.m. unless notification given 24 hours ahead of time.		Should be done in early morning.
Service of outages	Repairs must be made 24 hours a day, 7 days a week.	Repairs of service interruptions must be completed within 24 hours under normal operating procedures.		Outages reported before 9 p.m. must be handled that day. Outages reported after 9 p.m. must be repaired within 24 hours beginning the next morning.		Company must dispatch technicians to outages immediately during business hours and within 30 minutes at other times.
Credit for service outages	Credit given for outages lasting more than 24 hours.	On customer request, pro-rated 24 hour credit given for any outage of 4 hours or more.	Pro-rated credit automatically given for any outage of 24 or more consecutive hours. On customer request, 1 day's credit given for any outage of greater than 4 hours in a 24 hour period.	Credit given for each loss of 24 hours of service.	24-hour credit must be provided for any outage of at least 4 hours or more in one day.	Pro-rated rebate given based on length of outage for any outage of 24 or more consecutive hours.
Credit for reception problems	Credit given based on type of trouble. Generally, full credit given for affected period.					

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD						
Installation scheduling and priorities	Company must adhere to following priorities: 1) service change for existing subscribers. 2) Disconnection for existing subscribers. 3) Installation for new subscribers.		Installation must be made within 9 calendar days of customer request, or company must give customer a \$10 credit upon request.	All requests for installation shall be completed within 10 days of the request.		Company must install cable service and provide requested service changes to existing customers within 10 business days of the original request.
Billing and billing disputes	2 cycles beginning on 1st and 16th of month. Late fee assessed if payment not received by cut-off date.	Bills must be itemized		Bills must be sent monthly.	Bills must be itemized.	In cycles; monthly in Mecklenburg County. Company must provide information on billing annually to customers, and must give 30 days prior notice of any changes to the billing process.
Late charges	Company may impose a late fee for bills not paid by due date.			Late payment charges must be clearly stated on bills and must be included as part of information provided to subscribers.		

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD Resolution of service-related disputes		Company must semi-annually provide notification to all customers that they may refer unresolved disputes to the City Cable Office.	The company, at least twice a year, must give written notice that the city telecommunications department will address complaints not satisfactorily handled by the company. Department checks notice prior to forwarding to subscribers.	Cable Agency may investigate unresolved complaints and may order corrective action as appropriate.		Company must respond to complaints within 7 days. The city may review and monitor unresolved customer complaints.
Involuntary disconnection	Accounts 45 days overdue are disconnected. Company must provide two notices prior to disconnection, 15 days and 10 days prior to date service can be disconnected.	Accounts 30 days overdue with minimum 10 days notice; or if subscriber tampers with equipment.			Accounts 30 days overdue, with minimum 7 days notice; or if customer tampers with equipment.	Company must provide 7 days' notice prior to disconnection.

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD Voluntary disconnection		No notice to company required. No charge allowed and deposit must be returned within 10 working days. Company may either pick up equipment or provide postage prepaid mailers.	Company must refund all surpluses on account within 45 days after disconnection or give \$10 to subscriber in addition to surplus.	Customer may request disconnection at any time without charge. Disconnection must occur as soon as possible, but no later than 30 days following the request.	No notice to company required, and no charge allowed. Refund of deposit must be made within 45 days after all equipment returned. Replacement of equipment must be made at the subscriber's residence by the next working day.	No charge allowed, and must be disconnected within 15 days of request. Any refunds due must be paid within 60 days of termination date.
Notice of rate changes or programming changes or deletions		10 days notice to city and subscribers of programming changes or deletions, or of rate increases.	30 days notice must be given for rate changes or channel scrambling, realignment, or deletions.		At least 10 days notice to customers of programming changes or deletions, and 30 days' notice to customers of late increases.	Any change in programming or services must be reported to the city at least 30 days prior to implementation.
Provision of cable service information to customers		Upon installation, company must provide customer with service and rate information and semi-annually send notice of complaint procedures.	Before installation, company must provide information on rates, notices, and procedures for resolving complaints.	Company must provide information on billing and service complaint mechanisms.	Company must upon installation provide information on company policies.	Company shall provide all subscribers with complete information on services and rates.

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
STANDARD						
Distribution of promotional materials to subscribers		All pay-per-view and other promotional materials must clearly disclose price terms.		Promotional materials must include costs and terms of the described promotions.		
Services to disabled people		Must provide necessary facilities, including TDD/TTY and remote control.	Company must provide remote control devices to disabled persons, and must utilize TTD equipment.		Must provide necessary facilities including TDD/TTY and remote control.	

FRANCHISING AUTHORITY	St. Louis, Missouri	Portland, Oregon	Los Angeles, California	Mt. Prospect, Illinois	Vancouver, Washington	Charlotte/Mecklenburg North Carolina
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STANDARD

MISCELLANEOUS STANDARDS

Customer surveys and research		Per franchisees, company must conduct customer satisfaction surveys (city also does annual survey).		Company must conduct customer satisfaction surveys.		Company must research customer needs on an ongoing basis.
Service technician availability	Available 8 a.m. - 7 p.m., Monday - Friday, and 8 a.m. - 5 p.m., Saturdays. On-call for outages 24 hours a day, seven days a week.	Service and repairs must be completed in 24 to 72 hours.	Must be available 24 hours a day, 7 days a week for cable-related emergency repairs and maintenance.	Company must maintain a maintenance service capable of locating and repairing malfunctions at all hours.		

CUSTOMER SERVICE STANDARDS

FRANCHISING AUTHORITY	Sacramento, California	District of Columbia (Proposed)	Manhattan, New York	New York State	NCTA SUGGESTED STANDARDS
STANDARD					
Customer Service Representatives (Working hours)	24 hour toll-free access required with customer service representatives. Company with less than 30,000 customers can use an answering service.	Must have local telephone numbers answered 24 hours a day, 7 days a week. The lines may be answered by a service or automated response service.	Local number, answered 24 hours a day, 7 days a week. Can be answered by a service outside normal business hours.	Companies must have a telephone number to which subscribers may direct telephone calls. If trouble calls must be made outside of the local dialing area, the calls must be toll-free.	Company representatives must respond to telephone inquiries Monday-Friday during normal business hours.
Customer service Representatives (after hours)	Companies may use an answering service between midnight and 7 a.m. and on national holidays.		Telephone number may be answered by a service outside of normal business hours.		Systems will be staffed after hours based on community needs.
Telephone service time requirements	Answer time must not exceed 30 seconds, and busy signals should not occur more than 3% of the time. These standards should be met at least 90% of the time.	Calls answered in 4 rings. Lost calls not to exceed 4-1/2%. Maximum 30 second hold. Overflow device, triggered by no more than 20% of calls.	Company must maintain a state-of-the-art telephone system. Calls answered in 4 rings. Lost calls not to exceed 4-1/2%. Maximum 30 second hold. Overflow device for customers to leave messages triggered by a maximum of 20% of callers.		Answer time not to exceed 30 seconds. Rings will be limited to four. Busy signals less than 3% of time.

FRANCHISING AUTHORITY	Sacramento, California	District of Columbia (Proposed)	Manhattan, New York	New York State	NCTA SUGGESTED STANDARDS
STANDARD					
Walk-in office hours	Company must have office open at least 9 hours per business day, and for companies with over 30,000 customers, at least 5 hours on the weekend.	Company must have one office in each city quadrant. These must be open 8 a.m.-7 p.m. weekdays and at least 5 hours on Saturday.	Service centers must be open 8 a.m. to 7 p.m. weekdays and at least 5 hours on Saturday.		Centers must be open Monday-Friday during normal business hours. Companies will schedule additional hours based upon community needs.
Customer complaint and service handling reports	Company must provide quarterly telephone statistics on busy signals and response time.	Company must compile a monthly report of telephone efficiency, and monthly reports on repairs and outages handled.	Company must compile a quarterly report detailing customer service requests and telephone requests.	Reports on trouble calls must be filed by the companies.	
Customer service representative/employee identification	Technicians, etc. must wear picture badges. All representatives must identify themselves by their names and/or identification numbers.	Employees who come to customers' residences must wear uniforms and picture identifications. Other company employees must wear name badges.	Employees who come to customers' residences must wear uniforms and picture identifications. Other company employees must wear name badges.		
Handling of service calls	Complaints of poor quality must be responded to within 16 business hours. No charge permitted for service calls.	Calls must be returned within 1 business day. Reception problems must be corrected within 48 hours after complaint is received. No charge allowed.	Reception problems must be corrected within 48 hours after complaint is received. No charge for repair service is allowed.	Investigative action on trouble calls should be initiated the same day, but shall be initiated no later than the next business day.	General service problems must be responded to within 36 hours during the business week.

AUTHORITY	Sacramento, California	District of Columbia (Proposed)	Manhattan, New York	New York State	NCTA SUGGESTED STANDARDS
STANDARD					
Service call scheduling	Company must respond to service call at either a specific time or within a four hour time block.	Service calls must be made within 5 hour segment. The company may not cancel any appointment less than 24 hours before the appointment time.	Appointments can be made in 5 hour blocks. The company may not cancel any appointment less than 24 hours before the appointment time.	Appointments must be made either for morning, afternoon, evening or Saturday.	Appointments must be scheduled during morning, afternoon, or all day.
Credit for missed service calls	For a failure to meet an appointment within the specified parameters, the company must, at the customer's discretion, give either credit for 1 month's free basic service or an opportunity to seek remedies under the California Code.	Failure to make a service call within specified 5 hour block entitles subscriber to credit for 1 month's service.	Failure to make a service call within specified 5 hour period entitles subscriber to credit for 1 month's service.		
Service interruption for system repair		Company must give at least 48 hours notice, and should not interrupt service except between 1 a.m. and 7 a.m.	Company must give notice of interruptions at least 48 hours in advance.	Companies must inform subscribers in advance of any scheduled service outage for equipment repair.	
Service of outages	System outages must be responded to within 2 hours, 24 hours a day. For isolated outages, response must be made within 8 business hours.	Outages must be corrected within 12 hours after the company learns of them.	Outages must be corrected within 12 hours after the company is notified.		Service interruptions must be responded to promptly, in no case later than 24 hours.