

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Cable Television Technical and Operational
Requirements

MB Docket No. 12-217

**REPLY COMMENTS OF THE MT. HOOD CABLE REGULATORY COMMISSION
Representing Multnomah County and the
Cities of Gresham, Fairview, Portland, Troutdale and Wood Village, Oregon**

I. INTRODUCTION

The Mt. Hood Cable Regulatory Commission (“MHCRC”) submits these reply comments to express its support for the comments of the National Association of Telecommunications Officers and Advisors (NATOA) and to urge the Commission to adopt the proposed cable performance and technical standards rules¹ with the modifications to the rules recommended by NATOA. Contrary to claims by the industry, there is a need for new cable performance and technical rules. Subscribers have filed numerous complaints about digital cable service with our local jurisdiction.

The MHCRC was created in 1992 when the City of Portland, Oregon agreed to consolidate its cable regulatory program and staffing with the already-existent (since 1982) joint cable regulatory program of Multnomah County and the cities of Gresham, Troutdale, Fairview, and Wood Village, Oregon. (“collectively, with Portland, the “MHCRC Jurisdictions”). The MHCRC advocates for and protects the public interest in the regulation and development of

¹ *Cable Television Technical and Operational Requirements*, Notice of Proposed Rulemaking, MB Docket No. 12-217, FCC 12-86 (rel. Aug. 3, 2012).

cable communications systems, resolves cable subscribers' concerns, and facilitates the planning and implementation of community uses of cable communications technologies that make use of the public rights-of-way. The Commission is a partnership of six jurisdictions within Multnomah County, Oregon and comprises the majority of the Portland media market.

Our community is primarily served by Comcast with substantially fewer customers served by Frontier and Reliance Connects. Comcast is decommissioning its analog services and this transition will be complete in the MCHRC franchise area in March 2013.

Complaints Data. In the past few months, we have received at least 4 subscriber complaints about digital television service quality. Below is a summary of the complaints we have received:

#1 Subscriber reports loss of digital television service without an explanation or reason for the loss of service 11/5/2012.

#2 Subscriber reports sporadic, unreliable digital television service (e.g. pixelation, tiling, blanking, sporadic sound) 11/15/2012.

#3 Subscriber reports sporadic, unreliable digital television service (e.g. pixelation, tiling, blanking, sporadic sound) 11/28/2012.

#4 Subscriber reports sporadic, unreliable digital television service (e.g. pixelation, tiling, blanking) 12/19/2012.

In our experience, there are likely more problems with signal quality than have been reported to our office. That is because subscribers usually call the cable television provider first to report complaints and not everyone who has a complaint contacts our office, even if the cable television provider is unable or unwilling to resolve the issue.

Subscriber complaints are entered into a database, emailed to the cable provider and monitored for progress. The cable provider typically emails a final outcome which is logged into our database.

The cable provider is initially responsive but in two of four instances the technician was unable to find trouble during a brief visit compelling subscribers to file additional complaints. The cable provider reports remote monitoring of these sites, however issues remain unresolved.

We believe our efforts to address these types of technical complaints with the cable company would be more effective if the Commission would issue up-to-date technical standards.

In summary, we strongly believe that in order to ensure that high-quality digital transmissions are provided to consumers, the Commission must adopt updated rules. Thus, we urge the Commission to adopt the proposed rules, with the changes described in NATOA's filings.

Respectfully submitted,

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January 25, 2013

cc: Steve Traylor, Executive Director, National Associations of Telecommunications Officers and Advisors