

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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)	CG Docket No. 24-472
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Strengthening Customer Service in the)	
Communications Industry)	
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REPLY COMMENTS OF 15 STATE ATTORNEYS GENERAL

I. Introduction

The undersigned State Attorneys General (“State AGs”) submit these Reply Comments in connection with the Notice of Inquiry issued by the Federal Communications Commission (“FCC”) under the above-referenced docket. The Notice of Inquiry seeks information and comment regarding ways to ensure that consumers have appropriate access to customer service resources they require to interact with their service providers in a manner that allows them to efficiently resolve issues, avoid unnecessary charges, and make informed choices regarding the services they receive from those providers.

Every day, State AGs hear from consumers about deceptive, confusing, and unfair interactions with service providers mentioned in the Notice of Inquiry – including cable operators, Direct Broadcast Satellite (DBS) Provider Services, voice and broadband service providers. Our offices regularly mediate, and/or initiate investigations with respect to the most

concerning of these complaints, under the state Consumer Protection Laws that we are charged with enforcing.¹

We applaud the FCC for filing the Notice of Inquiry and initiating a dialogue regarding this complex, multi-faceted set of customer service issues. While we do not comment on the jurisdictional issues addressed in the Notice of Inquiry, we are always pleased to be able to share our experience with these issues, with the goal of improving the lot of the consumers.

While all of the topics raised in the Notice of Inquiry resonate with our experiences, set forth below is our reply regarding several of the issues raised in the Notice of Inquiry.

II. Cable Customer Service Requirements should be Extended to DBS, voice and Broadband Service Providers

In ¶31, the FCC asks if they should consider extending cable customer service requirements to DBS, voice, and broadband service providers. Our response is that such extension should be considered. As technology has developed, there are fewer distinctions that can be drawn between customer service needs related to cable companies and those of DBS, voice, and broadband service providers. The rules outlined in ¶ 30 relating to the need to provide trained representatives, limited wait time, and convenient customer service center and bill payment locations should apply to DBS, voice and broadband service providers. As a general matter, State AGs receive complaints regarding customer service provided by all these types of providers relatively evenly. Thus,

¹ For example, since 2015, the Attorneys General of West Virginia, New York, Nevada, Pennsylvania, Washington, and Minnesota have brought enforcement actions against Frontier alleging that Frontier engaged in acts or practices with respect to its service to customers that were unlawful, unfair, deceptive or misleading. The FTC and several other states filed a Complaint against Frontier in the Central District of California in 2021. By way of another example, CenturyLink (now called Lumen Technologies) has also been the target of similar enforcement actions brought by a number of states, including Oregon, Arizona, Minnesota and Pennsylvania. And these are only examples -- such investigations and enforcement actions have been instituted by state attorneys general against a significant number of other providers as well.

extending the rules to a wider net of telecommunications companies would be a welcome and helpful action.

III. Training of Representatives

As a follow-on to our comments above, we note the issues consumers raise with us in this area are not limited to simple inability *to reach* a customer service representative. We also regularly receive complaints about inconsistent and/or incorrect information provided by customer service representatives of all types of service providers. Any rules put into place should include a requirement that customer service representatives be thoroughly trained and monitored, and that training should be ongoing. Poor and inconsistent interactions with customer service representatives lead to many complaints we receive.

IV. Recorded Customer Service Interactions Should be Readily Available

We suggest a recording requirement for consumer calls and that such recordings should be made available to consumers upon request. We have received complaints from consumers that regularly express frustration towards service providers that tell them previous call recordings are only released pursuant to court order, subpoena or other legal process. Service providers should be required to maintain call recordings that properly identify consumers who request such recordings, and that the recordings are promptly provided to consumers.

V. Auto-Credits are Advisable

The concept of offering consumers credits or reimbursements for various service outages and other disruptions or inconveniences is mentioned in several places in the Notice of Inquiry (e.g., Notice of Inquiry ¶ 43). All such suggested credits or reimbursements are appropriate, and

it is important to note that such credits and reimbursements should be provided *automatically*, whether or not requested by the consumer.

VI. Permitting or Encouraging a Service Fee to “Skip Waiting” is Ill-Advised

We were concerned to read about the possibility that consumers are “being asked to pay a service fee to skip call wait times.” (e.g., Notice of Inquiry ¶ 32) The practice of charging consumers a fee to “jump the line” is concerning. This practice rewards service providers for providing service that is not universally prompt, and it negatively impacts those consumers who are unable to pay the fees, and/or who have commitments that do not allow them to spend extended periods of time waiting to speak to a customer service representative.

VII. Many Complaints Related to Missed Service Appointments

¶ 41 and ¶ 42 address standards for service calls. Missed or severely delayed service calls are the focus of many consumer complaints received in our offices with respect to telecommunications providers. This area must be addressed, especially because existing requirements are often not met. Some service providers do offer options for service times outside of normal business hours, and this practice should be encouraged.

VIII. Conclusion

The initiatives and proposals set forth in the Notice of Inquiry would be helpful in improving customer service for cable operators, DBS providers, voice service providers, and broadband service providers. This Reply seeks to call out certain aspects of such initiatives and proposals that are of particular concern or interest to us, based on the consumer complaints filed in our States. Although we have not opined on whether the topics of this Notice of Inquiry are

within the FCC's jurisdiction, we applaud the FCC for bringing these important and relevant concerns to the forefront.

RESPECTFULLY SUBMITTED,



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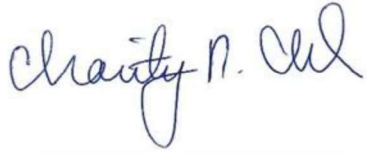
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