State of Connecticut

Office of Consumer Counsel

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The Energy and Technology Committee

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Raised Bill No. 417, AAC Call Centers And The Timely Repair Of Public Utility Poles

Testimony of Mary J. Healey, Consumer Counsel

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The Office of Consumer Counsel (OCC) has carefully reviewed Raised Bill No. 417, AAC Call Centers And The Timely Repair Of Public Utility Poles, and **supports** the bill, but proposes some revisions.

The understandable perception among consumers faced with miscommunication and lack of responsiveness by call centers well removed from Connecticut is that such companies are simply not interested in Connecticut customers. If the market is truly as competitive as some companies make it out to be, then providing personal attention to customers should be of paramount concern to them. There is no greater or easier way to provide that level of attention than to generate high satisfaction among consumers by creating a personal and positive call center experience. Not only does a bad experience cause a loss of business, but for regulated companies, satisfied customers means a reduction in complaints to regulators.

It is apparent that Voice over Internet Protocol (VoIP) services are becoming more prevalent each year as the basic system over which data and voice calls will be carried. Even E-911 will evolve to IP trunking over the next couple of years. It seems clear that such provisioning for *nomadic* VoIP will be exempt from this bill. Thus, a number of VoIP calls may not be subject to the bill's provisions. The regulatory status of *fixed* VoIP service is unsettled. Thus, the future for *fixed* VoIP regulation, whether there will be federal service quality regulation, and to what extent, remains unclear.

That said, it is clear that there are real problems concerning call center operations of all kinds being handled far from Connecticut. For instance, it has lately come to light that operations crucial to customer welfare are being handled from call centers across the US and indeed the world. For instance, network monitoring of E-911 calls originating from Connecticut customers, the most fundamental of emergency response systems, have actually been handled by two centers in India. Similarly, while Connecticut dispatch operations for AT&T are now

handled in Michigan, repair calls are handled from a center in Ohio. These moves from Connecticut-based centers are relatively recent, having been made in the last year or two.

There are also reports of call centers dispatching trucks from two separate parts of Connecticut, sometimes 50 miles or more removed from the customer site, entirely because the dispatcher had no sense of the state's local geography. This not only causes excess costs, critical in the rates charged to consumers in the case of rate-of-return companies, but also can lead to inexcusable delays in responding to customer needs.

In short, the OCC believes that the market value of promoting a local call center has a higher value in terms of customer satisfaction than the savings generated by lower wages or consolidation of call center costs. It's a question of a company regarding a high level of quality of service as being a fundamental method for generating profits from satisfied customers . . .

As for the timely repair of public utility poles, we are reminded of Senator Duff's proposed bill from the 2009 session, S.B. 597, AAC *The Timely Removal Of Double And Bare Utility Poles*, which resulted from a series of discussions with constituents that alerted the Senator to the dangers posed by poles not being timely removed from the public rights of way.

After testimony and discussion with Senator Duff and Representative Nardello, on March 6, 2009, the OCC filed a Petition to Reopen for Compliance Review with the DPUC to reopen an existing docket dealing with that problem that resulted in Docket No. 03-03-07PH01, *DPUC Review of Public Utility Structures and Poles Within Municipal Rights of Way – Reopening.* The DPUC opened that docket and directed the providers to immediately report to it on this problem. The record evidence in the Docket does not reveal any action since those reports were filed late last year.

The OCC would be happy to petition the DPUC to broaden the scope of that docket, or in its judgment, to open a new docket focused on the concerns presented by this bill. The OCC is conscious, however, that a state statute demanding more definition from the DPUC in terms of specifics for prompt replacement of utility poles might be timely in light of the many years that have elapsed since the double poles issue first arose in 2003.