

**Testimony of
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CTIA – THE WIRELESS ASSOCIATION®
In Opposition to Connecticut House Bill 5491**

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Before the Connecticut General Assembly Joint Committee on General Law

On behalf of CTIA-The Wireless Association, the trade association for the wireless communications industry, I submit this testimony in opposition to Connecticut House Bill 5491, which seeks to regulate call center operations. Wireless companies appreciate our customers' time and understand they value an efficient response to their inquiries. Accordingly, the wireless industry strives to resolve customer inquiries as quickly as possible. While we understand the objectives being pursued by HB 5491, this legislation could lead to customer inconvenience and unnecessarily burdens wireless companies' customer care operations.

HB 5491 would require call center employees located outside of the United States to disclose certain information to Connecticut residents within the first 30 seconds of a call. Instead of allowing a call center employee to resolve a customer inquiry as quickly and effectively as possible, this legislation would mandate the disclosure of information unrelated to the customer's inquiry. This would certainly lengthen the call time resulting in a delayed response and a poor customer experience. Call center employees are also trained to avoid transferring customers or having customers call multiple times to resolve their concerns. Unnecessary transfers and customer call backs are detrimental to the customer experience and will not expedite the resolution of customer inquiries, which is the ultimate goal of call center operations.

It is also unclear whether a call center employee will know when he or she is receiving a call from a Connecticut resident. Wireless providers, for example, may have no way of knowing whether a caller is a Connecticut resident. Even if providers rely on customer billing information, callers may receive their bills at out-of-state addresses but consider themselves Connecticut residents. This type of

uncertainty may lead to customer confusion and complaints and does nothing to address customers' immediate concerns.

Moreover, every call to a customer care employee has a cost. By mandating specific disclosures for Connecticut residents, HB 5491 will increase call times. It may also result in fewer calls for Connecticut residents being processed quickly and efficiently. This outcome will lead to greater costs for wireless companies without corresponding consumer benefits.

Wireless providers adhere to strict federal laws and regulations that govern the protection of their subscribers' personal information. In addition to the stringent federal requirements, wireless providers have their own internal policies to ensure the security of their customers' information. The underlying intent of HB 5491 seems to be a concern about call center employees located outside of the U.S. receiving personal information from Connecticut residents. We are not aware of data indicating that fraud is dependent on an employee's location. Any misuse of customer information is strictly prohibited no matter where the employee is located.

In addition, HB 5491 attempts to regulate out-of-state business activities and business activities in other countries. Congress is empowered to regulate commerce amongst the states to promote harmony. As such, the bill likely violates the Commerce Clause of the U.S. Constitution as it infringes on interstate commerce. This legislation may also infringe on international agreements and obligations that have been settled to prevent impediments to global trade.

In closing, the ultimate goal of the wireless industry's call center operations is to ensure that customer inquiries are effectively and efficiently addressed. HB 5491 would disrupt that goal, leading to customer inconvenience and frustration. For these reasons, we ask that you oppose this legislation.