



City of Seattle

**Community Technology
Advisory Board**
seattle.gov/ctab

**City of Seattle Community Technology Advisory Board's (CTAB)
Position Statement on Comcast Franchise Renewal**

Comcast provides cable and broadband to a majority of Seattle residents. During the franchise renewal process, there is an opportunity to build upon previous agreements and improve the relationship between Comcast, its subscribers, and the City. In particular, Comcast's

Internet Essentials service to Seattle's low income residents should be improved with added outreach and customer service by Comcast.

The Community Technology Advisory Board (CTAB), pursuant to our duty to provide recommendations to the Council and Mayor on issues of cable television and technology access, submits this statement for the Council to consider during the vote on the Comcast Franchise Renewal.

CTAB applauds Comcast, as part of the updated agreement, offering to:

- Provide an extra \$50,000 to fund the Digital Equity Initiative.
- Continue the nonprofit cable modem services (up to 350 sites).
- Add cable television service to the above nonprofit services.

CTAB recommends Comcast improve its cable channel lineup by doing the following:

1. Reflect Seattle's diverse population with channels and programming that better reflect Seattle's cultures and languages.
 - a. Adding more cultural/language programming to Limited Basic cable (the tier that Seattle's immigrant populations can typically afford) will add relevant content for customers.
 - b. Customers qualifying for the low income discount for Comcast's Limited Basic cable should have access to all multi-cultural and foreign language programming on Comcast's network. Such a commitment on Comcast's part would be supportive of the City's current effort to increase digital equity by providing tools for self-improvement.

CTAB values Comcast's Internet Essentials program and recommends that Council negotiate to improve the following items:

1. Include Seattle as a pilot site for extending Internet Essentials to low income seniors like Comcast is deploying in San Francisco and elsewhere.
 - a. Seniors on fixed incomes need the Internet to access relevant content and be connected to society and family. They need and deserve support just like low income families with school-aged children.
2. Improve ease of enrollment process for Internet Essentials applicants. At a minimum, match CenturyLink's efficient use of Lifeline eligibility criteria (SSI, Medicaid, FPHA, LIHEAP, SNAP, TANF) enrollment as qualifiers for Internet Essentials program enrollment.
3. Improve Comcast sales approach and customer service for low income and senior customers.
 - a. Ensure that all Comcast customer service and sales representatives are educated on the Internet Essentials and Low Income Limited Basic cable discount programs and are required to inform all customers of their existence as options.
 - i. Currently, Comcast representatives do not uniformly inform potential customers about the existence of the Internet Essentials program and the Low Income discount available for the Limited Basic cable tier.
 - ii. As a result, housing nonprofits report significant recurring problems with low income residents being sold higher level programming bundles by Comcast resulting in their inability to pay and leaving them in debt.
 - b. Alternatively, in order to avoid the structural conflict of interest inherent with Comcast Sales serving low income and senior customers, a simpler solution might be Comcast delegating

the outreach, registration, and first level of customer support for low income and senior populations to established city departments or nonprofit service organizations in Seattle.

- i. With the City serving as steward in setting up the cooperative service relationships and Comcast providing a funding stream, a public/ private partnership could be established with the City and Seattle's nonprofit organizations to better serve low income and senior populations, creating possible win-win for all parties to remove the impediments currently limiting the deployment and adoption of low income TV discounts and the Internet Essentials program in Seattle.
4. Provide free wifi hot spot service at some of Seattle's low income and senior housing locations and low income neighborhoods.
 - a. Providing individual connections to many low income and senior nonprofits in multi unit dwellings is logistically difficult and often cost-prohibitive for low income and senior housing providers and residents.
 - b. If Comcast provides free wifi hot spot service in common or public areas of low income and senior housing units and in public areas of low income neighborhoods, it would significantly increase digital equity in Seattle.
5. Meet the FCC definition of broadband, 25 mbps down and 4 mbps up, and continue to update the program if FCC changes the definition.
 - a. Internet Essentials' current minimal bandwidth is problematic for usage by families with school-aged children.
6. Report adoption data to the City.

CTAB believes customer service should be improved through the following measures:

1. Improve customer phone troubleshooting
 - a. Comcast's increasing reliance on out-of-Comcast network call centers in recent years, while shortening call answer times, has greatly increased tech call solution times since out-of-network call centers lack the powerful networked diagnostic tools available to in-network Comcast technical support. As solving customer's technical problems efficiently is the primary goal, we feel the turn to out-of-network tech call centers has been counterproductive and for tech support related calls and should be reversed.
 - b. Alternatively,
 - i. The out-of-network tech call centers could be equipped with the same capabilities as in-network centers.
 - ii. All tech calls that cannot be solved by the first out-of-network based technician should be automatically escalated to a fully equipped in-network technician.
 - c. Currently Comcast does not provide the Franchise Authority's City Cable Office Customer Service phone numbers and email address for customer's unresolved complaints in any of their bills, publications or website. In the interest of supporting customers with unresolved problems, we ask that Comcast make the City's Cable Office telephone and email contact information easily discoverable at all points of Comcast customer contact.
 - d. Customer service representatives should be conversant with the requirements of the City of Seattle's Cable Customer Bill of Rights.

Thank you for your consideration. With the adoption of the proposed recommendations, CTAB expresses its support for the Comcast franchise renewal.