



Dec. 4, 2007

Louise E. Rickard  
Acting Executive Secretary  
Department of Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051

Dear Ms. Rickard:

Herein please find CACSCC response to the request for comments on **DOCKET NO. 07-08-16** NOTICE OF WRITTEN COMMENTS for informal renewal of three franchises: Comcast Norwich-Groton-Vernon

It was suspected that in response to Public Act 07-253, CT cable companies would seek relief in the franchise process. The initial strategy was the request for simplification of current renewals and the new strategy appears to be new applications for all existing franchises. As such the specific questions in this inquiry which appear to require legal interpretation are now out of date and were beyond the capacity of most Cable Advisory Councils to reply anyway.

As advocates for the consumer-citizen-subscribers of cable services we can only hope that the outcome of this turmoil created in part by a biased Public Act 07-253 will be a simplified, fair competitive environment that does not lose sight of the fact that all this competition is based on use of public rights of ways.

## **CONSUMER ISSUES      NEW FRANCHISES-INFORMAL REVIEW RISKS**

### **RATES**

THIS REMAINS OUTSIDE THE PURVIEW OF THIS PROCESS BUT PARAMOUNT IN THE EYES OF CONSUMERS. However, Senior Discounts, always less than expected by Seniors are difficult to monitor and inconsistently applied across franchises. They are also and often tied to non-related programs that adversely impact State Agencies and consumer eligibility (i.e. Connpace, Fuel subsidy eligibility.)

### **SERVICES**

Local, timely services are what consumers comment on as well as representation of diversity in programming. Many request more package options tailored to their personal interests with more price levels. Most customers appear to be unaware of the DTV changes.

### **COMMUNITY ACCESS**

While provisions for PEG have been guaranteed for all communities in CT since 1995, consumer understanding of this resource is far less than communities with municipal franchises in other states. Accessible space, sufficient return-lines, infrastructure upgrades are challenges in each community. Most facilities would report being under-funded.

At a recent Council meeting advisors agreed that the franchise process is expensive, complex and ultimately unsatisfying. The expectation is that informal reviews will automatically mean no opportunity to address what was not addressed in prior renewals or what was subsequently determined to be a new need since the last renewal. The expectation is that the company's would build the infrastructures needed to sustain its growth in a competitive environment but will not be PEG or diversity friendly unless required to be.

It was concluded that if new or informal reviews are pursued certain items should be standardized state-wide during this 'leveling' process: 1) Senior Discounts 2) Addition of Return-lines 3) Annual Media Literacy Education Program Support instead of Internet capabilities for schools [most schools can not use the Internet resource] and that 4) the addition of a 'reasonable need' review process like petitioning could be used to require the provider to be responsive to what a community identifies as reasonable need during a anticipated 15 year franchise period.

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Chairman, CACSCC  
Comcast Branford