

**Date:** August 21, 2007

**To:** Bill Schrier, Chief Technology Officer, City of Seattle

**From:** Tony Perez, Department of Information Technology, Office of Cable Communications  
Susan Cohen, Seattle City Auditor

**Subject:** Review of Millennium Digital Media's Compliance with the City of Seattle's Cable Customer Bill of Rights

### **Background**

The City Council established the Cable Customer Bill of Rights (CCBOR) in 1999 to ensure that Seattle cable customers receive competent, responsive service from cable companies. In April 2002, the City Council adopted amendments to the CCBOR which strengthened several provisions, clarified that the CCBOR applied to cable modem service, and added some of the most stringent privacy protections in the country. The City of Seattle is a leader among cities in providing an active customer service enforcement program for cable customers.

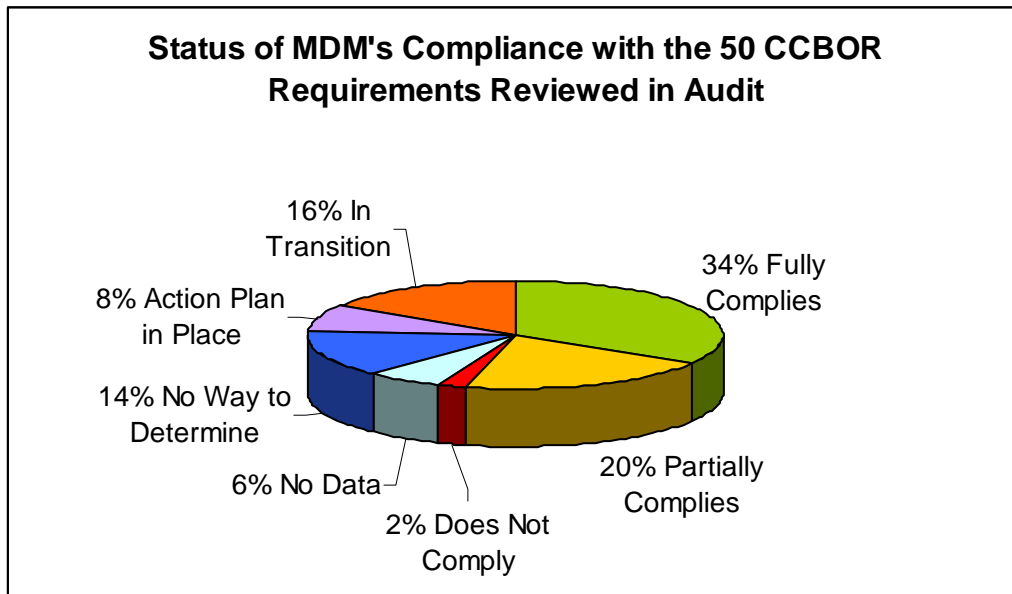
Under the CCBOR, the City has the authority to audit cable companies to determine if they are in compliance with its requirements. This review was the third in a series of planned, periodic compliance reviews of one of the City's two cable franchises, Millennium Digital Media Corporation (MDM). The scope of the review was based on input from the City's Office of Cable Communications (OCC), and, among other things, considered the number of customer complaints their office received about specific aspects of MDM's service.

During this review, we examined MDM's compliance with fifty CCBOR requirements. To assess the extent to which MDM complied with each requirement, we conducted site visits; interviewed MDM managers, staff, and consultants with whom MDM contracts, and experts in the field of cable communications; and reviewed MDM policies, procedures, and reports, and customer surveys and technical reports. We conducted our work between February and July 2007, in accordance with generally accepted government auditing standards. We reviewed our results with Millennium Digital Media managers and incorporated their feedback into the findings presented in this memorandum.

### **Findings**

We found that MDM fully complied with seventeen of fifty CCBOR requirements, partially complied with ten, and did not comply with one. MDM has corrective action plans in place to ensure compliance with four requirements. Because MDM recently closed its Seattle area customer call center and moved to a regional Customer Call Center located out-of-state, we rated their compliance for eight requirements "in transition." We were unable to determine if MDM complied with three requirements because MDM was unable to provide us with sufficient data. We could not determine MDM's compliance with seven requirements because either there was no reasonable way to make a determination of compliance or non-compliance, or no activity had occurred in the area to allow us to conduct testing. See the Chart I and Table I below for summary information on MDM's compliance with fifty CCBOR requirements.

**Chart I. Status of MDM's Compliance with 50 CCBOR Requirements**



**Table I. Status of MDM's Compliance with 50 CCBOR Requirements by Area**

Issue Area	Fully Complies	Partially Complies	Does Not Comply	MDM could not provide data	No reasonable way to determine	Action Plan In Place	In Transition
Customer Service	9	6	1	1	6	3	7
Customer Complaints	3	2		2			1
Customer Privacy	5				1	1	
Reporting Requirements		2					
<b>Total number by rating:</b>	<b>17</b>	<b>10</b>	<b>1</b>	<b>3</b>	<b>7</b>	<b>4</b>	<b>8</b>
<b>Percent by rating:</b>	<b>34%</b>	<b>20%</b>	<b>2%</b>	<b>6%</b>	<b>14%</b>	<b>8%</b>	<b>16%</b>

Areas in which MDM fully complies with CCBOR requirements include:

- Crediting customers for reported outages upon request;
- Meeting Federal Communications Commission (FCC) technical standards for signal quality;
- Offering service appointments to customers during specified times; and

- Protection of customer privacy.

Areas in which MDM could improve their compliance with CCBOR requirements include:

- Notifying customers of planned outages MDM anticipates will last more than four hours;
- Providing customers thirty day advance notice of rate, programming and channel changes;
- Ensuring that their promotional material accurately discloses price terms (including available discounts and the cost of basic service);
- Establishing and publicizing complete procedures for handling customer complaints, including not only where and to whom customers may register a complaint, but also how such complaints will be acted upon and resolved, and the credits available to customers for violations of the CCBOR (in accordance with Schedule A); and
- Gathering and maintaining sufficient data so MDM can report its performance to the City in an accurate and timely manner and in accordance with CCBOR requirements. Specifically, reporting could be improved in the areas of customer complaints, and scheduled service interruptions and outages.

See Table II on page four for a complete list of the fifty CCBOR requirements we examined and how we rated them.

### **Matter for Consideration**

In mid-May 2007, MDM moved its Bellevue, Washington customer call center to a consolidated customer call center in Lansing, Michigan. Since then, customer service has declined significantly and City of Seattle and MDM managers have been in dialogue about the needed improvements. In light of this situation, we recommend that the City revisit within the next year all areas identified in this report as “in transition.” This assessment could be conducted after a reasonable period of time has passed to allow start up issues with the new call center to be resolved.

### **Recommendation**

In addition, we recommend that the City closely monitor all areas identified in Table II as out-of-compliance, including those rated partially complies, does not comply, action plan in place, and in transition.

cc: Distribution list

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**Table II. Summary of Ratings  
50 Cable Customer Bill of Rights Requirements**

**Green:** Millennium Digital Media (MDM) **fully complies** with the requirement (17)  
**Gold:** MDM **partially complies** with the requirement (10)  
**Red:** MDM **does not comply** with the requirement (1)  
**Blue:** MDM **does not collect sufficient data** or **there is no reasonable way to determine compliance or non-compliance** (10)  
**Purple:** MDM is not in full compliance, but has a **corrective action in place** (4)  
**Orange:** **In transition**-compliance with these requirements will be assessed when new Call Center is completely operative<sup>1</sup> (8)

Requirement	Rating
<b>Customer Service - Courtesy</b>	
1. All employees shall be courteous, knowledgeable and helpful and shall provide effective, timely and satisfactory service in all contacts with Customers. (SMC 21.60.820 A)	<b>In Transition; Recommend Follow Up</b>
<b>Customer Service - Accessibility</b>	
2. Cable Operator shall provide at least one service center for every 75,000 customers served. Service centers must be: <ul style="list-style-type: none"> <li>▪ A safe, visible site</li> <li>▪ Within the City of Seattle</li> <li>▪ Handicapped accessible</li> <li>▪ Located along a mass transit route</li> <li>▪ Open M-F 8 a.m. – 7 p.m.; Sat 9 a.m. – 5 p.m.</li> <li>▪ Fully staffed, and offering the following services: bill payment, equipment exchange, processing change of service requests, and response to customer inquiries and requests, and</li> <li>▪ Post a sign advising customers of its hours of operation and contact information for the City of Seattle and the Cable Operator if not open during business hours.</li> </ul> (SMC 21.60.820 B)	<b>Partially Complies</b>
3. Cable Operator shall provide free exchanges of faulty converters at the Customer's address. (SMC 21.60.820 B)	<b>Fully Complies</b>
4. Customer Service Representatives (CSRs) will be available to respond to customer inquiries during regular business hours. (SMC 21.60.820 B)	<b>In Transition; Recommend Follow Up</b>
5. Cable Operator shall maintain local or toll free telephone access lines that shall be available during Normal Business Hours for service/repair requests and billing inquiries. (SMC 21.60.820 B)	<b>In Transition; Recommend Follow Up</b>

<sup>1</sup> Millennium Digital Media moved its Customer Call Center from Bellevue, WA to Lansing, MI in May 2007.

6. Cable Operator shall have dispatchers and technicians on call 24 hours a day, 7 days a week, including legal holidays, for emergency purposes. (SMC 21.60.820 B)	<b>In Transition; Recommend Follow Up</b>
7. Telephone calls to service/repair and billing lines will be: <ul style="list-style-type: none"> <li>▪ Answered within 30 seconds</li> <li>▪ Transferred within 30 seconds</li> <li>▪ Customer shall be able to speak with a CSR (human being) within 5 minutes.</li> </ul> <b>These standards will be met no less than 90 percent of the time, measured on a quarterly basis under Normal Operating Conditions.</b> (SMC 21.60.820 B)	<b>In Transition; Recommend Follow Up</b>
8. The total number of calls receiving busy signals shall not exceed 3 percent of the total telephone calls. <b>This standard shall be met 90 percent of the time, measured under Normal Operating Conditions.</b> (SMC 21.60.820 B)	<b>In Transition; Recommend Follow Up</b>
<b>Customer Service – Responsiveness</b>	
9. In the event of a system outage resulting from MDM equipment failure affecting five or more Customers, MDM shall initiate repairs within two hours after the third Customer call is received. All Customers who call the Cable Operator to report an outage shall receive credit for the entire day on which the outage occurred and for each additional day the outage continues. (SMC 21.60.820 C (3))	<b>Fully Complies</b>
10. The Cable Operator shall notify the City of any outage of at least 4 continuous hours that affects at least 10 percent of its Customers. (SMC 21.60.820 C (3))	<b>Action Plan In Place</b>
11. The Cable Operator shall initiate repairs to all other service interruptions resulting from Cable Operator equipment failure within 24 hours. (SMC 21.60.820 C (3))	<b>In Transition; Recommend Follow Up</b>
12. A Cable Operator shall initiate repairs to Customer reported outages and service interruptions, for any cause beyond the control of the Cable Operator, with 24 hours after the conditions beyond its control have been corrected. (SMC 21.60.820 C (3))	<b>No Reasonable Way to Determine</b>
13. The signal quality provided by the Cable Operator shall meet or exceed technical standards established by the Federal Communications Commission (FCC). (SMC 21.60.820 C (4))	<b>Fully Complies</b>
14. Cable modem Internet connections shall meet performance specifications advertised by the Cable Operator. (SMC 21.60.820 C (4))	<b>Fully Complies</b>
15. The Cable Operator shall render efficient service, make repairs promptly, and interrupt service only for good cause and for the shortest time possible. (SMC 21.60.820 C (4))	<b>Action Plan In Place</b>
16. Scheduled interruptions that the Cable Operator anticipates will last more than 4 hours shall be preceded by at least 24 hours notice to affected Customers, and shall occur during period so minimum use of the system, preferably between midnight and 6 a.m.	<b>Action Plan In Place</b>

(SMC 21.60.820 C (4))	
17. Notification of a planned outage may take the form of a door hanger, a message or insert into the monthly bill, a telephone call, or supplemented with on-screen messages announcing the planned outage. Cable modem Internet Customers may receive notification by e-mail. (SMC 21.60.820 C (4))	<b>Partially Complies</b>
18. If a Customer experiences poor signal quality or interruptions of Cable or Other Services attributable to the Cable Operator's equipment, the Cable Operator shall respond and repair the problem no later than the day following the Customer call provided that the Customer is available and the repair can be made within the allotted time. (SMC 21.60.820 C (4))	<b>MDM Could Not Provide Data</b>
19. If an appointment is necessary, the Customer may choose a 4 hour block of time during Normal Business Hours. At the Customer's request, the Cable Operator shall repair the problem at a later time convenient to the Customer. The Cable Operator shall provide Customers the option of service or installation appointments weekday evenings until 7:00 p.m. and a minimum of 4 hours on Saturdays. (SMC 21.60.820 C (4))	<b>Fully Complies</b>
<b>Customer Service – Services for Customers with Disabilities</b>	
20. For any Customer with a disability, the Cable Operator shall at no charge deliver and pickup converters at the Customer's home. In the case of malfunctioning equipment, the technician shall provide and install substitute equipment, ensure that it is working properly, and return the defective equipment to the Cable Operator. (SMC 21.60.820 D)	<b>No Reasonable Way to Determine</b>
21. The Cable Operator shall provide TDD/TYY service through trained operators who can provide every type of assistance rendered by the Cable Operators' CSR for any hearing impaired customer at no charge. (SMC 21.60.820 D)	<b>Fully Complies</b>
22. The Cable Operator shall provide free use of a converter remote control unit to mobility-impaired Customers. (SMC 21.60.820 D)	<b>No Reasonable Way to Determine</b>
<b>Customer Service – Customer Information</b>	
23. Upon installation, annually, and at any time the Customer requests, the Cable Operator shall provided the following information, in clear, concise written form: <ul style="list-style-type: none"> <li>▪ Products and services offered (30 days prior to changing its channel lineup, the Cable Operator shall provide subscribers with the revised channel lineup);</li> <li>▪ Prices and options for programming services, including conditions of subscription to programming and other services and policies concerning changes in services offered, notification of changes, disconnection and service downgrades (30 days prior to changing any of the above, the Cable Operator shall provide subscribers with the changes);</li> <li>▪ A copy of the Cable Customer Bill of Rights and other customer standards;</li> <li>▪ Installation and service and maintenance policies, including Customer's responsibilities for equipment;</li> <li>▪ Instruction on the use of cable TV service, remote control and on standard</li> </ul>	<b>Does Not Comply</b>

<p>VCR hookups;</p> <ul style="list-style-type: none"> <li>▪ Instruction on the use of interactive television if provided by the cable operator;</li> <li>▪ Instruction on the use of cable modem service;</li> <li>▪ Billing and complaint procedures, including the address and telephone number of the Cable Operator’s offices, the Cable Operator’s policies on deposits and credit balances, returned check charges, refunds of disruption of service or poor reception, and telephone numbers and descriptions of services of the FCC and the City’s Office of Cable Communications;</li> <li>▪ Policies concerning protection of Customer privacy (the Cable Operator shall include a self-addressed mail back postcard for opt-out purposes;</li> <li>▪ Use and availability of parental control/lock out device;</li> <li>▪ Special services for Customers with disabilities including any other discounts required by the franchises; and</li> <li>▪ Days, hours of operation, and locations of the service centers.</li> </ul> <p><b>A sample of all notices provided to the Customer shall be filed concurrently with the City.</b> (SMC 21.60.820 E)</p>	
<p>24. The Cable Operator shall provide Customers with written notification of any change in rates, programming, or channels at least 30 days before the date of the change. (SMC 21.60.820 E)</p>	<b>Partially Complies</b>
<p>25. All officers, agents, and employee of the Cable Operator, its contractors and subcontractors in personal contact with the Customer shall have a visible identification card with their name and photograph. (SMC 21.60.820 E)</p>	<b>Partially Complies</b>
<p>26. Every vehicle of the Cable Operator used for providing services to Customers shall be clearly visually identified to the public as working for the Cable Operator. (SMC 21.60.820 E)</p>	<b>Fully Complies</b>
<p>27. All CSRs shall identify themselves orally to callers immediately following the greeting during each telephone contact with the public. (SMC 21.60.820 E)</p>	<b>Fully Complies</b>
<p>28. Officers, agents, and employees of the Cable Operator, its contractors and subcontractors shall identify themselves to the Customer when making a service call or installation. (SMC 21.60.820 E)</p>	<b>Fully Complies</b>
<p>29. All CSRs, technicians and employees of the Cable Operator in every contact with a Customer shall state the estimated cost of the service, repair, or installation orally prior to delivery of the service or before any work is performed, and shall provide the Customer with an oral statement of the charges before terminating the telephone call or before leaving the location at which the work was performed. (SMC 21.60.820 E)</p>	<b>No Reasonable Way to Determine</b>
<p>30. All promotional materials advertising cable services shall accurately disclose price terms. (SMC 21.60.820 E)</p>	<b>Partially Complies</b>
<p>31. For non-automated orders, the CSRs shall make clear the price of pay-per-view and pay-per-event programming before an order is taken.</p>	<b>No Reasonable</b>

(SMC 21.60.820 E)	<b>Way to Determine</b>
<p>32. The Cable Operator shall distribute promotional material in multi-unit buildings only with the approval of the building owner. The Cable Operator shall not condition the provision of Cable Services on the receipt of such approval.</p> <p>(SMC 21.60.820 E)</p>	<p><b>Partially Complies</b></p>
<p>33. The Cable Operator shall not charge Customers for any services they have not affirmatively requested; provided that this subsection shall not prevent a Cable Operator from adding programming to an existing tier.</p> <p>(SMC 21.60.820 E)</p>	<p><b>No Reasonable Way to Determine</b></p>
<b>Customer Service – Cable Customer Privacy</b>	
<p>34. A Cable Operator shall not use the Cable System to collect, record, monitor or observe Personally Identifiable Information without the prior affirmative written or electronic consent of the Customer unless, and only to the extent that such information is: (a) used to detect unauthorized reception of cable communications, or (b) necessary to render a Cable Service or Other Service provided by the Cable Operator to the Customer.</p> <p>(SMC 21.60.820 F (2))</p>	<p><b>Fully Complies</b></p>
<p>35. A Cable Operator shall take such actions as are necessary to prevent any Affiliate from using the facilities of the Cable Operator in any manner, including, but not limited to, sending data or other signals through such facilities, to the extent such use will permit an Affiliate unauthorized access to personally Identifiable Information on the computer or other equipment of a Customer or on any of the facilities of the Cable Operator that are used in the provision of Cable Service.</p> <p>(SMC 21.60.820 F (2))</p>	<p><b>Fully Complies</b></p>
<p>36. A Cable Operator shall take such actions as are necessary to prevent a person or entity (other than Affiliates) from using the facilities of the Cable Operator in any manner, including, but not limited to, sending data or other signals through such facilities, to the extent such use will permit such person or entity unauthorized access to personally Identifiable Information on the computer or other equipment of a Customer or on any of the facilities of the Cable Operator that are used in the provision of Cable Service.</p> <p>(SMC 21.60.820 F (2))</p>	<p><b>Fully Complies</b></p>
<p>37. A Cable Operator shall not disclose Personally Identifiable Information (PII) without the prior written or electronic consent of the Customer, except as follows:</p> <ul style="list-style-type: none"> <li>▪ A Cable Operator may disclose for a Non-cable-related purpose the name and address of a Customer to any general programming tiers of service and other categories of Cable and Other Service provided by the Cable Operator if the Cable Operator has provided the Customer the opportunity to prohibit or limit such disclosure in accordance with this subsection F and Section 631 of the Federal Communications Act, 47 U.S.C. 551, and such disclosure does not directly or indirectly disclose:</li> <li>▪ A Customer’s extent of viewing of a Cable Service or Other Service provided by the Cable Operator;</li> </ul>	<p><b>Fully Complies</b></p>

<ul style="list-style-type: none"> <li>▪ The extent of any other use by a Customer of a Cable Service or Other Service provided by the Cable Operator, including, but not limited to, a disclosure of the particular viewing selections by a person subscribing to a Cable Service or Other Service, or the particular websites visited by a customer to cable modem service (i.e., a Cable Operator may only disclose the fact that a person subscribes to cable modem service); or</li> <li>▪ The nature of programming or sites that a Customer subscribes to or views (i.e., a Cable Operator may only disclose the fact that a person subscribes to a general tier of service or a package of channels with the same type of programming).</li> </ul> <p>A minimum of 30 days prior to making any disclosure of PII of any Customer as provided in this subsection P3a, the Cable Operator shall notify in writing the Office of Cable Communications and each Customer (that the Cable Operator intends to disclose information about) of the specific information that will be disclosed, to whom it will be disclosed, and notice of the Customer's right to prohibit the disclosure of such information for Non-cable related purposes. The notice to Customers may be included with or made a part of the Customer's monthly bill for Cable Service or Other Service or may be made by separate mailed notice. Each time that this notice is given to a Customer, the Cable Operator also shall provide the Customer with an opportunity to prohibit the disclosure of information in the future. Such opportunity shall be given in one of the following forms: a postage paid, self-addressed post card provided by the Cable Operator; a box that may be checked by the Customer on the Customer's monthly bill for Cable Services or Other Services; a toll-free number that the Customer may call; or such other equivalent methods as may be approved by the Office of Cable Communications.</p> <ul style="list-style-type: none"> <li>▪ A Cable Operator may disclose PII only to the extent that it is necessary to render, or conduct a legitimate business activity related to, a Cable Service or Other Service provided by the Cable Operator to the Customer.</li> <li>▪ To the extent required by federal law, a Cable Operator may disclose PII pursuant to a subpoena or valid court order authorizing such disclosure, or to a government agency.</li> </ul> <p>(SMC 21.60.820 F (3))</p>	
<p>38. Any PII gathered and maintained by a Cable Operator shall be made available for Customer examination within 30 days of receiving a request by a Customer to examine such information at the local offices of the Cable Operator or other convenient place within the City designated by the Cable Operator. Upon a reasonable showing by the Customer that the information is inaccurate, a Cable Operator shall correct such information.</p> <p>(SMC 21.60.820 F (4))</p>	<p style="text-align: center;"><b>No Reasonable Way to Determine</b></p>
<p>39. A Cable Operator shall annually mail a separate, written privacy statement to Customers consistent with 47 U.S.C. 551(a)(1), and shall provide a Customer a copy of such statement at the time the Cable Operator enters into an agreement with the Customer to provide Cable Service or Other Service.</p>	<p style="text-align: center;"><b>Action Plan In Place</b></p>

<p>The written notice shall be in a clear and conspicuous format and be printed in ten point type or larger.</p> <p>In the statement required by subsection F5a, a Cable Operator shall state substantially the following regarding the disclosure of Customer information: “Unless a Customer affirmatively consents electronically or in writing to the disclosure of PII, any disclosure of PII for purposes other than to the extent necessary to render, or conduct a legitimate business activity related to, a Cable Service or Other Service, is limited to:</p> <ul style="list-style-type: none"> <li>▪ Disclosure pursuant to a subpoena or valid court order authorizing such disclosure; or to a governmental entity, but only to the extent required by applicable federal law.</li> <li>▪ Disclosure of the name and address of a Customer to any general programming tiers of service and other categories of cable and Other Services provided by the Cable Operator that do not directly or indirectly disclose:</li> </ul> <p>A Customer’s extent of viewing of a Cable Service or Other Service provided by the Cable Operator;</p> <p>The extent of any other use by a Customer of a Cable Service or Other Service provided by the Cable Operator, including, but not limited to, a disclosure of the particular viewing selections by a person subscribing to a Cable Service or Other Service, or the particular web sites visited by a Customer of cable modem service (i.e., a Cable Operator may only disclose the fact that a person subscribes to cable modem service); or</p> <p>The nature of any transactions made by a Customer over the Cable System;</p> <p>The nature of programming or sites that a Customer subscribes to or views (i.e., a Cable Operator may only disclose the fact that a person subscribes to a general tier of service, or a package of channels with the same type of programming.)</p> <p>The notice shall also inform the Customers of their right to prohibit the disclosure of their names and addresses in accordance with Subsection b for non-cable related purposes. This opportunity will be presented in the form of both a toll-free telephone number and a postage paid, self-addressed post card, provided by the Cable Operator with the privacy notice or other manner acceptable to the Office of Cable Communications. If a Customer exercises his/her right to prohibit the disclosure of name and address as provided in subsection F3a or this subsection, such prohibition against disclosure shall remain in effect permanently, unless the Customer subsequently notifies the Cable Operator in writing that s/he wishes to permit the Cable Operator to disclose his/her name and address.</p> <p>(SMC 21.60.820 F (5))</p>	
<p>40. A Cable Operator shall destroy, within ninety days, any PII if the PII is no longer necessary for the purpose for which it was collected and there are no pending requests or orders for access to such PII under subsection 3 of this</p>	<p><b>Fully</b></p>

subsection, pursuant to a court order, or pursuant to Section 6631 of the Communications Act, 47 U.S.C. 551. (SMC 21.60.820 F (9))	<b>Complies</b>
<b>Complaint Procedures – Complaints to the Cable Operator</b>	
41. The Cable Operator shall establish written procedures for receiving, acting upon, and resolving Customer Complaints, and crediting Customer accounts in accordance with company policies or Schedule A, whichever is greater, and shall publicize such procedures through printed documents at the Cable Operator’s sole expense. (SMC 21.60.830 A)	<b>Partially Complies</b>
42. Cable Operator’s written complaint procedures shall prescribe a simple process by which any Customer may submit a complaint in person or by telephone, electronic mail or in writing to the Cable Operator regarding an alleged violation of any provision of these Customer Service Standards, any terms or conditions of the Customer’s contract with the Cable Operator, or reasonable business practices. (SMC 21.60.830 A)	<b>Partially Complies</b>
43. For violations of the ordinance codified in Sections 21.60.800 through 21.60.830, credits shall be made to the Customer’s account. (SMC 21.60.830 A)	<b>In Transition; Recommend Follow Up</b>
44. In the event that the Customer no longer receives Cable Service or Other Services from the Cable Operator, the Cable Operator shall issue a check to the Customer within 30 days of the resolution of the Complaint. (SMC 21.60.830 A)	<b>MDM Could Not Provide Data</b>
45. The Cable Operator will make best efforts to resolve Customer concerns or Complaints at the first contact. (SMC 21.60.830 A)	<b>Fully Complies</b>
46. Within 15 calendar days after receiving a Complaint, the Cable Operator shall notify the Customer of the results of its investigation and its proposed action or credit. If the Complaint is in writing, a written response shall be sent to the Customer within 2 weeks of receipt. (SMC 21.60.830 A)	<b>MDM Could Not Provide Data</b>
47. The Cable Operator shall also notify the Customer of the Customer’s right to file a Complaint with the City in the event the Customer is dissatisfied with the Cable Operator’s decision, and shall explain the necessary procedures for filing such Complaint with the City. (SMC 21.60.830 A)	<b>Fully Complies</b>
48. The Cable Operator’s Complaint procedures shall be filed with the City prior to implementation. (SMC 21.60.830 A)	<b>Fully Complies</b>
<b>Complaint Procedures – Verification of Compliance</b>	
49. The Cable Operator shall maintain, in a manner consistent with the privacy rights of Customers, an accurate and comprehensive file of (1) any and all Complaints regarding the Cable System or the Cable Operator’s type and their disposition; (2) service requests, identifying the number and nature of the requests and their disposition; (3) service interruptions and their disposition; (4) required Cable Operator contacts with Customers after installation, and (5) Customer privacy information as per SMC 21.60.820 F	<b>Partially Complies</b>

<p>(6). (SMC 21.60.830 D)</p>	
<p>50. Reports detailing compliance with the standards herein shall be provided by the Cable Company on a quarterly basis, within 30 days of the end of the quarter and shall be in a format consistent with the output capabilities of a Cable Operator’s call tracking technology sufficient for the City to monitor the Cable Customer Bill of Rights. If the Cable Operator fails to provide such reports on a timely basis, or if they are incomplete, monetary sanctions up to \$500 for the first quarter, up to \$1,000 for the second consecutive quarter of noncompliance, up to \$1,500 for the third consecutive quarter of noncompliance and up to \$2,000 for all subsequent consecutive non-complaint quarters may be imposed to encourage compliance. The Cable Operation shall permit the City to review and audit the information at any time during Normal Business Hours upon reasonable notice. (SMC 21.60.830 D)</p>	<p style="text-align: center;"><b>Partially Complies</b></p>