

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 19-4845-PET

Petition of Southern Vermont Cable)
Company for consent, pursuant to 30)
V.S.A § 109, to sell substantially all of its)
Vermont assets to Comcast of)
Connecticut/Georgia/Massachusetts/New)
Hampshire/New York/North Carolina/)
Virginia/Vermont, LLC, approval,)
pursuant to 30 V.S.A. § 505, of such)
entity’s abandonment of cable-television)
service in Vermont and revocation of its)
Certificates of Public Good)

Petition of Comcast of Connecticut/)
Georgia/Massachusetts/New Hampshire/)
New York/North Carolina/Virginia/)
Vermont, LLC for a Certificate of Public)
Good, pursuant to 30 V.S.A. §§ 503 &)
504 and Vermont Public Utility)
Commission Rule 8.200, to own and)
operate the cable-television systems in)
Vermont currently owned and operated by)
Southern Vermont Cable Company)

**FIRST SET OF INFORMATION REQUESTS SERVED UPON
JOINT PETITIONERS BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department”) by and through Sarah L. J. Aceves, Special Counsel, hereby serves the following First Set of Information Requests upon the Joint Petitioners Southern Vermont Cable Company and Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC (collectively, “Joint Petitioners”) in this matter in accordance with Public Utility Commission Rule 2.214 and V.R.C.P. 33 and 34, and requests that the Joint Petitioners answer the requests in accordance with V.R.C.P. 33 and 34 and deliver their answers and all requested documents and materials to the Department's offices in Montpelier no later than **February 24, 2020**. Joint Petitioners are requested to provide one complete copy of all documents. Joint Petitioners are also requested to provide a copy of their answers in electronic format, that is, Word, Excel, or other format readable by the Department, and to provide any spreadsheets in electronic format.

INSTRUCTIONS

1. Responses to any and all Department requests that are contained herein or that may be filed later should be supplied to the Department as soon as they become available to Joint Petitioners. That is, Joint Petitioners should not hold answers to any requests for which they have responsive data, documents, etc. until responses to any or all other requests are compiled.
2. V.R.C.P. 33 requires the response to each request to be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.
3. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in Joint Petitioners' workpapers and files or that is otherwise available.
4. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). Joint Petitioners are directed to change, supplement and correct their answers to conform to all information as it becomes available to Joint Petitioners, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.
5. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
6. Some of the Department's requests may make reference to a particular portion of Joint Petitioners' filing. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to Joint Petitioners that is responsive to the questions stated.
7. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.

8. “Document,” as used herein, shall be construed as broadly as possible to include any and all means and media by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. **All spreadsheets provided must be in native format have all formulae and links intact and accessible.**
9. “Petition,” as used herein, shall refer to the Petition the Joint Petitioners filed with the Vermont Public Utility Commission on December 11, 2019, unless the context indicates otherwise.
10. “Joint Petitioners,” as used herein, shall refer upon Southern Vermont Cable Company (“SVCC”) and Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC (“Comcast”).
11. “Customer,” as used herein, shall refer to SVCC’s Vermont-based residential customers.
12. “Department,” as used herein, shall mean the Vermont Department of Public Service.
13. “Commission,” as used herein, shall mean the Vermont Public Utility Commission.
14. With respect to each document produced by Joint Petitioners, identify the person who prepared the document and the date on which the document was prepared.
15. If any interrogatory or request requires a response that Joint Petitioners believe to be privileged, please state the complete legal and factual basis for the claim of privilege, provide the information required by the 5/16/95 order in Docket No. 5771 and respond to the parts of the interrogatory or request as to which no privilege is asserted.
16. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection.
17. To expedite the discovery process and the resolution of this docket, Joint Petitioners should contact the Department as soon as possible, and prior to the above deadline for response, if they seek clarification on any of these information requests.

18. The Department reserves the right to submit additional information requests to Joint Petitioners.

INTERROGATORIES AND REQUESTS TO PRODUCE

For SVCC:

Q:DPS:JP.1.1. Please provide, consistent with Condition 8(b) of the Renewed Certificate of Public Good (“CPG”) issued June 30, 2011, a copy of all SVCC written and orally transmitted consumer complaints received during the preceding calendar year or annual period for the past five (5) years.

Q:DPS:JP.1.2. Please provide a copy of the notice sent to SVCC customers notifying them of the transaction that is the subject of this proceeding.

Q:DPS:JP.1.3. Please describe in detail all line extensions that have been completed over the course of SVCC’s current CPG term. For each year, please list and describe the number of road miles constructed, the number of dwellings passed by the new extensions and the cost of the extensions. Please separately identify any complex line extensions (those requiring the installation of amplifiers, power supplies, line extenders and/or nodes or fiber). Please produce all data and documents used to prepare and support your response.

Q:DPS:JP.1.4. Please explain whether SVCC customers are served by fiber-to-the-home (“FTTH”) or Coax cable.

- a. Please detail the number of SVCC customers served by FTTH.
- b. Please detail the number SVCC customers served by Coax.

For Joint Petitioners:

Q:DPS:JP.1.5. Please provide a copy of the purchase and sale agreement between SVCC and Comcast.

Q:DPS:JP.1.6. Please refer to page 3, lines 18-21 of Mr. Scialabba’s testimony and pages 7-8, lines 14-22 and 1-7 of Mr. Glanville’s testimony. Please detail those products not currently offered to SVCC customers that will be available via Comcast Xfinity cable and internet services.

Q:DPS:JP.1.7. Please detail the average monthly cost for basic cable service for the preceding five (5) years for respective SVCC customers and Comcast customers.

Q:DPS:JP.1.8. Please detail the average monthly cost for a standard triple play service for the preceding five (5) years for respective SVCC customers and Comcast customers.

Q:DPS:JP.1.9. Please provide the average length of time, in minutes, the respective SVCC and Comcast customer waits to speak to a customer service representative.

Q:DPS:JP.1.10. Please provide the average length of time, in minutes, it takes for the respective SVCC and Comcast customer complaint to be resolved, from the point the call is answered by an integrated voice response system or person to completion of the request for assistance.

Q:DPS:JP.1.11. Please detail the nearest SVCC and Comcast storefront office and hours of operation for the Towns of Dummerston, Jamaica, Newfane, Putney and Townshend.

Q:DPS:JP.1.12. Please provide the number of service outages affecting more than 25 SVCC and Comcast customers for the preceding five (5) years.

- a. Please provide the duration of each service outage experienced by more than 25 SVCC and Comcast customers for the preceding five (5) years.

For Comcast:

Q:DPS:JP.1.13. Please refer to page 6, lines 18-19 of Mr. Glanville's testimony.

- a. Please explain whether, as a result of the sale of SVCC assets to Comcast, Comcast intends to build out and serve the Towns of Dover, Newfane, Putney and Townsend.
- b. Please explain any other build out plans that will result from the sale of SVCC assets to Comcast.

Q:DPS:JP.1.14. Please refer to page 8, lines 9-19 of Mr. Glanville's testimony. Please detail how SVCC customers will benefit from Comcast's route-diverse and redundant fiber network.

- a. Please explain whether, after the network transition is completed, there will be fewer and/or shorter service outages.

Q:DPS:JP.1.15. Please explain, if applicable, whether SVCC FTTH and/or Coax customers will receive the same or different Comcast offerings.

Q:DPS:JP.1.16. Please refer to pages 9-10, lines 20-21 and 1-15 of Mr. Glanville's testimony.

- a. Please explain whether Comcast will provide periodic updates to customers during the transition period.
- b. Please explain whether, once the integration is complete, notice will be provided to customers regarding the transition to Comcast services.
- c. Please explain how customers will be updated (by mail, email, or telephone) regarding

the transition. Please provide any and all documents Comcast anticipates providing to customers.

- d. Please explain in detail how customers will be migrated from SVCC cable to Comcast cable.
- e. Please explain in detail how customers will be migrated from SVCC internet to Comcast internet.
- f. Please explain whether SVCC customers will be charged for transition-related issues including, but not limited to, set-top box installation, modem issues and post-transition problems.

Q:DPS:JP.1.17. Please refer to page 13, lines 13-16 of Mr. Glanville’s testimony. Please explain whether Comcast plans to add diverse cable entry to eliminate single points of failure and increase reliability at the Putney headend.

Q:DPS:JP.1.18. Please explain whether Comcast will offer a “grandfathered” service for SVCC customers who decide they prefer a cable alternative to Comcast.

Q:DPS:JP.1.19. Please explain whether SVCC customers will be considered “new” Comcast customers eligible for all discounts and promotional packages available to new customers in other areas.

Q:DPS:JP.1.20. Please detail the percentage of complaints per thousand customers Comcast has received from its Vermont customers for the preceding five (5) years.

- a. Please detail how the customer complaint rate for Vermont compares with the complaint rate of Comcast customers in other states, including but not limited to, New Hampshire and Maine.

Q:DPS:JP.1.21. Please explain what Data Over Cable Service Interface Specification (“DOSCIS”) Comcast will use to serve SVCC customers.

- a. Please explain whether Comcast’s DOSCIS is compatible with Radio Frequency over Glass (“RFoG”).
- b. If Comcast’s DOSCIS is compatible with RFoG, please explain whether RFoG will continue to be used after the network transition is complete.
- c. If RFoG will continue to be used, please explain whether Comcast will maintain adequate RFoG inventory for the next six to 12 months.

- d. If Comcast's DOSCIS is not compatible with RFoG, please explain whether and how this will affect Comcast's ability to offer the full suite of Xfinity products to SVCC FTTH and/or Coax customers.

Q:DPS:JP.1.22. Please explain whether Comcast will offer to SVCC customers any unencrypted digital channels that do not require a set-top box or additional rental fees.

- a. If no, please explain whether all SVCC customers will be required to rent a set-top box to access any and all television channels.

Q:DPS:JP.1.23. Please explain whether Comcast's systems are designed and built so that closed caption data can pass through, as required by Commission Rule 8.363(b).

Dated at Montpelier, Vermont this 31st day of January, 2020.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc. Service List