

**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 )

**PETITIONER SOUTHERN VERMONT CABLE COMPANY'S RESPONSES TO FIRST  
SET OF INFORMATION REQUESTS SERVED UPON  
JOINT PETITIONERS BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

**GENERAL OBJECTIONS**

1. Southern Vermont Cable Company ("SVCC") objects to the Requests to the extent they purport to impose obligations greater or different from those required pursuant to the Vermont Rules of Civil Procedure.
2. SVCC objects to the Requests to the extent they seek information protected by attorney-client privilege, work product doctrine or other such privilege.
3. SVCC objects to the Requests to the extent they are overbroad.
4. SVCC objects to the Requests to the extent they seek information that is not relevant to any party's claims or defenses.
5. SVCC objects to the Requests to the extent they seek information that is not proportional to the needs of this case.
6. SVCC objects to the Requests to the extent they are unduly burdensome.
7. SVCC objects to the Department's Instructions to the extent they demand creation of any documents or indices related to the Requests not required pursuant to the Vermont Rules of Civil Procedure.
8. SVCC reserves all objections to the admission of any information produced at the time of trial of this action. Identification or production of any document or supplying any information does not constitute an admission by SVCC that such document or information is relevant or material to this action.
9. SVCC reserves the right to supplement and/or amend its responses to these Requests should additional information be ascertained.

**INTERROGATORIES AND REQUESTS TO PRODUCE**

*For SVCC:*

All responses provided by Ernest Scialabba.

1. **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.

RESPONSE TO INTERROGATORY NO. 1.1:

Please see Attachment DPS-JP-1.1.

**2. 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.

RESPONSE TO INTERROGATORY NO. 1.2:

Please see Attachment DPS-JP-1.2.

**3. 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.

RESPONSE TO INTERROGATORY NO. 1.3:

SVCC does not track data on regular line extensions.

Complex line extensions:

2014 - 11.23 miles of FTTH, 56 homes passed, cost \$111,655.  
2015 – 20.89 miles of FTTH, 232 homes passed, cost \$497,991.  
2016 – 5.39 miles of FTTH, 24 homes passed, cost \$53586.  
2017 - .55 miles of coax, 6 homes passed, cost \$6468.  
2018 – 4.06 miles of FTTH, 32 homes passed, cost \$40364.  
2019 – 2.16 miles of coax, 22 homes passed, cost \$26107.

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

RESPONSE TO INTERROGATORY NO. 1.4:

- a. Please detail the number of SVCC customers served by FTTH.  
212 customers
- b. Please detail the number SVCC customers served by Coax.  
2222 customers

*For Joint Petitioners:*

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

RESPONSE TO INTERROGATORY NO. 1.5:

The agreement shall be provided pursuant to the Protective Agreement entered into between SVCC, Comcast and the Department.

**6. 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.

RESPONSE TO INTERROGATORY NO. 1.6:

This information was provided by Comcast in response to the questions for Joint Petitioners.

**7. 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.

RESPONSE TO INTERROGATORY NO. 1.7:

2015 - \$27.10

2016 - \$27.10

2017 - \$28.81

2018 - \$34.08

2019 - \$34.08

Includes taxes & fees

**8. 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.

RESPONSE TO INTERROGATORY NO. 1.8:

2015 – \$126.43

2016 - \$126.43

2017 - \$127.32

2018 - \$142.46

2019 - \$142.46

Includes taxes & fees

**9. 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.

RESPONSE TO INTERROGATORY NO. 1.9:

Less than one minute.

**10. 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.

RESPONSE TO INTERROGATORY NO. 1.10

10 minutes

**11. 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.

RESPONSE TO INTERROGATORY NO. 1.11:

There is no such storefront office.

**12. 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.

RESPONSE TO INTERROGATORY NO. 1.12:

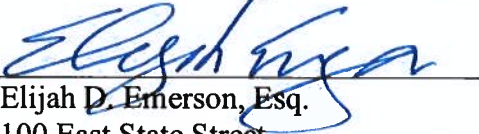
SVCC does not track this data.

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Dated: February 20, 2020.

PRIMMER PIPER EGGLESTON & CRAMER PC

By:



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