

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

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)

Case No. 19-4845-PET

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 Commission Rule 8.200, to own and)
operate the cable-television systems in)
Vermont currently owned and operated by)
Southern Vermont Cable Company)

SUMMARY OF SUPPLEMENTAL PREFILED TESTIMONY
OF DANIEL M. GLANVILLE

Mr. Glanville's supplemental testimony addresses concerns outlined in the prefiled testimony of Clay Purvis on behalf of the Vermont Department of Public Service.

Mr. Glanville sponsors the following exhibits:

Exhibit DMG-9A	Supplemental Response to Information Request Q:DPS:JP.1.16
Exhibit DMG-9B	Supplemental Responses to Information Request Q:DPS:JP.1.18
Exhibit DMG-10	Memorandum of Understanding Between Comcast and Brattleboro Community Television

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SUPPLEMENTAL PREFILED TESTIMONY OF DANIEL M. GLANVILLE

1 Q1. What is your name?

2 A1. My name is Daniel M. Glanville.

3

4 Q2. What is the purpose of your testimony?

5 A2. The purpose of my supplemental testimony is to address the following concerns outlined

6 in the prefiled testimony of Clay Purvis, filed on March 4, 2020, on behalf of the

7 Department of Public Service ("Department"): 1) the migration of the Southern Vermont

1 Cable Company (“SVCC”) system and customers to Comcast’s system; 2) rates and
2 franchise fees; and 3) the service quality plan and reporting. This testimony also
3 supplements the discovery responses filed by Comcast on February 14, 2020.
4

5 Q3. What are Comcast’s plans for migrating SVCC’s system and customers to Comcast’s
6 system?

7 A3. At the time Comcast filed its discovery responses on February 14, 2020, Comcast was in
8 the very early stages of developing a plan for migrating SVCC’s system and customers to
9 Comcast’s system. Since that time, Comcast has been working through various
10 operational and logistical issues associated with the migration and continues to refine the
11 plan as more information becomes available. As a result, Comcast is now better able to
12 respond to the Department’s First Set of Information Requests and includes its
13 Supplemental Responses to Information Requests Q:DPS:JP.1.16 and Q:DPS:JP.1.18
14 with this supplemental prefiled testimony as Exhibit DMG-9A and Exhibit DMG-9B,
15 respectively.
16

17 Comcast is willing to provide the Vermont Public Utility Commission (“Commission”)
18 and the Department with a detailed migration plan forty-five (45) days after the
19 Commission issues an order approving the joint petition. As the detailed migration plan
20 will contain competitively sensitive information, Comcast will request that it be treated as
21 containing potentially confidential information.
22

1 The migration of SVCC's system and customers to Comcast's system will occur in three
2 phases. The first phase has already begun as Comcast is currently doing preparatory
3 work that does not require coordination with SVCC. The preparatory work includes
4 activities such as strategic planning, making necessary engineering changes to Comcast's
5 facilities in order to support additional customers, and conducting network and systems
6 testing.

7
8 The second phase will begin when the Vermont Public Utility Commission
9 ("Commission") approves the joint petition filed by SVCC and Comcast. During this
10 time, SVCC will still own and will continue to operate the cable television system.
11 SVCC will also notify customers of the pending sale to Comcast. This notification will
12 be coordinated between SVCC and Comcast in order to provide this detail. Calls from
13 SVCC customers will begin to be routed to a team of specially trained Comcast Customer
14 Account Executives ("CAEs"). Comcast will begin implementing planned engineering
15 modifications that require coordination with SVCC. After SVCC has notified its
16 customers of the pending sale, Comcast will subsequently begin communicating directly
17 with SVCC customers. These communications will include introducing Comcast
18 products and services and will provide SVCC customers with information on what to
19 expect during the migration process.

20
21 The third phase will begin after the closing for the sale of SVCC, at which point Comcast
22 will be able to begin migrating SVCC customers to Comcast's system soon after the

1 close. Customers will be notified in advance of their migration date. Comcast plans to
2 have sales representatives contact customers in advance to discuss Comcast services and
3 pricing. As SVCC customers will be considered new Comcast customers, they will be
4 eligible for new customer promotions in the market at the time of their migration.
5 Comcast plans to offer free professional installation of service; customers will also have
6 the option to request a self-installation kit. After migration, customer service inquiries
7 will be routed and handled in accordance with Comcast's usual customer service
8 procedures.

9
10 Q4. Please address the Department's concern regarding rates and franchise fees.

11 A4. As previously stated, all SVCC customers will be considered new customers and thus
12 will be eligible for Comcast new customer promotions in the market at the time of
13 migration. Example of promotions can be viewed at www.xfinity.com. Additionally,
14 Comcast's sales representatives will work with customers to find the combination of
15 products and services that best fits the customer's needs, interests, and budget.

16
17 In accordance with Commission Rule 8.417, SVCC currently pays a franchise fee equal
18 to 2.25% of their cable operator gross revenues which is used to support the provision of
19 public, educational, and government ("PEG") access in SVCC's service territory. SVCC
20 has designated Brattleboro Community Television ("BCTV") to provide PEG access
21 services and programming. Comcast has executed a Memorandum of Understanding
22 ("MOU") with BCTV regarding the continued provision of and funding for PEG access

1 in SVCC's service territory. The MOU was filed with the Commission on March 4, 2020
2 and is included as Exhibit DMG-10. The MOU outlines a gradual increase of the
3 franchise fee from 2.25% to 5.0%.

4
5 Q5. Please address the Department's concerns regarding a Service Quality Plan ("SQP").

6 A5. Comcast currently has a Service Quality Plan on file with the Commission and the
7 Department and files quarterly reports with both the Commission and Department
8 regarding its performance with respect to its SQP. Comcast consistently meets or
9 exceeds the standards in its SQP. Comcast anticipates reaching out to CAPI within thirty
10 (30) days after the closing for the sale of SVCC to establish a schedule for an updated
11 service quality plan for all areas in the State of Vermont.

12
13 Once the migration of SVCC customers to Comcast products and billing is complete,
14 Comcast will be able to include the former SVCC system in its quarterly Service Quality
15 reporting.

16
17 Q6. Does this conclude your testimony?

18 A6. Yes.