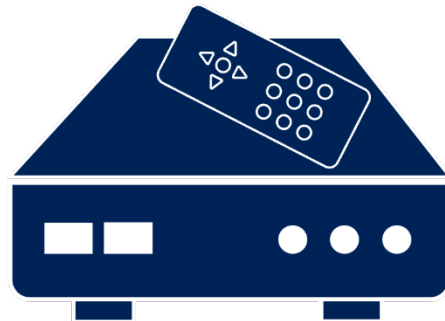


Audit of Comcast's Compliance with Seattle's Cable Customer Bill of Rights



July 25, 2025



**Andrew Scoggin
IB Osuntoki**

David G. Jones, City Auditor



Seattle Office of City Auditor

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Report Highlights

Background

As a cable television franchising authority, the City of Seattle (City) can require providers to follow rules for customer service. The City's rules, also known as the Cable Customer Bill of Rights, include standards such as time for a customer to connect to a live agent by phone, installation and repair time, and services for customers with disabilities. Comcast is one of two cable television providers in Seattle.

What We Found

We assessed Comcast's compliance with 49 Cable Customer Bill of Rights standards, resulting in 53 ratings (some standards cover multiple elements). We found Comcast complied with 39 standards in policy and practice, complied with 4 standards in policy, and did not comply with 2 standards. We were unable to assess 7 standards and did not need to test 1 standard. As a result of our testing, we identified issues in two areas:

- **Billing:** Comcast's billing system is applying late fees to February bills too early, contrary to the City's rules.
- **Services for customers with disabilities:** Comcast does not publicize these services in its welcome kit for new customers. Without proper notification, customers with disabilities may not be aware of the services that the City requires Comcast to provide.

Recommendations

We make two recommendations to address these issues (see Appendix B).

Summary of Comcast's Response

Application of late fees: Comcast disagrees with this finding and recommendation. Comcast asserts they are compliant with the City's rules because they manually credit back late fees that are issued in error for the month of February.

Services for customers with disabilities: Comcast disagrees with this finding but agrees with our recommendation to update their welcome kit.

See Appendix A for Comcast's full response to our audit.



WHY WE DID THIS AUDIT

This audit was requested by Seattle City Councilmember Joy Hollingsworth and Mayor Bruce Harrell.

The objective of this audit was to assess Comcast's compliance with City of Seattle rules for cable television providers, also known as the Cable Customer Bill of Rights.

HOW WE DID THIS AUDIT

To accomplish the audit's objective, we:

- Conducted site visits to Comcast stores in Seattle
- Reviewed Comcast quarterly and yearly reports to the City
- Reviewed Comcast policies and procedures
- Reviewed data and files provided by Comcast

Seattle Office of City Auditor

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INTRODUCTION

Audit overview

This audit was requested by Seattle City Councilmember Joy Hollingsworth and Mayor Bruce Harrell.

The objective of this audit was to assess Comcast's compliance with City of Seattle (City) rules for cable television providers as the City begins to renegotiate its franchise agreement with Comcast, set to expire in January 2026. Our last audit of Comcast was completed in 2009.

The period covered by this audit was January 2022 to June 2024.

Comcast has about 60,000 Seattle cable customers, according to the company's 2024 annual report to the City.

Background

The City of Seattle is a cable television franchising authority, meaning it can negotiate agreements with cable providers in exchange for use of public rights of way. Two companies have franchise agreements with the City: Comcast and Astound.

As part of these agreements, the City receives franchise fees; in 2024, Comcast reported about \$4.8 million in franchise fees owed to the City. The City contracts with an accounting firm to conduct financial reviews of franchise fees.

The City also receives funding to support [Public, Educational, and Governmental Access Channels](#) (PEG) in its franchise agreement with Comcast, as well as complimentary cable television service.

As a franchising authority, the City can enforce customer service rules for cable television. In 1999, the Seattle City Council adopted the [Cable Customer Bill of Rights](#), the City's customer service rules for cable television providers. Last updated in 2015, it includes standards such as:

- Required time for a customer to connect to a live agent by phone
- Installation and repair time
- Credits for outages when reported by customers
- Timelines for bill due date, late fees, and disconnection
- Services for customers with disabilities
- Complaints answered by cable providers within 15 days and a right for a cable customer to file a follow-up complaint with the City

Exhibit 1 below provides an overview of some of the rights cable customers have under City rules.

The City's rules also set forth required credit amounts to pay to customers when cable television providers do not comply with the rules. For example, if a customer is not given the option to speak with a live agent within three minutes when calling customer service, they are entitled to a \$20 credit. The City can also fine a provider up to \$1,000 for a "pattern of, or unremedied, noncompliance" under the Cable Customer Bill of Rights.

Exhibit 1: Overview of Seattle Cable Customer Bill of Rights



Source: Office of City Auditor; see [Seattle Municipal Code 21.60](#) for the full description of the Cable Customer Bill of Rights.

For this audit, we selected 49 standards from the Cable Customer Bill of Rights for testing. A complete list of standards tested, with results, can be found in Appendix C. We assigned a numbering system to the standards for ease of tracking.

A 2024 survey commissioned by the City found that 54 percent of Comcast cable television customers and 66 percent of Astound cable television customers did not know about the Cable Customer Bill of Rights. If you are experiencing an issue regarding your cable television service, the City recommends first attempting to contact your cable provider. One option is to call your provider at the following numbers:

- Comcast: 800-266-2278
- Astound: 866-928-3123

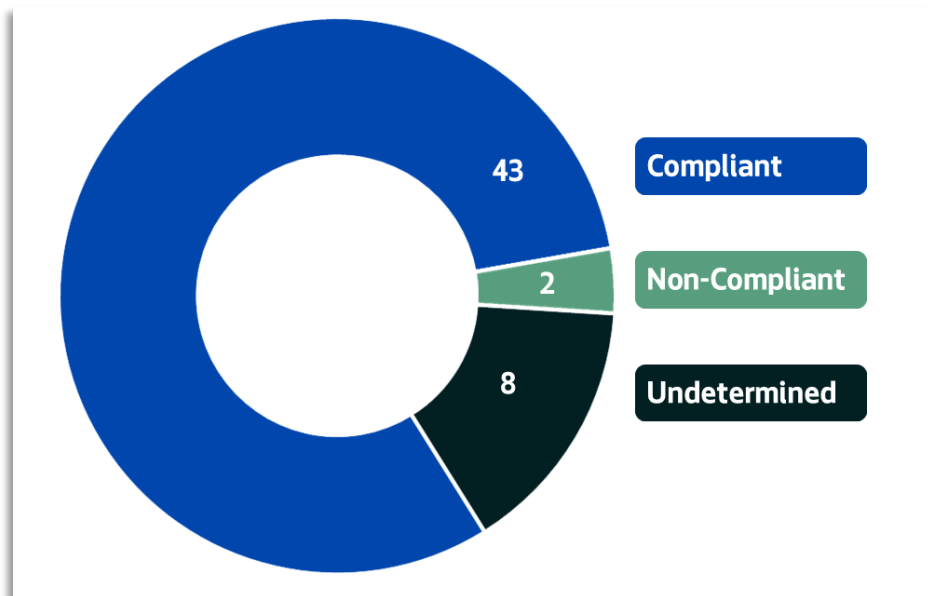
If your issue is still not resolved, you can contact the City through a [webform](#) or by calling 206-684-8498.

SUMMARY OF COMPLIANCE TESTING

Compliance rating results

Our assessment of 49 standards from the City's Cable Customer Bill of Rights resulted in 53 ratings described below; some standards have two ratings because they cover multiple elements. The full results of our assessment are in Appendix C.

Exhibit 2: Summary of ratings from compliance testing



Source: Office of City Auditor

Complied

- Comcast complied with 39 standards: We concluded that Comcast generally met these standards' requirements based on our review of available data, information, and practices.
- Comcast complied, based on policies, with an additional 4 standards: These are standards that we were able to assess Comcast complied with based on its written policies and procedures, but not how the company puts them into practice. We provided explanations in the standards' note column as appropriate in Appendix C.

Did not comply

- Comcast did not comply with 2 standards: We concluded that Comcast did not adhere to these standards based on our review of available data, information, and practices.

Undetermined

- We rated 7 standards as ones we were unable to assess either due to the vagueness of the standard's language or lack of adequate information. We provided explanations in the standards' note column as appropriate.
- We did not test 1 standard for television reception/signal quality. The City has contracted with a consultant to conduct a technical review of Comcast's network.

Some standards have two ratings because they cover different elements. Our assessment of those elements led to different ratings, resulting in a total of 53 ratings for the 49 standards we assessed. For example, Standard 44 includes requirements for awarding credits to current customers and checks to former customers when a cable provider violates the City's rules. While we rated Comcast as compliant regarding awarding credits to current customers, we could not assess whether Comcast is issuing checks to its former customers.

Our testing also resulted in two recommendations to Comcast, which we discuss below. We also included observations regarding Comcast's practices that may be informative for customers.

COMCAST APPLIES LATE FEES FOR FEBRUARY BILLS TOO EARLY

Section summary

Comcast is applying late fees to February bills before 30 days have elapsed, in violation of the City's rules for cable television providers, also known as the Cable Customer Bill of Rights. This is due to how Comcast generates monthly bills and to February being shorter in days compared to other months. While Comcast officials said the company uses a manual process to identify improper late fees applied for the month of February and issue refunds, its billing system still applies late fees too early for February and has led to customer complaints. We recommend that Comcast update its billing system to ensure it complies with the City's rules.

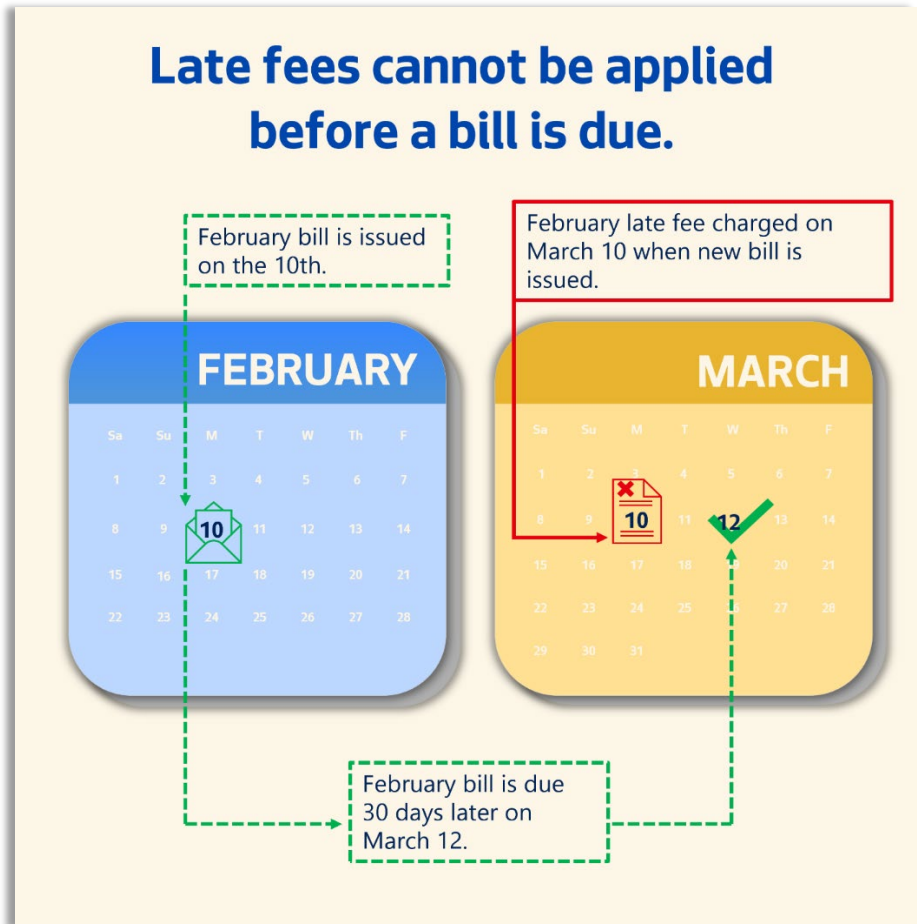
Comcast's billing process does not comply with the City's late fee rules

The City's Cable Customer Bill of Rights requires that a late fee should not be applied to a customer's bill before its due date, which should be at least 30 days out. The City's standards prescribe a minimum of 30 days as the due date on all monthly bills and state that a late fee may only be applied to a bill if not paid by its due date. We found that Comcast's billing system complied with having the required due dates of at least 30 days on monthly bills. However, for the month of February, Comcast did not comply with the required timeline for applying late fees. Comcast's billing system is applying late fees to February bills too early.

Comcast applies late fees to February bills that are not paid by the time March bills are generated, which occurs before the stated February due date. Comcast generates bills for an account on the same day each month (e.g., January 10, February 10, March 10, etc.) and applies applicable late fees when a succeeding bill is generated. This process for applying late fees complies with City rules when months have 30 or 31 days. But since February has 28 days (or 29 days in leap years), Comcast generates customers' March bills before their February bills are due. Comcast then applies late fees to customers who have not yet paid their February bills, which is one or two days before the February bills are actually due for payment. This violates the City's requirement that a late fee may only be applied if a bill is not paid by its 30-day due date. Customers who haven't paid their February bills by the time their March bills are generated should not see a late fee applied to their accounts because their bills are not due for another day or two.

Exhibit 3 provides a graphical example of billing and due date timeline for a Comcast customer.

Exhibit 3: Example of a Comcast customer billing timeline for February and March



Source: Office of City Auditor

Comcast's application of late fees to customers' accounts before their due dates is contrary to the City's rules. Comcast is aware of this issue; Comcast officials stated that they have a process to review February bills and manually credit customers back any improperly applied late fees. However, because this is a manual process and does not correct the system issue, this increases the possibility that it may miss some customers. The improper late fees could also confuse and frustrate customers who see it in their accounts. We reviewed two complaints from customers to the City about Comcast applying late fees to their accounts before their bill was due.

Comcast advocates for changing the due date requirement to 27 days to fix this violation of the City's rules. While this change would resolve the issue, it would also mean that customers would have at least three fewer days to pay their bills.

Recommendation 1

Comcast should update its billing process to ensure it complies with the Cable Customer Bill of Rights requirement for applying late fees.

COMCAST SHOULD BETTER PUBLICIZE SERVICES FOR CUSTOMERS WITH DISABILITIES

Section summary

The City's rules for cable television providers require that they provide certain services to customers with disabilities and to inform customers of such services. We found that Comcast does not publicize these services in its welcome kit for new customers. Without proper notification, customers with disabilities may not be aware of the services that the City requires Comcast to provide. We recommend that Comcast include information about its services for customers with disabilities in the welcome kit and other communications that go to all customers.

City rules require providing and publicizing services for customers with disabilities

Seattle's Cable Customer Bill of Rights includes the right for customers with disabilities to receive certain services, including closed captioning and free delivery, installation, and pickup of equipment. Exhibit 4 below describes these services.

Exhibit 4: Overview of the services available to Seattle cable customers with disabilities



Source: Office of City Auditor

During our testing, we found that Comcast complied with three of the four requirements related to services for customers with disabilities. We could not confirm whether Comcast provides free installation and pickup of equipment. See Appendix C for a full description of the standards and compliance ratings.

The City's rules also require that customers receive certain information at regular intervals: at installation, each year, by request, and when there are significant changes in such information. Required information (described in full in Appendix C, Row 28) includes services for customers with disabilities. Our testing of Comcast's compliance with this standard included reviewing the welcome kit provided to Seattle customers. The welcome kit has important information for new customers, such as prices, channel lineup, the privacy policy, and the service agreement. We did not find information in the welcome kit related to services for customers with disabilities.

Without proper notification, customers with disabilities may not be aware of the services that Comcast is required to provide to them. In the absence of proper notification, customers with disabilities must request information on services that they are owed under the Cable Customer Bill of Rights.

Comcast officials stated that their monthly bills have a section on accessibility. This section contains contact information that people can use regarding issues affecting customers with disabilities. However, it does not describe what services that Comcast provides, including ones required under City rules for cable providers.

In addition, for another standard on remote controls, we asked Comcast how customers are told about different remote options, including large-button remotes. Comcast told us that such information is provided upon request or if a customer self-identifies as having a disability.

Comcast has a support center for customers with disabilities. However, there is no information about the [center](#) or the services that the center offers in the welcome kit for cable customers.

Recommendation 2

Comcast should describe its services for customers with disabilities in its welcome kit and additional communications that go to all customers.



OBSERVATIONS FOR CUSTOMERS

As part of our compliance testing, we learned additional information that may be helpful to Comcast customers.

Third-party stores

Under the City's rules—also known as the Cable Customer Bill of Rights—cable providers are required to have one store for every 75,000 customers that offers services like bill payment or equipment exchange. Comcast has about 60,000 customers and four stores in Seattle; we visited each as part of our audit.

While we determined Comcast complies with this requirement, we found that the extent of services offered differs between stores depending on whether Comcast or a third party operates them. Comcast operates stores downtown and at Northgate, while its additional third-party stores are in Ballard and West Seattle.

We noted that the two third-party stores were not able to provide the same extent of customer service as Comcast-operated stores. For example, an employee at the West Seattle store said they couldn't provide customers with bill credits. Store employees said they would refer customers who need more extensive help to Comcast.

Use of chat

The City requires that cable providers answer customer calls and transfer them to a live agent within a certain amount of time. These rules do not apply to online chat, which Comcast also uses for customer service.

We called Comcast's customer service line to test its responsiveness as part of our audit. The automated system connected us with a live agent within the required time. The system twice offered for us to use the chat option during our call testing, including after we asked to speak with a live agent.

Outage credits

Cable television customers in Seattle can receive credit prorated for each day of an outage. However, the rules only apply to customers who report an outage. During our audit, we identified jurisdictions (Philadelphia and Fairfax County, Virginia) that require automatic credits to customers for outages in certain scenarios.

Systemwide change to paperless billing

City of Seattle rules require that cable television customers "retain the option of whether to receive bills by mail or electronically." While we determined that Comcast complied with this rule, we learned during our audit that the company made a systemwide change in March 2023 to switch customers to paperless billing. Comcast notified existing customers of the change and how to opt out.

If you are a Comcast customer, you can go to xfinity.com/paperless to indicate whether you prefer to receive a paper or electronic bill.

Interest on deposits

According to the City's rules, deposits "shall accrue interest at a fair market rate" and be repaid when a customer cancels service. Comcast policy states that customers may need to put down a deposit to get service, depending on the results of a credit screening.

We determined that Comcast complies with City rules regarding deposits. In documentation provided to us by Comcast, we saw that the company is providing interest on deposits each month as bill credit. The interest credited to the customer each month in the example we saw was \$0.02.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

This audit was requested by Seattle Mayor Bruce Harrell and Councilmember Joy Hollingsworth. They asked our office to review Seattle's two cable providers' compliance with the Cable Customer Bill of Rights as the City prepares to renew its franchise agreements. The objective of this audit was to assess Comcast's compliance with these rules. We plan to also assess the compliance of Astound, the City's other cable provider.

Scope

The scope for this audit included Comcast data from January 2022 to June 2024. We tested compliance with 49 standards in the City's Cable Customer Bill of Rights.

Methodology

To accomplish the audit's objectives, we performed the following:

- Reviewed past Office of City Auditor work regarding the City's Cable Customer Bill of Rights
- Reviewed archival information regarding legislation related to the City's Cable Customer Bill of Rights
- Reviewed federal rules and regulations regarding cable television
- Conducted site visits to the four Comcast stores in Seattle in November 2024
- Conducted call testing to Comcast customer service
- Reviewed Comcast quarterly and yearly reports to the City's Office of Cable Communications
- Reviewed Comcast policies and procedures
- Analyzed unplanned and planned outages data, refunds and credits data, customer complaints data, monthly call data, and installation data
- Reviewed logs of poor signal quality, disconnections, and deposits
- Reviewed comprehensive files of customer complaints, signal interruptions, service requests, and customer service calls and response times

We assessed the reliability of the data we analyzed in this report to ensure they were sufficiently complete and accurate. We concluded that the data are of undetermined reliability because of limited information about Comcast's systems and lack of access to the data sources. However, we used the data in our compliance testing because

the City's Office of Cable Communications uses this data in its oversight role and based on our review of the limited information we have about Comcast's systems.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX A

Comcast Response



June 12, 2025

Mr. Andrew Scoggin
Assistant City Auditor, Seattle Office of City Auditor
700 Fifth Avenue, Suite 2410
Seattle WA 98124-4729

Dear Mr. Scoggin,

Comcast appreciates the opportunity to respond to the City Auditor's findings and report on Comcast's compliance with the Seattle Cable Customer Bill of Rights. As you know the CCBOR is extensive, and we appreciate how thorough and professional your team has been while working to ascertain Comcast's compliance. We provided a lot of information for your review and from the questions you generated it is clear that your team examined it all thoroughly.

Comcast strives to provide an excellent customer experience and adheres to the CCBOR closely. We are pleased to see that the audit found Comcast to be compliant with 47 of the 49 standards assessed, equaling a 96% compliance rate. However, we strive to achieve 100% and with that would like to respond to the two standards that generated recommendations, one of which is from a finding of non-compliance.

Recommendation #1: Comcast should update its billing process to ensure it complies with the Cable Customer Bill of Rights requirement for applying late fees;

Comcast respectfully disagrees with this finding and recommendation. Comcast is in compliance with the CCBOR because Comcast's billing system is set to a 30-day cycle. And while a 30-day billing cycle can create issues because the month of February has less than 30 days, Comcast manually credits back all February late fees that are issued in error so that those customers do not pay a late fee, in order to remain compliant with the CCBOR. This practice ensures compliance with the CCBOR, because customers do in fact have 30 days to pay their bill before they would have to pay a late fee. This practice differs from our other markets where the system is set to 27 days because of the month of February. In short, 30 days doesn't exist in February and Comcast cannot technically adjust the billing system for one month only. Even if it could, this would result in overlapping bills, creating other customer impacting issues. Therefore, Comcast works around the issues created by the 30-day billing cycle by manually crediting back all erroneously-issued February late fees. Over the past decade, Comcast has repeatedly brought this matter to the City's attention and asked for the number of days to be adjusted down to account for the reality of the month of February. Many other industries do the same or provide even less time – 21 days to pay. We again implore the City to make this simple change to 27 days.

Recommendation #2: Comcast should describe its service for customers with disabilities in its welcome kit and additional communications that go to all customers;

900 132nd Street SW, Everett, WA 98204

Comcast provides a robust offering of services for subscribers with disabilities and respectfully disagrees that Comcast does not properly publicize these services, however, we will work to include information about our support for subscribers with disabilities in our welcome kit. Comcast is committed to making our products, services, and experiences accessible to the widest possible audiences.

<https://corporate.comcast.com/impact/accessibility>. The Company firmly believes in the principal that disability isn't the lack of ability, it's the lack of a solution and is committed to the betterment of accessible solutions for its customers. As previously shared, a description of accessible product features can be found at [Xfinity Accessibility and Inclusive Design](#). In addition to accessibility features included or passed through on video programming, like closed captioning, audio description and voice guidance, Comcast provides customers with assistive technologies and support such as a large button voice remote and braille or large print format bills, and/or channel lineups upon request. Comcast is also committed to its accessible customer call center ("ACoE") that has a specially trained support team to assist customers between 8 a.m. and 11 p.m. (ET), 7 days a week. Customers can reach the ACoE by calling 855-270-0379 and saying "accessibility." Customers can also contact care agents by sending an email, using our accessible chat service, or texting "Accessibility" to 266278. This ACoE call center information is posted on Comcast's web page and included in customer billing. Further, Comcast also provides an American Sign Language call center for customers that use ASL. [Help and support in American Sign Language \(ASL\) and by text - Xfinity Support](#). Comcast is proud of these efforts and is working on the City's request to add the Accessibility website and ACoE toll-free number into the Welcome Kit.

Again, we thank you and your team for their professionalism in conducting this audit. Comcast is proud to serve the residents of the City of Seattle and looks forward to doing so in the coming years.

Sincerely,



Zshoni Nalls

Director, External - Government Affairs

APPENDIX B

List of Recommendations and Comcast Response

Recommendation 1:

Comcast should update its billing process to ensure it complies with the Cable Customer Bill of Rights requirement for applying late fees.

Comcast Concurrence: No

Estimated Date of Completion (Qtr./Yr.): N/A

Response Submitted by Comcast: Comcast complies with the CCBOR and has repeatedly asked the City to make the simple change to 27 days to pay in order to comport with the reality of February. This would be inline with how it is done across other markets and industries.

Auditors' Response: We maintain our assessment that Comcast did not comply with the Seattle Cable Customer Bill of Rights (CCBOR) standard regarding application of late fees for February. Per the CCBOR, cable providers "may apply an administrative fee" to an account when "not paid by the due date." As explained on pages 7-9 of this report, we found that Comcast applies late fees to February bills that are not paid by the time March bills are generated, which occurs before the stated February due date. This may confuse and frustrate customers, and the City has received complaints from customers about Comcast applying late fees too early. Although Comcast states in their response letter (see Appendix A) that their process of manually refunding fees "ensures compliance with the CCBOR," this practice does not prevent fees from being applied, as required by the CCBOR.

Recommendation 2:

Comcast should describe its services for customers with disabilities in its welcome kit and additional communications that go to all customers.

Comcast Concurrence: Yes

Estimated Date of Completion (Qtr./Yr.): Q1 2026

Response Submitted by Comcast: Comcast will endeavor to include information such as the accessibility center website in the welcome kit provided to subscribers.

APPENDIX C

Cable Customer Bill of Rights Standards and Compliance Ratings

The table below contains the results of our testing of Comcast's compliance with the City's rules for cable providers, also known as the Cable Customer Bill of Rights. The period covered by this audit was January 2022 to June 2024.

We tested Comcast's compliance on 49 standards. The first column contains the standard as written in [Chapter 21.60 of Seattle Municipal Code](#). Our compliance rating appears in the second column, while the third column has additional information that we identified as part of our testing.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
1. Except as otherwise approved by the City in a franchise, the grantee shall provide at least one service center for each 75,000 customers served, located at a safe, visible site within the City that is handicapped accessible and located along mass transit routes. Except as otherwise approved by the City, all service centers shall be open during normal business hours and shall be fully staffed on-site with CSRs [Customer Service Representatives] offering the following services to customers who come to the service center: bill payment (including the ability to provide change and customer receipts); equipment exchange; processing of change of service requests; and response to customer inquiries and requests. The City may approve alternatives for service centers that provide substantially equivalent services. The grantee shall post a sign at each service center advising customers of its hours of operation and of the addresses and telephone numbers to contact the City and the grantee after normal business hours [SMC 21.60.820(B)(1)] "Normal business hours" means the hours of 9 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m., Saturday, excluding federal, state, or City holidays [SMC 21.60.030 Definitions]	Complied	Comcast has four stores in Seattle, more than required by this standard. Comcast owns and operates two stores located downtown and in Northgate. The two other stores in Ballard and West Seattle are third-party stores owned and managed by a contractor. We noted that the two third-party stores were not able to provide the same level of customer service as Comcast-owned stores. For example, an employee at the West Seattle store said they couldn't provide customers with bill credits. Employees at the third-party stores said they would refer customers who need more extensive help to Comcast. In addition, the third-party stores' handouts about the City's Cable Customer Bill of Rights were either outdated and kept behind a counter or unavailable. At the time of our site visits, all four stores had opening hours of 10 a.m. to 7 p.m., Monday through Saturday, which is an hour later than required by this standard. However, all the stores had opening hours of 11 a.m. to 6 p.m. on Sundays, which this standard does not require. We advise that Comcast post its after-hours contact information at all four stores.

Audit of Comcast's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
2. The grantee shall provide free exchanges of faulty equipment at the customer's address [SMC 21.60.820(B)(1)]	Complied	
3. CSRs [Customer Service Representatives] will be available to respond to customer inquiries during normal business hours. The grantee shall maintain local or toll-free telephone lines during normal business hours for service/repair requests and billing inquiries [SMC 21.60.820(B)(2)]	Complied	
4. The grantee shall have dispatchers and technicians on call 24 hours a day, seven days a week, including legal holidays, for emergency purposes [SMC 21.60.820(B)(3)]	Complied	
5. The grantee shall keep sufficient CSR [Customer Service Representative] and telephone line capacity to ensure that telephone calls are answered by an IVR [Interactive Voice Response] or a CSR within 30 seconds under normal operating conditions. If the call is answered by an IVR, the IVR must allow the option to speak with a CSR within no more than three minutes. If a customer has exercised the option to speak with a CSR, the customer shall be able to speak with a CSR within 30 seconds once the call is transferred during normal business hours. This standard shall be met no less than 80 percent of the time, measured on a monthly basis under normal operating conditions. Compliance with this standard shall be reported on a quarterly basis according to a reporting form established by the Office of Cable Communications [SMC 21.60.820(B)(4)]	Complied	Comcast met the 80% requirement for this standard. Under federal guidelines, the standard for live agents answering calls within 30 seconds is 90%. The City and other franchising authorities are not required to use this federal standard. This standard does not apply to Comcast's chat function. We were offered the chat function during our call testing, including when we requested assistance from a customer service representative.
6. The total number of calls receiving busy signals shall not exceed three percent of the total telephone calls. This standard shall be met no less than 90 percent of the time, measured on a quarterly basis under normal operating conditions [SMC 21.60.820(B)(5)]	Complied	

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
7. Guaranteed seven-day standard installation and service. The grantee shall complete all standard installations and service repairs requested by customers within seven business days after an order has been placed, unless otherwise requested by the customer. This standard must be met no less than 95 percent of the time under normal operating conditions measured on a quarterly basis [SMC 21.60.820(C)(1)]	Complied in 9 of 10 quarters reviewed; did not comply in Q2 2023	Comcast did not meet the 95% requirement in the second quarter of 2023. Comcast reported that 93% of installations and service repair requests were completed within seven days in Q2 2023. Comcast met the 95% requirement during the other nine quarters within the audit period.
8. Residential installation and service appointments. Customers requesting installation of cable service or repair service to an existing installation may choose any available four-hour block of time during normal business hours. The grantee shall provide customers the option of service or installation appointments weekday evenings until 7 p.m. and a minimum of four hours on Saturdays at the request of and for the convenience of the customer. The grantee may not cancel an appointment with a customer after 5 p.m. on the day before the scheduled appointment [SMC 21.60.820(C)(2)]	Complied	
9. The grantee shall be deemed to have responded to a request for service under the provisions of this Section 21.60.820 if a technician arrives within the agreed-upon time period. If the customer is absent when the technician arrives, the technician shall verify the appointment with the technician's dispatcher by telephone while at the customer's door and leave written notification of timely arrival. The grantee shall keep a record of the notification. In such circumstances, the customer must contact the grantee to reschedule the appointment. In the event that a technician arrives without a prior appointment, and the customer must be present for service to proceed, and the customer is absent, the grantee will not be considered to have responded to a request for service [SMC 21.60.820(C)(2)(b)]	Complied	Comcast does not provide a written notice (as prescribed by this standard) but uses text messages and phone calls to notify customers.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
10. In the event of a system outage (an outage is a service interruption that involves a loss or substantial impairment in reception on all channels for a period of one hour or more) resulting from grantee equipment failure affecting five or more customers, the grantee shall initiate repairs within two hours after the third customer calls to report the outage [SMC 21.60.820(C)(3)(a)]	Complied	
11. All customers who call the grantee 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)]	Complied	This standard applies to system outages as defined in standard 10. The credits we reviewed varied in amount.
12. The grantee shall notify the City of any outage of at least four continuous hours that affects at least ten percent of its customers [SMC 21.60.820(C)(3)(c)]	Complied	Comcast's log of outages did not include any outages large enough to qualify under this standard during the period we reviewed. However, Comcast provided notification to the City regarding outages due to the November 2024 windstorm.
13. The grantee shall initiate repairs for all other service interruptions resulting from grantee equipment failure within 24 hours. Grantee shall provide any customer who reports a service interruption with a credit for each day of service interruption due to the grantee's equipment failure [SMC 21.60.820(C)(3)(d)]	Complied	
14. TV reception. The signal quality provided by the grantee shall meet or exceed technical standards established by the FCC [Federal Communications Commission]. The grantee 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)]	Did not test	The City's Office of Cable Communications has contracted with a consultant to conduct a technical review of Comcast's network.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
15. A planned outage that the grantee anticipates will last more than four hours shall be preceded by at least 24 hours' notice to affected customers and shall occur during periods of minimum use of the system, preferably between midnight and 6 a.m. Such notification of a planned outage may take the form of a door hanger, a message or insert into the monthly bill, or a telephone call and may be supplemented with on-screen messages announcing the planned outage [SMC 21.60.820(C)(4)(a)]	Complied	
16. If a customer experiences poor signal quality or reception, the grantee 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. If an appointment is necessary, the customer may choose a four-hour block of time during normal business hours. At the customer's request, the grantee shall repair the problem at a later time convenient to the customer. The grantee shall provide customers the option of service or installation appointments weekday evenings until 7 p.m. and until 5 p.m. on Saturdays [SMC 21.60.820(C)(4)(b)]	Complied	
17. A grantee's CSRs [Customer Service Representatives] shall have the authority to provide credit for interrupted service or any of the other credits listed in Section 21.60.850, to waive fees, to schedule service appointments, and to change billing cycles, if appropriate [SMC 21.60.820(C)(5)(a)]	Complied	
18. Any difficulties that cannot be resolved by the CSR [Customer Service Representative] shall be referred to the appropriate supervisor who shall make best efforts to contact the customer within four hours and resolve the problem within 48 hours or within such other time frame as is reasonable [SMC 21.60.820(C)(5)(b)]	Unable to assess	Comcast has a 24-hour callback policy for escalated complaints. Comcast data did not show when complaints are escalated to a supervisor.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
19. Grantee will send customers a clear and concise bill every month. The grantee shall provide a due date on each bill that is at least 30 days from the beginning date of the applicable billing cycle. A monthly bill shall be issued to all customers regardless of balance due. The customer shall retain the option of whether to receive bills by mail or electronically [SMC 21.60.820(C)(6)(a)]	Complied	Comcast made a systemwide change to paperless billing during the audit period. We saw examples of communications Comcast sent to customers (both paper and electronic) stating that customers could opt out of the change.
20. The grantee shall respond to a customer's billing inquiry, general question, or comment made by telephone or e-mail within 48 hours during normal business hours. The grantee shall respond in writing to a written and mailed billing inquiry, general question, or comment within two weeks of the date of receipt of the letter [SMC 21.60.820(C)(6)(b)]	Unable to assess	
21. If a customer's service bill is not paid by the due date the grantee may apply an administrative fee to the customer's account. If the customer's service bill is not paid within 45 days of the beginning date of the applicable service period, the grantee may perform a "soft" disconnect of the customer's service. If a customer's service bill is not paid within 52 days of the beginning date of the applicable service period, the grantee may disconnect the customer's service, but only upon showing that it provided ten days' notice to the customer that such disconnection may result [SMC 21.60.820(C)(6)(c)]	Did not comply on timeline for applying late fee for February bill Complied with disconnection timeline based on policies but unable to assess practices	We recommend that Comcast update its billing process to comply with this standard (see Recommendation 1 earlier in this report). Comcast's disconnection policy timeline exceeded this standard's requirements. Comcast provided a log of disconnections, but we could not determine how delinquent the accounts were.
22. If a customer requests cancellation of any or all services, billing for affected services shall end on the same day, or on the future date for which the cancellation is requested. After the requested cancellation date, the customer shall not be responsible for cable services delivered. The grantee must refund any credit balance owed the customer, less any owed or disputed amounts, within 15 business days after the close of the customer's billing cycle following the return of the equipment and request for cancellation [SMC 21.60.820(C)(6)(d)]	Unable to assess the cancellation requirement Complied on refunding credit balance based on policies but unable to assess practices	Comcast did not provide enough information about its cancellation policy to assess this requirement. We were unable to assess the timeliness of the refunds we reviewed, but Comcast policies require the payment to be made in accordance with local franchise requirements.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
23. Deposits shall accrue interest at a fair market rate. Within 15 business days after cancellation of service, the grantee shall repay any deposit with a statement showing accrued interest to the customer, less any sums owed to the grantee [SMC 21.60.820(C)(6)(e)]	Complied	Comcast paid out interest accrued on deposits every month as an account credit—\$0.02 in the account we reviewed
24. For any customer with a verified disability that prevents the customer from self-installing equipment, the grantee shall at no charge deliver, install, and pick up equipment at the customer's home. In the case of malfunctioning equipment, the grantee shall provide and install substitute equipment, ensure that it is working properly, and remove the defective equipment [SMC 21.60.820(D)(1)]	Unable to assess	Comcast has an Accessibility Support Center for Customers with Disabilities . However, we couldn't verify that the center provides all the services required by this standard. We recommend that Comcast describe its services for customers with disabilities in its welcome kit and other communications that go to all customers (see Recommendation 2 earlier in this report).
25. The grantee shall provide TDD/TTY [Telecommunications Device for the Deaf/Teletypewriter] service with trained operators who can provide every type of assistance rendered by the grantee's CSR [Customer Service Representative] for any hearing-impaired customer at no charge [SMC 21.60.820(D)(2)]	Complied	
26. The grantee shall install, at no charge, any closed captioning device purchased by a hearing-impaired customer [SMC 21.60.820(D)(3)]	Complied	
27. The grantee shall provide free use of a converter remote control unit to mobility-impaired customers [SMC 21.60.820(D)(4)]	Complied	In addition to regular voice remotes, Comcast offers a free large-button voice remote for customers with disabilities. We recommend that Comcast describe its services for customers with disabilities in its welcome kits and other communications that go to all customers (see Recommendation 2 earlier in this report).

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
28. Upon installation, annually, and at any time a customer requests, the grantee shall provide the following information to its customers in a clear, concise written form. In addition, the grantee shall notify customers 30 days in advance of any significant changes in the following: a. Cable services offered by the grantee, including its channel lineup; b. The grantee's prices and options for cable services; conditions of subscription to cable services; and policies concerning changes in services offered, notification of changes, disconnection, and service downgrades; c. A description of these Subchapter II (Cable Customer Bill of Rights) standards in a form provided by or approved by the City; d. Installation and service maintenance policies, including the customer's responsibilities for equipment; e. Instruction on the use of cable TV service, remote control, and standard video recording device hookups; f. Instruction on the use of interactive television if provided by the grantee; g. Billing and complaint procedures, including the address and telephone number of the grantee's offices, the grantee's policies on deposits and credit balances, returned check charges, and refunds for disruption of cable service or poor signal quality; h. Contact information for filing a consumer complaint with the FCC [Federal Communications Commission] and the Office of Cable Communications; i. Policies concerning protection of customer privacy, including provisions for opting-out of disclosure of customer name and address for marketing purposes; j. Use and availability of parental control/lock out device; k. Special services for customers with disabilities including any discounts required by the franchise or other agreements; and l. Days, hours of operation, and locations of the service centers [SMC 21.60.820(E)(1)]	Complied	Comcast lists most of the required information in its welcome kit. Although Comcast lists third-party stores as being full service, we found that those stores do not offer the extent of services that Comcast-owned stores do, as we explained in the note for Standard 1. We advise Comcast to include the Federal Communications Commission (FCC) contact information in its welcome kit and recommend that Comcast describe its services for customers with disabilities in its welcome kit and other communications that go to all customers (see Recommendation 2 earlier in this report).

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
29. The grantee shall concurrently send to the Office of Cable Communications a copy of all notices provided to customers under this subsection [SMC 21.60.820(E)(2)]	Complied	
30. The grantee shall provide customers with written notification, and announcements on the cable system, of any changes in programming, services, or channel positions as soon as possible, but no less than 30 days in advance of such changes if the change is within the control of the grantee. Customers shall be given a description of the changes, their options for changing services they receive, the phone number for questions, and the effective date [SMC 21.60.820(E)(3)]	Complied	
31. All of the grantee's officers, agents, employees, contractors, and subcontractors who are in personal contact with customers shall have visible identification cards bearing their name and photograph. The grantee shall account for all identification cards at all times. Every vehicle of the grantee used for providing services to customers shall be clearly visually identified to the public as working for the grantee. All CSRs [Customer Service Representatives] shall identify themselves orally to callers immediately following the greeting during each telephone contact with the public. Officers, agents, and employees of the grantee and its contractors and subcontractors shall identify themselves to the customer when making a service call or installation [SMC 21.60.820(E)(4)]	Complied based on policies but unable to assess practices	

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
32. All CSRs [Customer Service Representatives], technicians, employees, agents, contractors, and subcontractors of the grantee in every contact with a customer shall state the estimated cost of the service, repair, or installation orally before delivery of the service or before any work is performed and shall provide the customer with an oral statement of the estimated total charges before terminating the telephone call. At the customer's request, the grantee shall send the customer a written statement detailing such charges. Grantee shall also provide customers with a written statement of the total estimated charges before leaving the location at which the work was performed [SMC 21.60.820(E)(5)]	Complied	
33. All promotional materials advertising cable services shall accurately disclose price terms. For non-automated orders, the CSRs [Customer Service Representatives] shall make clear the price of pay-per-view and pay-per-event programming before an order is taken. The grantee shall distribute promotional material in multiple unit buildings only with the approval of the building owner. The grantee shall not condition the provision of cable services on the receipt of such approval [SMC 21.60.820(E)(6)]	Complied	
34. All listings of the grantee's services shall conspicuously display the availability of all service tiers and corresponding prices for City customers, including the cost of either the basic cable service subject to rate regulation or the cost of the grantee's lowest priced cable service tier [SMC 21.60.820(E)(7)]	Complied	
35. The grantee shall not charge customers for any services they have not affirmatively requested. This Section 21.60.820 shall not prevent a grantee from adding programming to an existing tier [SMC 21.60.820(E)(8)]	Complied	

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
36. Multiple dwelling unit buildings. The grantee shall ensure that rates charged by the grantee to residents of multiple dwelling unit buildings do not exceed the charges paid by residents of single family homes. The grantee may not condition provision of services to multiple dwelling unit buildings on any requirement not imposed on other subscribers, except as expressly permitted in the franchise. The grantee may not condition provision of services to multiple dwelling unit buildings on an exclusive service agreement with grantee. The grantee may offer a building owner the option of a long-term agreement in return for installation of internal wiring or other telecommunications improvements unique to the building, but the grantee must offer the alternative of a no term agreement to building owners who wish to contract directly for installation by a contractor approved by the grantee and in accordance with the grantee's generally applicable technical standards. The foregoing does not restrict, condition, or inhibit the grantee's ability to negotiate longer-term right of entry agreements prior to offering service to multiple unit building residents for the purpose of maintaining grantee's on-site signal and facilities. For purposes of this subsection 21.60.820.F, a "right of entry agreement" means an agreement that permits the grantee access to the building to extend its distribution cable from the grantee's cable system in the right-of-way or public easement to the utility closet or other demarcation point in the multiple unit building [SMC 21.60.820(F)]	Complied with similar rates for multi-unit dwellings and single-family homes Unable to assess the requirement about exclusive service agreements in multi-unit dwellings	We were unable to review Comcast's right of entry agreements with multi-unit buildings. Comcast said these agreements are confidential but said they are non-exclusive and compliant with the law as well as City rules.
37. Safety. The grantee shall install and locate its facilities, cable system, and equipment in compliance with all federal, state, local, and company safety standards, and in such manner as shall not unduly interfere with or endanger persons or property. If the grantee receives notice that an unsafe condition exists with respect to its equipment, the grantee shall investigate such condition immediately, and shall take such measures as are necessary to remove or eliminate any unsafe condition [SMC 21.60.820(G)]	Complied	

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
38. Satisfaction guaranteed. The grantee shall guarantee customer satisfaction for every customer who requests new installation of cable service, video, or interactive television or adds any additional cable service to the customer's cable subscription. Any such customer who adds expanded basic or other higher tier of video service or interactive television to the customer's cable subscription and then requests discontinuation of such upgraded service within 30 days due to dissatisfaction with the service shall receive an account credit in an amount equal to the pro rata charge for the remaining days of service following the request to discontinue the service. If a customer subscribes to a service under a promotion that provides free service and chooses to discontinue the service during the promotion window, there shall be no charge of any kind for the service or for discontinuing the service [SMC 21.60.820(H)] As part of the installation process, the grantee shall provide documentation explaining the 30-day satisfaction guaranteed program pursuant to subsection 21.60.820.H. The documentation must include the toll-free contact number a customer can use to exercise customer rights under this Section 21.60.820 [SMC 21.60.820(C)(2)(a)]	Complied	
39. Destruction of personally identifiable information. A grantee shall destroy, within 90 days, any personally identifiable information if the personally identifiable information is no longer necessary for the purpose for which it was collected and there are no pending requests or orders for access to such personally identifiable information under this Section 21.60.825, pursuant to a court order, or pursuant to 47 U.S.C. § 551 [SMC 21.60.825(J)]	Complied based on policies but unable to assess practices	

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
40. Complaints to the grantee. The grantee shall, consistent with the obligations of this Chapter 21.60 including the minimum credit amounts set forth in Section 21.60.850, establish written procedures for receiving, acting upon, and resolving customer complaints and crediting customer accounts in accordance with company policies, and shall publicize such procedures at the grantee's sole expense [SMC 21.60.830(A)]	Complied	
41. The written procedures shall prescribe a simple process by which any customer may submit a complaint in person or by telephone, electronic mail, or in other forms to the grantee regarding an alleged violation of any provision of these customer service standards, any terms or conditions of the customer's contract with the grantee, or reasonable business practices [SMC 21.60.830(A)(1)]	Complied	
42. The grantee will make best efforts to resolve customer concerns or complaints at the first contact. The City will make best efforts to redirect to the grantee all cable customers who have contacted the City first with a cable or other service inquiry, concern, or complaint relating to cable services. Within 15 days after receiving a complaint, the grantee 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 two weeks of receipt [SMC 21.60.830(A)(2)]	Complied	It took Comcast an average of 11 days to close the escalated complaints we reviewed. Although some complaints took more than 15 days to close, Comcast data did not show when customers were notified of the proposed resolutions.
43. The grantee 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 grantee's decision and shall explain the necessary procedures for filing such complaint with the City [SMC 21.60.830(A)(3)]	Complied	Comcast's publicly available information for customers notifies them of their right to file a complaint with the City. We were unable to assess whether Comcast is notifying customers of this right at the point of the company's proposed resolution.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
44. For violations of this Subchapter II, credits shall be made to the customer's account in the amounts set forth in Section 21.60.850, at a minimum, or in greater amounts should the grantee choose to exceed the minimum credit. If the customer no longer receives cable service from the grantee, but registered a complaint while a subscriber of grantee's cable services, the grantee shall issue a check to the customer within 30 days of the resolution of the complaint [SMC 21.60.830(A)(4)]	Complied with the issuance of credits Unable to assess the issuance of checks to former customers	
45. The grantee's complaint procedures shall be sent to the City before implementation [SMC 21.60.830(A)(5)]	Unable to assess	We reviewed Comcast's compliance procedures but were unable to verify that the procedures were sent to the City before implementation.
46. At the City's request, the grantee shall include on its billing statement, in a clear and conspicuous manner, information on how to contact the City's Office of Cable Communications. At the City's discretion, such information may include, but shall not be limited to, the address, telephone number, and e-mail address of the Office of Cable Communications [SMC 21.60.830(F)(1)]	Complied	
47. At least annually, the grantee shall notify its customers of the existence, location and function of the City's Office of Cable Communications and shall provide, in a form provided by or approved by the City, a summary of this Subchapter II and the remedies and procedures available to its customers [SMC 21.60.830(F)(2)]	Complied	
48. The grantee 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 grantee's operation of the cable system to provide cable service, by number and type and their disposition; (2) service requests, identifying the number and nature of the requests and their disposition; (3) service interruptions and their disposition; and (4) all telephone calls from customers to grantee, and their response times [SMC 21.60.840]	Complied	

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
49. The Office of Cable Communications will develop and provide a quarterly reporting form to monitor the grantee's compliance with this Subchapter II. The grantee shall complete the form and send it to the Office of Cable Communications on a quarterly basis, within 30 days of the end of the quarter. All data in the report shall reflect activity within an area that reasonably approximates the jurisdictional boundaries of King County, including the City. To measure the grantee's compliance with standards related to customer telephone response times, the report shall include, at a minimum, the following information from the grantee: 1) the total number of calls offered to a grantee; 2) the number of calls handled by the grantee's IVR within 30 seconds; 3) the total number of calls during which a customer requested, in any fashion, to speak with a CSR [Customer Service Representative]; 4) the total number of calls transferred to a CSR; 5) the total number of calls transferred to a CSR that were answered within 30 seconds; 6) the average wait time before a call to a CSR was answered; and 7) other information that may be requested by the Office of Cable Communications, and is retained by the grantee, to assess the overall level and effectiveness of grantee's customer service practices or is necessary to address customer service complaints. If calls abandoned by callers exceed five percent of calls handled, the grantee shall provide an explanation [SMC 21.60.840(A)]	Complied	

APPENDIX D

Seattle Office of City Auditor Mission, Background, and Quality Assurance

Our Mission:

We conduct independent analyses of City programs and services with an equity and social justice perspective, making recommendations on ways the City can better serve the people of Seattle.

Background:

Seattle voters established our office by a 1991 amendment to the City Charter. The office is an independent department within the legislative branch of City government. The City Auditor reports to the City Council and has a four-year term to ensure their independence in deciding what work the office should perform and reporting the results of this work. The Office of City Auditor conducts performance audits and non-audit projects covering City of Seattle programs, departments, grants, and contracts. The City Auditor's goal is to ensure that the City of Seattle is run as effectively, efficiently, and equitably as possible in compliance with applicable laws and regulations.

How We Ensure Quality:

The office's work is performed in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. These standards provide guidelines for audit planning, fieldwork, quality control systems, staff training, and reporting of results. In addition, the standards require that external auditors periodically review our office's policies, procedures, and activities to ensure that we adhere to these professional standards.

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