



SUMMARY OF CHALLENGES TO SIGNING UP ELIGIBLE FAMILIES FOR COMCAST INTERNET ESSENTIALS

The California Emerging Technology Fund (CETF) and its partners since 2011 have been helping eligible low-income families living in Comcast service areas in California to sign up for Comcast Internet Essentials (CIE), the program proposed by Comcast to secure approval from the Federal Communications Commission (FCC) for purchase of NCB Universal. Currently, households with school children on the free-or-reduced-lunch program are eligible for CIE. The following is a summary complaints from experienced community-based organizations (CBOs) working in the Bay Area, San Joaquin Valley and Sacramento regions regarding the challenges encountered by actual prospective customers in attempting to subscribe to CIE. Although the CIE offer approved by the FCC (\$9.95 per month until a student graduates from high school or is no longer eligible for the school lunch program plus a \$150 voucher for a computing device) is a very good price point for low-income households with school children, there continues to be numerous hurdles to signing up for CIE. As a consequence, in 3 years Comcast has signed up only 11% of eligible households. The FCC and other federal regulators must hold Comcast accountable for resolving these problems and increasing CIE subscriptions.

Sign-Up Restrictions

Comcast makes the sign-up process long and cumbersome. The application process often takes 2-3 months, far too long for customers who are skeptical about the product in the first place, and have other pressing demands on their budgets. The waiting period between the initial call to Comcast and the CIE application arriving in the mail can stretch 8-12 weeks, if it comes at all. After submitting the application, another 2-4 weeks elapse before the equipment arrives. Many low-income residents do not have Social Security Numbers (SSNs) and are required to travel long distances to verify their identities because Comcast has closed many of its regional offices. Recently, some potential subscribers with SSNs were rejected over the phone and told they had to visit a Comcast office. Comcast has a pilot effort in Florida that should be expanded to allow customers to fax or email photocopied IDs as proof of identification.

Comcast enrolls oldest child in the program. When a potential CIE customer calls, the Comcast representative often attempts to sign up the oldest child eligible for the program, even if there are younger eligible children in the household. This means the family will be “kicked out” sooner because the discount only lasts as long as the registered child is in school and on the lunch program. Families can lose several years of CIE eligibility because of this procedure.

Comcast market-rate customer representatives don't know about Internet Essentials. When a potential CIE customer calls the market-rate line instead of the Internet Essentials line (sometimes the customer just remembers “Comcast” and calls the market-rate line), they are not guided to the CIE service. In some cases, less-knowledgeable customers have been “up-sold” to a market-rate product that they cannot afford. Even when consumers call the CIE number, the same thing may happen. Depending on which agent is handling the call, customers get different qualifying information, which sometimes leads to no service at all. One customer was told that she could get not service because she didn't have a SSN, which is not true.

Denial of Service

Comcast conducts credit checks for some customers, contrary to CIE rules. Dozens of clients are receiving letters from Comcast saying that they have failed a credit check. Comcast specifically states and advertises no credit check is needed for CIE. This has repercussions beyond obtaining broadband service. The act of performing a credit check can negatively impact the consumer's credit worthiness. Initially, some CIE service representatives told customers they could pay \$150 deposit to avoid a credit check, also contrary to program rules.

Comcast records show erroneous information for some customers. There are cases in which families have never been subscribers to Comcast Internet but someone who previously lived at the same address was, and the current household is denied service because of the 90-day "waiting" requirement. Similarly, Comcast records may indicate that its equipment associated with a certain address has not been returned and service is denied to a new resident, yet the customer attempting to subscribe clearly is not responsible for the missing equipment.

Wired Modem Outdated for Family and Student Use

Comcast only offers a wired modem to Internet Essentials customers, restricting the number of users at one time. If wireless modem/routers were offered as part of CIE, several family members could be online at the same time. In public statements Comcast repeatedly estimates the number of "people" they've reached (instead of households), which would be more logical if CIE provided a wireless modem/routers.

Comcast modems often are not compatible with computing devices issued by schools. Many schools are now allowing students to bring home school-issued computing devices, such as a tablet. In most cases, these devices require a wireless modem/router to connect to the Internet and the Comcast wired modem cannot be used. Comcast needs to offer CIE service that complements initiatives by schools to integrate technology into education as well as align with the recent E-rate modernization ruling by the FCC.

Complaints from Community Partners on Subscription Sign-Up Process

Comcast Internet Essentials online application process does not work. Non-profit CBOs have been diligently requesting from the beginning of the program that Comcast establish a workable online registration process for CIE. The existing system has never worked properly. The site is often unable to complete address eligibility searches and simply redirects the customer to the 1-855 number again. This situation has been a major barrier at technology fairs, where families are told they cannot sign up online and must make a separate trip to a Comcast office. Comcast continues to ignore consumer feedback about the poor website operations.

Comcast will not supply a list of auto-enroll schools to CBOs. Since the inception of CIE, CBOs have been asking for a list of schools in the Comcast service areas and priority targets for CIE, especially the auto-enroll schools, to facilitate the sign-up process. (The auto-enroll schools are those with at least 75% of the students on free-or-reduced-lunch, thus making all students eligible for CIE.) However, Comcast rarely provides a list of eligible auto-enroll schools. Meanwhile, CIE customer representatives typically are not aware of the auto-enroll schools CBOs or their clients call to enroll, which complicates and lengthens the enrollment process.