

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)

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)

Case No. _____

SUMMARY OF INITIAL PREFILED TESTIMONY OF DANIEL M. GLANVILLE

Mr. Glanville's testimony addresses the criteria established by federal and state law for transfer of a cable television franchise.

Mr. Glanville sponsors the following exhibits:

- | | |
|---------------|--|
| Exhibit DMG-1 | Daniel M. Glanville Resume |
| Exhibit DMG-2 | Proposed Certificate of Public Good |
| Exhibit DMG-3 | Docket No. 7633 Certificate of Public Good |
| Exhibit DMG-4 | Docket No. 8301 Amended Certificate of Public Good |

- Exhibit DMG-5A Southern Vermont Cable Company Cable Television Service Tiers
- Exhibit DMG-5B Southern Vermont Cable Company Channel Lineup
- Exhibit DMG-6A Comcast Price List – Brattleboro System
- Exhibit DMG-6B Comcast Channel Lineup – Brattleboro System
- Exhibit DMG-7 Annual Reports on Form 10-K of Comcast for the fiscal years ended December 31, 2014 – 2018 and 2019
Quarterly Reports on Form 10-Q of Comcast (provided on CD)
- Exhibit DMG-8 Comcast Customer Notices: Quality of Service Notice, Vermont Billing Practices Notice, Complaint and PEG Notice, and Important Information Notice

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INITIAL 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 your position and by whom are you employed?

1 A2. My position is Vice President of Government/Regulatory Affairs and Community Impact
2 for Comcast's Western New England Region.
3

4 Q3. What are your qualifications to present the testimony you intend to sponsor?

5 A3. As Vice President of Government/Regulatory Affairs and Community Impact for
6 Comcast's Western New England Region, I oversee franchise negotiations, license and
7 regulatory compliance, interactions with elected and appointed officials, and government
8 and public affairs initiatives for a region which serves over 830,000 residential and
9 business customers in over 300 communities in Connecticut, western Massachusetts,
10 western New Hampshire, New York, and Vermont. I also coordinate with Senior
11 Management on the implementation of operational initiatives. I have more than 21 years
12 of cable television and telecommunications experience with Comcast and its predecessor
13 companies. A true and correct copy of my resume is attached as Exhibit DMG-1.
14

15 Q4. What is the purpose of your testimony?

16 A4. The purpose of my testimony is: 1) to establish that Comcast has the legal, financial, and
17 technical ability to own and operate Southern Vermont Cable Company's ("SVCC's")
18 assets; 2) to demonstrate that acquisition of SVCC'S assets by Comcast and Comcast's
19 ownership and operation of these assets will promote the public good of Vermont; 3) to
20 outline how Comcast will meet each of the criteria established by statute and rule for
21 Comcast to own and operate a cable television system in Vermont; 4) to outline
22 Comcast's plans for integrating SVCC's system into Comcast's Vermont systems; and 5)

1 to provide a basis for issuing the requested Certificate of Public Good (“CPG”) with
2 certain conditions. Accordingly, the Commission should approve the sale of SVCC’s
3 assets to Comcast and issue a CPG authorizing Comcast to serve Southern Vermont
4 Cable Company’s subscribers. As part of my testimony, I am providing a proposed CPG
5 as Exhibit DMG-2.

6
7 Q5. How will you organize your testimony?

8 A5. I will begin by providing an overview of Comcast’s plans for integration and the benefits
9 this transfer will provide to current SVCC subscribers and the communities SVCC
10 serves. Then I will review the various criteria established by federal and Vermont law for
11 transfer of a franchise and issuance of a CPG to Comcast to own and operate SVCC’s
12 cable television systems in Vermont, including how Comcast will comply with both the
13 criteria of 30 V.S.A. § 504 and the “EMCO Criteria”, as required by the Commission’s
14 Application for a Cable Television CPG for the Operation of CATV Systems
15 (“Application”).

16
17 **I. Comcast: The Acquisition, Integration & Benefits to SVCC Subscribers**

18 Q6. Describe the transaction that will lead to Comcast acquiring substantially all of SVCC’s
19 assets.

20 A6. Comcast and SVCC have executed an Asset Purchase Agreement (“APA”), which
21 provides that SVCC will sell substantially all of its assets, such as accounts receivable
22 and tangible personal property, to Comcast in exchange for financial consideration.

1 SVCC will retain certain vehicles, real property, and other equipment, which Comcast
2 will not need for providing service.

3
4 SVCC has a certificate of Public Good, issued in Docket No. 7633, which authorizes
5 SVCC to serve 11 communities: Brattleboro, Brookline, Dover, Dummerston, Jamaica,
6 Marlboro, Newfane, Putney, Townshend, Wardsboro, and Westminster. See Exhibit
7 DMG-3. SVCC currently has assets in Dummerston, Jamaica, Newfane, Putney, and
8 Townshend. Comcast has an Amended Certificate of Public Good, issued in Docket No.
9 8301, to serve 197 communities in Vermont, including Brattleboro, Brookline,
10 Dummerston, Jamaica, Marlboro, Wardsboro, and Westminster. However, Comcast does
11 not have authority to serve three communities in which SVCC has assets: Newfane,
12 Putney, and Townshend. See Exhibit DMG-4.

13
14 Under the Asset Purchase Agreement, SVCC must obtain all regulatory approvals
15 necessary to enable Comcast to acquire the assets and operate the SVCC system. To
16 effectuate the acquisition, Comcast must obtain a franchise agreement— that is, a
17 Certificate of Public Good— to enable it to serve the communities of Newfane, Putney,
18 and Townshend. Comcast is willing to accept a CPG which also includes Dover, even
19 though SVCC does not have any assets or active cable plant in Dover.

20
21 Q7. How will Comcast's acquisition benefit SVCC customers?

1 A7. For more than thirty years, SVCC has offered great local service to its customers and has
2 made significant capital investments in its system throughout the years. However, there
3 is a need for continued capital investment as technology continues to evolve and video
4 competition continues to increase due to an ever-growing number of video service
5 options. The sale of SVCC's assets to Comcast will provide the technical, operational,
6 and financial resources needed for continued support of SVCC's system.

7
8 SVCC's system is contiguous to Comcast's system in Windham County as well as a
9 portion of Comcast's system in Bennington County. This provides a number of
10 advantages, including operational, infrastructure, and marketing efficiencies that will
11 foster greater competition with national satellite-service providers, over-the-top video
12 providers (such as Netflix and Hulu), and incumbent telephone carriers.

13
14 Comcast will provide increased reliability and network capacity which will enable former
15 SVCC customers to enjoy the full suite of Comcast's Xfinity TV services, including the
16 X1 platform, Xfinity on Demand (Comcast's video on demand service), multiple high-
17 definition ("HD") offerings, sports programming, and international programming.

18 Comcast will also introduce Comcast Business Services, which provides business-grade
19 products and services for businesses of all sizes.

20
21 Video customers will also be able to use the Xfinity Stream app on their tablet or
22 smartphone to view live and Xfinity On Demand programming. Comcast's robust

1 selection of non-video services, which include Xfinity Internet, Xfinity Voice, Xfinity
2 Mobile, and Xfinity Home, will be available to former SVCC customers. The online My
3 Xfinity customer portal will be available to any customer with internet access and
4 customers will also be able to use the Xfinity My Account app on their tablet or
5 smartphone. Some of the features of the Xfinity My Account app include the ability for
6 customers to access information regarding their account, view their bill, make payments,
7 check for outages, and make changes to their services.

8
9 Q8. Explain how Comcast's acquisition will provide greater reliability and capacity.

10 A8. Currently SVCC serves approximately 2,450 Vermonters with a 750-MHz headend and
11 coaxial and fiber runs totaling about 123 miles. SVCC already has co-located headend
12 facilities at the Comcast headend serving Comcast's Brattleboro system and Comcast
13 provides signal processing services to SVCC. Comcast plans to integrate the SVCC
14 system into Comcast's fiber backbone to provide redundancy and reliability. Comcast's
15 fiber network is closely monitored and maintained by area, regional, and divisional
16 personnel. Fiber restoration, plant maintenance, and headend operations will be
17 supported 24 hours a day, 7 days a week, 365 days a year. By integrating the SVCC
18 system into Comcast's route-diverse and redundant fiber network, SVCC subscribers will
19 enjoy a more reliable network with greater capacity.

20
21 Q9. How will Comcast's ownership affect customer cable services?

1 A9. Increased reliability and system capacity mean that Comcast will be able to offer more
2 programming and service options to meet the diverse needs of former SVCC customers.
3 SVCC currently offers three cable television service tiers, including a basic package with
4 19 analog channels. SVCC also offers four premium movie packages. SVCC offers a
5 total of 127 channels, 51 of which are also available in HD, and digital music channels.
6 See Exhibit DMG-5A and Exhibit DMG-5B.

7
8 Once SVCC's system is fully integrated, former SVCC customers will enjoy the same
9 service offerings offered in Comcast's Windham County footprint. Comcast's lowest
10 level of service, Limited Basic, currently includes 53 channels and also digital music
11 channels. Limited Basic customers with HD equipment also receive at least 25 HD
12 channels. Comcast offers a variety of video service tiers, premium movie packages,
13 subscription sports packages, and a la carte international programming. See Exhibit
14 DMG-6A and Exhibit DMG-6B. Former SVCC customers will have more choices for
15 video service tiers, allowing them to choose the service tiers that best fit their interests
16 and budget. Comcast will also introduce and offer its X1 entertainment system and
17 Xfinity On Demand, Comcast's video on demand service, providing access to even more
18 viewing choices.

19
20 Q10. What is Comcast's plan for integrating the SVCC system into its operations, and when
21 will Comcast services be available to residents of the new franchised communities?

1 A10. At this time, I estimate it will take approximately six months to fully integrate SVCC's
2 system into Comcast's operations. During this transition period, certain SVCC personnel
3 will assist with various operational activities, such as service installations, trouble calls,
4 system maintenance, customer support, and billing and collections. Programming
5 services—channel line-ups, cable services—will remain unchanged during the near term
6 while SVCC is integrated into Comcast's network and all relevant customer information
7 is migrated to Comcast's customer support, so that there is a seamless transition from
8 SVCC to Comcast. Comcast's engineering team will plan and oversee the integration of
9 SVCC's infrastructure with Comcast's network and the IT and finance teams will plan
10 and oversee migration of all customer accounts to Comcast's billing system. During this
11 time, Comcast will also be working towards the complete integration of customer care
12 functions. The customer care team will plan and oversee the transition of customer
13 support from SVCC to Comcast. Once integration work is complete, then Comcast will
14 be able to begin migrating existing customers to Comcast services and Comcast services
15 will be available to new customers.

16
17 **II. CPG Criteria**

18 **A. Quality of Comcast's Service**

19 Q11. We now turn to the various criteria that the Commission must apply by statute and rule to
20 support issuance of a CPG to Comcast. Describe how Comcast will satisfy the
21 requirements of 30 V.S.A. § 504 and the "EMCO Criteria" listed in Commission Rule
22 8.214(B).

1 A11. I will begin with the specific criteria in 30 V.S.A. § 504 (b)(1) and (3), which require the
2 “designation of adequate channel capacity and appropriate facilities for public,
3 educational, or governmental use” and “a reasonably broad range of public, educational,
4 and governmental programming.”

5
6 Comcast has adequate channel capacity for this purpose and will continue to maintain the
7 two public, educational, and governmental (“PEG”) access channels currently offered by
8 SVCC. SVCC has designated Brattleboro Community Television (“BCTV”) as the
9 Access Management Organization (“AMO”) for the serviceable portions of the Towns of
10 Dummerston, Jamaica, Newfane, Putney, and Townshend. Through PEG Access Fees
11 collected from SVCC video customers, SVCC provides funding to support BCTV’s
12 provision of PEG access services and programming to SVCC’s customers. BCTV has a
13 long history of providing PEG access services and programming in Windham County and
14 is Comcast’s designated AMO for the serviceable portions of the Towns of Brattleboro,
15 Guilford, and Vernon.

16
17 Comcast believes BCTV provides a reasonably broad range of public, educational, and
18 governmental programming, as evidenced by the programming schedules on BCTV’s
19 website (www.brattleborotv.org/schedules). Comcast also believes that BCTV is capable
20 of continuing to satisfactorily fulfill the obligations of an AMO, as outlined in
21 Commission Rule 8.420. Comcast looks forward to continuing and expanding its
22 partnership with BCTV.

1
2 Comcast will comply with the terms of the existing PEG agreement between SVCC and
3 BCTV, Commission Rule 8.400 *et seq.*, and the PEG-related conditions of the CPG
4 issued to Comcast as a result of this proceeding.
5

6 Q12. Describe how Comcast will satisfy 30 V.S.A. §504(b)(2), which requires “adequate and
7 technically sound facilities, equipment, and signal quality.”

8 A12. Comcast provides adequate and technically sound facilities and equipment, and excellent
9 signal quality. Comcast’s Vermont systems are operated and maintained to comply with
10 the technical standards set forth in the FCC’s rules and regulations as they apply to cable
11 television systems. Comcast maintains a hybrid fiber-optic/coaxial cable network, fully
12 capable of carrying a minimum bandwidth of 750 MHz in all its Vermont systems.
13

14 Comcast continues to invest in its Vermont infrastructure in order to support provision of
15 advanced video services, such as HD TV, video on demand, and digital video recorder
16 (“DVR”) service. In 2012, Comcast completed its Digital Network Enhancement project
17 in Vermont. Once completed, this project provided customers with more HD
18 programming, additional digital channels, more Xfinity On Demand content, and an
19 improved television viewing experience with 100% digital picture and sound. In 2013,
20 Comcast introduced the X1 entertainment system in Vermont. X1 is a cloud-based
21 platform which provides the world’s largest collection of video; a single search
22 functionality across live television, Xfinity On Demand, and DVR content as well as

1 content available through the Netflix, Amazon Prime, and YouTube apps on X1; a
2 Talking Guide for visually impaired users; a voice-activated remote; personalized
3 viewing recommendations; and the X1 DVR with Cloud Technology. The X1 DVR with
4 Cloud Technology enables cable television customers to stream recordings to mobile
5 devices and computers, download recordings to mobile devices within the home for
6 viewing at a later time outside the home, and stream live TV channels to their mobile
7 devices and computers while using their in-home WiFi network.

8
9 As I have described previously, the SVCC system will become part of an integrated
10 regional network owned and operated by Comcast and supported by local (area)
11 professionals. SVCC customers will receive the benefit of Comcast Corporation's
12 Excellence in Operations ("XOC") Center (formerly known as its Network Operating
13 Center) that manages the network 24 hours a day, 365 days a year. Additionally,
14 Comcast Corporation operates a national, fiber-based backbone to transport its signals.
15 This provides an added layer of redundancy to the network for the benefit of Vermont
16 customers.

17
18 Q13. Describe how Comcast will satisfy 30 V.S.A. §504(b)(4), which requires the "prohibition
19 of discrimination among customers of basic service", and 30 V.S.A. §504(b)(5), which
20 requires "basic service in a competitive market".

21 A13. Comcast will offer basic service in accordance with federal law. Comcast does not and
22 will not discriminate against any customer in the availability of cable television service.

1 Comcast shall be subject to all other requirements of federal and state laws or regulations
2 through the term of the CPG; however, these statements do not affect the ability of
3 Comcast to offer promotional discounts. Additionally, Comcast may negotiate
4 discounted contracts from time to time with businesses and institutions that, to the extent
5 that this may be viewed as “discrimination” among customers of basic service, is
6 permitted by federal law.

7
8 Q14. Describe how Comcast will satisfy the requirements of 30 V.S.A. §504(c), starting with
9 the first specific criterion, which requires “a reasonable quality of service for basic,
10 premium, or otherwise, having regard to available technology, subscriber interest, and
11 cost.”

12 A14. Comcast currently offers a broad range of programming and, as a result of its Digital
13 Network Enhancement project, provides 100% digital picture and sound to all Comcast
14 cable television customers. Comcast cable television subscribers with HD equipment can
15 receive more than 100 HD channels. See Exhibit DMG-6A for the Comcast residential
16 products and services currently offered in Windham County. Once the integration of
17 SVCC’s system is completed, products and services offered by Comcast in Windham
18 County will also be offered in SVCC’s former service territory.

19
20 Q15. Describe how Comcast will satisfy 30 V.S.A. §504(c)(2), which requires “construction,
21 including installation, which conforms to all applicable State and federal laws and
22 regulations and the National Electric Safety Code.”

1 A15. Comcast confirms that it will comply with all applicable State and federal laws and
2 regulations and the National Electrical Safety Code. Comcast uses materials of good and
3 durable quality in the construction of line extensions. All work involved in construction,
4 installation, maintenance, and repair of its cable systems is performed in a safe, thorough,
5 and reliable manner and is in compliance with the “Safety Rules for the Installation and
6 Maintenance of Electrical Supply and Communication Lines” of the National Bureau of
7 Standards, U.S. Department of Commerce; the latest edition of the National Electric
8 Safety Code, as may be amended and revised from time to time; and all applicable
9 federal, State, and municipal laws, ordinances, and regulations.

10
11 Q16. Describe how Comcast will satisfy 30 V.S.A. §504(c)(3), which requires “a competent
12 staff sufficient to provide adequate and prompt service and to respond quickly and
13 comprehensively to customer and Department complaints and problems.”

14 A16. Comcast maintains a Service Quality Plan (“SQP”) regarding measurement and reporting
15 of its performance with respect to the customer service benchmarks found in 47 C.F.R.
16 §76.309. Over the past thirteen years, Comcast’s performance, as measured by the SQP,
17 has improved and it consistently meets or exceeds the benchmarks. Comcast is
18 committed to local operation and management of its cable television systems; it maintains
19 call centers both in New England and nationwide, staffed by Customer Account
20 Executives (“CAEs”) trained to handle a wide variety of customer issues. Through its
21 focus on local management, Comcast works with the Department’s Consumer Affairs and

1 Public Information (“CAPI”) Division to resolve customer complaints and problems,
2 taking into account the Commission’s Rules, the SQP, and the needs of the customer.

3
4 Currently, SVCC is not required to maintain an SQP or to file Service Quality reports.
5 Once integration of SVCC’s system is complete, Comcast will be able to include the
6 former SVCC system in its quarterly Service Quality reporting.

7
8 Q17. Describe how Comcast will satisfy 30 V.S.A. §504(c)(4), which requires “an office that
9 shall be open during usual business hours, and a listed, toll-free telephone number so that
10 complaints and requests for repairs or adjustments may be received.”

11 A17. Comcast currently provides a variety of convenient methods for its Vermont customers to
12 contact the Company for assistance and will make these same methods available to
13 SVCC’s former customers, once the integration of SVCC’s system is complete. These
14 methods include contacting the Company by phone, via the My Account app, on the
15 internet, and in person. Customers can call either 1-800-COMCAST (1-800-266-2278)
16 or 1-800-XFINITY (1-800-934-6489) to speak with a CAE, 24 hours a day, 7 days a
17 week. The My Account app, available on both Android and iOS devices, provides yet
18 another way for customers to contact Comcast. Other functions of the My Account app
19 include providing customers with the ability to view their bill, make payments, make
20 changes to their services, check for outages, troubleshoot service issues, manage service
21 appointments, and locate the closest Comcast service center or Xfinity Store.

22

1 Customers with an internet connection can obtain assistance by visiting
2 www.xfinity.com. At this dedicated self-service website, customers can view their
3 account information, monthly bill statements, and payment history; make payments on
4 their account; obtain information regarding services and products, including instructional
5 videos; troubleshoot technical issues, either on their own or by chatting online with a
6 CAE; check on service interruptions; and manage service appointments.

7
8 Customers can visit either a Comcast service center or an Xfinity Store for assistance
9 during normal business hours. Comcast also partners with Western Union to provide
10 customers with another option for making payments and with The UPS Store to offer
11 convenient and free equipment returns.

12
13 Comcast provides various self-service tools to help customers troubleshoot issues,
14 manage their account, and learn more about the features of their Comcast services.
15 Customers can access these self-service tools either on the internet at www.xfinity.com,
16 on their mobile device by using the My Account app, or on their television by using the
17 My Account TV app on the X1 platform.

18
19 Q18. Describe how Comcast will satisfy 30 V.S.A. §504(c)(5), which requires “reasonable
20 rules and policies for line extensions, disconnections, customer deposits and billing
21 practices.”

1 A18. There should be no material change for SVCC customers with respect to these practices
2 and policies. Comcast's policies related to line extensions are consistent with Vermont
3 law and the conditions specified in Comcast's Line Extension Tariff (Commission Tariff
4 No. 1) on file with the Commission, with an effective date of March 17, 2010.
5 Comcast's policies for disconnections, customer deposits and billing practices are
6 consistent with Vermont law and waivers granted by the Commission. Once integration
7 of SVCC's system is complete, Comcast will utilize the same disconnection notice it uses
8 in its other Vermont systems.

9
10 **B. Financial, Legal and Technical Ability**

11 Q19. In addition to quality of service, the Commission typically considers a number of criteria,
12 known as the "EMCO Criteria", that demonstrate a cable operator's financial, legal and
13 technical ability. Does Comcast have the financial, legal and technical ability to provide
14 the services and facilities at least on a par with those being provided by SVCC under its
15 existing CPG? Begin with "financial soundness and stability, both of the applicant
16 generally and the particular proposal", the first EMCO criterion.

17 A19. My testimony, as a whole, speaks to the financial soundness and stability of both
18 Comcast and this particular proposal. The responses to Questions 7-9 provide an
19 overview of Comcast's proposal. Comcast Corporation is a financially stable *Fortune*
20 *500* company and is a global media and technology company with network facilities
21 covering portions of 39 states and the District of Columbia. Comcast is a leading
22 provider of video, high-speed Internet, digital voice, and other next-generation services

1 and technologies to residential customers and small- and medium-sized businesses.

2 Comcast currently owns and operates cable systems serving approximately 21.4 million

3 video customers (as of September 30, 2019), including residential and business

4 customers. Comcast also owns NBCUniversal, a global media, news, and entertainment

5 company. Having consistently invented, developed, deployed, and improved a wide

6 range of new technologies and services, Comcast has established a reputation as an

7 industry leader in communications, technology, financial performance, and operational

8 efficiency. See Exhibit DMG-7, provided via CD format, which contains Comcast

9 Corporation's 10-K filings for 2014-2018 and Comcast Corporation's 10-Q filings for the

10 first three quarters in the 2019 calendar year.

11
12 Comcast will not need to obtain financing for this transaction. Through its subsidiaries,

13 Comcast Corporation will provide financial support as necessary to ensure that its

14 systems, including the SVCC system, provide a quality of service that is competitive.

15 The responses to Questions 11, 12, and 14 outline how Comcast will accomplish this.

16
17 Q20. The second EMCO criterion considers "the present proposed service offerings to
18 customers, including the number of channels and the ability and capacity of the system to
19 offer additional varied services in the future, and the ability to provide public access."

20 Address this criterion.

21 A20. Since Comcast's entry into Vermont in 2006, Comcast has demonstrated its ability to
22 launch advanced cable services to all customers across the State of Vermont similar to

1 those being launched and broadly offered across New England and the country without
2 regulatory requirement. Examples include the launch of multiple HD offerings,
3 introduction of X1 Platform, advanced DVR services, and countless other cable service
4 offerings. Comcast recognizes it operates in a vastly competitive video service
5 environment and gives customers offerings that demonstrate the latest technological
6 enhancements along with high value. Comcast also has a long commitment to the
7 provision of meaningful public access. As previously stated, Comcast will continue to
8 partner with BCTV, the designated AMO providing PEG access services in SVCC's
9 service territory as well as a portion of Comcast's Brattleboro, Vermont system.

10
11 Q21. The third EMCO criterion considers "the commitment to a construction and in-service
12 schedule." Address this criterion.

13 A21. It is expected there will be minimal impact as a result of the transition from SVCC to
14 Comcast. It will not be necessary to upgrade SVCC's system. As part of integrating
15 SVCC's system, Comcast will implement a scheduled transfer of customers to Comcast's
16 network. This schedule will have minimal impact on customers and all customers will be
17 notified of any potential outage that might occur during this transition.

18
19 Q22. The fourth EMCO criterion considers, "the experience and ability of the applicant to run
20 and manage a cable television system." Address this criterion.

21 A22. Comcast Corporation began offering cable service in 1963 and has more than 55 years of
22 experience and ability in running and managing cable television systems. Comcast

1 currently owns and operates cable systems that service approximately 21.4 million video
2 customers (as of September 30, 2019), including residential and business customers.
3 Having consistently invented, developed, deployed, and improved a wide range of
4 technologies and services, Comcast has established a reputation as an industry leader in
5 communications, technology, financial performance, and operational efficiency.
6 Comcast is a leading provider of video, high-speed Internet, digital voice, and other next-
7 generation services and technologies to residential customers and small- and medium-
8 sized businesses. Comcast provides service to over 105,500 video customers in Vermont
9 (as of December 31, 2018) through a seasoned local management team working and
10 living in Vermont and New England.

11
12 **C. Reasonableness of Proposal**

13 Q23. The fifth EMCO criterion considers, “the rates proposed to be charged to customers.”

14 Address this criterion.

15 A23. Comcast operates in a very competitive market for video services in Vermont, where
16 consumers can choose between multiple video service providers, including satellite
17 providers, over-the-top programming providers such as Netflix and Hulu that use the
18 Internet, over the air broadcast stations, and in some areas, telephone companies, in
19 addition to Comcast. Comcast provides customers with competitively priced basic cable
20 service that includes a broad range of analog, digital, and HD channels. Comcast also
21 offers a variety of service tiers so that customers can choose a level of service that best
22 fits their viewing interests and budget. See Exhibit DMG-6A.

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Q24. The sixth EMCO criterion considers, “consumer policies, particularly re: complaints and problems.” Address this criterion.

A24. Each year, Comcast sends several notices to Vermont customers, in compliance with both federal law and Vermont regulations, to inform customers of Comcast policies and procedures. These notices include the “Quality of Service Notice”, the “Billing Practices Notice”, and the “Complaint and PEG Notice”, which are all required by Vermont regulations, as well as the “Important Information Notice” which is required by federal law. These notices are included with my testimony as Exhibit DMG-8.

Q25. The seventh EMCO criterion considers, “availability of service to maximum number of residences.” Address this criterion.

A25. Comcast will comply with the terms and conditions of its recently amended CPG and Commission Rule 8.313. Upon issuance of an Order and CPG by the Commission, Comcast will file an updated Line Extension Tariff to include Dover, Newfane, Putney, and Townshend.

Q26. The eighth EMCO criterion considers, “the quality of the engineering and materials used in the system.” Address this criterion.

A26. Comcast is a global media and technology company. We occupy a unique role at the intersection of media and technology with a nationwide network of over 141,000 route miles of fiber. This network has the first and largest fully 4G backbone in the United

1 States. The network is used to deliver an unrivaled portfolio of assets which include
2 world-class video and broadband technology.

3
4 We are one of the nation's leading developers of information, communications and
5 entertainment products and services. The network and product innovation are fueled by
6 Comcast Labs, established to serve as the advanced technology arm of the company.

7 As a result of this research and development, we lead our video competitors in
8 revolutionizing the television experience through our X1 Entertainment Operating
9 System. We believe we have the absolute best products on the market thanks to X1, our
10 content lineup, and Cloud DVR. All these services and more are available in Vermont.

11 Comcast continues to make network enhancements to its Vermont systems in order to
12 offer additional services as they are developed.

13
14 Q27. The last EMCO criterion considers whether the system is a "logical fit with neighboring
15 systems." Address this criterion.

16 A27. This system is a logical fit with Comcast's systems in Vermont as it is contiguous to
17 Comcast's system in Windham County and a portion of Comcast's system in Bennington
18 County. The proximity of SVCC's system to Comcast's Brattleboro system will enable
19 interconnection with Comcast's existing headend and hub facilities. As a result, Comcast
20 will be able to provide the same level of service to former SVCC customer's as is
21 currently received by Comcast's Vermont customers, in full compliance with the terms of
22 its CPG.

1

2 **III. Summary And Conclusion**

3 Q28. Summarize your testimony.

4 A28. Comcast Corporation is the nation's leading cable television service provider but, more
5 importantly, a cable provider which has both local operations and leadership. Following
6 the closing of this acquisition, SVCC's cable television system will be fully integrated
7 into Comcast's Vermont systems and supported by both Vermont and Western New
8 England Regional management teams. Therefore, I believe the acquisition of SVCC's
9 cable television systems by Comcast will promote the public good.

10

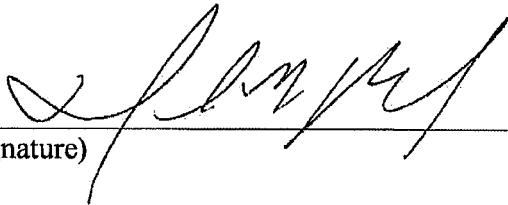
11 In the materials and exhibits submitted to the Commission, Comcast has demonstrated its
12 financial, legal and technical qualifications to operate the cable television system now
13 owned and operated by SVCC. Comcast has also outlined its plans for integrating
14 SVCC's cable television system, with the goal of delivering all advanced cable television
15 services, including the X1 platform, more HD channels, increased programming choices,
16 and Xfinity on Demand. Approval of this transaction presents the Commission with the
17 opportunity to bring to SVCC's customers all the benefits enjoyed by Comcast's
18 Vermont customers as a result of being served by one of the most innovative, well-
19 managed, responsible and qualified cable operators in the country.

20

21 Q29. Does this conclude your testimony?

22 A29. Yes.

DATED at Berlin, CT this 9th day of
December, 2019.

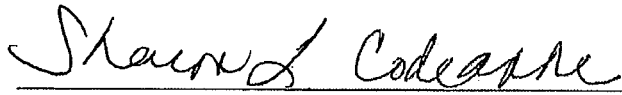

(signature)

ACKNOWLEDGEMENT

STATE OF CONNECTICUT:

COUNTY OF HARTFORD, SS (Berlin)

On this the 9th day of December, 2019, before me, Sharon L. Codeanne, the undersigned officer, personally appeared Daniel M. Glanville, who acknowledged himself to be the Vice President of Government/Regulatory Affairs & Community Impact, Western New England Region of Comcast, a corporation, and that he as such Vice President of Government/Regulatory Affairs & Community Impact, being authorized so to execute the foregoing instrument for the purposes therein contained, by signing the name of the corporation by himself as Vice President of Government/Regulatory Affairs & Community Impact. In witness whereof I hereunto set my hand.


Signature of Commissioner of Superior Court
Juris # 409734

Sharon L. Codeanne
Printed Name of Commissioner of Superior Court