



September 27, 2006

Ms. Susan M. Hudson, Clerk
Public Service Board
112 State Street, Drawer 20
Montpelier, VT 05620-2701

Mr. Stephen Wark
Director of Consumer Affairs and Public Information
Department of Public Service
112 State Street, Drawer 20
Montpelier, VT 05620-2601

RE: Comcast's Revised Service Quality Plan Document

Dear Ms. Hudson:

Pursuant to the Order in Docket No. 7077, paragraph 6, please find enclosed a copy of the recently revised Service Quality Plan for Comcast, dated September 27, 2006. In consultation with Stephen Wark of the Department of Public Service ("DPS"), Comcast has minimally revised the Service Quality Plan ("SQP") by deleting two (2) standards that were previously granted waivers and by making administrative changes, including the change from "Adelphia" to "Comcast" and deleting references to the waivers obtained in year 2000.

The following reflects the changes to the Service Quality Plan:

Section I: Service Quality Performance Areas

- B. All calls for cable customer service will be answered within 120 seconds.

Deleted: In November 2000, a waiver was obtained on reporting this standard due to limitations to the Integrated Voice Response system prohibiting measurement for both 30 second and 120 second calls. Comcast continues to measure calls at the more stringent 30 second standard and therefore this standard is deleted in its entirety.

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- D. At least 90 percent of calls transferred will be answered within 30 seconds of the transfer.

Deleted: In November 2000, a waiver was obtained on reporting this standard due to limitations to the Integrated Voice Response system. Similarly, Comcast will not report on this standard and it is deleted in its entirety. The DPS and Comcast have agreed to leave Section III (D) allowing the DPS and Comcast to re-negotiate this provision if the DPS receives consumer complaints reflecting a pattern of transfers exceeding the 30 second time frame.

The balance of the revisions to the SQP are administrative; replacing references from Adelphia to Comcast. Further, references indicating an anticipatory November 2000 waiver have been deleted as now being moot.

Please note that under this SQP, Comcast is required to track grievances as well as complaints.¹ This is a legacy distinction required of Adelphia; it is not included in the SQPs of other operator, such as Charter Communications or Burlington Telecom. We hope that over time, this distinction will no longer be necessary.

I will forward these documents to you in electronic form as well. If you have any questions about these changes, please do not hesitate to contact me at (802) 419-6601. Thank you.

Sincerely,

Christina L. DeGraff-Murphy
Regulatory Affairs Manager

Attachment

cc: C. Campbell, Director for Telecommunications
J. Davison, Customer Care Manager

¹ A complaint is any situation where the customer is forwarded to a level higher than the customer service representative that initially speaks to the consumer. A grievance involves customer dissatisfaction with practices or issues that are otherwise consistent with law (statute, PSB rules, tariff) or company policy but does not require escalation to a supervisor for resolution.

COMCAST CUSTOMER SERVICE QUALITY & COMPLAINT STANDARDS, MONITORING & REPORTING PLAN

This document establishes the method by which Comcast shall monitor and evaluate the quality of service provided to its customers and track complaints by customers in the State of Vermont. It shall be referred to throughout the document as "Service Quality Plan" or "SQP."

Section I: Service Quality Performance Areas

Comcast's service quality is subject to the following 17 performance areas and standards:

- A. At least 90 percent of calls to a customer service representative shall be answered within 30 seconds under normal operating conditions.
- B. Under normal operating conditions, average monthly calls abandoned shall not exceed four percent of total calls reaching Comcast.
- C. Under normal operating conditions, the customer will receive a busy signal less than three percent of the time.
- D. Under normal operating conditions, at least 95 percent of standard installations shall be performed within 7 business days after the order has been scheduled.
- E. Under normal operating conditions, at least 95 percent of the time work on service interruptions (nil or no picture trouble calls) shall begin promptly and in no event later than 24 hours after the interruption becomes known.
- F. Under normal operating conditions, at least 95 percent of the time work on non-nil service calls shall begin the next business day after notification of the service problem.
- G. At least 95 percent of the time under normal operating conditions, Comcast shall offer a four-hour "appointment window" during normal business hours.
- H. At least 95 percent of the time under normal operating conditions, appointments shall not be cancelled after the close of business on the business day prior to the scheduled appointment.
- I. At least 95 percent of the time under normal operating conditions, the customer shall be contacted in advance if a company representative is running late for an appointment and shall be unable to keep the appointment as scheduled. These customers shall have the opportunity to reschedule at a time convenient for them.
- J. In all cases of billing complaints, Comcast shall acknowledge all billing complaints not later than three business days after receipt.
- K. In all cases of billing complaints, Comcast shall propose in writing a disposition within

15 business days of receipt.

- L. In all cases of billing complaints in which the proposed disposition offered by Comcast is contested by the consumer, the company shall have 15 business days from the date on which the consumer contested to provide a final disposition.
- M. All refunds shall be issued no later than either: (a) the customer's next billing cycle following resolution of the request or 30 days, whichever is earlier; or (b) the return of the equipment supplied by Comcast if service is terminated.
- N. In all cases of a billing dispute, Comcast shall respond to written complaints within 30 days.
- O. All credits for service shall be issued no later than the customer's next billing cycle following the determination that a credit is warranted.
- P. Credits shall be given for all outages that are more than 24 hours in duration if the outage is known to Comcast.
- Q. All consumer complaints to Comcast will be: captured daily, tabulated, analyzed and reported quarterly, including corrective actions taken in response to the complaints.

Section II: Measurement, and Reporting Protocol

- A. Performance areas listed in Section I shall be measured as detailed in Section III. The detailed definition of each performance area is shown in Section III.
- B. This plan covers service to all Comcast's Vermont cable customers.
- C. This SQP explicitly does not address PowerLink customer service, except to the extent that any customer service monitored under the plan is delivered by Comcast in a way that does not differentiate between cable television and PowerLink. The exclusion of PowerLink from this plan does not preclude establishment of a separate SQP for PowerLink nor the application of existing FCC customer service standards or other appropriate standards to PowerLink in the future.
- D. Comcast shall begin performance monitoring in accordance with this SQP on November 1. The first quarterly report shall be for the months of November and December, 2006, only, and subsequent reporting periods will be calendar quarters.
- E. Performance results shall be aggregated monthly and quarterly, and shall be reported quarterly to the Department of Public Service (DPS) and the Public Service Board (the Board).
- F. Quarterly reports shall include both monthly and quarterly averages. Quarterly averages shall be derived from raw data, not by averaging monthly averages.

- G. Comcast shall report its quarterly results for all performance areas no later than thirty days after the completion of each quarter.
- H. Where quarterly performance falls more than ten percent below any standard, or where performance does not meet any standard for two consecutive quarters, the Company shall within 30 days of the end of the quarter in which this provision is triggered, submit a corrective action plan indicating how it will regain the failed standard.
- I. Performance shall be evaluated and reported to one decimal place for all performance areas. Actual performance shall be rounded up when the second decimal place is more than 5. Comcast shall retain all of its reports that support the results for each of the performance areas for a period of not less than 24 months after the results are reported. Comcast shall provide these reports upon request to DPS and the Board.
- J. Comcast shall review with the DPS Division of Consumer Affairs & Public Information (CAPI) any change to Comcast's measurement protocol or to the internal reporting methods that are used to obtain the data measured prior to Comcast's implementation of such changes. Comcast shall have an affirmative duty to report missing data or other events that could reasonably affect the quality of the data at the time the Company becomes aware of such events.
- K. With respect to conditions Comcast believes fall outside "normal operating conditions" warranting exemption from standards that apply only in the case of normal conditions, Comcast shall, detail any conditions in the quarterly service quality report that are believed to be "out of normal". Quarterly reports shall include detailed information concerning the commencement and duration of the excluded period. If the DPS disputes the designation by the company of an out-or-normal condition, the Board shall be asked to rule on the matter.
- L. Definitions:
1. Customer Complaint: A "customer complaint" is any situation in which customers report dissatisfaction to Comcast. There are two types of complaints. "Interventions" involve situations brought forth by customers which require some action on the part of Comcast to conform to law, PSB rule, tariff, or company policy. "Grievances" involve customer dissatisfaction with Comcast business practices that are consistent with law, PSB rule, tariff, or company policy.
 2. Business Day: A "business day" is any day, Monday through Friday, excluding days on which legal holidays are observed and Comcast is closed to routine business operations.
 3. Normal Business Hours: "Normal business hours" are 8am and 7pm Monday through Friday excluding days on which legal holidays are observed and Comcast is closed to routine business operations.
 4. Normal Operating Conditions: "Normal operating conditions" shall be those service conditions which are within the control of Comcast. Those conditions which are not

within the control of Comcast include, but are not limited to, natural disasters, civil disturbances, power outages, telephone network outages, and severe or unusual weather conditions. These conditions may occur in locations in other states that disrupt the normal flow of customer inquiries into Comcast.

5. Standard Installation: A standard installation shall be an installation of 300 feet or less, starting at the nearest end of the existing trunk or distribution system.
- M. Comcast and the DPS shall meet regularly to discuss service quality issues, trends in service quality data reported by Comcast, issues raised by customer complaints filed with the DPS, and other policy issues relating to customer service. Comcast shall initiate these meetings on a periodic basis with a goal of meeting quarterly. Meetings may occur more frequently at DPS discretion. These meetings shall focus on customer service issues raised by customer complaints filed with the DPS and by other communications to the DPS from customers. The intent of these informal meetings is to exchange information in an open and frank atmosphere, to suggest pragmatic solutions, and solve problems.

Section III: Performance Standards

- A. Calls Answered Thirty Seconds: At least 90 percent of all calls during normal business hours shall be answered within 30 seconds under normal operating conditions. This standard shall be measured by utilizing the Call Management Software (CMS) that Comcast employs. Measurement begins when the call is placed in queue to reach a customer service representative (CSR) and is terminated when either the call is answered by a CSR or when the customer abandons the call. Comcast will program no more than 50 seconds of messaging and prompting in its call vectors except the repair vectors, which may be used to provide automated outage information, and therefore may exceed the 50 second limit. Except for the repair vector, Comcast will not exceed the 50 second limit without providing DPS with at least 30 days prior opportunity to object. Upon DPS objection to a request for a change in the standard, Comcast may not exceed the 50 second limit without first obtaining Board approval. Data shall be compiled monthly as one number for all systems.

This standard is calculated as follows:
$$\frac{\text{TCA30}}{\text{TCA}}$$

TCA 30 equals the total calls answered within 30 seconds after being queued to reach a CSR. TCA equals the total number of calls answered during normal business hours.

- B. Calls Answered 120 Seconds: Comcast has obtained a waiver of this standard from the Public Service Board with DPS support because the Company reports on the 30-second standard which is more stringent.
- C. Abandoned calls: Under normal operating conditions, average monthly calls abandoned shall not exceed four percent of total calls reaching Comcast, excluding calls abandoned before 30 seconds has elapsed.

This standard is calculated as follows: $(ABAN - ABAN30) / (CALLS + ABAN)$

ABAN equals the total number of calls abandoned. ABAN30 equals the number of calls that were abandoned within 30 seconds. CALLS equals the total number of calls answered.

Calculation method: Comcast will generate a Call Profile Monthly (CPM) that measure the total number of calls answered, the total number of abandoned calls, and the total number of abandoned calls within 30 seconds. This information will be transferred to a Call Abandoned (CA) spreadsheet that will calculate the percentage of calls abandoned.

- D. Calls transferred in 30 seconds: Comcast has obtained a waiver of this standard from the Public Service Board since the company's call answering protocols do not provide for call transfer and the telephone system, therefore, is not programmed to measure performance. If DPS receives consumer complaints reflecting a pattern of transfers exceeding the 30-second time frame, Comcast and the Department will re-negotiate tracking of this standard.
- E. Customers Receiving Busy Signal: This standard requires, under normal operating conditions, the customer shall receive a busy signal less than three percent of the time. This standard shall be measured by the Call Management System (CMS) that Comcast employs. This number shall reflect all calls that are sent to Comcast local telephone and toll free numbers. This report assumes that any time all trunks to Comcast's Call Center are busy, customers are receiving busy signals.

The standard is calculated as follows: ATB/TM

ATB equals the total number of minutes all trunks were busy during normal business hours. TM equals the total minutes during normal business hours.

Calculation method: Comcast will generate a daily Trunk Group Summary Interval (TGSI) (see Attachment E1) report that indicates a percentage of time that all trunks to the South Burlington Call Center are busy. This report will be calculated based upon normal business hours. This information will be transferred to a Trunk Blockage (TB) spreadsheet (see Attachment E2) that will log number of minutes during the course of a day that all trunks were busy and divide this number by the total number of minutes being measured. This number will be calculated monthly as a percentage of time all trunks were blocked.

- F. Installations Performed On Time: Under normal operating conditions, at least 95 percent of standard installations shall be performed within seven business days after the order has been scheduled. This standard shall be measured by utilizing the Cable Data Compliance Report. This report totals all installation jobs that were scheduled. From this total, exempt orders (defined below) will be subtracted to produce a net number of jobs. Of these net installation jobs, calculations will total those that are in compliance

(completed within seven business days) and those out of compliance. An overall percentage for each system will be generated and reported. The installations that are exempt from reporting are the following:

Custom Jobs greater than 300 feet in length of installation drop.

Customer requested jobs that are scheduled for greater than seven business days at the customer request when appointments were available to that customer that would have been within compliance (i.e. within seven business days).

Cancelled installation jobs due to customer request.

Rescheduled or not done installation jobs that are coded to one of the following reasons: Customer requested; No access; No Authorization; No schedule; Customer will call; Customer not home; Only minor home; No money.

This standard is calculated as follows: $IC / (TJ - (CJ+CR+XJ+RS))$

IC equals the number of installation orders that were completed within seven business days. TJ equals the total number of installations that are scheduled. CJ equals the custom jobs that were scheduled. CR equals the customer requested jobs that were scheduled. XJ equals the cancelled jobs that were scheduled. RS equals the rescheduled and not done jobs that were scheduled and not completed due to one of the above reasons.

Comcast will also report the percentage of jobs that are customer requested beyond the seven business day window. This shall be measured by utilizing the Cable Data Compliance Report. The number of Customer Requested orders (orders that are scheduled in the future greater than seven business days when there are earlier appointments available that would have been in compliance) will be divided by the Total jobs to generate the percentage of Customer Requested jobs. This will be reported for each system.

This standard is calculated as follows: CR / TJ

CR equals the number of customer requested installation orders that are exempt from reporting. TJ equals the total number of installation orders that were scheduled during the month by system.

- G. Repair of Service Interruptions: Excluding conditions beyond Comcast's control, at least 95 percent of the time work on service interruptions (nil or no picture trouble calls) shall begin promptly and in no event later than 24 hours after the interruption becomes known. This standard shall be measured by utilizing information from Cable Data, Comcast's data management system. Performance is calculated as follows: The information used to calculate this standard is taken from a Cable Data Work in Progress (WIP) report (Attachment G1) that is generated after the end of each business day. This

report produces a detailed listing of each job that was input into Cable Data during that business day that has a repair code 1 (Nil or No Picture). This report is manually reviewed to identify orders that have not been dispatched to field personnel. The information is transferred to a manual tracking form (MTF) (Attachment G2) that allows the Dispatch department to log the time the order was dispatched. This WIP report is sorted by office area. The information is manually transferred to a spreadsheet titled Trouble Call Dispatch Tracking (TCDT) (Attachment G3) in the following manner:

- 1 The WIP report is checked individually for a completion date and code. If the record is coded in this manner, it has been completed. As the order was placed in the same date as the report was generated, the order was completed within 24 hours (#1 on Attachment G1).
- 2 All entries that have no completion date and time printed on the WIP report are checked individually for either a cancellation or a future schedule date. Canceled orders (#2 on Attachment G1) are assumed to be resolved and are subtracted from the gross order total for each calendar day. Orders scheduled in the future are considered to be done so at the request of the customer and are considered to be dispatched.
- 3 All orders that are not canceled, scheduled in the future, or already completed are recorded on a MTF (#3 on Attachment G1 and Attachment G3).
- 4 The dispatch group completes the MTF as each order is dispatched.
- 5 All data is transferred to TCDT spreadsheet for the purpose of calculating calls dispatched in 24 hours in the following manner.
- 6 The total number of Nil repair calls for each office area from the WIP report is recorded in the TCDT form (#4 on Attachment G1 and Attachment G3).
- 7 The total number of canceled orders is entered on the TCDT form (#2 on Attachment G1 and Attachment G3). This number is subtracted from the total in the Nil column (#4 on Attachment G3) to arrive at the Net Nils number (#5 on Attachment G3).
- 8 The MTF is reviewed after completed by dispatch personnel to determine the number of orders not completed within 24 hours. This number is manually counted and subtracted from the number of Net Nils (#5 on Attachment G3). This number is the total of Nil Repair Calls that were dispatched within 24 hours (# 6 on Attachment G3).
- 9 The TCDT spreadsheet divides the number of Nil Repair Calls dispatched within 24 hours (#6 on Attachment G3) by the Net number of Nil Repairs (#5 on Attachment G3). This number is the percentage of Nil calls dispatched within 24

hours (#7 on Attachment G3).

This standard is calculated as follows:

DN/TN

DN equals the number of daily Nil orders dispatched within twenty-four hours. TN equals the total number of nils received on that same day.

Comcast will also report a quarterly trouble call completion time for Nil work. This will be taken from a Trouble Call Response Time report (see Attachment G4) generated from Cable Data. This report will show elapsed time from when the job was entered into the management system until the work was completed. This information will be transferred to a Nil Completion Report (NCR) (see Attachment G5) which will be tabulated quarterly. Comcast will report number of nil jobs that were completed within 12 hours, within 24 hours, and greater than 24 hours in order to measure promptness of response to nil/no-picture trouble calls.

H. Repair of Non-Nil Troubles: Excluding conditions beyond Comcast's control, at least 95 percent of the time work on non-nil service calls shall begin the next business day after notification of the service problem. This standard shall be measured by utilizing information from Cable Data. This information is monitored and manually tracked via logs to ensure compliance. Calculation of Standard: The information used to calculate this standard is taken from a Cable Data Work in Progress (WIP) report (Attachment H1) that is generated after the end of each business day. This report produces a detailed listing of each job that has a repair code other than 1 (Nil or No Picture) that was input into Cable Data during that business day. This report is manually reviewed for the purpose of determining orders that have not been dispatched to field personnel. The information is transferred to a manual tracking form (MTF) (Attachment H2) that allows the Dispatch department to log the time the order was dispatched. This WIP report is sorted by office area. The information is manually transferred to a spreadsheet titled Trouble Call Dispatch Tracking (TCDT) (Attachment H3) in the following manner.

- 1 The WIP report is checked individually for a completion date and code. If the record is coded in this manner, it has been completed. As the order was placed in the same date as the report was generated, the order was completed within the next business day (#1 on Attachment H1).
- 2 All entries that have no completion date and time printed on the WIP report are checked individually for either a cancellation or a future schedule date. Canceled orders (#2 on Attachment H1) are assumed to be resolved and are subtracted from the gross order total for each calendar day. Orders scheduled in the future date are considered to be done so at the request of the customer and are considered to be dispatched.

- 3 All orders that are not canceled, scheduled in the future, or already completed are recorded on a MTF (#3 on the Attachments H1 and H2).
- 4 The dispatch group completes the MTF as each order is dispatched.
- 5 All data is transferred to TCDT spreadsheet for the purpose of calculating calls dispatched within the next business day in the following manner.
- 6 The total number of Non Nil repair calls for each office area from the WIP report is recorded in the TCDT form (#4 on the Attachments H1 and H3).
- 7 The total number of canceled orders is entered on the TCDT form (#2 on Attachments H1 and H3). This number is subtracted from the total in the Non Nil column (#4 on Attachment H3) to arrive at the Net Non Nils number (#5 on Attachment H3).
- 8 The MTF is reviewed after completed by dispatch personnel to determine the number of orders not completed within 24 hours. This number is manually counted and subtracted from the number of Net Non Nils (#5 on Attachment H3). This number is the total of Non Nil Repair Calls that were dispatched within 24 hours (#6 on Attachment H3).
- 9 The TCDT spreadsheet divides the number of Non Nil Repair Calls dispatched within the next business day (#6 on Attachment H3) by the Net number of Non Nil Repairs (#5 on Attachment H3). This number is the percentage of Non Nil calls dispatched within the next business day (#7 on Attachment H3).

The data are compiled monthly for each Comcast office.

This standard is calculated as follows:
$$\text{DNN/TNN}$$

TNN equals the total number of non nils received through the month. DNN equals the number of non-nil orders that are dispatched within the next business day reflected in TNN that were dispatched on the following business day.

- I. Four-hour appointment window: At least 95 percent of the time under normal operating conditions, Comcast shall offer a four-hour "appointment window" during normal business hours. Cable Data, the cable management software utilized by Comcast, is formatted to allow only appointments that are four hours or less. Therefore, 100 percent compliance is assured by the system engineering and the standard need not otherwise be monitored. If DPS or the Company receives complaints concerning compliance with the standard, the need for monitoring will be revisited.
- J. Comcast Canceled Appointments: Under normal operating conditions, 95 percent of customers shall be contacted by the close of the prior business day in the event of an

appointment cancellation. This standard shall be measured by utilizing information from Attachment J1, Comcast Cancelled Appointments, a manual report designed to track this standard. The data are compiled monthly for each Comcast office.

This standard is calculated as follows: CWN/C

CWN equals the number of appointments that were cancelled with notification by the close of the prior business day. C equals the number of appointments that were cancelled in total.

- K. Advance Notice of Late Appointment: At least 95 percent of the time under normal operating conditions, the customer shall be contacted in advance if a company representative is running late for an appointment and shall be unable to keep the appointment as scheduled. These customers shall have the opportunity to reschedule at a time convenient for them. This standard shall be measured from manual reports as shown in Attachment K1, Late Appointment Log. The data are compiled monthly for each Comcast office.

This standard is calculated as follows: NLA/LA

NLA equals the total number of customers who had late appointments that were notified. LA equals the total number of late appointments.

- L. Acknowledgment of billing complaints: In all cases of billing complaints, Comcast shall acknowledge the complaints not later than three business days after receipt by mailing a postcard to the customer upon logging the complaint, which will occur the next business day after the complaint is received. The log will be maintained in manual form, (see Customer Complaint Grievance Log, Attachment L1). Each system will designate a representative, who shall log the mailing of the postcard to customers. The data are compiled monthly for each Comcast office.
- M. Resolution of consumer complaints: In all cases of billing complaints, Comcast shall propose in writing a disposition within 15 business days of receipt. Comcast shall track this standard via a manual log (see Customer Complaint Grievance Log, Attachment L1). Each system will designate a representative who shall log the resolution of consumer complaints and billing complaints. The data are compiled monthly for each Comcast office.
- N. Response to contested resolutions: In all cases of billing complaints in which the proposed disposition offered by Comcast is contested by the consumer, the company shall provide a final disposition within 15 business days of the date on which the consumer contested the company's response. Comcast shall track this standard via a manual log (see Customer Complaint Grievance Log, Attachment L1). Each system will designate a representative who shall log the incidents that occur when a customer contests Comcast's proposed settlement of an issue, and will also log the eventual

resolution of that issue. The data are compiled monthly for each Comcast office.

- O. Timely issuance of refunds: This standard measures the number of customers who have refunds due them shall have their refunds processed within either (a) the return of equipment, or (b) the earlier of 30 days or the next billing cycle. Performance will be measured on the basis of consumer complaints regarding late refunds. Complaints will be logged manually using the Customer Complaint Grievance Log (see Attachment L1).
- P. Response to billing complaints: All written billing disputes will be responded to within 30 days. This federal standard is far less stringent than the PSB standard L and M above, therefore, there is no necessity to track this standard separately.
- Q. Timely issuance of credits: All credits for service shall be issued no later than the customer's next billing cycle following the determination that a credit is warranted. Performance will be measured on the basis of consumer complaints regarding failure to issue credits on a timely basis. Complaints will be logged manually using the Customer Complaint Grievance Log (see Attachment L1).
- R. Outage credits: Credits shall be given for all outages that are more than 24 hours in duration if the outage is known to Comcast. This standard shall be measured through the Outage logs maintained at each system and also through Cable Data. Comcast will track all outages that occur in its monthly system outage report. All outage of more than 24 hours duration will be listed. The total number of subscribers effected will be listed. From Cable Data, Comcast will generate a report that documents the number of customers issued credit outage. The data are compiled monthly for each Comcast office.

The standard is calculated as follows:

$$\text{NOCO24} / \text{NOCE24}$$

NOCO24 equals the number of customers credited in an outage lasting longer than 24 hours. NOCE24 equals the number of customers affected by an outage that last longer than 24 hours.

- S. Tracking of consumer complaints: All consumer complaints to Comcast will be captured daily, tabulated, analyzed and reported quarterly, including corrective actions taken in response to the complaints. Comcast will use the complaint tracking forms and procedure documented in Attachment S1 through S5 to monitor, track and report consumer complaints.