

# 15 | CPUC CONSUMER AFFAIRS BRANCH COMPLAINTS

## Principal observations and takeaways

- CAB collects geo-coded customer location information, but this is not consistent with the customer of record/account data that is contained in the ILECs' trouble report records, such as the customer's account or billing telephone number, serving wire center, or other location-specific information. Consequently, CAB complaint records cannot be directly linked to or correlated with carrier trouble tickets because CAB does not collect detailed customer account or location data.
- Less than a quarter of the total complaints received by CAB involved service outages and other service-related problems.
- The vast majority VoIP-related complaints received by CAB address issues other than VoIP service quality, such as billing disputes and other customer service issues.
- Although the absolute number of service-related complaints received by CAB is extremely small when compared with the number of complaints made directly with carriers, on a relative scale more than four times as many complaints involve legacy services provided by Frontier than those furnished by AT&T.
- CAB should undertake to collect customer account and location data as part of all service-related complaints.

## CPUC CONSUMER AFFAIRS BRANCH COMPLAINTS

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## Introduction

The mission of the CPUC's Consumer Affairs Branch ("CAB") is to assist consumers of public utility services address problems that may arise from time to time in connection with their service, billing issues, and/or other relationships with the utility. The CAB describes its role as follows:

The California Public Utilities Commission (CPUC) regulates privately owned California utilities that provide energy, water, and telecommunications services. If you have a question or complaint concerning one of these utility providers, help is available through the Consumer Affairs Branch (CAB).

CAB's team of representatives is ready to assist consumers with billing and service matters with regulated utilities. Through dedicated specialists, CAB assists consumers in resolving application denials (appeals) for the California LifeLine program participation. ...<sup>113</sup>

Within the overall scope of our work on Phase 1, ETI examined Consumer Affairs Branch complaint data with an attempt to correlate it with the more direct GO 133-C/D Trouble Report records submitted by the carriers. We determined that CAB complaint records do not typically include the complainant's billing telephone number (BTN) or location, making it impossible to link individual consumer complaints as submitted to CAB with Trouble Ticket records maintained by the carriers and furnished to us for purposes of this Study. For Phase 2, ETI has been tasked with examining (1) whether wire centers with a high number of consumer complaints have worse service quality metrics than the statewide average; and (2) the breakdown of complaints of VoIP versus traditional telephone service.

CAB handles both informal complaints as well as formal complaints that are ultimately adjudicated by the CPUC. Our examination was, however, limited to informal complaints. CAB collects geo-coded customer location information, but this is not consistent with the customer of record/account data that is contained in the ILECs' trouble report records, such as the customer's account or billing telephone number, serving wire center, or other location-specific information. Because CAB complaint records do not typically include the complainant's billing telephone number (BTN), it is usually not possible to link individual consumer complaints as submitted to CAB with Trouble Ticket records maintained by the carriers and furnished to us for purposes of this Study. As a result, we are able to address only limited aspects of issue (1). However, we have reviewed records of all complaints received by CAB pertaining to AT&T California (U-1001) and Frontier California (U-1002) over the 24 month period from January 2018 through December 2019, and are able to provide an overall assessment of the relationship between service outages as reported to the carriers vs. service-related complaints submitted to CAB.

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113. <https://www.cpuc.ca.gov/cab/>



CAB collects geo-coded customer location information, but this is not consistent with the customer of record/account data that is contained in the ILECs' trouble report records, such as the customer's account or billing telephone number, serving wire center, or other location-specific information. Consequently, CAB complaint records cannot be directly linked to or correlated with carrier trouble tickets because CAB does not collect detailed customer account or location data.

### **Types and quantities of consumer complaints received by CAB**

Over the Phase 2 2018-2019 study period, CAB received a total of 5,729 Complaints pertaining to AT&T California and 2,925 Complaints pertaining to Frontier California. In its complaint data records, CAB identifies approximately 75 principal types of complaints by their subject. Tables 15.1 and 15.2 below summarize these, and provide the quantities received in each subject category, for AT&T California and Frontier California, respectively.

To support our analysis, we have associated each of the CAB complaint types with one of six (6) principal complaint categories, as follows:

- Service Quality issue
- Billing / Commercial Dispute
- Customer service issue
- VoIP
  - Service quality issues
  - Other issues (e.g., billing, customer service)
- Non-phone issue (Cable, Internet)
- Unknown

These principal complaint category assignments are also shown on Tables 15.1 and 15.2.

Table 15.1

**CPUC CONSUMER AFFAIRS BRANCH  
TYPES OF CONSUMER COMPLAINTS RECEIVED  
RELATING TO AT&T CALIFORNIA  
2018-2019**

<b>Complaint type</b>	<b>Category</b>	<b>Count</b>	<b>Pct of Total</b>
Abusive Marketing	Customer service	112	1.95%
Bill Adjustment	Billing / Commercial	118	2.06%
Bill Format	Billing / Commercial	12	0.21%
Bill Not Received	Billing / Commercial	72	1.26%
Bundled Services	Customer service	62	1.08%
Call Quality	Service issue	144	2.51%
Commission Policy/Rules	Customer service	22	0.38%
Cramming/3rd Party Billing	Billing / Commercial	33	0.58%
Cramming/3rd Party Billing	Billing / Commercial	3	0.05%
Dead Zones/Dropped Calls	Service issue	6	0.10%
Deaf and Disabled Programs (DDTP)	Customer service	2	0.03%
Delayed Orders/Missed Appointments	Service issue	293	5.11%
Deposits	Billing / Commercial	1	0.02%
Disconnected In Error	Customer service	62	1.08%
Disconnection Non Payment	Billing / Commercial	136	2.37%
Disputed Customer of Record	Billing / Commercial	28	0.49%
Early Termination Fee - ETF	Billing / Commercial	28	0.49%
Fraud	Billing / Commercial	2	0.03%
Health	Customer service	1	0.02%
High Bill	Billing / Commercial	666	11.63%
Late Payment Charge - LPC	Billing / Commercial	56	0.98%
LL Consumer Did Not Return Form	Customer service	5	0.09%
LL Documents Not Provided/Does Not Meet Guidelines	Customer service	3	0.05%
LL Form Complexity	Customer service	1	0.02%
LL IDV Identity Verification	Billing / Commercial	14	0.24%
LL No Carrier Authority	Customer service	1	0.02%
LL Nondeliverable	Customer service	2	0.03%
LL Policy/Practices	Customer service	6	0.10%
LL SSN/DOB/TRIBAL ID Not Provided	Customer service	1	0.02%
LLB Address Error	Billing / Commercial	29	0.51%
LLB Application Request	Billing / Commercial	557	9.72%
LLB Approved for Discount	Billing / Commercial	244	4.26%
LLB Discount Switched to Other Carrier	Billing / Commercial	73	1.27%
LLB Federal Program/Equipment	Customer service	2	0.03%
Low Income/Special Needs	Customer service	1	0.02%
NJ Cable/Satellite TV	Non-phone issue	278	4.85%
NJ Claims for Damages	Customer service	21	0.37%
NJ Company Practice	Customer service	65	1.13%
NJ Customer Service	Customer service	70	1.22%
NJ Easements/Right of Way	Customer service	24	0.42%
NJ Equipment	Service issue	40	0.70%

Complaint type	Category	Count	Pct of Total
NJ Inability to Serve	Service issue	14	0.24%
NJ Inside Wiring	Non-phone issue	3	0.05%
NJ Internet Billing	Non-phone issue	150	2.62%
NJ Internet Service/Equipment	Non-phone issue	318	5.55%
NJ Landlord/Tenant Issues	Billing / Commercial	2	0.03%
NJ Not Listed	Customer service	102	1.78%
NJ Out of State Consumer	Customer service	8	0.14%
NJ Property Restoration/Debris Removal	Service issue	7	0.12%
NJ Rebates/Promotions	Billing / Commercial	25	0.44%
NJ Surcharges/Taxes	Billing / Commercial	27	0.47%
NJ VOIP (Voice Over Internet Protocol)	VoIP	318	5.55%
NJ Yellow Page Directory	Non-phone issue	2	0.03%
Number Portability - Wireless or Landline	Customer service	47	0.82%
Numbering Plan Area - Area Code Changes	Customer service	4	0.07%
Obscene/Threatening/Harassing Calls	Customer service	31	0.54%
Operator Services	Service issue	2	0.03%
Other Charges	Billing / Commercial	335	5.85%
Out of Service Credit - OOS	Billing / Commercial	13	0.23%
Outage	Service issue	623	10.87%
Payment Arrangements	Billing / Commercial	60	1.05%
Payment Error	Billing / Commercial	61	1.06%
Premise Visit Charges	Billing / Commercial	4	0.07%
Rate Design	Billing / Commercial	4	0.07%
Rate Protest	Billing / Commercial	1	0.02%
Refusal To Serve	Customer service	55	0.96%
Robo Calls/ADAD	Customer service	44	0.77%
Safety	Service issue	79	1.38%
Slamming	Billing / Commercial	30	0.52%
Toll Dispute	Billing / Commercial	21	0.37%
Unknown	Unknown	32	0.56%
VoIP (Voice over Internet Protocol)	VoIP	1	0.02%
Whistleblower	Customer service	1	0.02%
White Page Listings - Telephone Directory	Non-phone issue	4	0.07%
Wildfires	Service issue	5	0.09%
<b>TOTAL</b>		<b>5729</b>	<b>100.00%</b>

Table 15.2

**CPUC CONSUMER AFFAIRS BRANCH  
TYPES OF CONSUMER COMPLAINTS RECEIVED  
RELATING TO FRONTIER CALIFORNIA  
2018-2019**

<b>Complaint type</b>	<b>Category</b>	<b>Count</b>	<b>Pct of Total</b>
Abusive Marketing	Customer service	73	2.50%
Bill Adjustment	Billing / Commercial	99	3.38%
Bill Format	Billing / Commercial	3	0.10%
Bill Not Received	Billing / Commercial	20	0.68%
Bundled Services	Customer service	33	1.13%
Call Quality	Service issue	85	2.91%
Commission Policy/Rules	Customer service	13	0.44%
Cramming/3rd Party Billing	Billing / Commercial	27	0.92%
Cramming/3rd Party Billing	Billing / Commercial	1	0.03%
Dead Zones/Dropped Calls	Service issue	5	0.17%
Deaf and Disabled Programs (DDTP)	Customer service	2	0.07%
Delayed Orders/Missed Appointments	Service issue	168	5.74%
Deposits	Billing / Commercial	3	0.10%
Disconnected In Error	Customer service	29	0.99%
Disconnection Non Payment	Billing / Commercial	42	1.44%
Disputed Customer of Record	Billing / Commercial	9	0.31%
Early Termination Fee - ETF	Billing / Commercial	27	0.92%
Fraud	Billing / Commercial	1	0.03%
High Bill	Billing / Commercial	325	11.11%
Late Payment Charge - LPC	Billing / Commercial	6	0.21%
LL IDV Identity Verification	Billing / Commercial	3	0.10%
LL Policy/Practices	Customer service	3	0.10%
LL Signature/Printed Name Does Not Match/Missing	Billing / Commercial	1	0.03%
LLB Address Error	Billing / Commercial	1	0.03%
LLB Application Request	Billing / Commercial	89	3.04%
LLB Approved for Discount	Billing / Commercial	49	1.68%
LLB Discount Switched to Other Carrier	Billing / Commercial	19	0.65%
LLB Federal Program/Equipment	Customer service	3	0.10%
NJ Cable/Satellite TV	Non-phone issue	73	2.50%
NJ Claims for Damages	Customer service	5	0.17%
NJ Company Practice	Customer service	32	1.09%
NJ Customer Service	Customer service	36	1.23%
NJ Easements/Right of Way	Customer service	8	0.27%
NJ Equipment	Service issue	30	1.03%
NJ Inability to Serve	Service issue	4	0.14%
NJ Internet Billing	Billing / Commercial	162	5.54%
NJ Internet Service/Equipment	Non-phone issue	255	8.72%
NJ Not Listed	Customer service	39	1.33%
NJ Out of State Consumer	Customer service	3	0.10%
NJ Property Restoration/Debris Removal	Service issue	3	0.10%
NJ Rebates/Promotions	Billing / Commercial	8	0.27%
NJ Surcharges/Taxes	Billing / Commercial	22	0.75%
NJ VOIP (Voice Over Internet Protocol)	VoIP	244	8.34%

<b>Complaint type</b>	<b>Category</b>	<b>Count</b>	<b>Pct of Total</b>
NJ Yellow Page Directory	Non-phone issue	1	0.03%
Number Portability - Wireless or Landline	Customer service	42	1.44%
Numbering Plan Area - Area Code Changes	Customer service	1	0.03%
Obscene/Threatening/Harassing Calls	Customer service	1	0.03%
Operator Services	Service issue	1	0.03%
Other Charges	Billing / Commercial	279	9.54%
Out of Service Credit - OOS	Billing / Commercial	9	0.31%
Outage	Service issue	399	13.64%
Payment Arrangements	Billing / Commercial	12	0.41%
Payment Error	Billing / Commercial	22	0.75%
Payphone	Billing / Commercial	1	0.03%
Premise Visit Charges	Billing / Commercial	8	0.27%
Rate Design	Billing / Commercial	1	0.03%
Refusal To Serve	Customer service	12	0.41%
Robo Calls/ADAD	Customer service	11	0.38%
Safety	Service issue	22	0.75%
Slamming	Billing / Commercial	14	0.48%
Toll Dispute	Billing / Commercial	3	0.10%
Unknown	Unknown	20	0.68%
VoIP (Voice over Internet Protocol)	VoIP	1	0.03%
White Page Listings - Telephone Directory	Non-phone issue	1	0.03%
Wildfires	Service issue	1	0.03%
<b>TOTAL</b>		<b>2925</b>	<b>100.00%</b>



Table 15.3 below provides the total number of complaints received by CAB over the 2018-2019 period in each of these principal complaint categories. The “Service Quality issue” category, which relates most directly with Trouble Reports submitted to the carriers for service outages and other service-related problems, represents less than a quarter of the total complaints received by CAB. For AT&T California, only 1,213, or 21.17%, of the 5,729 complaints received by CAB pertained to service outages and other telephone service related service quality issues. By comparison, over the 2018-2019 period, AT&T California customers reported some 573,585 service outages to the carrier. For Frontier California, only 718, or 24.55%, of the 2,925 complaints received by CAB during 2018-2019 pertained to telephone service related service quality issues, whereas Frontier California customers reported some 81,021 service outages to the carrier during 2018 and 2019.

<b>Table 15.3</b>				
<b>CPUC CONSUMER AFFAIRS BRANCH PRINCIPAL CATEGORIES OF CONSUMER COMPLAINTS 2018-2019</b>				
<b>Complaint category</b>	<b>CAB Complaint Counts</b>			
	<b>AT&amp;T</b>	<b>Pct of Total</b>	<b>Frontier</b>	<b>Pct of Total</b>
Service Quality issue	1,213	21.17%	718	24.55%
Billing / Commercial Dispute	2,655	46.34%	1,266	43.28%
Customer service issue	755	13.18%	346	11.83%
VoIP Service issue	106	1.85%	245	8.38%
VoIP Billing issue	213	3.72%	37	1.26%
Non-phone issue (Cable, Internet)	755	13.18%	208	7.11%
Unknown	32	0.56%	20	0.68%
<b>TOTALS</b>	<b>5,729</b>	<b>100.00%</b>	<b>2,925</b>	<b>100.00%</b>



Less than a quarter of the total complaints received by CAB involved service outages and other service-related problems.

By far the largest number of Complaints submitted to CAB were associated with billing or other commercial interactions between the customer and the carrier. Billing and other commercial interaction issues accounted for 46.34% – nearly half – of all complaints received by CAB relating to AT&T California, and for Frontier California, these same types of complaints represented 43.28% of all those received. Other non-billing Customer Service complaints represented 13.18% and 11.83% of all complaints received relating to AT&T California and Frontier California, respectively. More than half of all complaints received by CAB fall into one of these two categories, neither of which has any direct counterpart with respect to service outages or other trouble tickets as reported to the carriers.

CAB also received many complaints that addressed services over which the CPUC has limited or no direct regulatory authority, such as cable TV, Internet access, and even inside wire issues.

## VoIP Services

Also included in the CAB records were complaints dealing with VoIP services; however, the vast majority of these dealt with issues other than service-related problems, such as billing and related commercial matters, delayed service installations, and other customer service issues. Nevertheless, it may still be instructive to compare VoIP service quality-related complaints with those addressing service quality issues associated with legacy services, and to present these in the context of Trouble Reports both for VoIP and for legacy services as well as the number of lines in service for each of the two carriers. Table 15.4 below compares CAB VoIP Complaints, VoIP Trouble Tickets, and VoIP subscriptions for each of the two carriers over the Phase 2 2018-2019 study period, and provides similar data for legacy services as well. Subscription counts are averaged over the two years so as to correspond with the Complaint and Trouble Ticket totals over that same period.

<b>VoIP AND LEGACY SERVICE COMPLAINTS, TROUBLE REPORTS AND SUBSCRIPTION COUNTS 2018-2018</b>				
<b>Complaint category</b>	<b>VoIP</b>		<b>Legacy telephone service</b>	
	<b>AT&amp;T</b>	<b>Frontier</b>	<b>AT&amp;T</b>	<b>Frontier</b>
Service-related Complaints received by CAB	106	37	1,213	718
Service outage Trouble Reports received by carriers	400,577	63,726	573,585	81,021
Average subscriber counts 2018-2019	920,131	224,022	1,932,389	681,470
Service-related CAB Complaints per 100 lines in service (2018-19 average)	0.0115	0.0165	0.0628	0.1054
Total Out-of-Service Reports per 100 VoIP lines in service, 2018-2019	43.53	28.45	29.68	11.89
Average Out-of-Service Reports per month, per 100 VoIP lines in service	1.8138	1.1854	1.2367	0.4954

Both carriers appear to be experiencing higher rates of service-related trouble conditions (i.e., out-of-service reports per month per 100 lines in service) for VoIP services than for their legacy telephone services. Notably, the CAB service-related complaints per 100 lines in service are actually *lower* for VoIP services than for legacy services. However, these numbers are so small, and represent little more than a minuscule fraction of all trouble reports for both categories of

service, that no meaningful conclusions as to the reasons for this seemingly inverse relationship are possible.



The vast majority VoIP-related complaints received by CAB address issues other than VoIP service quality, such as billing disputes and other customer service issues.

### **CAB complaints vs. carrier trouble reports for legacy services**

In that regard, while the total quantity of service-related complaints submitted to CAB is an extremely small fraction of the total number of trouble reports received by both carriers, the relative number of CAB complaints has been consistently and significantly greater for Frontier California than for AT&T California. As summarized on a monthly basis in Tables 15.5 and 15.6 below, over the 2018-2019 period, CAB received 1,213 service-related complaints from AT&T customers, representing 0.2115% of the 573,585 service outage trouble tickets processed by AT&T over that same period. In the case of Frontier, CAB received 718 service-related complaints, representing 0.862% of the 81,021 service outage trouble tickets processed by Frontier.

While the absolute number of complaints received by CAB are still extremely small relative to the number of service problems being reported directly to the carriers, the stark difference in the instance of such complaints as between customers of the two carriers is striking. On a relative basis, four times as many Frontier California customers saw fit to contact CAB to report service problems than did AT&T California customers, which is generally reflective of the persistent service problems that have been plaguing Frontier over the 2018-2019 period.



Although the absolute number of service-related complaints received by CAB is extremely small when compared with the number of complaints made directly with carriers, on a relative scale more than four times as many complaints involve legacy services provided by Frontier than those furnished by AT&T.

Table 15.5

**AT&T CALIFORNIA**  
**COMPARISON OF CARRIER OUT-OF-SERVICE TROUBLE REPORTS**  
**VS. SERVICE QUALITY-RELATED COMPLAINTS RECEIVED BY**  
**CPUC CONSUMER AFFAIRS BRANCH**  
**2018-2019**

Month	Out-of-Service Trouble Reports	CAB Service Quality Complaints	CAB Complaints as Pct of Total Trouble Reports
January 2018	39,512	76	0.1923%
February 2018	22,322	33	0.1478%
March 2018	33,342	68	0.2039%
April 2018	23,508	40	0.1702%
May 2018	20,218	44	0.2176%
June 2018	18,310	35	0.1912%
July 2018	19,693	43	0.2184%
August 2018	19,973	44	0.2203%
September 2018	16,289	45	0.2763%
October 2018	21,732	44	0.2025%
November 2018	19,125	53	0.2771%
December 2018	32,709	51	0.1559%
January 2019	39,635	55	0.1388%
February 2019	39,213	65	0.1658%
March 2019	31,845	45	0.1413%
April 2019	19,883	27	0.1358%
May 2019	19,706	56	0.2842%
June 2019	17,937	42	0.2342%
July 2019	16,458	41	0.2491%
August 2019	16,681	52	0.3117%
September 2019	17,085	46	0.2692%
October 2019	19,101	56	0.2932%
November 2019	16,724	41	0.2452%
December 2019	32,584	111	0.3407%
<b>TOTALS</b>	<b>573,585</b>	<b>1,213</b>	<b>0.2115%</b>

Table 15.6

**FRONTIER CALIFORNIA  
COMPARISON OF CARRIER OUT-OF-SERVICE TROUBLE REPORTS  
VS. SERVICE QUALITY-RELATED COMPLAINTS RECEIVED BY  
CPUC CONSUMER AFFAIRS BRANCH  
2018-2019**

<b>Month</b>	<b>Out-of-Service Trouble Reports</b>	<b>CAB Service Quality Complaints</b>	<b>CAB Complaints as Pct of Total Trouble Reports</b>
January 2018	4,079	36	0.8826%
February 2018	2,276	20	0.8787%
March 2018	4,421	29	0.6560%
April 2018	2,931	26	0.8871%
May 2018	2,755	23	0.8348%
June 2018	2,298	15	0.6527%
July 2018	2,493	19	0.7621%
August 2018	2,620	14	0.5344%
September 2018	2,027	24	1.1840%
October 2018	3,864	15	0.3882%
November 2018	3,112	8	0.2571%
December 2018	5,047	21	0.4161%
January 2019	5,489	40	0.7287%
February 2019	5,710	68	1.1909%
March 2019	4,793	62	1.2936%
April 2019	3,457	42	1.2149%
May 2019	3,077	33	1.0725%
June 2019	3,077	39	1.2675%
July 2019	2,593	48	1.8511%
August 2019	2,687	22	0.8188%
September 2019	2,513	27	1.0744%
October 2019	2,597	35	1.3477%
November 2019	2,287	21	0.9182%
December 2019	4,818	31	0.6434%
<b>TOTALS</b>	<b>81,021</b>	<b>718</b>	<b>0.8862%</b>

## Conclusion

As noted earlier, the lack of customer-specific location and account data on CAB complaint data records does not allow for a direct examination of such complaints *vis-à-vis* the corresponding trouble ticket and its resolution by the carrier. That said, the substantially higher *rate* of complaints filed by Frontier customers experiencing service-related problems appears consistent with the company's difficulties over the 2018-2019 period.

CAB complaint data would be enormously more useful, going forward, if customer-specific service details, such as serving wire center, billing telephone number, and street address could be recorded along with the description of the problem being experienced by the customer. While these details may be of lesser importance for complaints that do not directly involve service outages and other service-related issues, at the very least this additional account-specific data should be collected where the complaint does involve service quality problems.



CAB should undertake to collect customer account and location data as part of all service-related complaints.