



**INTERNATIONAL
BROTHERHOOD
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WORKERS®**

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November 22, 2024

VIA EMAIL

Ms. Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NW
Washington, DC 20554

**Re: IBEW Comments on October 23, 2024 - Notice of Inquiry on
Strengthening Customer Service in the Communications Industry**

Dear Chairwoman Rosenworcel:

On behalf of the 838,000 active and retired members of the International Brotherhood of Electrical Workers (IBEW), I am writing to respond with comments to the Federal Communications Commission (FCC) *Notice of Inquiry*¹ regarding strengthening customer service in the communications industry. The IBEW is a strong proponent of ensuring that all Americans have access to *reliable* broadband service, which is why the IBEW continues to support the Broadband Equity Access and Deployment (BEAD) program, established by the Infrastructure and Investment Jobs Act (IIJA), that dedicated \$42.5 billion to ensure all Americans have access to broadband service. The IBEW has witnessed first-hand the negative impacts on both public safety and customer service of decades of deregulation and underinvestment within the telecommunications industry.

I. 911 Outages and Public Safety

The IBEW currently represents approximately 39,000 permanent employees working for telecommunications companies as well as thousands of construction workers who perform contract work for internet service providers. The IBEW has historically served a significant role in the telecommunications industry, as one of the largest labor unions representing workers for incumbent local exchange carrier (ILEC) providers, the largest building trade in the telecommunications sector, and as a labor representative for workers manufacturing and assembling telecommunications equipment.

It is apparent that most Americans believe broadband is an essential service, like electricity or water. One of the FCC's most important responsibilities is to promote public safety, and it is indisputable that *reliable* broadband service is critical to public safety. The FCC's existing standards for cable operators, among others, is "the cable operator will begin working on 'service interruptions'

¹ <https://www.fcc.gov/document/fcc-review-customer-support-offered-consumers>



**INTERNATIONAL
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Chairwoman Jessica Rosenworcel
November 22, 2024
Page 2

promptly and no later than 24 hours after the cable operator becomes aware of the interruption.”² In 2024, broadband outages caused millions of Americans to lose access to 911 and some outages even disabled 911 call centers themselves, which prevented thousands of 911 emergency calls from getting through.³ The inability for Americans to place 911 calls, for any length of time, is a critical threat to public safety, and the IBEW recommends that the FCC strengthen its standard from operators shortening the 24-hour response time to 911 outages to as quickly as possible.

II. Deregulation, Underinvestment, and Customer Service within the Communications Industry

Historically, the telecommunications industry had customer service protections at the federal, state, and local levels. After decades of deregulation, throughout most of the country, there are no customer service protections in place and the average consumer is at the mercy of their service provider.

The elimination of customer service protections in the telecommunications industry has led to massive workforce reductions. At the same time, profits in the telecommunications industry have skyrocketed. In 2002, the IBEW’s membership in the Telecommunications branch was 74,762. Twenty years later, IBEW’s telecommunications membership had been reduced to 37,677 which amounts to nearly a 50% reduction. Nationwide, the U.S. telecommunications industry employed approximately 1,281,000 workers in 2002. By 2022, the telecommunications industry employed approximately 663,000 workers which also amounts to a nearly 50% reduction. However, during this same period, revenue for telecommunication companies went from **\$430.3 billion** in 2002 to **\$666.7 billion** in 2022, which is a 54.5% **increase** in revenue for the industry.

Once telecommunications companies were not held to customer service quality standards, they dramatically reduced their workforce, significantly increased their revenues, and yet provided considerably worse service quality to consumers. It comes as no surprise to the IBEW, as the FCC notes, “the American Customer Satisfaction Index (ACSI) has consistently ranked subscription television service as having one of the lowest customer service satisfaction out of all industries surveyed since it began ranking traditional subscription TV service as an industry in 2001.”⁴

² 47 CFR § 76.309(c)(2).

³ See <https://www.nytimes.com/2024/06/19/us/emergency-911-outages.html>
<https://www.washingtonpost.com/dc-md-va/2024/08/15/dc-911-outages-dysfunction/>
<https://www.usatoday.com/story/news/nation/2024/07/16/911-emergency-system-brink-of-crisis/74411456007/>

⁴ FCC 24-110, p.7



**INTERNATIONAL
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Chairwoman Jessica Rosenworcel
November 22, 2024
Page 3

To begin to improve customer service standards for installation, outages, and service calls, the IBEW believes that customer service standards should be harmonized amongst technologies. Whether the end-user receives broadband service through cable, telecom, or satellite technology, the standards should be the same. As for the standards themselves, the IBEW would propose the following: (1) installation of service within **three** business days of the customer's order; (2) service outages resolved within 24 hours of the customer's report; (3) appointment windows should be no more than **four** hours (e.g., 8:00a.m.-12p.m.); and (4) broadband speeds should be equal to or greater than the speeds advertised by the service provider.

Additionally, the IBEW believes that service providers should provide customers with reasonable access to live representatives with the following standards: (1) customers should be able to reach a live representative at all times to report a service outage; (2) for billing questions, service orders, and other customer requests, customers should have access to a live representative during normal business hours; (3) the vast majority of customer calls should be answered within 1 minute; (4) customers should have the ability to bypass the service providers' automated Voice Response Unit by pressing "0" to speak with a live representative; and (5) alternate technologies such as "Chat" options should be available for customers to reach a live representative.

The IBEW continues to stand in support of the current FCC's efforts to ensure all Americans can access affordable, reliable, high-speed broadband, especially in unserved, underserved, and rural communities. I appreciate this opportunity to comment on protecting the country's vital 911 call system and improving customer service within the telecommunications industry and look forward to continuing to work together on these, and many other, important issues.

Sincerely yours,

Kenneth W. Cooper
International President

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