

Exhibit No.:

Issues: Telephone Specific

Witness: William L. Voight

Sponsoring Party: MO PSC Staff

Type of Exhibit: Direct Testimony

Case No.: TC-2007-0111

Date Testimony Prepared: March 16, 2007

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**DIRECT TESTIMONY**

**OF**

**WILLIAM L. VOIGHT**

**COMCAST IP PHONE, LLC**

**CASE NO. TC-2007-0111**

**Jefferson City, Missouri**

**March 2007**

Staff Exhibit No. 1  
Date 7/25/07 Case No. TC-2007-0111  
Reporter MV

**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

Staff of the Public Service Commission of )  
the State of Missouri, Complainant, v. )  
Comcast IP Phone, LLC, Respondent )

Case No. TC-2007-0111

**AFFIDAVIT OF WILLIAM L. VOIGHT**

STATE OF MISSOURI     )  
                                  ) ss  
COUNTY OF COLE     )

William L. Voight, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 17 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

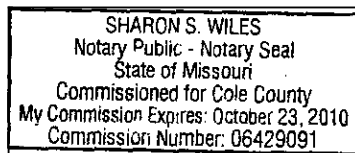


William L. Voight

Subscribed and sworn to before me this 15<sup>th</sup> day of March, 2007.



Notary Public



My commission expires \_\_\_\_\_

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**DIRECT TESTIMONY**  
**OF**  
**WILLIAM L. VOIGHT**  
**COMCAST IP PHONE, LLC**  
**CASE NO. TC-2007-0111**

**Q. Please state your name and give your business address.**

A. My name is William L. Voight and my business address is P.O. Box 360, 200 Madison Street, Jefferson City, Missouri 65102.

**Q. By whom are you employed and in what capacity?**

A. I am employed by the Missouri Public Service Commission (Commission or MoPSC) as a supervisor in the Telecommunications Department. I have general supervisory responsibility for staff recommendations pertaining to tariff filings, certificate applications, interconnection agreements, and telephone company mergers and acquisitions. In conjunction with other staff persons, I provide staff recommendations on a wide variety of other matters before the Commission including rule makings, complaints filed with the Commission, and Commission comments to the Federal Communication Commission (FCC). My duties have also involved participation as a member of the Commission's Arbitration Advisory Staff, which is comprised of subject matter experts who assist an arbitrator in interconnection and compensation disputes involving the Federal Telecommunications Act of 1996. Lastly, I participate in and coordinate special projects, as assigned by management. Examples of special projects include Case No. TW-2004-0324, a Study of Voice over Internet Protocol in Missouri, and Case No. TW-2004-0471, a Commission-appointed Task Force to study expanded local calling in Missouri. As necessary and appropriate, I also

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1 provide assistance to the Commission, upper management, and members of the General  
2 Assembly on legislative matters.

3 **Q. What is your education and previous work experience?**

4 A. I received a Bachelors of Science degree with a major in economics from  
5 Lincoln University in Jefferson City, Missouri. A copy of relevant work history is attached  
6 as Schedule 1.

7 **Q. Have you previously testified before the Commission?**

8 A. Yes, a list of cases where I have served as a witness by providing testimony is  
9 attached as Schedule 2.

#### 10 EXECUTIVE SUMMARY

11 **Q. Please summarize your testimony.**

12 A. In the Staff's opinion, Comcast IP Phone, LLC is providing  
13 telecommunications service in Missouri without first obtaining certificates of operating  
14 authority from the Commission. The crux of this case involves a disagreement between the  
15 Staff and Comcast over the extent to which the Commission may exert jurisdiction over a  
16 particular kind of digital telecommunications technology known as Voice over Internet  
17 Protocol (VoIP), and whether or not the state of Missouri has been preempted by the federal  
18 government from exerting jurisdiction over Comcast's VoIP service. The Staff recommends  
19 the Commission find Comcast in violation of Section 392.410.2 RSMo and to authorize its  
20 General Counsel to bring an action in Circuit Court to recover from Comcast the maximum  
21 statutory forfeiture allowed.

22 **Q. What is the purpose of your Direct Testimony?**

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1           A.     On September 21, 2006, the Telecommunications Department Staff (Staff),  
2     acting by and through the Commission's General Counsel, filed a complaint against Comcast  
3     IP Phone, LLC (Comcast). My testimony is filed in support of Staff's complaint.

4           **Q.     Why did the Staff file a complaint against Comcast?**

5           A.     Comcast is providing telecommunications services in Missouri without proper  
6     authorization. As stated in Paragraph Nine of the Staff's Complaint, John G. Sullivan, Vice  
7     President of Comcast Phone of Missouri, LLC, signed an affidavit stating that its affiliate,  
8     "Comcast Digital Voice, which is a VoIP provider, furnishes all-distance VoIP calling  
9     services to two or more residential customers in each of the Buckner, Lake Lotawana, Oak  
10    Grove, Odessa, and Pleasant Hill exchanges..."<sup>1</sup> Comcast's response to Staff Data Requests  
11   12 and 13 indicates that the company provides its "All Distance VoIP service" in eighteen  
12   Missouri municipalities and that it began providing the service on April 17, 2006. In the  
13   Staff's opinion, irrespective of the marketing name given to its service (i.e., Digital Voice or  
14   "All Distance VoIP service"), Comcast's offering constitutes the provisioning of  
15   telecommunications service. Staff further alleges that Comcast is providing such service  
16   without having first obtained a certificate of operating authority and tariff approval from the  
17   MoPSC.

18          **Q.     Please describe Digital Voice or All Distance VoIP service.**

19          A.     They appear, quite simply, to be the marketing names given to the telephone  
20    service provided over the coaxial cable TV wires of Comcast. These marketing names are  
21    similar to product names used by other cable TV companies, which are certificated in  
22    Missouri (A more detailed discussion of Time Warner's offering, known as "Digital Phone"

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<sup>1</sup> RE: *In the Matter of the Application of Embarq Missouri, for Competitive Classification Under Section 392.245.5, RSMo 2005*. Case No. IO-2006-0551, Staff Recommendation filed on July 10, 2006.

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1 is discussed further in this testimony). Due to advances in technology, it is now possible to  
2 provide data, voice, and video service over the same wire(s). Digital Voice represents a  
3 "voice" product offering of Comcast. Digital Voice is often combined with Comcast's data  
4 and video offerings to form a "bundle" or "package" of services. In my opinion, one of the  
5 unique aspects of Digital Voice appears to involve the complete elimination of "long  
6 distance" charges associated with calling anywhere in North America.

7 **Q. Isn't "Comcast" already certificated by the Commission?**

8 A. An entity known as Comcast Phone of Missouri, Inc. d/b/a Comcast Digital  
9 Phone (Comcast Digital Phone) was granted certificates by the Commission to provide non-  
10 switched local, basic local, and interexchange telecommunications service effective July 7,  
11 2005 in Case No. LA-2005-0417. Comcast Digital Phone's certificate to provide basic local  
12 telephone service is limited to the geographic area of Southwestern Bell Telephone Company  
13 and Sprint Missouri, Inc, now known as AT&T Missouri and Embarq Missouri, Inc. d/b/a  
14 Embarq, respectively. Pursuant to the grant of its certificate(s), Comcast Digital Phone was  
15 ordered by the Commission to file tariff sheets reflecting the rates, rules, regulations, and  
16 services it was to have offered. Although Comcast Digital Phone later submitted an exchange  
17 access tariff, it never submitted a tariff to provide local exchange or interexchange telephone  
18 service.

19 **Q. Given that Comcast Digital Phone appears to have the necessary**  
20 **certificates of operating authority, shouldn't the Staff's complaint be focused more**  
21 **towards getting Comcast Digital Phone to file additional tariffs, rather than apply for**  
22 **additional certificates of service authority?**

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1           A.     The Commission's Electronic Filing and Information System (EFIS) contains  
2 listings reflecting at least six separate entities associated with the name "Comcast." For  
3 clarity, examples are shown in Schedule 3, attached. Entries in the EFIS contain references to  
4 such names as Comcast Phone of Missouri, LLC; Comcast Long Distance; Comcast IP  
5 Phone, LLC; Comcast Digital Voice; Comcast Digital Phone; and Comcast Business  
6 Communications, Inc. At some point in time, the Staff began to question which companies  
7 were providing which services. Our attention became magnified by the affidavit supplied by  
8 Mr. Sullivan in Case No. IO-2006-0551, which indicated that "Comcast Digital Voice" was  
9 providing telephone service to residential customers in Missouri.

10           On September 13, 2006, the Staff met with Comcast officials in an attempt to  
11 determine the extent and nature of services being provided and, the entities providing the  
12 various services. As a result of that meeting, and with Comcast's assistance, the Staff  
13 concluded that Comcast IP Phone, LLC was the entity providing basic local and  
14 interexchange telecommunications service in Missouri, and that it was doing so without  
15 benefit of the necessary certificates. Consequently, the Staff's complaint was lodged against  
16 that entity.

17           **Q.     The Staff's complaint asserts that Comcast is providing local and**  
18 **interexchange telecommunications service in certain Missouri exchanges. How did**  
19 **Comcast respond to these assertions?**

20           A.     Comcast denied the assertions.

21           **Q.     Does Comcast provide telecommunications service in Missouri?**

22           A.     Yes. Section 386.020 (52) RSMo defines telecommunications service as the  
23 transmission of information by wire, radio, optical cable, electronic impulses, or other similar

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1 means. In response to Staff Data Request No. 1, Comcast states "yes, but only via a  
2 broadband network" to the question: "Does Comcast's All Distance VoIP service transmit  
3 information by wire, radio, optical cable, electronic impulses, or other similar means?"

4 **Q. Does Comcast's qualifier that its service is provided "only via a**  
5 **broadband network" change your answer?**

6 A. No. Again, Section 386.020 (52) RSMo defines telecommunications service as  
7 the transmission of information by wire, radio, optical cable, electronic impulses, or other  
8 similar means. In the Staff's opinion, the bit rate at which Comcast's end users'  
9 communications are occurring has nothing to do with the legal or regulatory status of the  
10 services being provided.

11 **Q. Does Comcast provide local exchange telecommunications service in**  
12 **Missouri?**

13 A. Yes. Section 386.020 (31) defines local exchange service as  
14 telecommunications service between points within an exchange. Comcast's Web site  
15 description of Digital Voice would appear to fit this description.

16 **Q. Does Comcast provide interexchange telecommunications service in**  
17 **Missouri?**

18 A. Yes. Section 386.020 (24) defines interexchange service as  
19 telecommunications service between points in two or more exchanges. Although Comcast  
20 objected to Staff Data Request No. 11, which asked whether Comcast's All Distance VoIP  
21 service transmits information between points in two or more exchanges, the statement in  
22 Comcast's Answer that it does provide All Distance VoIP service in the listed exchanges  
23 confirms that it provides interexchange telecommunications services in Missouri.

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1           **Q.   Mr. Voight, please state your opinion as to the real crux of the**  
2 **disagreement in this case.**

3           A.   In my opinion, the central disagreement surrounds the question of whether  
4 Comcast's Digital Voice or "All Distance VoIP service" should fall under the jurisdiction of  
5 the MoPSC. As I would understand Comcast's argument, the company believes only the  
6 federal government should be permitted to exert any authority over the terms and conditions  
7 of its telephone service offerings.

8           **Q.   What forms the basis for your opinion?**

9           A.   Comcast has repeatedly espoused the theory that the MoPSC's jurisdiction  
10 over Comcast's telephone service has been preempted by the federal government. Beginning  
11 with its Affirmative Defenses in its December 26<sup>th</sup> Answer in this case, Comcast stated that  
12 the Commission lacked jurisdiction over Comcast and that the Federal Communications  
13 Commission "has exclusive jurisdiction to determine whether, to what extent, and under  
14 whose authority VOIP services such as Comcast's VOIP services may be subject to  
15 regulation."

16           In its response to the Staff's Data Request No. 1, Comcast replied that it did not admit  
17 that it is providing a "telecommunications service" under Missouri law. In its Reply Brief,  
18 Comcast points to the Supreme Court's finding that the definition of "telecommunications  
19 service" is ambiguous.<sup>2</sup> Comcast states that the MoPSC has "overstepped its grounds" in its  
20 attempt to classify Comcast's Digital Voice as a telecommunications service<sup>3</sup>. Comcast states  
21 that the relevant inquiry is to determine whether Comcast's is an "information service"

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<sup>2</sup> Comcast IP Phone, LLC's Reply Brief in Support of its Motion for Preliminary Injunction;(p. 12); United States District Court for the Western District of Missouri Central Division. Case No. 06-4233-CV-C-NKL

<sup>3</sup> Id. page 15

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(which it states is the equivalent of an “enhanced service”) or a “telecommunications service”  
(which it states is the equivalent of a “basic service”).<sup>4</sup>

**Q. How does the Federal Communications Commission define VoIP service?**

A. VoIP is defined by the FCC in 47 C.F.R. 9.3. Interconnected VoIP service is a service that:

- (1) Enables real-time, two-way voice communications;
- (2) Requires a broadband connection from the user’s location;
- (3) Requires Internet protocol-compatible customer premises equipment (CPE) and;
- (4) Permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network.

As shown in Schedule 4-1, Comcast’s Web site describes VoIP as follows:

Voice over Internet Protocol (VoIP) is a technology used to transmit voice and related calls over a data network. Most VoIP service providers use the public Internet to transmit your calls. Comcast does not; we use this technology to transmit your calls over our advanced broadband network. Comcast Digital Voice service uses VoIP technology to provide you a number of enhanced new features without sacrificing any of your current phone features or the call clarity you expect.

Staff would caution the Commission that there are many different types of offerings which are called “VoIP services.” As discussed more fully below, the FCC continues to review this issue and has yet to make a sweeping determination as to the classification of VoIP services in general.

**Q. In its Reply Brief in Case No. 06-4233-CV-C-NKL before the U.S. District Court for the Western District of Missouri Central Division, Comcast describes several VoIP cases that have been decided by the Federal Communications Commission.<sup>5</sup> What**

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<sup>4</sup> Id. page 17

<sup>5</sup> Id. pages 5-11

1 is your understanding of the decisions by the Federal Communications Commission  
2 regarding VoIP service?

3 A. The FCC has addressed regulatory VoIP issues on a case-by-case basis. In  
4 each case, the FCC stated that the determination in the particular case was applicable only to  
5 the situation at issue and was not a blanket determination on the regulation of VoIP services.  
6 The FCC also stated its case-by-case determinations were not a determination as to whether  
7 VoIP services generally were telecommunications services or information services.

- 8
- 9 • **Pulver.com** (WC Docket No. 03-45) – The FCC found that pulver.com’s Free World  
10 Dialup offering is not a telecommunications service and will remain an unregulated  
11 information service since it maintains no geographically defined end point.
- 12 • **AT&T** (CC Docket No. 01-92 and WC Docket No. 02-361) – The FCC found  
13 AT&T’s Phone-to-Phone IP Telephony service was a telecommunications service  
14 because (1) it holds itself out as voice telephony or facsimile transmission service; (2)  
15 it does not require the customer to use CPE different from that CPE necessary to place  
16 an ordinary touch-tone call (or facsimile transmission) over the public switched  
17 telephone network; (3) it allows the customer to call telephone numbers assigned in  
18 accordance with the North American Numbering Plan, and associated international  
19 agreements; and (4) it transmits customer information without net change in form or  
20 content. The FCC has not preempted state commissions from applying  
21 telecommunications regulations to this AT&T IP service.
- 22 • **Vonage** (WC Docket No. 03-211) – Vonage asked the FCC to preempt a ruling by the  
23 Minnesota PUC to apply state telecommunications regulations to Vonage’s  
24 DigitalVoice service. The FCC preempted the Minnesota PUC by concluding the  
25 lack of dependence on *any* geographically defined location distinguishes DigitalVoice  
26 from other services whose federal or state jurisdiction is determined based on the  
27 geographic end points of the communications. The FCC declined to determine  
28 whether Vonage’s VoIP service should be classified as a telecommunications service  
29 or as an information service. This decision has been appealed.
- 30 • **USF Contribution Order** (WC Docket 04-36) – In this docket, the FCC was  
31 examining the USF contribution factor to determine whether VoIP providers should  
32 contribute to the USF; however the FCC also modified the earlier preemptive Vonage  
33 decision. The FCC stated:  
34 “[W]e note that an interconnected VoIP provider with the capability to  
35 track the jurisdictional confines of customer calls would no longer  
36 qualify for the preemptive effects of our *Vonage Order* and would be  
37 subject to state regulation. This is because the central rationale  
38 justifying preemption set forth in the *Vonage Order* would no longer  
39 be applicable to such an interconnected VoIP provider.

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1 As such, the FCC determined that VoIP providers should contribute to the  
2 USF at a certain percentage unless traffic studies were completed to justify  
3 another amount.  
4

5 **Q. How do the services discussed in these FCC decisions compare to the**  
6 **service offered by Comcast?**

7 A. In my opinion, there is little or no comparison. The Pulver.com decision solely  
8 involved "computer to computer" applications and, unlike Comcast's Digital Voice service,  
9 did not extend to calls traversing what is deemed the public switched telephone network. In  
10 the AT&T decision, the FCC concluded that AT&T's "IP in the middle" "phone to phone"  
11 VoIP service was subject to exchange access charges. Although the FCC further found that  
12 AT&T's VoIP service was a "telecommunication service" and not an "information service,"  
13 the Staff does not believe any inferences from that case can be drawn to Comcast's offering  
14 in Missouri. In the Vonage order, the FCC expressly stated it was not deciding whether VoIP  
15 services are information services or telecommunications services.<sup>6</sup> In reaching its decision,  
16 the FCC concluded that the lack of dependence on *any* geographically defined locations  
17 distinguishes Vonage's service from other services whose federal or state jurisdiction is  
18 determined by geographic end points of the communications.

19 **Q. Has the Missouri Commission made any decisions regarding VoIP**  
20 **service?**

21 A. Yes. In Case No. LT-2006-0162 Time Warner submitted a filing

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<sup>6</sup> RE: *In the Matter of Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, FCC 04-267, 2004 WL 2601194, 19 F.C.C.R. 22404 (2004) (the "Vonage FCC Order," para. 14, 20-22) Petitions for Review pending, *The Minnesota Public Utilities Commission vs. F.C.C.*, Nos. 05-1069, et. al. (8<sup>th</sup> Cir.) The Eight Circuit heard oral argument on January 12, 2006.

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1 proposing to remove its Digital Phone VoIP telephone service from its existing tariff based  
2 on the FCC's Vonage decision. In its Report and Order rejecting the tariff filing, the  
3 Commission found:

4 Time Warner has the ability to track the jurisdictional nature of  
5 customer calls. Digital Phone subscribers obtain telephone numbers  
6 that correlate to the actual physical location of the customer. Digital  
7 Phone can only be used at the subscriber's location, so calls to and  
8 from the Digital Phone subscriber have a discrete origination or  
9 termination point at which the call can be rated. Time Warner can  
10 identify a call as being either interstate or intrastate. Digital Phone  
11 service is identical to traditional telephone service in terms of  
12 identification of, and separation into, interstate and intrastate  
13 communications.<sup>7</sup>  
14

15 The Commission also found that The *Vonage Order* does not serve to except or exempt Time  
16 Warner's telecommunications services offering from its jurisdiction. The Commission's  
17 decision has been appealed.

18 **Q. How does Comcast advertise Digital Voice service to consumers?**

19 A. As shown throughout the material in Schedule 4, Comcast advertises Digital  
20 Voice as a telecommunications service. Frequently Asked Questions (FAQ) and other  
21 information about Comcast's Digital Voice and *Digital Phone* service are found under the  
22 "Home Phone Service" portion of Comcast's Web site [www.comcast.com](http://www.comcast.com). In addition to  
23 factual product information, this Web site solicits potential customers to "get to know  
24 Comcast as a phone company with Comcast Digital Voice service." It offers a number of  
25 "enhanced new features" available with Digital Voice service.

26 **Q. Please describe the advertised features that customers may expect from**  
27 **Comcast's Digital Voice service.**

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<sup>7</sup> RE: *In the Matter of Tariff No. 3 of Time Warner Cable Information Services (Missouri), LLC d/b/a Time Warner Cable*. Case No. LT-2006-0162; Report and Order, Issued August 8, 2006.

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1           A.     According to the Web site information as shown in Schedule 4 , features that  
2 customers may expect from Comcast Digital Voice include:

- 3  
4     ✓     The ability for customers to retain their current telephone number  
5     ✓     Availability of popular calling features such as call waiting, caller ID, and call  
6           blocking  
7     ✓     Availability of touch tone dialing  
8     ✓     Availability of enhanced 9-1-1  
9

10          **Q.     What does Comcast's product advertising offer in terms of "enhanced"**  
11 **features?**

12          A.     The only enhanced features that appear to be offered with Comcast Digital  
13 Voice are "enhanced" voice mail and what Comcast calls "One bill" – that is, the ability to  
14 have three different services (i.e., cable TV, Internet, and telephone service) combined onto  
15 one customer invoice.

16          **Q.     In the previous question, are you using the term "enhanced" as that term**  
17 **is defined by the FCC in Section 64.702 of its rules?**

18          A.     Not necessarily. I'm simply examining Comcast's statements made to  
19 potential customers on the one hand, and comparing those statements with statements made  
20 to regulators and courts on the other hand. From my perspective, it appears Comcast couches  
21 Digital Voice as an "enhanced" or "information" service to regulators, policy makers, and the  
22 courts, but then propose it as a telephone service to consumers.

23          **Q.     In its Reply Brief in Case No. 06-4233-CV-C-NKL, Comcast stated that**  
24 **its VoIP service includes a "suite of services" traditionally referred to as "enhanced**  
25 **services" and offered Internet voice mail retrieval, the ability to "view call detail," and**  
26 **the ability to "manage" their Comcast account as the only examples. Comcast then**  
27 **stated that the offering of these capabilities belie the Staff's conclusion that Comcast's**

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1 **telephone service is no different than services ordinarily offered by traditional regulated**  
2 **carriers.<sup>8</sup> How do you respond?**

3 A. Based on my experience, there does not appear to be very much that is  
4 particularly unique or "enhanced" about Comcast's service. Indeed, features such as the  
5 ability to port telephone numbers, service bundling, caller identification, touch tone dialing,  
6 and the ability to call 9-1-1 (even an enhanced version of 9-1-1) do not strike me as  
7 particularly unique. Even features sometimes described as on-line call management tools -  
8 such as call detail and "on-line billing" - do not strike me as particularly unique to Comcast  
9 or the Cable TV telephone companies, or even to "VoIP providers" in general. From my  
10 perspective, Comcast's voice mail retrieval system (which is a totally nonregulated item in  
11 any context) is about the only item that would seem "enhanced" and in my view, even that  
12 may be suspect. In any regard, it is my opinion that Comcast's attempt to characterize its  
13 offerings as a "suite" of offerings unavailable from more traditional carriers is a bit of an  
14 overstatement, and should be viewed with some degree of skepticism.

15 **Q. Has Comcast given any indications as to why it is unwilling to submit its**  
16 **Digital Voice service offering to MoPSC jurisdiction?**

17 A. Yes. Attached to Comcast IP Phone, LLC's October 31, 2006 Reply Brief in  
18 Case No. 06-4233-CV-C-NKL, was an affidavit of Beth Choroser, an official of Comcast.  
19 Based solely on Ms. Choroser's affidavit, it would appear that Comcast objects to service and  
20 billing quality rules. Ms. Choroser also states that tariff filing requirements would  
21 "substantially damage" the company's ability to compete with other carriers such as Vonage,  
22 who are not required to file tariffs. In summary, Ms. Choroser asserts that submitting to

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<sup>8</sup> Id. page 18.

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1 MoPSC jurisdiction would "require a monumental effort on Comcast's part to reverse and  
2 reengineering (sic) its systems and practices." Ms. Choroser also states that Comcast applies  
3 many rules, regulations, and guidelines of broadband service "across its various services  
4 including voice service." Lastly, Ms. Choroser states that Comcast abides by 9-1-1 disclosure  
5 and acknowledgement requirements, as well as "consumers (sic) laws of general  
6 applicability."<sup>9</sup>

7 **Q. In your opinion, would Comcast's avoidance of MoPSC jurisdiction**  
8 **enable it to achieve a competitive advantage over other carriers who do come under the**  
9 **jurisdiction of the MoPSC?**

10 A. Yes. Incumbent and competitive local and interexchange carriers not only are  
11 required to adhere to state laws (such as tariff filing requirements) and Commission service  
12 quality and billing rules, but are required to submit annual reports and pay certain fees, such  
13 as commission assessments. In my view, the competitive advantage Comcast gains in not  
14 having to adhere to similar legal requirements would seem axiomatic.

15 **Q. Would the Staff be willing to support a re-examination of the MoPSC's**  
16 **rules in recognition of the systems employed by the cable TV industry in general, and**  
17 **Comcast in particular?**

18 A. Yes, particularly for the quality of service rules, which were last revised in  
19 2004. In Case No. TE-2006-0415, Staff witness Henderson testified that revising the quality  
20 of service rules was "the most reasonable" option for the Commission in deciding the merits  
21 of that case. The Staff is willing and committed to working with the industry in obtaining  
22 meaningful rules in recognition of changes that continue to occur in the industry.

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<sup>9</sup> Id. Exhibit B, Affidavit, para. 7, 8

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1           **Q. In her affidavit, Ms. Choroser references “consumer laws of general**  
2 **applicability.”<sup>10</sup> In your opinion, are consumer laws of general applicability sufficient to**  
3 **safeguard the telecommunications interests of consumers?**

4           A. In my opinion they are not. Neither are “consumer laws of general  
5 applicability” sufficient to safeguard the interests of small, medium-sized and large business  
6 customers, nor are such laws sufficient to safeguard the interests of other carriers with whom  
7 Comcast must interconnect, either directly and indirectly (either by itself or through the  
8 facilities of a third party such as Sprint Communications Corporation), in order to compete in  
9 the marketplace. In my opinion, removing service quality, billing, numbering-resource,  
10 malicious call jurisdiction, interconnection, emergency telephone service, and other standards  
11 from the general oversight of an expert subject matter agency of state government is against  
12 the public interest. Removal of state Commission oversight of these matters would, in my  
13 opinion, lead to time-consuming court proceedings and costly legal fights and do little to  
14 protect the interests of consumers and other potential stakeholders.

15           **Q. Are there indications that Comcast customers may occasionally**  
16 **experience the same kinds of day-to-day service difficulties as do customers of regulated**  
17 **telecommunications service?**

18           A. Yes, in my view there are. For example, [www.consumeraffairs.com](http://www.consumeraffairs.com)  
19 (3/14/07) offers a few experiences. For illustrative purposes, a copy of this Web site is  
20 attached to my testimony as Schedule 5.

21           **Q. What is your opinion relative to Schedule 5?**

---

<sup>10</sup> Id.

Direct Testimony of  
William L. Voight

1           A.     Although the examples shown tend to represent negative experiences for the  
2 affected consumers, I am comforted to find what appears to be very few instances of  
3 consumer dissatisfaction associated with Comcast's service, at least in-so-far as is reported  
4 on the Consumer Affairs Web site. In any regard, my purpose in showing these complaints is  
5 not to cast negative aspersions on Comcast's service. Rather, my purpose is to show that  
6 customers of Comcast do sometimes find themselves in situations that could be assisted by  
7 consumer service experts of a state utility commission, such as the MoPSC. As can be seen  
8 from a reading of the examples, these negative customer experiences involve instances of:  
9 repeated one-way communication (01/31/07); billing issues (06/18/06 & 03/18/03);  
10 misunderstanding over price (03/06/06 & 02/17/06); no help in tracing obscene phone calls  
11 (03/03/06); extended total outage (01/26/06); apparent unauthorized toll charges (06/24/04);  
12 refusal to cancel service of an elderly parent who needs help with daily activities (11/11/03);  
13 unauthorized toll blocking initiated (12/15/03); and, an inability to freely choose another  
14 local service provider (10/27/03). While unfortunate, my experience leads me to conclude  
15 that these kinds of negative customer experiences are not uncommon in the world of  
16 telecommunications, no matter the service provider.

17           In the Staff's view, customers should always try to first resolve differences by directly  
18 contacting the telephone company. However, the Staff is equally of the view that "consumer  
19 laws of general applicability" are not sufficient to address telephone customer service  
20 problems that staff persons at the MoPSC deal with on a daily basis.

21           **Q.     Would Comcast be the only cable TV telephone company regulated by the**  
22 **MoPSC?**

Direct Testimony of  
William L. Voight

1           A.    No. Other cable TV telephone companies providing telephone service in  
2 Missouri are subject to the Commission's jurisdiction as well; Comcast would certainly not  
3 represent an exception. Other examples include, MCC (MCC Telephony of Missouri, Inc.  
4 a/k/a Mediacom); Time Warner (Time Warner Cable Information Services/Missouri, LLC  
5 d/b/a Time Warner Cable); Charter (Charter Fiberlink-Missouri, LLC); and St. Joseph  
6 Cablevision (News-Press & Gazette Company d/b/a St. Joseph Cablevision). I would offer  
7 these companies as examples of providers of "fixed" VoIP telephone service utilizing the  
8 same kind of digital technology being relied upon by Comcast in an attempt to escape  
9 Commission jurisdiction.

10           **Q.    What action do you recommend the Commission take in this case?**

11           A.    Consistent with the Staff's September 21, 2006 Complaint, the Staff  
12 recommends the Commission:

13           (a) find that Comcast is offering and providing local and interexchange  
14 telecommunications service in violation of section 392.410.2 RSMo, and

15           (b) authorize the General Counsel of the Commission to bring an action in Circuit  
16 Court to recover from Comcast the maximum statutory forfeiture allowed by section 392.360  
17 RSMo for each separate, distinct, and continuing violation.

18           **Q.    Does this conclude your Direct Testimony?**

19           A.    Yes, it does.

**William L. Voight**

**SUMMARY OF WORK EXPERIENCE**

**1974 – 1985** **United Telephone Company**, I began my telephone career on February 4, 1974, as a central office equipment installer with the North Electric Company of Gallion, Ohio. At that time, North Electric was the manufacturing company of the United Telephone System. My duties primarily included installation of all forms of central office equipment including power systems, trunking facilities, operator consoles, billing systems, Automatic Number Identification systems, various switching apparatuses such as line groups and group selectors, and stored program computer processors.

In 1976, I transferred from United's manufacturing company to one of United's local telephone company operations – the United Telephone Company of Indiana, Inc. I continued my career with United of Indiana until 1979, when I transferred to another United Telephone local operations company – the United Telephone Company of Missouri. From the period of 1976 until 1985, I was a central office technician with United and my primary duties included maintenance and repair of all forms of digital and electronic central office equipment, and programming of stored program computer processors. United Telephone Company is today known as **Embarq**.

**1985-1988** In 1985, I began employment with **Tel-Central Communications, Inc.**, which at that time was a Missouri-based interexchange telecommunications carrier with principal offices in Jefferson City, Missouri. As Tel-Central's Technical Services Supervisor, my primary duties included overall responsibility of network operations, service quality, and supervision of technical staff. Tel-Central was eventually merged with and into what is today MCI.

In conjunction with Tel-Central, I co-founded **Capital City Telecom**, a small business, "non-regulated" interconnection company located in Jefferson City. As a partner and co-founder of Capital City Telecom, I planned and directed its early start-up operations, and was responsible for obtaining financing, product development, marketing, and service quality. Although Capital City Telecom continues in operations, I have since divested my interest in the company.

**1988-1994** In 1988, I began employment with **Octel Communications Corporation**, a Silicon Valley-based manufacturer of Voice Information Processing Systems. My primary responsibilities included hardware and software systems integration with a large variety of Private Branch eXchange (PBX), and central office switching systems. Clients included a large variety of national and international Local Telephone Companies, Cellular Companies and Fortune 500 Companies. Octel Communications Corporation was later merged with Lucent Technologies.

**1994-Present** **Missouri Public Service Commission**

**William L. Voight**

**TESTIMONY EXPERIENCE**

- Case No. TR-96-28      In the Matter of Southwestern Bell's tariff sheets designed to increase Local and Toll Operator Service Rates.
- Case No. TT-96-268      In the Matter of Southwestern Bell Telephone Company's tariffs to revise PSC Mo. No. 26, Long Distance Message Telecommunications Services Tariff to introduce Designated Number Optional Calling Plan.
- Case No. TA-97-313      In the Matter of the Application of the City of Springfield, Missouri, through the Board of Public Utilities, for a Certificate of Service Authority to Provide Nonswitched Local Exchange and Intrastate Interexchange Telecommunications Services to the Public within the State of Missouri and for Competitive Classification.
- Case No. TA-97-342      In the Matter of the Application of Max-Tel Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.
- Case No. TA-96-345      In the Matter of the Application of TCG St. Louis for a Certificate of Public Convenience and Necessity to provide Basic Local Telecommunication Services in those portions of St. Louis LATA No. 520 served by Southwestern Bell Telephone Company.
- Case No. TO-97-397      In the Matter of the Petition of Southwestern Bell Telephone Company for a Determination that it is Subject to Price Cap Regulation Under Section 392.245 RSMo. (1996).
- Case No. TC-98-337      Staff of the Missouri Public Service Commission, Complainant, vs. Long Distance Services, Inc., Respondent.
- Case No. TO-99-227      Application of Southwestern Bell Telephone Company to Provide Notice of Intent to File an Application for Authorization to Provide In-Region InterLATA Services Originating in Missouri Pursuant to Section 271 of the Telecommunications Act of 1996.
- Case No. TA-99-298      In the Matter of the Application of ALLTEL Communications, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive.
- Case No. TO-99-596      In the Matter of the Access Rates to be Charged by Competitive Local Exchange Telecommunications Companies in the State of Missouri.
- Case No. TO-99-483      In the Matter of an Investigation for the Purpose of Clarifying and Determining Certain Aspects Surrounding the Provisioning of Metropolitan Calling Area Service After the Passage and Implementation of the Telecommunications Act of 1996.

Case No. TO-2001-391	In the Matter of a further investigation of the Metropolitan Calling Area Service after the passage and implementation of the Telecommunications Act of 1996.
Case No. TO-2001-416	In the Matter of Petition of Fidelity Communications Services III, Inc. Requesting Arbitration of Interconnection Agreement Between Applicant and Southwestern Bell Telephone Company in the State of Missouri Pursuant to Section 252 (b)(1) of the Telecommunications Act of 1996.
Case No. TO-2001-467	In the Matter of the Investigation of the State of Competition in the Exchanges of Southwestern Bell Telephone Company.
Case No. TT-2002-129	In the Matter of AT&T Communications of the Southwest, Inc.'s Proposed Tariff to Establish a Monthly Instate Connection Fee and Surcharge.
Case No. TC-2002-1076	Staff of the Missouri Public Service Commission, Complainant, vs. BPS Telephone Company, Respondent.
Case No. TK-2004-0070	In the Matter of the Application of American Fiber Systems, Inc. for Approval of an Agreement with Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, Under the Telecommunications Act of 1996.
Case No. CO-2005-0066	In the Matter of the Confirmation of Adoption of an Interconnection Agreement with CenturyTel of Missouri, LLC d/b/a CenturyTel and Spectra Communications Group, LLC d/ba CenturyTel by Socket Telecom, LLC
Case No. TO-2003-0257	In the Matter of the Request from the Customers in the Rockaway Beach Exchange for an Expanded Calling Scope to Make Toll-Free Calls to Branson
Case No. IO-2006-0086	Application of Sprint Nextel Corporation for Approval of the Transfer of Control of Sprint Missouri, Inc., Sprint Long Distance, Inc. and Sprint Payphone Services, Inc. From Sprint Nextel Corporation to LTD Holding Company.
Case No. LT-2006-0162	In the Matter of Tariff No. 3 of Time Warner Cable Information Services (Missouri), LLC, d/b/a Time Warner Cable.
Case No. TM-2006-0272	In the Matter of the Application for Approval of the Transfer of Control of Alltel Missouri, Inc. and the Transfer of Alltel Communications, Inc. Interexchange Service Customer Base.
Case No. TT-2006-0474	In the matter of McLeodUSA Telecommunications Services, Inc.'s Tariff Filing to Increase its Missouri Intrastate Access Rates.

**TA-98-510** - Application of Comcast Telecommunications, Inc., d/b/a **Comcast Long Distance**, for authority to provide interexchange and local exchange telecommunications services - Order Approving Interexchange and Nonswitched Local Exchange Certificates of Service Authority and Order Approving Tariff. Updated 7/2/98.

**TO-2001-612** - Comcast Telecommunications, Inc.'s change of corporate name to **Comcast Business Communications, Inc.**

**TM-2002-403** - IN THE MATTER OF THE NOTIFICATION REGARDING THE TRANSFER OF ULTIMATE CONTROL OF **COMCAST BUSINESS COMMUNICATIONS, INC.** FROM **COMCAST CORPORATION**, TO **AT&T CORPORATION**

Comcast Business Communications, Inc. (CBC), d/b/a **Comcast Long Distance**, filed a letter of notification regarding the proposed transfer of CBC's ultimate parent, Comcast Corporation, to AT&T Comcast Corporation

**LA-2005-0417** - IN THE MATTER OF THE APPLICATION OF **COMCAST PHONE OF MISSOURI, LLC, D/B/A COMCAST DIGITAL PHONE**, FOR CERTIFICATE OF SERVICE AUTHORITY TO PROVIDE BASIC LOCAL, LOCAL EXCHANGE, AND INTEREXCHANGE TELECOMMUNICATIONS SERVICES THROUGHOUT THE STATE OF MISSOURI AND TO CLASSIFY THE COMPANY AS COMPETITIVE

7-7-05 - Order granting basic local, local exchange and EXC authority to **Comcast Phone of Missouri**

9-1-05 - Order including fictitious name of **Comcast Digital Phone** to certificate of authority

**LA-2006-0173** - In the Matter of the Application of **Comcast Phone of Missouri, LLC** d/b/a **Comcast Digital Phone** for Certificate of Service Authority to Provide Basic Local, Local Exchange, and Interexchange Telecommunications Services Throughout the State of Missouri and to Classify the Company as Competitive.

Comcast asked that case be dismissed and it was.

**Comcast Digital Voice** - no record

**TC-2007-0111** - Staff of the Public Service Commission of the State of Missouri, Complainant, v. Comcast IP Phone, LLC, Respondent

**Comcast Phone of Missouri** - no record

**2005 Annual reports**

**Comcast Digital Phone – CLEC/IXC annual report – revenues, access lines**

**Comcast Long Distance – CLEC/IXC annual report – MO revenues access lines**



English ▼

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### What is Voice over Internet Protocol (VoIP)?

Voice over Internet Protocol (VoIP) is a technology used to transmit voice and related calls over a data network. Most VoIP service providers use the public Internet to transmit your calls. Comcast does not; we use this technology to transmit your calls over our advanced broadband network.

Comcast Digital Voice® service uses VoIP technology to provide you a number of enhanced new features without sacrificing any of your current phone features or the call clarity you expect.

To check for availability and to learn more about pricing and introductory offers in your area, go to Shop Comcast Digital Voice or call 1-800-COMCAST.

Did this information help to answer your question?

☐ Yes

☐ No

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### What is Comcast Digital Voice® service?

You already know Comcast as a Cable TV and High-Speed Internet company. Now you have another great opportunity to get to know Comcast as a phone company with Comcast Digital Voice® service.

Comcast Digital Voice uses our advanced broadband network to provide you a number of enhanced new features without sacrificing any of your current phone features or the call clarity you expect - and with a great opportunity to save!

### Features to expect from Comcast Digital Voice® service:

**Keep your current phone number** - When you switch to Comcast Digital Voice service, you can bring your current phone number with you.

**Enjoy popular calling features** - In addition to Enhanced Voice Mail, Comcast Digital Voice offers 12 popular calling features like Call Waiting, Caller ID and Call Blocking - all included in your low monthly price.

**Use your existing touch-tone phone** - Comcast Digital Voice service is compatible with most existing phone equipment.

**Retain access to E911** - Unlike many other Voice over Internet Protocol

("VoIP") service providers, Comcast Digital Voice service offers access to E911 calling.

**Enhanced features to make life simpler:**

**Enhanced Voice Mail** – Enhanced Voice Mail allows you to manage your Comcast Digital Voice voicemail messages by phone, or on the Web from anywhere.

**One bill** - Enjoy one simple summary bill for Comcast's Cable TV, High-Speed Internet, and Phone services. Plus, you can view your long distance call detail online.

**Why switch to Comcast Digital Voice?**

**Unlimited local and long-distance calling** – With the Comcast Digital Voice Unlimited Plan, you can call anyone, anytime, anywhere in the country - talk as long as you like, all for one low monthly price.

**Satisfaction guaranteed\*\*** - We are so confident about the quality of Comcast Digital Voice service that we guarantee you will be satisfied, or we'll refund your money for the first 30 days of service.

**Professional installation** - Leave the wiring to us. We come in and do the whole standard installation for you. And once it's set up, you're ready to go!

To check for availability and to learn more about pricing and introductory offers in your area, go to Explore Comcast Digital Voice, Shop Comcast Digital Voice, or call 1-800-COMCAST.

For instructions on how to use features and voice mail, click here.

For Terms of Service, click here.

Did this information help to answer your question?

Comcast Digital Voice® (CDV) is available to residential customers located in CDV serviceable areas that select CDV for all their home calling needs. CDV Unlimited Plan monthly fee includes direct-dialed domestic calls from home only. **Submit** It include federal, state, or local taxes and fees; our Regulatory Recovery Fee, which is not a tax or government-required; or other applicable charges (e.g., per-call charges or international calling). Equipment charges may apply. CDV (including 911/emergency services) may not function during an extended power outage\*\*\*, network congestion, network/equipment failure, or another technical problem. If you move CDV to a new service address, you must provide Comcast with adequate prior notice of this address change or 911 calls may be directed to the wrong emergency authority and/or the wrong address may be transmitted with your 911 calls. Certain customer premises equipment may not be compatible with CDV. CDV is subject to terms and conditions of the CDV subscriber agreement and other applicable terms and conditions. Restrictions apply. Call for details.

\*\*30 day limited guarantee covers standard installation charges, recurring charges, and equipment rental or purchase fees actually paid to CDV for first month of service.

\*\*\* If Comcast Digital Voice® service is interrupted as a result of downed cables connecting to your home or cuts to other portions of our network (as can happen in cases of severe storms), the service will not function until those facilities are restored. Depending on the specific facilities impacted, traditional phone providers



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### **How is Comcast Digital Voice® service different from the traditional phone service I have today?**

Comcast Digital Voice® service uses our advanced broadband network to provide you with a number of enhanced new features without sacrificing any of your current phone features or the call clarity you expect - and with a great opportunity to save! You can even keep your same phone number.

With Comcast Digital Voice® service you get all of these benefits and more:

**Enhanced Voice Mail** - Enhanced Voice Mail allows you to manage your Comcast Digital Voice voicemail messages by phone, or on the Web from anywhere.

**Popular calling features** - In addition to Enhanced Voice Mail, Comcast Digital Voice offers 12 popular calling features like Call Waiting, Caller ID and Call Blocking - all included in your low monthly price. Click here for information on how to use features and voice mail.

**One simple bill** - Enjoy one simple bill for Comcast's Cable TV, Digital Voice and High-Speed Internet services, with multiple payment options. Plus, you can view your long distance call detail online.

**Unlimited local and long-distance calling** – With the Comcast Digital Voice Unlimited Plan, you can call anyone, anytime, anywhere in the country - talk as long as you like, all for one low monthly price.

**Low international rates** – Comcast Digital Voice offers low rates to your favorite international calling destinations.

**Professional installation** - Leave the wiring to us. We come in and do the whole standard installation for you. And once it's set up, you're ready to go!

**Satisfaction guaranteed\*** - We are so confident about the quality of our Comcast Digital Voice service that we guarantee you will be satisfied, or we'll refund your money for the first 30 days of service.

To check for availability and to learn more about pricing and introductory offers in your area, go to Explore Comcast Digital Voice, Shop Comcast Digital Voice, or call 1-800-COMCAST.

\* Comcast Digital Voice® (CDV) is available to residential customers located in CDV serviceable areas that select CDV for all their home calling needs. CDV Unlimited Plan monthly fee includes direct-dialed domestic calls from home only and does not include federal, state, or local taxes and fees; our Regulatory Recovery Fee, which is not a tax or government-required; or other applicable

~~Charges (e.g., per call charges for international calling). Equipment charges may~~  
apply. CDV (including 911/emergency services) may not function during an  
extended power outage\*\*, network congestion, network/equipment failure, or  
another technical problem. If you move CDV to a new service address, you must  
provide Comcast with adequate prior notice of this address change or 911 calls  
may be directed to the wrong emergency authority and/or the wrong address may  
be transmitted with your 911 calls. Certain customer premises equipment may not  
be compatible with CDV. CDV is subject to terms and conditions of the CDV  
subscriber agreement and other applicable terms and conditions. Restrictions  
apply. Call for details.

\*30 day limited guarantee covers standard installation charges, recurring charges,  
and equipment rental or purchase fees actually paid to Comcast Digital Voice for  
first month of service.

\*\* If Comcast Digital Voice® service is interrupted as a result of downed cables  
connecting to your home or cuts to other portions of our network (as can happen in  
cases of severe storms), the service will not function until those facilities are  
restored. Depending on the specific facilities impacted, traditional phone providers  
may be affected in similar ways.

Did this information help to answer your question?

☐ Yes

☐ No

**Submit >**



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## Home Phone Service

[Digital Voice](#)

[Digital Phone](#)

[Determine your service type](#)

## Home Phone Service FAQs

1. Determine Your Comcast Home Phone Service Type

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Determine your service type

FAQs / Home Phone Service / Determine your service type

### How do I know if I have Comcast Digital Phone, or Comcast Digital Voice service?

The easiest way to tell which home phone service product you have is to look at your bill. If you have other Comcast services (such as High-Speed Internet, or Video), you will see that Comcast Digital Voice® service is billed on the same statement as your other Comcast services. If you receive a separate bill for your home phone service, you have Comcast Digital Phone™.

Additional ways to confirm which home phone service you have with Comcast (useful if you have only home phone service and no other services from Comcast):

#### Comcast Digital Voice:

- Summary of Charges: Your Comcast Digital Voice statement will have a section titled "Summary of Charges" on the first page.
- If you are able to view your bill online (after enrolling) at [www.comcast.com](http://www.comcast.com), you have Comcast Digital Voice service.
- Your Comcast Digital Voice bill includes all features and domestic long distance for one rate.
- Comcast Digital Voice comes as a package that includes all your local and domestic long distance calling, low international rates, 12 popular calling features, plus Enhanced Voice Mail (which includes web access to voice mail).



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FAQs / Home Phone Service / Digital Phone

## Digital Phone

Billing and Payment

Repair/Troubleshooting

Order or Change Service

Products and Features

E911

## Digital Phone FAQs

1. How do I find my balance and payment options for my Comcast Digital Phone™ bill?
2. How do I read my Comcast Digital Phone™ service statement?
3. What is Comcast Digital Phone™?
4. What should I do if I have no dial tone?
5. Who do I contact if I need help with my Comcast Digital Phone™ service?

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Digital Phone

Determine your service  
type

FAQs / Home Phone Service / Digital Phone / Products and Features / General Product  
Information

### What is Comcast Digital Phone™?

Comcast brings you local phone service with the power of broadband technology. With Comcast Digital Phone™ service, you can enjoy digital quality and reliable local phone service. You can choose from several packages for features and long distance services to suit your needs.

For information on Comcast Digital Voice®, [click here](#).

Did this information help to answer your question?

☐ Yes

☐ No

**Submit >**



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## Digital Voice

Establish or Change Service

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Billing

Using Your Digital Voice Features

Equipment

Troubleshooting

E911

Home Alarm Systems

Digital Voice Center (DVC)

## Digital Voice FAQs

1. What is Comcast Digital Voice® service?
2. What is Voice over Internet Protocol (VoIP)?
3. How is Comcast Digital Voice® service different from the traditional phone service I have today?
4. Where can I find my Comcast Digital Voice® Welcome Kit or user manual?
5. How is Comcast Digital Voice® service different from Vonage or AT&T CallVantage?
6. What should I know about my Comcast Digital Voice® E911 service?
7. How can I order Comcast Digital Voice® service?

1 - 7 of 7



Authorized Retailer

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ONLY AVAILABLE  
COMCASTPHONE**
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## Get Comcast Digital Voice® Home Phone Service for Less!

**As low as \$39.95 per month!\***

- **First month FREE plus FREE standard installation**
- **Unlimited local and long-distance calling**
- **Keep your current number**
- **12 popular calling features plus Voice Mail**

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voice

**Sign up today  
and get  
\$25  
cash back!\*\***
**Search Now for Special  
Comcast Digital Voice Offer**

BOLD items with an

First Name: Last Name: → Street Address: Apt/Unit #: → Zip: Home Telephone:   E-mail: 
**Get Offers Now**
**Hurry, offer ends March**

Last updated on 3/14/2007

\*\* The \$25 cash back rebate is only valid with purchase of new Comcast residential service purchased on or after 03/01/2007. Offer ends 03/31/2007. Please allow 10 to 16 weeks after completed qualifying activity to receive \$25 rebate check. Comcast Digital Voice service activated for a minimum of 30 days. Comcastphoneoffers.com is independently operated by Broadbandoffers.com, working with Comcast Corporation to bring you this \$25 cash back rebate offer. This offer is not available directly from Comcast. See official terms and conditions.

\* Offer expires 03/31/2007 and is only available through participating retail locations. First Month Free Offer and Free Standard Installation to new residential customers located in participating Comcast systems (and may not be transferred) and Comcast serviceable areas. May apply. Unlimited package pricing applies to direct-dialed domestic calls from home. No separate long distance carrier connection Plan does not include international calls. Pricing shown does not include federal, state, or local taxes and fees; or the Regulatory Recovery Fee which is not a tax or government required fee, or other applicable charges (e.g. per call charges). ©2007 Comcast. All rights reserved. Trademarks are the property of their respective owners. See official terms and conditions.

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# Regulatory

## Comcast Digital Phone Service

Comcast Digital Phone Service is a traditional circuit-switched telephone service that delivers local, domestic long distance and international services.

The menu to the right offers access to the following information types:

### Service Agreements

Our Service Agreements contain the general terms and conditions applicable to Comcast Digital Phone's non-tariffed services.

### Service Guides

Our Service Guides contain a brief description of non-tariffed Comcast Digital Phone services as well as additional terms and conditions for each service. Moreover, our Service Guides contain the monthly charges, usage-sensitive charges and one-time charges applicable to these services. Service guides generally apply to interstate and international services only.

### Tariffs (sometimes referred to as "Price Lists")

Our tariffs are filed with the Federal Communications Commission and state public utility commissions and contain service descriptions; applicable terms and conditions; pricing; and references to some state, municipal and/or federal fees and surcharges.

### Privacy and CPNI Policies

Our Privacy and CPNI Policies contain the policies that we follow to safeguard the privacy and account information of our Comcast Digital Phone retail service customers.

**consumeraffairs.com**  
*knowledge is power!*

Consumer News   Recalls   Complaint Form   Scam Alerts  
 Rogues Gallery   Good Guys   Search   Home Page

Small Claims Guide | Lemon Law | FAQ | Resources | Newsletters | Blogs

Automotive   Careers   Electronics   Family   Finance   Health   Homeowners   Shopping   Travel

**Comcast Cable Services**

Triple Play: Cable, Phone, Internet  
 \$33mo/ Each for 1 Year. \$200  
 Back!  
[www.ComcastCableOffers.com](http://www.ComcastCableOffers.com)

**Local telephone**

Unlimited calls, voicemail, call ID  
 for just \$24.99/mo. Try Vonage  
 now!  
[www.Vonage.com](http://www.Vonage.com)

**Compare Internet Phone**

We compare and review the  
 leading Internet Phone (VoIP)  
 providers  
[www.ConsumerCompare.org](http://www.ConsumerCompare.org)

Ads by Google

Ads by Google

Comcast VoIP

Telephone Rates

Comcast.com

Comcast

COMMUNICATIONS: Cable/DBS | Cell Phones | Internet Services | Local Phone Servi

## Comcast Local Phone Service

Ruben of San Jose CA (01/31/07)

I just had my Internet and phone services transferred to COMCAST. The day after the installation, we found out that when a Verizon Wireless customer calls us, they cannot hear us but we can hear them. I called customer service and they opened a ticket for a tech to come and verify the installation. The tech said that everything was done properly, but I still have the same problem.

I called customer service again with the same problem, and again they sent somebody to inspect our lines. The tech informed us that he has known about this problem with Verizon Wireless customers for three months now. He closed the ticket again without solving my problem. I called customer service again and told them what the tech has told us. The personnel that I talked to said that there is no problem with any phone companies. He opened another ticket and told me that the issue will be investigated thoroughly within 72 hours.

Everyone in my family is a Verizon wireless customer. I should have stayed with my old telephone service provider.

Pravin of Atlanta GA (06/18/06)

Hi I took Cable and Internet Service from Comcast on June 14, 2006. The same night I started getting trouble. I complained that neither Cable nor Internet is working fine on June 15th, 2006. They told me that the technician is coming on June 18th, 2006 between 11:00AM and 2 PM. I got a call from Comcast and they

**Comcast**

•Cable TV

•Internet Service

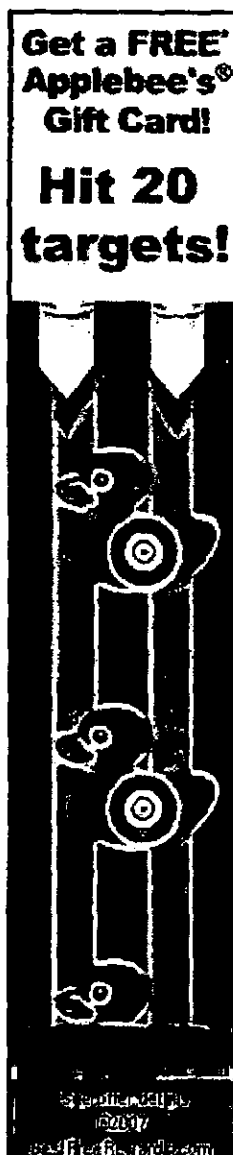
•Telephone Service

—

**News**

• Comcast Cable  
 Fined \$1 Million in  
 Massachusetts  
 Settlement





**Luis of Decatur GA (01/26/06)**

On January 7th 2006 I called Comcast digital phone service customer service to inform them that the phone line from across the street got hit by a tall truck and it is out on the street and I have no dial tone. They said that it would be a week before they can come out. The week came by and they never showed up. I called again and I cannot believe the lack of professionalism that they have. They said it would be 3 days and then 3 days went by and again they never showed up.

It is the 26th today and they finally came by, they looked at the line and they did nothing and said they would be back. I had to switch to BELLSOUTH. I got a call from some lady in their customer service and she would not give me her name and she told me that my line was not going to be fixed and she hung up. I still have no line. What is really interesting here is that at this address I just finished building a 5 unit small plaza and I was about to give COMCAST the commercial account for all of the shops.

I will never give comcast any business. I have apartments in Snellville and in Lilburn and I shall make sure that comcast DOES NOT provide our properties any type of service.

**Gina of Pinole CA (6/24/04):**

On 6/22/04, I requested a charge of \$22.28 to reverse on my phone bill due to the negligence of Comcast customer rep. In early February 2004, I called Comcast and spoke with John to request service change & put a restriction on my long-distance phone line. John commented that Comcast do not actually put restriction on long distance calls. And that he has never asked to do that before. After some resistance from him, I insisted that he put in that restriction that my phone would not be able to dial outside of the 12-mile radius.

After our long conversation, I confirmed my service changes with John. I went back to the monthly routine of paying about the same amount of (\$27). I was surprised with the June bill of \$49.74. There were 4 international phone charges. The 4 calls were less than 2 minutes each (it was probably less if the minutes were not rounded up to whole minute). These 4 unconnected calls cost \$22.28. I called 6/22 and spoke with Jessica (supervisor) to resolve this matter. Her comment was those charges cannot be reversed because there were no notation of my request of the restriction.

**Chris of Woodstock IL (11/11/03):**

My elderly mother has come to live with me before entering assisted living. I attempted to cancel her phone service with COMCAST and was honest about who I was and what the

situation was. I was asked for her pin number (which she did not know). I guessed and got it right. Then he told me he couldn't disconnect because I wasn't her. I said why did you ask for her pin then? No response. He said only she could cancel.

I was at work so called my mother at my home and she was not comfortable even dialing the number (elderly, remember). I called back and was told no dice anyway. So I said, OK, pretend I'm her and I'll answer any information you might need to verify identity. She isn't capable at this moment of handling this herself. No way. My frustration won out and I said OK, I'll call back and say I'm her to take care of it. He said "no you won't. I'm writing it on her account that you might do that". So, I'm still trying to cancel her account. I will never go with COMCAST. Nor will my family.

My mother is now crying on the couch at my home because she can't cancel her phone line. Also, the phone is still in service and being assessed a charge. I will now go home tonight and attempt to get her to feel comfortable enough to talk on the phone with these awful people.

*Chris should write Comcast a letter and have her mother sign it. She should also have her mother sign a power of attorney, an advance medical directive and other forms that are appropriate for an elderly person who needs help with daily activities.*

**Christine of Pittsburgh (12/15/03):**

On December 12th, 2003 I tried to make a phone call to a friend and it would not go through. I tried several times and all I got was a recording say that I could not reach this number as dialed. On December 15th, 2003 I recieved a letter from Comcast stating that they made changes to my Comcase Digital Phone service at my request. I NEVER spoke to anyone from Comcast about making any changes in my phone service. The change Comcast made was to my NON-PAY TOLL RESTRICTION.

As a result of this I can not call anywhere out side the borough that I live. Now I can not call a lot of place not to mention my place of employment. Work can call me but, I can not call work. In case of an emerency my family would not be able to contact me at work.

**Michael of Atlanta GA (10/27/03):**

I just moved to the Estates of Dunwoody in Atlanta. When I moved here they said Comcast Broadband was the telephone provider. Comcast does not provide DSL service. They don't even provide good phone service. It is staticky all the time. So naturally I wanted to change my telephone provider. My girlfriend called BellSouth and they weren't aware that this address existed.

BellSouth was then informed by my apartment complex that they were not welcome here. My complex has a contract with Comcast but I don't.

I thought the 1996 Telecommunications Act said I have a choice about who my telephone provider is. I'm stuck with slow internet and horrible telephone service. The telephone connection is always crackly. I also sell stuff on the internet and it takes longer to use dial up service.

*Michael is right about the Telecom Act. He should file a complaint with the Federal Communications Commission.*

**Steve of Lombard IL (3/18/03):**

Dear Comcast: For last 3 months, I have been talking to customer service rep in reference to erroneous billing for local toll, international calls etc. Even AT&T called your service to let you know AT&T is my long distance and international carrier for many years, yet you are charging me for all calls. I have spent hrs and hrs of my time and faxed information several times, yet no correction is made as of last bill I just received.

In my last communication with veronica I have faxed my contract and copy of my AT&T billing info and she also talked to AT&T and promised us to correct and adjust all charges. This phone is my elderly mom's phone as we use mostly cell phone. This problems all started when your company switched and started making unauthorized erroneous billing changes. Also your company representative misrepresented information about call plans.

**Nilanjan of Fremont CA writes (3/10/03):**

I would like to bring to your attention the improper business conduct and gross unwillingness to cooperate from my former local telephone service provider that is causing me extreme frustration and anxiety. I am bringing this to your attention hoping that I can get a speedy redressal to this issue.

#### Complaints against COMCAST (formerly AT&T BroadBand)

- **Fraudulent charges.** A number of entries in the February bill were completely baseless and I would consider fraud, amounting to about \$270. It has charges for ☐Returned Checks☐ whereas in reality such a situation NEVER happened! Then there were charges added marked as ☐Customer Satisfaction☐ which instead of being a negative number or credit, was reversed and added as a charge to customer.
- **Long Distance slamming.** My long distance provider was changed multiple times by Comcast without my knowledge, even after repeated requests and notification on not to change my long distance provider from my original preferred vendor (AT&T). Since COMCAST had the

local telephone service they were kind of □at will□ to change our long-distance provider whenever they pleased to do so! In fact when we complained about these switches and slamming, they said that □it is like picking tomatoes in the grocery store□ and our original and preferred long distance company AT&T was supposedly picking and choosing calls! When I contacted AT&T regarding this they were shocked and said they had never heard of such a thing and Comcast was completeley misleading us.

- **Incorrect and significantly higher rates and inflated billing.** The rates charged by COMCAST were about 10 to 15 times higher than the rates promised to me. For example certain international calls which I was promised 42c/min were charged at about \$6 per minute! I was receiving two bills per month - one from AT&T Long Distance and the other from AT&T Broadband (now COMCAST) where certain random calls intermittently were charged by AT&T Long Distance (at correct rates) but most of the other calls were routed through Comcast with exorbitant rates.
- **Representative intentionally created false charges on bill due to customer disputes.** It seems that in an act of vengeance, frustration, malice the representative whom we called at the COMCAST customer service added these fraudulent charges intentionally to my bill. The dates of the contact and the posting of charges match. And there does not seem to be any other reason. This is definitely something which I would request has to be dealt with stemly.
- **Credits applied and then again revoked after a few days.** Reason as per representative being that since I choose not to use their long distance service! After spending a few hours with the representative, my bill was adjusted and a credit applied according to the representative. I even got a confirmation number for it. But a few days later after I had settled the payment for the bill, they had reversed the credit. Since I had opted to switch off my long distance connectivity from my phone! The representative specifically mentioned that since I had switched off my long distance their company would not be able to make money from me and hence they reversed the credit which is for an incorrect and fraudulent bill anyway!

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