

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Modernizing the FCC Form 477 Data Program)	WC Docket No. 11-10
)	
Development of Nationwide Broadband Data to)	
Evaluate Reasonable and Timely Deployment of)	
Advanced Services to All Americans, Improvement)	WC Docket No. 07-38
of Wireless Broadband Subscribership Data, and)	
Development of Data on Interconnected Voice over)	
Internet Protocol (VoIP) Subscribership)	
)	
Service Quality, Customer Satisfaction,)	WC Docket No. 08-190
Infrastructure and Operating Data Gathering)	
)	
Review of Wireline Competition Bureau Data)	WC Docket No. 10-132
Practices)	

**COMMENTS OF THE
MICHIGAN PUBLIC SERVICE COMMISSION**

On February 8, 2011, the Federal Communications Commission (FCC) issued a Notice of Proposed Rulemaking in the above-mentioned dockets regarding proposed changes to the FCC's Form 477 data collection process. The Michigan Public Service Commission (MPSC) believes that the Form 477 data collection process is a very important vehicle for collecting data about the communications market. The MPSC is able to access Form 477 data subject to a confidentiality agreement, and uses the data in many areas of policy-making, including as a reasonableness check on the data the MPSC itself collects from providers. The MPSC commends the FCC's continued efforts to revise Form 477 in order to collect better and more relevant data in light of the continuously changing communications landscape. The following comments of the MPSC specifically address the FCC's request for comment on service quality and customer satisfaction data for voice service.

The NPRM seeks comment on whether to collect service quality and consumer satisfaction data for voice networks. In comments submitted November 13, 2008 in WC

Docket 08-190,¹ the MPSC urged the Commission to adopt reporting requirements for service quality and customer satisfaction data. The MPSC continues to believe such data is necessary for the FCC to analyze whether all citizens have access to quality voice services. Additionally, Michigan along with other states, have seen recent movement to abolish state-level service quality rules and reporting requirements. Therefore, it is all the more important that some type of service quality and reporting requirements exist at the federal level to ensure customers have adequate access to quality communications technologies.

To the extent practical, the metrics for service quality and customer satisfaction data should be similar across technology platforms, including metrics such as billing issues, installations, outage repair times, response time to customer inquiries (whether telephone or e-mail based), etc. The MPSC believes that such metrics are likely not overly burdensome, because providers are likely internally tracking their customer's service quality and satisfaction. It is important the FCC have data available in order to compare quality of service and customer satisfaction across platform types to determine the extent to which different voice technologies (landline, mobile wireless, interconnected VoIP) act as true competitive alternatives to one another.

Furthermore, the MPSC advocates for at least some subset of such data to be made publicly available. The data collected as part of ARMIS reports 43-05 and 43-06 was available to the public, however if service quality and customer satisfaction data is added to the Form 477 reporting requirements, as the MPSC supports, it will not be generally available to the public. The MPSC urges the FCC to make a subset of service quality and customer satisfaction data public so that customers can use it to make informed choices regarding telecommunications services. Reliable information is essential in order for customers to make informed choices—a necessary component for a

¹ A copy of these comments is available on the MPSC's website at:
http://www.dleg.state.mi.us/mpsc/orders/fcc/comments/08_11_13_08_190.pdf

well functioning market. The MPSC would prefer to see a publicly accessible online database showing each provider's scores on basic service quality and customer satisfaction metrics, including the functionality to simultaneously compare different providers' scores.

The MPSC appreciates this opportunity to express the need for the FCC to collect and analyze service quality and customer satisfaction data. As exciting developments in the telecommunications industry continue to progress, it is essential that no citizens are left behind. Empowering customers with reliable, verifiable data from a single source ensures that they are better able to take advantage of a competitive market, and in the event that certain customers do not have a competitive market, ensures that those customers still are being provided quality communications services. The MPSC looks forward to reading the comments of other parties in this proceeding on these topics as well as the others addressed Notice of Proposed Rulemaking.

Respectfully submitted,

Robin P. Ancona, Director
Telecommunications Division
6545 Mercantile Way, Suite 14
P.O. Box 30221
Lansing, MI 48909
(517) 241-6200

March 30, 2011