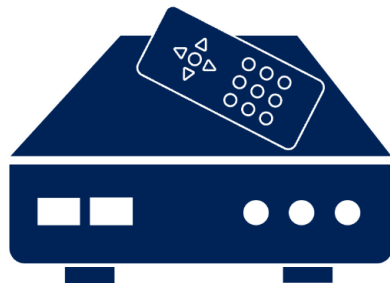


Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights



October 8, 2026



Andrew Scoggin

IB Osuntoki

Arushi Thakorlal, Acting City Auditor



Seattle Office of City Auditor



Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

REPORT HIGHLIGHTS

Background

As a cable television franchising authority, the City of Seattle (City) can require providers to follow rules for customer service. The City's rules, also known as the Cable Customer Bill of Rights, include standards such as the amount of time for a customer to connect to a live agent by phone, installation and repair time, and services for customers with disabilities. Astound is one of two cable television providers in Seattle. The other provider is Comcast, and we audited their compliance with these rules in 2025.

What We Found

We assessed Astound's compliance with 50 Cable Customer Bill of Rights standards, resulting in 61 ratings (some standards cover multiple elements). We determined Astound did not comply with six standards, including ones regarding call answering timeliness, customer billing, and data reporting. We also found that Astound should improve its communications about services for customers with disabilities.

Recommendations

We make six recommendations to Astound and three recommendations to the City's Office of Cable Communications to address these issues (see Appendix B).

Department Response

In their formal, written response to our report, Astound and the Office of Cable Communications stated that they generally concurred with the report findings (see Appendix A).

WHY WE DID THIS AUDIT

This audit was requested by Seattle City Council President Joy Hollingsworth and former Mayor Bruce Harrell. The objective of this audit was to assess Astound's compliance with City of Seattle rules for cable television providers.

HOW WE DID THIS AUDIT

To accomplish the audit's objectives, we conducted a site visit to Astound's store in Seattle, analyzed Astound data, met with Astound and City officials, and reviewed Astound's policies, procedures, and quarterly and yearly reports to the City.

Seattle Office of City Auditor

Arushi Thakorlal, Acting City Auditor
www.seattle.gov/city-auditor

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INTRODUCTION

Audit Overview

This audit was requested by Seattle City Council President Joy Hollingsworth and former Mayor Bruce Harrell. The objective of this audit was to assess Astound's compliance with City of Seattle (City) rules for cable television providers as the City begins to renegotiate its franchise agreement with Astound, set to expire in November 2027. We conducted an audit of Astound's predecessor, Broadstripe, in 2008.

The period covered by this audit was January 2023 to December 2025. Astound reported about 1,300 Seattle cable customers in 2025.

Background

The City of Seattle is a cable television franchising authority, meaning it can negotiate agreements with cable providers in exchange for use of public rights of way. Two companies have franchise agreements with the City: Comcast and Astound.

As part of these agreements, the City receives franchise fees from cable providers. The City also receives funding to support [Public, Educational, and Governmental Access Channels](#) (PEG) pursuant to its franchise agreement with Astound, as well as complimentary cable television service to schools, libraries, and buildings operated by the City for public purposes. According to the Office of Cable Communications, Astound paid the City about \$142,000 in franchise and PEG fees in 2025. The City contracts with an accounting firm to conduct financial reviews of franchise fees. The franchise agreements require the City to subject Seattle cable providers to similar financial obligations and regulatory requirements.

As a franchising authority, the City can enforce customer service rules for cable television unless specifically preempted at the federal level. In 1999, the Seattle City Council passed the [Cable Customer Bill of Rights](#), the City's rules for cable television customer service. It includes standards such as:

- Required time for a customer to connect to a live agent by phone
- Installation and repair time

- Credits for outages when reported by customers
- Timelines for bill due date, late fees, and disconnection
- Services for customers with disabilities
- Complaints answered by cable providers within 15 days and a right for a cable customer to file a follow-up complaint with the City

Exhibit 1 below provides an overview of some of the rights cable customers have under City rules.

Exhibit 1: Overview of Seattle Cable Customer Bill of Rights



Source: Office of City Auditor; see [Seattle Municipal Code 21.60](#) for the full description of the Cable Customer Bill of Rights.

The City's rules also set forth required credit amounts to pay to customers when cable television providers do not comply with the rules. For example, if a customer is not given the option to speak with a live agent within three minutes when calling customer service, they are entitled to a \$20 credit. The City can also fine a provider up to \$1,000 for a "pattern of, or unremedied, noncompliance" under the Cable Customer Bill of Rights.

For this audit, we selected 50 standards from the Cable Customer Bill of Rights for testing. A complete list of standards tested, with results, can be found in Appendix C. We assigned a numbering system to the standards for ease of tracking.

Our office [conducted a similar audit of Comcast](#), the City's other cable franchisee, in 2025.

A 2024 survey commissioned by the City found that 54 percent of Comcast television customers and 66 percent of Astound customers did not know about the Cable Customer Bill of Rights. The City recommends that Seattle cable customers first attempt to contact their cable provider if they are experiencing any issues. One option is to call the provider at the following numbers:

- Comcast: 800-266-2278
- Astound: 866-928-3123

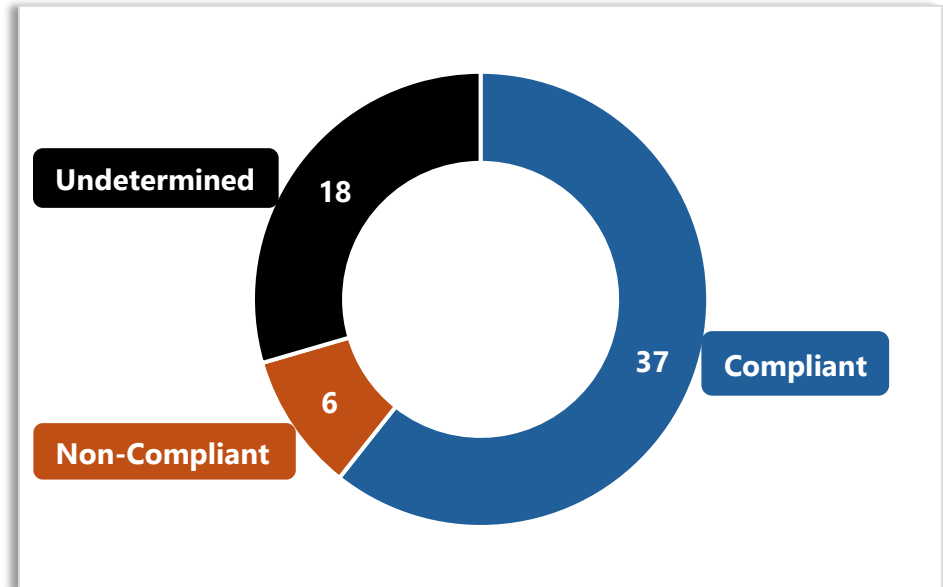
If the issue is still not resolved, customers can contact the City through a [webform](#) or by calling 206-684-8498.

SUMMARY OF COMPLIANCE TESTING

Compliance rating results

Our assessment of 50 standards from the City's Cable Customer Bill of Rights resulted in 61 ratings described below; some standards have two ratings because they cover multiple elements. The full results of our assessment are in Appendix C.

Exhibit 2: Summary of ratings from compliance testing



Source: Office of City Auditor assessment of Astound's compliance with the Cable Customer Bill of Rights

Complied

- Astound complied with 29 standards: We concluded that Astound generally met these standards' requirements based on our review of available data, information, and practices.
- Astound complied, based on policies and procedures, with an additional eight standards: These are standards that we were able to assess Astound complied with based on its written policies and procedures, but could not assess how the company puts them into practice. In Appendix C, we provide explanations in the standards' note column as appropriate.

Did not comply

- Astound did not comply with six standards: We concluded that Astound did not adhere to these

standards based on our review of available data, information, and practices. The body of this report provides more information about these standards, including recommendations to remedy the issues we identified.

Undetermined

- We rated 17 standards as ones we were unable to assess either due to the vagueness of the standard's language or lack of adequate information. In Appendix C, we provide explanations in the standards' note column as appropriate.
- We did not test one standard for television reception/signal quality. The City is contracting with a consultant to conduct a technical review of Astound's network.

Some standards have two ratings because they cover multiple elements. Our assessment of those elements led to different ratings, resulting in a total of 61 ratings for the 50 standards we assessed. For example, Standard 19 [Seattle Municipal Code 21.60.820(C)(6)(a)] includes requirements for sending monthly bills by mail or electronically and providing a due date on each bill that is at least 30 days from the beginning date of the applicable billing cycle. While we rated Astound as compliant regarding sending a monthly bill to current customers by mail or electronically, we also rated Astound as non-compliant in providing a due date of at least 30 days.

Our testing also resulted in six recommendations to Astound and three recommendations to the City's Office of Cable Communications, which we discuss below.

ASTOUND DID NOT ANSWER CUSTOMER CALLS TIMELY IN 2025

Section Summary

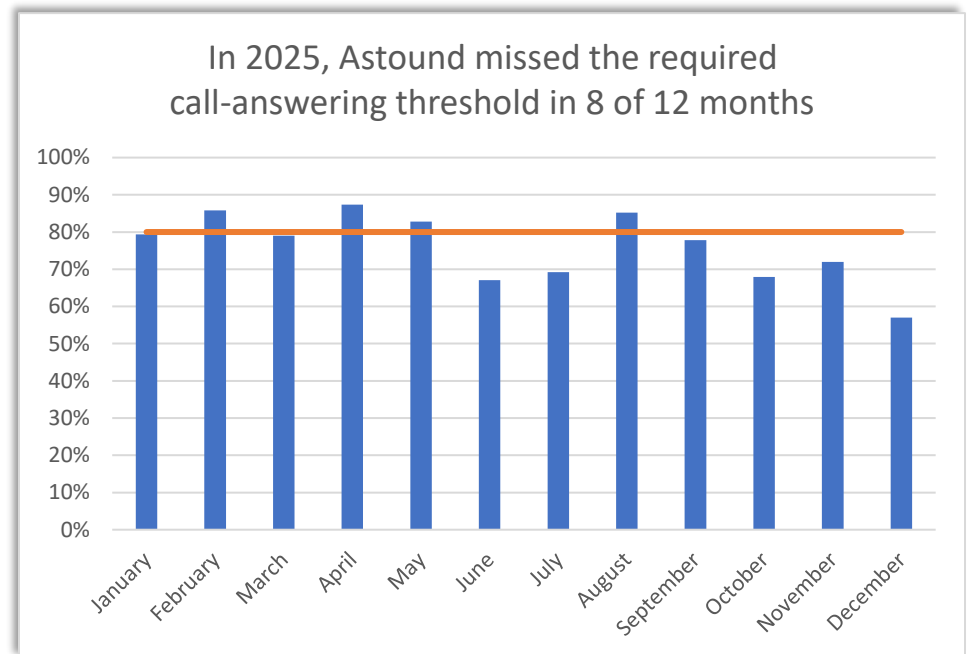
Astound is required under City rules to answer calls timely. We found that Astound's call answering fell below the required compliance threshold for 8 of 12 months in 2025. This noncompliance corresponded with an increase in calls abandoned by customers. If calls are not answered timely, customers have a harder time getting their issue addressed and have less recourse to exercise their rights under City regulations. We recommend that Astound determine why there were longer wait times in 2025 and make necessary changes. We also recommend that the City take enforcement action when appropriate to ensure that Astound answers customers' calls timely.

The City's Cable Customer Bill of Rights requires that cable providers answer calls and transfer customers from their automated system to live agents in a timely manner. When a customer wants to speak with an agent, this must happen within 30 seconds, at least 80 percent of the time each month. The City requires cable providers to maintain sufficient agent and phone line capacity to meet this requirement.

Astound did not meet call answering requirements for 8 months in 2025

We found that Astound did not answer at least 80 percent of transferred calls within 30 seconds for 8 of 12 months in 2025. Astound answered less than 70 percent of transferred calls within 30 seconds in June, July, October, and December 2025. The lowest percentage we observed was in December 2025, when Astound answered only 57 percent of transferred calls within 30 seconds. Exhibit 3 below provides monthly call-answering statistics for Astound in 2025.

Exhibit 3: Monthly percentage of customer calls transferred to a live agent by Astound within 30 seconds in 2025



Source: Office of City Auditor analysis of compliance reports provided by Astound

We found that Astound met the call wait times requirement in 2023 and in most of 2024. We could not assess their compliance for three months in 2024 because we identified duplicate information in two quarterly compliance reports, Q1 2023 and Q1 2024, that Astound provided to the City.

Astound also reported average wait times to the City in their quarterly reports. In 2025, the average wait time for Seattle Astound customers to be connected to a live agent was above 30 seconds for all 12 months, and above 60 seconds for 9 of 12 months. The highest monthly average wait time reported by Astound was in December 2025, at more than four minutes.

The high average monthly wait time corresponded with an increase in calls abandoned by Astound customers in 2025.

The percentage of calls abandoned by callers for each successive quarter in 2025 was 6, 9, 10, and 13 percent, respectively. Astound did not provide an explanation as to why abandoned calls were above 5 percent as required under City rules.

As part of our review, we requested backup data for Astound's telephone statistics. Astound did not provide the backup data;

Astound staff told us they implemented a new data system in 2025 that should provide more robust backup data for reporting.

Astound customers who experience long wait times are not having their issue resolved promptly, or at all, if they abandon their call. This ultimately results in customers having less recourse to have their concerns addressed, including their rights under the City's rules.

The City's Office of Cable Communications (OCC) is the designated authority for enforcing the Cable Customer Bill of Rights. The office receives required reports from cable providers to assess their compliance with various standards. In the past, OCC has initiated enforcement actions to ensure that Astound complies with the City's rules, including those concerning the safety and accessibility of Astound's store, the store's operation hours, and the timely submission of quarterly reports. Astound has responded to these actions by making applicable changes, including moving their store to a new location, extending store hours, and submitting their late reports by the new specified due date.

OCC also works with providers to resolve complaints that cable customers make to the City. For example, the office received multiple complaints from customers about Astound's communication during a January 2024 service outage. Customers complained that Astound's automated message provided a formulated estimation of service restoration time that was consistently the same amount of time whenever they called and did not provide helpful information. At least one resident complained that Astound's customer service was not available during the January 2024 outage. OCC directed complaints from the outage to Astound for resolution.

Recommendation 1

Astound should examine its call-answering process and data to identify the root cause(s) of not meeting the City's required wait time and make necessary changes to comply with the call-answering standard in the Cable Customer Bill of Rights.

Recommendation 2

The Office of Cable Communications should take appropriate enforcement action to ensure that Astound complies with the Cable Customer Bill of Rights standard for call-answering timeliness.

ASTOUND SHOULD UPDATE ITS BILLING PRACTICES

Section Summary

In Seattle, cable television providers are required to align their billing practices with City rules. During our review, we found that Astound did not comply with requirements regarding due dates and late fees: Astound's billing due dates are set too early, and its billing system is set up to apply late fees too soon for February bills. Improper due dates and application of late fees could confuse and frustrate customers. We recommend that Astound update its practices to comply with City rules. We also received conflicting information from Astound and were ultimately unable to assess their compliance with a standard related to customer deposits. We recommend that Astound update its terms and conditions and ensure its practices comply with City rules.

Payment due dates are too early

The City's Cable Customer Bill of Rights requires that cable providers give customers a minimum of 30 days to pay their bills. The requirement prescribes that payment due dates on monthly bills should be at least 30 days after the day the bill is generated. We found that the payment due dates on Astound's monthly bills are fewer than 30 days from the statements' dates. For example, one customer bill we reviewed from 2025 had a statement date of April 5 and a payment due date of April 26, just 21 days later.

Astound's billing procedures state that monthly bills are due within 22 days after the date of billing. This does not comply with the City's requirement, since Astound is giving customers fewer than 30 days to pay their bills.

Astound's billing system applies late fees too soon for February bills

The City's rules also require that a late fee should not be applied to a customer's bill before its due date, which should be at least 30 days out. We found that for the month of February, Astound did not comply with the required timeline for applying late fees, as its billing system applies late fees to February bills too early.

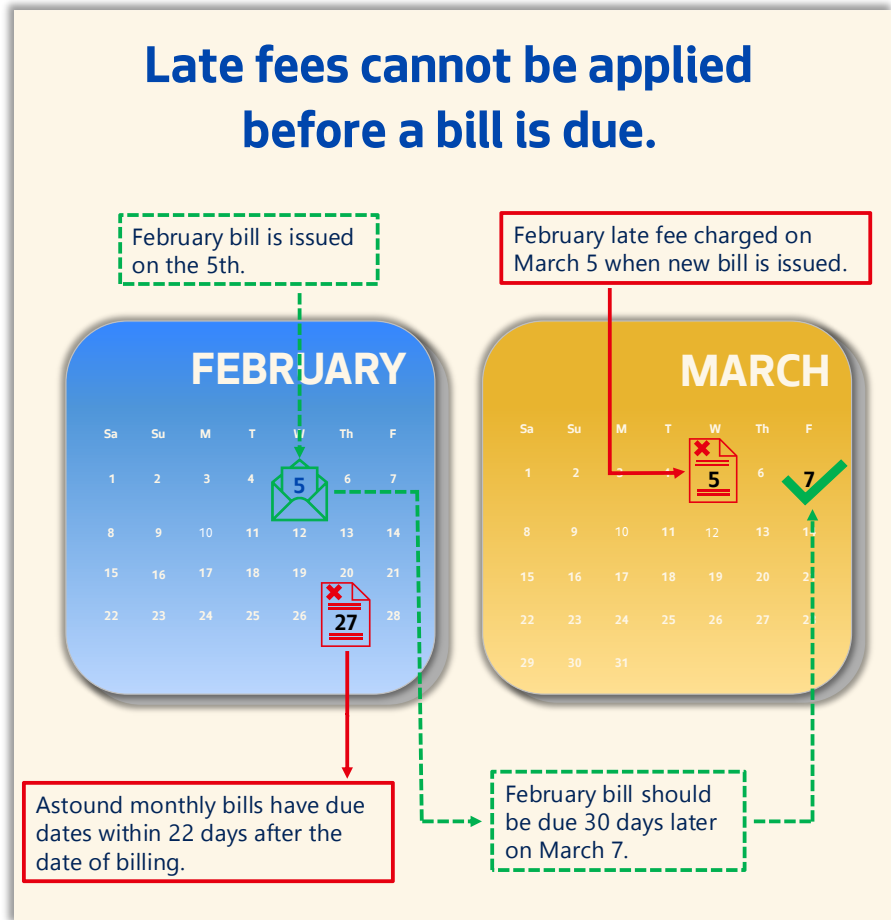
Although Astound's payment due dates on monthly bills are too early based on the City's rules, Astound does not actually apply late fees until the next month's bill is generated. However, under

its billing procedures, Astound would apply late fees to February bills that are not paid by the time March bills are generated, which occurs before the February bill should be due.

Astound's billing system generates bills for an account on the same day each month (e.g., January 5, February 5, March 5, etc.). They apply applicable late fees when a succeeding bill is generated. This process complies with City rules when months have 30 or 31 days. But since February has 28 or 29 days, Astound generates customers' March bills before their February bills are due. Astound then applies late fees to customers who have not yet paid their February bills, which is one or two days before Astound should be applying late fees.

Exhibit 4 provides an example of a billing and due date timeline for an Astound customer.

Exhibit 4: Example of an Astound customer billing timeline



Source: Office of City Auditor

Astound's application of late fees to customers' accounts before their due dates is contrary to the City's rules. Astound was not aware of this potential improper application of late fees until we informed them during this review. Although we did not identify any customer complaints about this issue to the City, we were unable to confirm whether customers had complained about the issue directly to Astound due to them not maintaining a log of complaints, which we discuss later in this report. The improper late fees could confuse and frustrate customers who see it in their accounts, or customers may pay a late fee without realizing it was misapplied.

Recommendation 3

Astound should update its billing processes to ensure it complies with the Cable Customer Bill of Rights standards for due dates on invoices and application of late fees.

Astound provided conflicting information about policy on customer deposits

The City's rules require that customers' deposits accrue interest at a fair market rate and be repaid with interest within 15 business days after cancellation of service.

Astound informed us that Seattle cable customers are not required to provide deposits when signing up for service. However, Astound's terms and conditions state that Astound may require a refundable deposit based on a credit check and will refund any required deposit within 30 business days after cancellation of service. The terms and conditions did not address how deposits should accrue interest and be paid to customers.

Because Astound's terms and conditions about deposits conflict with what staff told us and with the City's required refund timeframe, we were unable to determine if Astound complies with City rules regarding deposits. If Astound does collect deposits from Seattle customers, those deposits may not accrue interest at a fair market rate and Astound may not be providing refunds to customers within the City's specified timeframe.

Astound staff told us that conflicting information in their terms and conditions may be due to Astound trying to be inclusive of all jurisdictions in its service territory.

Recommendation 4

Astound should update its terms and conditions for Seattle customers to reflect their practices regarding customer deposits.

ASTOUND SHOULD IMPROVE COMMUNICATIONS REGARDING SERVICES FOR CUSTOMERS WITH DISABILITIES

Section Summary

Under City rules, cable providers are required to provide certain services to customers with disabilities—such as free installation and remotes—and to inform customers about them. We did not find information regarding such services in communications to customers that Astound provided to us for this audit. Without proper notification, customers with disabilities may not know about the services that Astound is required to provide them, putting the onus on customers to find information that should be readily available per City rules. We recommend that Astound update its communications to include information about its services for customers with disabilities. We also recommend that the City consider including such information in an existing annual notice.

Astound does not include information about services available to customers with disabilities in notices we reviewed

The City's Cable Customer Bill of Rights includes the right for customers with disabilities to receive certain services, including closed captioning and free delivery, installation, and pickup of equipment. Exhibit 5 below describes these services. During our review, we were unable to confirm whether Astound provides free delivery, installation, and pickup of equipment for customers with disabilities who cannot self-install cable equipment, because Astound did not provide sufficient information.

Exhibit 5: Overview of services available to Seattle cable customers with disabilities



Source: Office of City Auditor

The City's rules require Astound to provide information to customers—including services for customers with disabilities—upon installation and at other intervals.

Astound no longer gives customers a more extensive and comprehensive welcome kit because they found that customers were not using it. Instead, Astound told us they now provide a welcome flyer that acts as a quick-reference guide. We did not find information about services for customers with disabilities in Astound's welcome flyer or its rate card that describes television services.

Without proper early notification, customers with disabilities may not know about the services that Astound is required to provide them. Customers facing accessibility issues may also not know about the remedies available to them. This puts the onus on customers to find information that Astound should be making readily available.

The City's rules also require Astound to provide free remote controls to mobility-impaired customers. Although Astound provides voice remotes for some of their devices, we were unable to confirm that mobility-impaired customers are made aware of this free option. Astound charges \$15 to provide an additional remote to customers.

Recommendation 5

Astound should include information about its services for customers with disabilities in communications that go to all customers, such as in the welcome flyer or other notices.

The City's Office of Cable Communications works with cable providers to send annual notices that describe the Cable Customer Bill of Rights to Seattle cable customers. These annual notices are required under the Seattle Municipal Code, and the City has control over the notice's content. Although the 2025 notice listed assistance to customers with disabilities as one of Seattle cable customers' rights, it did not describe the services that the City requires cable companies to provide to customers with disabilities.

Recommendation 6

The Office of Cable Communications should consider describing services for customers with disabilities in the annual Cable Customer Bill of Rights notice that cable providers send to all customers.

ASTOUND SHOULD ENSURE ITS REPORTS TO THE CITY ARE TIMELY, ACCURATE, AND COMPLETE

Section Summary

City rules require that cable providers submit regular compliance reports to the City and maintain comprehensive files related to services provided to customers. We found that for our review period, such reports were often late and did not always contain complete or accurate data. We also did not receive many of the comprehensive files we requested from Astound during the audit. This impacts the City's ability to ensure that Astound is complying with its customer service rules. We recommend that Astound ensure its reports are timely, accurate, and complete and that they maintain required comprehensive files. We also recommend that the City continue to take enforcement action as appropriate regarding Astound's compliance reports.

**Astound's
quarterly reports
are frequently
late, incomplete,
and contain errors**

Under City rules, cable providers in Seattle must send quarterly compliance reports to the Office of Cable Communications (OCC) within 30 days of the end of each quarter. These reports contain summary data about cable providers' call services, installation and service repair timeliness, and credits provided to customers. OCC uses the quarterly reports to monitor providers' compliance with City rules.

For our review period, January 2023 through December 2025, we found the following issues in Astound's reports to the City:

1. **Timeliness:** Astound provided 8 of 12 required quarterly reports late to OCC. The degree that reports were late ranged from two weeks to nine months. The City sent Astound an enforcement letter in February 2026 notifying the company that they had violated City rules because they had not submitted any 2025 reports by that time. The City gave Astound 30 days to submit the reports or face fines. Astound sent the reports within that timeframe. Untimely reports delay the City's ability to identify noncompliance and enforce corrective actions.

2. **Completeness:** City rules require that cable providers provide an explanation when calls abandoned by customers exceed 5 percent in a given quarter. Astound exceeded that threshold for each quarter in 2025 and did not provide an explanation in their reports. The percentage of abandoned calls was 6, 9, 10, and 13 percent in successive quarters in 2025, indicating that the issue worsened as the year went on. Since no explanation was provided, the City is not aware of the reasons for the increase in the percentage of abandoned calls.
3. **Accuracy:** We identified duplicate information in two pairs of Astound quarterly reports for 2023 and 2024. We asked Astound about the duplicate information, and Astound provided us with updated data for one of the reports. However, the first quarter 2024 report that Astound provided to the City still contains data that is identical to the data in the first quarter 2023 report. Astound told us the duplicate data was likely due to overwritten files. It appears that Astound did not adequately review the telephone call statistics for the first quarter 2024 report. In addition, we identified a discrepancy between summary statistics reported for installation and service request data in the second quarter 2023 report provided to the City and backup data that Astound provided in response to our request. Using the backup data, we recalculated the percentage of such requests and found Astound was not in compliance as they had initially reported to the City. Inaccurate data can distort the appearance of compliance with the City's rules and affect the City's ability to accurately monitor Astound's compliance.

As regulator, the City can levy fines if the reports are incomplete or not submitted on time. Fines can reach up to \$3,000 depending on how many consecutive quarters the cable provider has not complied.

Recommendation 7

Astound should ensure that the required quarterly reports it provides to the Office of Cable Communications are timely, accurate, and complete.

Recommendation 8

The Office of Cable Communications should continue to take enforcement action as appropriate to ensure Astound complies with standards regarding quarterly reports.

Astound did not provide all comprehensive data files that are required under City rules

City rules require that cable providers maintain a comprehensive file of complaints, service requests, outages, and customer service calls. We asked Astound to provide these comprehensive files for our review period, January 2023 through December 2025. Astound did not provide comprehensive data related to complaints and telephone calls for 2023, 2024, and 2025 and outages for 2023 and 2024. As a result, we were unable to fully test their compliance with some of the City's standards and concluded that Astound was not in compliance with the City's standard on maintaining comprehensive data files.

Astound told us they do not maintain a log of complaints but said that they are creating a mechanism for doing so. Complaints are currently tracked at the customer level within their customer management system. In addition, Astound stated that they have limited historical data because of regular data purging.

Recommendation 9

Astound should maintain comprehensive data files as required by the Cable Customer Bill of Rights, including for complaints, service requests/installations, service interruptions, and telephone calls.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

This audit was requested by Seattle City Council President Joy Hollingsworth and former Mayor Bruce Harrell. They asked our office to review Seattle's two cable providers' compliance with the Cable Customer Bill of Rights as the City of Seattle (City) prepares to renew its franchise agreements. The objective of this audit was to assess Astound's compliance with these rules.

Scope

The scope for this audit included Astound data from January 2023 to December 2025. We tested compliance with 50 standards in the City's Cable Customer Bill of Rights.

Methodology

To accomplish the audit's objectives, we performed the following:

- Reviewed past Office of City Auditor work regarding the City's Cable Customer Bill of Rights
- Conducted a site visit to Astound's store in Seattle
- Conducted call testing to Astound customer service
- Reviewed Astound quarterly and yearly reports to the City's Office of Cable Communications
- Reviewed Astound policies and procedures
- Interviewed Astound and Office of Cable Communications officials
- Analyzed unplanned and planned outages/service interruption data, refunds and credits data, customer complaints data, monthly call data, and installation data

We assessed the reliability of the data we analyzed in this report to ensure they were sufficiently complete and accurate. We concluded that the data are of undetermined reliability because of limited information about Astound's systems and lack of access to the data sources. However, we still used the data in our compliance testing based on our review of the limited information about Astound's systems and because OCC uses this data in its oversight role.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX A

Astound and Office of Cable Communications Response



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September 21, 2026

Andrew Scoggin
IB Osuntoki
700 5th Ave, Suite 2410
Seattle, WA 98104

Re: Audit of Astound's Compliance with Seattle Cable Customer Bill of Rights

Dear Andrew, IB:

This letter is provided in response to the report provided by your office following the audit of Astound's compliance with the Cable Customer Bill of Rights ("CCBOR") of the city of Seattle (the "City"). Astound has appreciated the care which you and your office dedicated to the audit, and working with the City's Office of Cable Communications ("OCC") during the course of the process as well.

As noted in the report, the audit identified a number of areas which will benefit from more robust compliance with applicable CCBOR standards, and/or warrant further examination and adjustment. As reflected in the report and appendixes, Astound has modified and is reviewing and adjusting identified processes and procedures in order to more closely adhere to applicable CCBOR standards, and we look forward to continuing to work with your office, the OCC, and other City personnel as necessary and appropriate to ensure good outcomes continue to accrue as a result of the audit.

Astound is proud to provide its competitive services in the city, and we look forward to continuing to serve the city and its residents.

Very truly yours,

A handwritten signature in blue ink, reading "David von Moritz", with a stylized flourish at the end.

David von Moritz
Corporate Counsel & Vice President Gov. Relations



Seattle
Information Technology

September 24, 2026

Seattle Office of City Auditor
700 Fifth Avenue, Suite 2410
Seattle, WA 98124-4729

Arushi Thakorlal, Acting City Auditor and Office Staff:

Thank you for your careful, thorough, and diligent work in conducting the Audit of Astound's Compliance with the Cable Customer Bill of Rights (CCBOR). The audit report provides valuable insight into Astound's performance relative to the City's customer service standards and highlights important areas affecting Seattle cable customers, including call-answering timeliness, billing practices, communications regarding services for customers with disabilities, and the completeness and reliability of required compliance reporting.

We acknowledge and agree with the audit's findings and observations related to the City's oversight role. In particular, we appreciate the clarity the report brings to issues such as timely enforcement actions, the content of the annual CCBOR customer notice, and the importance of complete and accurate quarterly reporting by cable providers.

Seattle IT values the Auditor's role in protecting cable customers' rights and ensuring accountability among franchisees. The report's recommendations directed to the Office of Cable Communications will help strengthen ongoing oversight and reinforce the City's standards for customer service, accessibility, and transparency.

We look forward to continuing to enforce the CCBOR to ensure equitable and reliable cable services for Seattle residents.

Sincerely,

Shannon Smith

Shannon Smith, Acting Chief Technology Officer
Seattle Information Technology

APPENDIX B

List of Recommendations and Astound and Office of Cable Communications Response

Recommendation 1: Astound should examine its call-answering process and data to identify the root cause(s) of not meeting the City's required wait time and make necessary changes to comply with the call-answering standard in the Cable Customer Bill of Rights.

Astound Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q4 2026

Astound Response: Astound is in the process of reviewing and updating call answer data gathering and processes in order to provide more accurate and timely reporting and service.

Recommendation 2: The Office of Cable Communications should take appropriate enforcement action to ensure that Astound complies with the Cable Customer Bill of Rights standard for call-answering timeliness.

Office of Cable Communications Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q4 2026

Office of Cable Communication Response: The Office of Cable Communications agrees with the recommendation and will consider potential adjustments to enforcement policies and practices to support compliance with the Cable Customer Bill of Rights standard for call-answering timeliness.

Recommendation 3: Astound should update its billing processes to ensure it complies with the Cable Customer Bill of Rights standards for due dates on invoices and application of late fees.

Astound Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q4 2026

Astound Response: Astound is in the process of reviewing and updating billing practices to ensure compliance.

Recommendation 4: Astound should update its terms and conditions for Seattle customers to reflect their practices regarding customer deposits.

Astound Concurrence: Not yet determined

Estimated Date of Completion (Qtr./Yr.): To be determined

Astound Response: Astound does not collect deposits in the city of Seattle, and is considering adjusting its terms and conditions to reflect this. There is no clear timetable for handling of this item, however it is being actively considered and follow-up with the Office of Cable Communications regarding same will occur.

Recommendation 5: Astound should include information about its services for customers with disabilities in communications that go to all customers, such as in the welcome flyer or other notices.

Astound Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q4 2026

Astound Response: Astound is in the process of reviewing findings to determine how its services and communications can be more readily obtained and reviewed.

Recommendation 6: The Office of Cable Communications should consider describing services for customers with disabilities in the annual Cable Customer Bill of Rights notice that cable providers send to all customers.

Office of Cable Communications Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q2 2027

Office of Cable Communication Response: The Office of Cable Communications agrees with the recommendation and will explore options to incorporate a description of services for customers with disabilities on the annual Cable Customer Bill of Rights notice.

Recommendation 7: Astound should ensure that the required quarterly reports it provides to the Office of Cable Communications are timely, accurate, and complete.

Astound Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q3 2026

Astound Response: Astound has updated reporting practices, including data sourcing, review, handling, and transmission.

Recommendation 8: The Office of Cable Communications should continue to take enforcement action as appropriate to ensure Astound complies with standards regarding quarterly reports.

Office of Cable Communications Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q4 2026

Office of Cable Communication Response: The Office of Cable Communications agrees with the recommendation, and we will continue applying enforcement measures, as appropriate. We will also assess our enforcement policies and practices to determine whether any refinements may further support compliance with standards regarding quarterly reports.

Recommendation 9: Astound should maintain comprehensive data files as required by the Cable Customer Bill of Rights, including for complaints, service requests/installations, service interruptions, and telephone calls.

Astound Concurrence: Agree

Estimated Date of Completion (Qtr./Yr.): Q1 2027

Astound Response: Astound maintains data concerning complaints, services requests / installations, services interruptions, and telephone calls, and is reviewing aggregation possibilities so as to be able to provide "comprehensive" data that's more readily reportable.

APPENDIX C

Cable Customer Bill of Rights Standards and Compliance Ratings

The table below contains the results of our testing of Astound's compliance with the City's rules for cable providers, also known as the Cable Customer Bill of Rights. The period covered by this audit was January 2023 to December 2025.

We tested Astound's compliance on 50 standards. The first column contains the standard as written in Chapter 21.60 of Seattle Municipal Code. Our compliance rating appears in the second column, and the third column has additional relevant information that we identified as part of our testing.

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
1. Except as otherwise approved by the City in a franchise, the grantee shall provide at least one service center for each 75,000 customers served, located at a safe, visible site within the City that is handicapped accessible and located along mass transit routes. Except as otherwise approved by the City, all service centers shall be open during normal business hours and shall be fully staffed on-site with CSRs [Customer Service Representatives] offering the following services to customers who come to the service center: bill payment (including the ability to provide change and customer receipts); equipment exchange; processing of change of service requests; and response to customer inquiries and requests. The City may approve alternatives for service centers that provide substantially equivalent services. The grantee shall post a sign at each service center advising customers of its hours of operation and of the addresses and telephone numbers to contact the City and the grantee after normal business hours [SMC 21.60.820(B)(1)] "Normal business hours" means the hours of 9 a.m. to 7 p.m., Monday through Friday, and 9 a.m. to 5 p.m., Saturday, excluding federal, state, or City holidays [SMC 21.60.030 Definitions]	Complied	Astound has one store in downtown Seattle. At the time of our site visit, the store did not have after-hours contact information posted, as required. In addition, the parking lot has just one accessible parking space. We last visited this plaza in November 2024, during our audit of Comcast, and observed two accessible spaces at that time. We advise that Astound post its after-hours contact information at its store and inquire about the reduction in accessible parking spaces with their property manager.

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
2. The grantee shall provide free exchanges of faulty equipment at the customer's address [SMC 21.60.820(B)(1)]	Complied	No additional observation
3. CSRs [Customer Service Representatives] will be available to respond to customer inquiries during normal business hours. The grantee shall maintain local or toll-free telephone lines during normal business hours for service/repair requests and billing inquiries [SMC 21.60.820(B)(2)]	Complied	No additional observation
4. The grantee shall have dispatchers and technicians on call 24 hours a day, seven days a week, including legal holidays, for emergency purposes [SMC 21.60.820(B)(3)]	Complied	No additional observation
5. The grantee shall keep sufficient CSR [Customer Service Representative] and telephone line capacity to ensure that telephone calls are answered by an IVR [Interactive Voice Response] or a CSR within 30 seconds under normal operating conditions. If the call is answered by an IVR, the IVR must allow the option to speak with a CSR within no more than three minutes. If a customer has exercised the option to speak with a CSR, the customer shall be able to speak with a CSR within 30 seconds once the call is transferred during normal business hours. This standard shall be met no less than 80 percent of the time, measured on a monthly basis under normal operating conditions. Compliance with this standard shall be reported on a quarterly basis according to a reporting form established by the Office of Cable Communications [SMC 21.60.820(B)(4)]	Did not comply for 8 of 12 months in 2025	We recommend that Astound identify the root cause(s) of not meeting the City-required wait time and make necessary changes to meet this standard (see Recommendation 1). We also recommend that Office of Cable Communications take appropriate enforcement action to ensure that Astound complies with this standard (see Recommendation 2).
6. The total number of calls receiving busy signals shall not exceed three percent of the total telephone calls. This standard shall be met no less than 90 percent of the time, measured on a quarterly basis under normal operating conditions [SMC 21.60.820(B)(5)]	Complied	We couldn't fully assess data for three months in 2024 because we identified certain duplicate information in the Q1 2023 and Q1 2024 quarterly reports that Astound provided to the City.

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
7. Guaranteed seven-day standard installation and service. The grantee shall complete all standard installations and service repairs requested by customers within seven business days after an order has been placed, unless otherwise requested by the customer. This standard must be met no less than 95 percent of the time under normal operating conditions measured on a quarterly basis [SMC 21.60.820(C)(1)]	Complied in Q1 2023; Did not comply in Q2 2023	Astound shared data for only Q1 and Q2 2023 during our analysis phase. We were unable to assess other periods within the audit scope because Astound shared those data after we sent a draft copy of this report for their review. We recommend that Astound maintain comprehensive data files as required by standard 48 (see Recommendation 9).
8. Residential installation and service appointments. Customers requesting installation of cable service or repair service to an existing installation may choose any available four-hour block of time during normal business hours. The grantee shall provide customers the option of service or installation appointments weekday evenings until 7 p.m. and a minimum of four hours on Saturdays at the request of and for the convenience of the customer. The grantee may not cancel an appointment with a customer after 5 p.m. on the day before the scheduled appointment [SMC 21.60.820(C)(2)]	Complied	Astound customers may need to specifically request times after 5 p.m., and customer service agents may need to coordinate the request with dispatch. This is because weekday evening appointments after 5 p.m. do not show on Astound's scheduling system.
9. The grantee shall be deemed to have responded to a request for service under the provisions of this Section 21.60.820 if a technician arrives within the agreed-upon time period. If the customer is absent when the technician arrives, the technician shall verify the appointment with the technician's dispatcher by telephone while at the customer's door and leave written notification of timely arrival. The grantee shall keep a record of the notification. In such circumstances, the customer must contact the grantee to reschedule the appointment. In the event that a technician arrives without a prior appointment, and the customer must be present for service to proceed, and the customer is absent, the grantee will not be considered to have responded to a request for service [SMC 21.60.820(C)(2)(b)]	Complied	No additional observation

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
10. In the event of a system outage (an outage is a service interruption that involves a loss or substantial impairment in reception on all channels for a period of one hour or more) resulting from grantee equipment failure affecting five or more customers, the grantee shall initiate repairs within two hours after the third customer calls to report the outage [SMC 21.60.820(C)(3)(a)]	Complied based on policies but unable to assess practices	The outage data that Astound provided did not indicate when repairs were initiated.
11. All customers who call the grantee to report an outage shall receive credit for the entire day on which the outage occurred and for each additional day the outage continues [SMC 21.60.820(C)(3)(b)]	Complied	No additional observation
12. The grantee shall notify the City of any outage of at least four continuous hours that affects at least ten percent of its customers [SMC 21.60.820(C)(3)(c)]	Complied in 2025	Astound did not provide outage data for 2023 and 2024.
13. The grantee shall initiate repairs for all other service interruptions resulting from grantee equipment failure within 24 hours. Grantee shall provide any customer who reports a service interruption with a credit for each day of service interruption due to the grantee's equipment failure [SMC 21.60.820(C)(3)(d)]	Complied in 2025	Astound did not provide service interruption data for 2023 and 2024.
14. TV reception. The signal quality provided by the grantee shall meet or exceed technical standards established by the FCC [Federal Communications Commission]. The grantee shall render efficient service, make repairs promptly, and interrupt service only for good cause and for the shortest time possible [SMC 21.60.820(C)(4)]	Did not test	The City is contracting with a consultant to conduct a technical review of Astound's network.

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
15. A planned outage that the grantee anticipates will last more than four hours shall be preceded by at least 24 hours' notice to affected customers and shall occur during periods of minimum use of the system, preferably between midnight and 6 a.m. Such notification of a planned outage may take the form of a door hanger, a message or insert into the monthly bill, or a telephone call and may be supplemented with on-screen messages announcing the planned outage [SMC 21.60.820(C)(4)(a)]	Complied in 2025	Astound did not provide planned outage data for 2023 and 2024.
16. If a customer experiences poor signal quality or reception, the grantee shall respond and repair the problem no later than the day following the customer call provided that the customer is available and the repair can be made within the allotted time. If an appointment is necessary, the customer may choose a four-hour block of time during normal business hours. At the customer's request, the grantee shall repair the problem at a later time convenient to the customer. The grantee shall provide customers the option of service or installation appointments weekday evenings until 7 p.m. and until 5 p.m. on Saturdays [SMC 21.60.820(C)(4)(b)]	Complied on appointment times Complied on outage response based on policies but unable to assess practices	Astound customers may need to specifically request times after 5 p.m. and customer service representatives may need to coordinate the request with dispatch. This is because weekday evening appointments after 5 p.m. do not show on Astound's scheduling system.
17. A grantee's CSRs [Customer Service Representatives] shall have the authority to provide credit for interrupted service or any of the other credits listed in Section 21.60.850, to waive fees, to schedule service appointments, and to change billing cycles, if appropriate [SMC 21.60.820(C)(5)(a)]	Complied on providing credits Unable to assess whether credits align with those listed in section 21.60.850	We did not receive sufficient documentation regarding the credit amounts Astound provides to customers.
18. Any difficulties that cannot be resolved by the CSR [Customer Service Representative] shall be referred to the appropriate supervisor who shall make best efforts to contact the customer within four hours and resolve the problem within 48 hours or within such other time frame as is reasonable [SMC 21.60.820(C)(5)(b)]	Complied based on policies but unable to assess practices	Astound's policy states that supervisors should contact customers within four business hours and that complaints regarding technical issues and billing disputes must be resolved within 72 hours and 30 days, respectively.

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
19. Grantee will send customers a clear and concise bill every month. The grantee shall provide a due date on each bill that is at least 30 days from the beginning date of the applicable billing cycle. A monthly bill shall be issued to all customers regardless of balance due. The customer shall retain the option of whether to receive bills by mail or electronically [SMC 21.60.820(C)(6)(a)]	Did not comply on due date of at least 30 days Complied on sending monthly bill and option of mail or electronic bill	We recommend that Astound update its billing processes to ensure it complies with this standard (see Recommendation 3).
20. The grantee shall respond to a customer's billing inquiry, general question, or comment made by telephone or e-mail within 48 hours during normal business hours. The grantee shall respond in writing to a written and mailed billing inquiry, general question, or comment within two weeks of the date of receipt of the letter [SMC 21.60.820(C)(6)(b)]	Unable to assess	We were unable to verify whether Astound responds within the required timeline.
21. If a customer's service bill is not paid by the due date the grantee may apply an administrative fee to the customer's account. If the customer's service bill is not paid within 45 days of the beginning date of the applicable service period, the grantee may perform a "soft" disconnect of the customer's service. If a customer's service bill is not paid within 52 days of the beginning date of the applicable service period, the grantee may disconnect the customer's service, but only upon showing that it provided ten days' notice to the customer that such disconnection may result [SMC 21.60.820(C)(6)(c)]	Did not comply on timeline for applying late fee for February bill Unable to assess disconnection timeline	We recommend that Astound update its billing processes to ensure it complies with this standard (see Recommendation 3). Astound provided a sample of disconnection notices, but we could not verify how delinquent the accounts were before the notices were issued. Note that Astound provided sample invoices from 2026 for this standard. We used those sample invoices from 2026 for this assessment.
22. If a customer requests cancellation of any or all services, billing for affected services shall end on the same day, or on the future date for which the cancellation is requested. After the requested cancellation date, the customer shall not be responsible for cable services delivered. The grantee must refund any credit balance owed the customer, less any owed or disputed amounts, within 15 business days after the close of the customer's billing cycle following the return of the equipment and request for cancellation [SMC 21.60.820(C)(6)(d)]	Complied on prorated credit for service cancellation based on policies but unable to assess practices Unable to assess timeliness of credit refund	Astound's customer terms and conditions state that charges shall be prorated if services terminate other than on the last day of the month. However, we were unable to assess the timeline for when refunds are provided to customers.

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
23. Deposits shall accrue interest at a fair market rate. Within 15 business days after cancellation of service, the grantee shall repay any deposit with a statement showing accrued interest to the customer, less any sums owed to the grantee [SMC 21.60.820(C)(6)(e)]	Unable to assess	We recommend that Astound update its terms and conditions to reflect its practices, and to ensure its practices comply with this standard (see Recommendation 4).
24. For any customer with a verified disability that prevents the customer from self-installing equipment, the grantee shall at no charge deliver, install, and pick up equipment at the customer's home. In the case of malfunctioning equipment, the grantee shall provide and install substitute equipment, ensure that it is working properly, and remove the defective equipment [SMC 21.60.820(D)(1)]	Unable to assess	We recommend that Astound include information about its services for customers with disabilities in its welcome flyer or other notices (see Recommendation 5).
25. The grantee shall provide TDD/TTY [Telecommunications Device for the Deaf/Teletypewriter] service with trained operators who can provide every type of assistance rendered by the grantee's CSR [Customer Service Representative] for any hearing-impaired customer at no charge [SMC 21.60.820(D)(2)]	Complied	No additional observation
26. The grantee shall install, at no charge, any closed captioning device purchased by a hearing-impaired customer [SMC 21.60.820(D)(3)]	Complied	No additional observation
27. The grantee shall provide free use of a converter remote control unit to mobility-impaired customers [SMC 21.60.820(D)(4)]	Complied based on policies but unable to assess practices	Astound has a voice remote for customers with TiVo devices. Astound charges \$15 to provide an additional remote for customers. We did not see how information about remotes is communicated to mobility-impaired customers. We recommend that Astound include information about its services for customers with disabilities in its welcome flyer or other notices (see Recommendation 5).

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
28. Upon installation, annually, and at any time a customer requests, the grantee shall provide the following information to its customers in a clear, concise written form. In addition, the grantee shall notify customers 30 days in advance of any significant changes in the following: a. Cable services offered by the grantee, including its channel lineup; b. The grantee's prices and options for cable services; conditions of subscription to cable services; and policies concerning changes in services offered, notification of changes, disconnection, and service downgrades; c. A description of these Subchapter II (Cable Customer Bill of Rights) standards in a form provided by or approved by the City; d. Installation and service maintenance policies, including the customer's responsibilities for equipment; e. Instruction on the use of cable TV service, remote control, and standard video recording device hookups; f. Instruction on the use of interactive television if provided by the grantee; g. Billing and complaint procedures, including the address and telephone number of the grantee's offices, the grantee's policies on deposits and credit balances, returned check charges, and refunds for disruption of cable service or poor signal quality; h. Contact information for filing a consumer complaint with the FCC [Federal Communications Commission] and the Office of Cable Communications; i. Policies concerning protection of customer privacy, including provisions for opting-out of disclosure of customer name and address for marketing purposes; j. Use and availability of parental control/lock out device; k. Special services for customers with disabilities including any discounts required by the franchise or other agreements; and l. Days, hours of operation, and locations of the service centers [SMC 21.60.820(E)(1)]	Unable to assess	Astound told us they no longer provide a larger physical welcome kit. Instead, they provide a welcome flyer with links to webpages. We were unable to verify if Astound provides all information required by this standard, including information about services for customers with disabilities. We recommend that Astound include information about its services for customers with disabilities in its welcome flyer or other notices (see Recommendation 5).

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
29. The grantee shall concurrently send to the Office of Cable Communications a copy of all notices provided to customers under this subsection [SMC 21.60.820(E)(2)]	Unable to assess	The City's Office of Cable Communications reported that they received some information from Astound.
30. The grantee shall provide customers with written notification, and announcements on the cable system, of any changes in programming, services, or channel positions as soon as possible, but no less than 30 days in advance of such changes if the change is within the control of the grantee. Customers shall be given a description of the changes, their options for changing services they receive, the phone number for questions, and the effective date [SMC 21.60.820(E)(3)]	Complied	No additional observation
31. All of the grantee's officers, agents, employees, contractors, and subcontractors who are in personal contact with customers shall have visible identification cards bearing their name and photograph. The grantee shall account for all identification cards at all times. Every vehicle of the grantee used for providing services to customers shall be clearly visually identified to the public as working for the grantee. All CSRs [Customer Service Representatives] shall identify themselves orally to callers immediately following the greeting during each telephone contact with the public. Officers, agents, and employees of the grantee and its contractors and subcontractors shall identify themselves to the customer when making a service call or installation [SMC 21.60.820(E)(4)]	Complied on identification for grantee's officers, agents, and employees based on policy Unable to assess contractors, subcontractors, and vehicle branding	Astound policy did not address vehicle branding and identification for contractors and subcontractors.

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
32. All CSRs [Customer Service Representatives], technicians, employees, agents, contractors, and subcontractors of the grantee in every contact with a customer shall state the estimated cost of the service, repair, or installation orally before delivery of the service or before any work is performed and shall provide the customer with an oral statement of the estimated total charges before terminating the telephone call. At the customer's request, the grantee shall send the customer a written statement detailing such charges. Grantee shall also provide customers with a written statement of the total estimated charges before leaving the location at which the work was performed [SMC 21.60.820(E)(5)]	Complied on providing written statements detailing charges to customers Unable to assess providing verbal statement of estimated charges	Astound procedures we reviewed did not address providing verbal statement of estimated charges. However, Astound told us they are under a consent decree with the Washington State Office of the Attorney General that requires Astound to provide estimated charges and receipts at all points of sale.
33. All promotional materials advertising cable services shall accurately disclose price terms. For non-automated orders, the CSRs [Customer Service Representatives] shall make clear the price of pay-per-view and pay-per-event programming before an order is taken. The grantee shall distribute promotional material in multiple unit buildings only with the approval of the building owner. The grantee shall not condition the provision of cable services on the receipt of such approval [SMC 21.60.820(E)(6)]	Complied on disclosing price terms and promotional materials Unable to assess non-automated orders for pay-per-view pricing	Astound price terms did not address non-automated orders of pay-per-view events.
34. All listings of the grantee's services shall conspicuously display the availability of all service tiers and corresponding prices for City customers, including the cost of either the basic cable service subject to rate regulation or the cost of the grantee's lowest priced cable service tier [SMC 21.60.820(E)(7)]	Complied	No additional observation
35. The grantee shall not charge customers for any services they have not affirmatively requested. This Section 21.60.820 shall not prevent a grantee from adding programming to an existing tier [SMC 21.60.820(E)(8)]	Complied	No additional observation

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
36. Multiple dwelling unit buildings. The grantee shall ensure that rates charged by the grantee to residents of multiple dwelling unit buildings do not exceed the charges paid by residents of single family homes. The grantee may not condition provision of services to multiple dwelling unit buildings on any requirement not imposed on other subscribers, except as expressly permitted in the franchise. The grantee may not condition provision of services to multiple dwelling unit buildings on an exclusive service agreement with grantee. The grantee may offer a building owner the option of a long-term agreement in return for installation of internal wiring or other telecommunications improvements unique to the building, but the grantee must offer the alternative of a no term agreement to building owners who wish to contract directly for installation by a contractor approved by the grantee and in accordance with the grantee's generally applicable technical standards. The foregoing does not restrict, condition, or inhibit the grantee's ability to negotiate longer-term right of entry agreements prior to offering service to multiple unit building residents for the purpose of maintaining grantee's on-site signal and facilities. For purposes of this subsection 21.60.820.F, a "right of entry agreement" means an agreement that permits the grantee access to the building to extend its distribution cable from the grantee's cable system in the right-of-way or public easement to the utility closet or other demarcation point in the multiple unit building [SMC 21.60.820(F)]	Complied	No additional observation

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
37. Safety. The grantee shall install and locate its facilities, cable system, and equipment in compliance with all federal, state, local, and company safety standards, and in such manner as shall not unduly interfere with or endanger persons or property. If the grantee receives notice that an unsafe condition exists with respect to its equipment, the grantee shall investigate such condition immediately, and shall take such measures as are necessary to remove or eliminate any unsafe condition [SMC 21.60.820(G)]	Complied based on policies but unable to assess practices	The City is contracting with a consultant to conduct a technical review of Astound's network.
38. Satisfaction guaranteed. The grantee shall guarantee customer satisfaction for every customer who requests new installation of cable service, video, or interactive television or adds any additional cable service to the customer's cable subscription. Any such customer who adds expanded basic or other higher tier of video service or interactive television to the customer's cable subscription and then requests discontinuation of such upgraded service within 30 days due to dissatisfaction with the service shall receive an account credit in an amount equal to the pro rata charge for the remaining days of service following the request to discontinue the service. If a customer subscribes to a service under a promotion that provides free service and chooses to discontinue the service during the promotion window, there shall be no charge of any kind for the service or for discontinuing the service [SMC 21.60.820(H)] As part of the installation process, the grantee shall provide documentation explaining the 30-day satisfaction guaranteed program pursuant to subsection 21.60.820.H. The documentation must include the toll-free contact number a customer can use to exercise customer rights under this Section 21.60.820 [SMC 21.60.820(C)(2)(a)]	Complied	No additional observation

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
39. Destruction of personally identifiable information. A grantee shall destroy, within 90 days, any personally identifiable information if the personally identifiable information is no longer necessary for the purpose for which it was collected and there are no pending requests or orders for access to such personally identifiable information under this Section 21.60.825, pursuant to a court order, or pursuant to 47 U.S.C. § 551 [SMC 21.60.825(J)]	Unable to assess	The record management and retention policy that Astound sent to us does not specify the timeline for destruction of personally identifiable information.
40. Complaints to the grantee. The grantee shall, consistent with the obligations of this Chapter 21.60 including the minimum credit amounts set forth in Section 21.60.850, establish written procedures for receiving, acting upon, and resolving customer complaints and crediting customer accounts in accordance with company policies, and shall publicize such procedures at the grantee's sole expense [SMC 21.60.830(A)]	Complied on complaint procedures Unable to assess whether credits align with those listed in section 21.60.850	We did not receive sufficient documentation regarding the credit amounts Astound provides to customers.
41. The written procedures shall prescribe a simple process by which any customer may submit a complaint in person or by telephone, electronic mail, or in other forms to the grantee regarding an alleged violation of any provision of these customer service standards, any terms or conditions of the customer's contract with the grantee, or reasonable business practices [SMC 21.60.830(A)(1)]	Complied	No additional observation
42. The grantee will make best efforts to resolve customer concerns or complaints at the first contact. The City will make best efforts to redirect to the grantee all cable customers who have contacted the City first with a cable or other service inquiry, concern, or complaint relating to cable services. Within 15 days after receiving a complaint, the grantee shall notify the customer of the results of its investigation and its proposed action or credit. If the complaint is in writing, a written response shall be sent to the customer within two weeks of receipt [SMC 21.60.830(A)(2)]	Unable to assess	Astound does not maintain a comprehensive file of complaints in a format that is readily reportable. We recommend that Astound maintain such comprehensive data files as required by the Cable Customer Bill of Rights, including for complaints (see Recommendation 9).

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
43. The grantee shall also notify the customer of the customer's right to file a complaint with the City in the event the customer is dissatisfied with the grantee's decision and shall explain the necessary procedures for filing such complaint with the City [SMC 21.60.830(A)(3)]	Unable to assess	We did not receive sufficient documentation from Astound that addresses this standard.
44. For violations of this Subchapter II, credits shall be made to the customer's account in the amounts set forth in Section 21.60.850, at a minimum, or in greater amounts should the grantee choose to exceed the minimum credit. If the customer no longer receives cable service from the grantee, but registered a complaint while a subscriber of grantee's cable services, the grantee shall issue a check to the customer within 30 days of the resolution of the complaint [SMC 21.60.830(A)(4)]	Complied on issuing checks to former customers based on policies but unable to assess practices Unable to assess whether credits align with those listed in section 21.60.850	We did not receive sufficient documentation regarding the credit amounts Astound provides to customers.
45. The grantee's complaint procedures shall be sent to the City before implementation [SMC 21.60.830(A)(5)]	Unable to assess	The City's Office of Cable Communications was unable to confirm if Astound sent their complaint procedures before implementation.
46. At the City's request, the grantee shall include on its billing statement, in a clear and conspicuous manner, information on how to contact the City's Office of Cable Communications. At the City's discretion, such information may include, but shall not be limited to, the address, telephone number, and e-mail address of the Office of Cable Communications [SMC 21.60.830(F)(1)]	Complied	No additional observation
47. At least annually, the grantee shall notify its customers of the existence, location and function of the City's Office of Cable Communications and shall provide, in a form provided by or approved by the City, a summary of this Subchapter II and the remedies and procedures available to its customers [SMC 21.60.830(F)(2)]	Complied	No additional observation

Audit of Astound's Compliance with Seattle's Cable Customer Bill of Rights

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
48. The grantee shall maintain, in a manner consistent with the privacy rights of customers, an accurate and comprehensive file of: (1) any and all complaints regarding the cable system or the grantee's operation of the cable system to provide cable service, by number and type and their disposition; (2) service requests, identifying the number and nature of the requests and their disposition; (3) service interruptions and their disposition; and (4) all telephone calls from customers to grantee, and their response times [SMC 21.60.840]	Did not comply	Astound did not provide comprehensive files of complaints or telephone calls. They also did not provide service interruption data for 2023 and 2024. Astound shared data on service requests for Q1 and Q2 2023 during our analysis phase. We were unable to assess other periods within the audit scope because Astound shared those data after we sent a draft copy of this report for their review. We recommend that Astound maintain comprehensive data files as required (see Recommendation 9).

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
49. The Office of Cable Communications will develop and provide a quarterly reporting form to monitor the grantee's compliance with this Subchapter II. The grantee shall complete the form and send it to the Office of Cable Communications on a quarterly basis, within 30 days of the end of the quarter. All data in the report shall reflect activity within an area that reasonably approximates the jurisdictional boundaries of King County, including the City. To measure the grantee's compliance with standards related to customer telephone response times, the report shall include, at a minimum, the following information from the grantee: 1) the total number of calls offered to a grantee; 2) the number of calls handled by the grantee's IVR within 30 seconds; 3) the total number of calls during which a customer requested, in any fashion, to speak with a CSR [Customer Service Representative]; 4) the total number of calls transferred to a CSR; 5) the total number of calls transferred to a CSR that were answered within 30 seconds; 6) the average wait time before a call to a CSR was answered; and 7) other information that may be requested by the Office of Cable Communications, and is retained by the grantee, to assess the overall level and effectiveness of grantee's customer service practices or is necessary to address customer service complaints. If calls abandoned by callers exceed five percent of calls handled, the grantee shall provide an explanation [SMC 21.60.840(A)]	Did not comply	We found that for our review period, Astound's quarterly reports were often late and did not always contain complete or accurate data. We recommend that Astound ensure that the required quarterly reports provided to the City's Office of Cable Communications (OCC) are timely, accurate, and complete (see Recommendation 7). We also recommend that OCC continues to take appropriate enforcement action to ensure that Astound complies with this standard (see Recommendation 8).

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
50. Privacy notice to customers. 1. A grantee shall annually mail a separate, written privacy statement to customers consistent with 47 U.S.C. § 551(a)(1) and shall provide a customer a copy of such statement at the time the grantee enters into an agreement with the customer to provide cable service or other service. The written notice shall be in a clear and conspicuous format and be printed in ten-point type or larger. 2. In the statement required by subsection 21.60.825.E.1, the grantee shall state substantially the following regarding the disclosure of customer information: "Unless a customer affirmatively consents electronically or in writing to the disclosure of personally identifiable information, any disclosure of personally identifiable information for purposes other than to the extent necessary to render, or conduct a legitimate business activity related to, a cable service or other service, is limited to: (a) Disclosure pursuant to a subpoena or valid court order authorizing such disclosure; or to a governmental entity, but only to the extent required by applicable federal law; or	Complied	No additional observation

Standard [from the Seattle Municipal Code]	Compliance Rating	Note
Privacy notice to customers (continued) (b) Disclosure of the name and address of a customer to any general programming tiers of service and other categories of cable and other services provided by the grantee that does not directly or indirectly disclose: (1) A customer's extent of viewing of a cable service or other service provided by the grantee, (2) The extent of any other use by a customer of a cable service or other service provided by the grantee, including, but not limited to, a disclosure of the particular viewing selections by a person subscribing to a cable service or other service, or the particular web sites visited by a customer of non-cable service (i.e., a grantee may only disclose the fact that a person subscribes to non-cable service), (3) The nature of any transactions made by a customer over the cable system, or (4) The nature of programming or sites that a customer subscribes to or views (i.e., a grantee may only disclose the fact that a person subscribes to a general tier of service, or a package of channels with the same type of programming). 3. The statement shall also inform the customers of their right to prohibit the disclosure of their names and addresses in accordance with subsection 21.60.825.C for non-cable-related purposes. This opportunity will be presented in the form of a toll-free telephone number or website, provided by the grantee with the privacy notice or other manner acceptable to the Office of Cable Communications. If a customer exercises the customer's right to prohibit the disclosure of name and address as provided in subsection 21.60.825.C or this subsection 21.60.825.E, such prohibition against disclosure shall remain in effect permanently, unless the customer subsequently notifies the grantee in writing that the customer wishes to permit the grantee to disclose the customer's name and address. [SMC 21.60.825(E)]		

APPENDIX D

Seattle Office of City Auditor Mission, Background, and Quality Assurance

Our Mission:

We conduct independent analyses of City programs and services with an equity and social justice perspective, making recommendations on ways the City can better serve the people of Seattle.

Background:

Seattle voters established our office by a 1991 amendment to the City Charter. The office is an independent department within the legislative branch of City government. The City Auditor reports to the City Council and has a four-year term to ensure their independence in deciding what work the office should perform and reporting the results of this work. The Office of City Auditor conducts performance audits and non-audit projects covering City of Seattle programs, departments, grants, and contracts. The City Auditor's goal is to ensure that the City of Seattle is run as effectively, efficiently, and equitably as possible in compliance with applicable laws and regulations.

How We Ensure Quality:

The office's work is performed in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. These standards provide guidelines for audit planning, fieldwork, quality control systems, staff training, and reporting of results. In addition, the standards require that external auditors periodically review our office's policies, procedures, and activities to ensure that we adhere to these professional standards.

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