



STATE OF CONNECTICUT  
OFFICE OF CONSUMER COUNSEL

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Sent to Internet Service Provider Representatives via email.

To Whom It May Concern,

As you are aware from communications with my staff, the Office of Consumer Counsel (OCC) is developing a comparison rate chart for Connecticut consumers to compare plans and pricing for internet service. The purpose of this endeavor was to give the residents of Connecticut a baseline set of information about plans and pricing as a starting point when purchasing or updating broadband services. The methodology we utilized involved accessing each Connecticut residential internet service provider's website as a regular residential consumer would, using an address from the providers' mapped service area. OCC went through and recorded the plans that appeared on the website with the intent to share all plans and prices available. Unfortunately, we found several provider's websites confusing with multiple barriers hindering access or full disclosure to plans and pricing.

The next step in our process was to contact each provider and confirm the accuracy of the plans and pricing we had collected from each website. While OCC appreciates the feedback we received from some providers, based on some of the responses we determined that some of the providers' websites may not provide full and complete information and, in some instances, may be inaccurate. For example, we found that for some providers, not all plans are listed on the website and not all speeds and prices are always correctly reflected on the website. This can cause confusion for consumers and may be discriminatory in some cases if certain plans are offered to some but not others.

By not transparently presenting all plans and pricing, consumers are placed at a disadvantage, particularly those seeking to enroll in the Affordable Connectivity Program (ACP). As of today, [134,548 Connecticut households](#) are enrolled in the Affordable Connectivity Program. Access to broadband is essential to participating in today's society. For this reason, the Federal Communications Commission (FCC) has taken an active role in ensuring everyone has equitable access to broadband. This measure is emphasized in the broadband consumer transparency and labels rulemaking process (FCC CG Docket No. 22-2), the digital discrimination proceedings (FCC GN Docket No. 22-69), and the recently released [Broadband Access Experience Form](#) to collect consumer experiences on the ease of accessibility.

Accurate provider websites are essential for consumer access to broadband in Connecticut. As the FCC has recognized in its effort to adopt Broadband Consumer Labels, "Access to accurate, simple-to-understand information about broadband internet access services helps consumers make informed choices and is central to a well-functioning marketplace that encourages

competition, innovation, low prices, and high-quality service.”<sup>1</sup> Households and residents rely on the information that providers put on their websites as a complete set of information. Inaccurate or incomplete plan information on a website platform harms both potential and current consumers.

To better understand your company’s practices with respect to providing plan and pricing information on your company website, OCC requests responses to the following questions by no later than March 1, 2023:

1. How does the company decide what plans and services get posted to its website?
2. Are there written procedures, policies, or processes for developing services and plans that get posted to the company’s website? If so, please provide electronic copies.
3. Is the pricing of the company’s services and plans uniform across the state? If not, explain how the company determines pricing and plans offered and how they vary by location.
4. If pricing is uniform across the state, why does the company require a consumer to provide an address before accessing plans and pricing?
5. Do prices on the website include all charges related to internet service?
  - a. If yes, please list all the charges that are included.
  - b. If no, please list any additional charges that a customer would expect to incur upon purchasing each plan or service offered by the company in Connecticut.
  - c. Is modem pricing included?
6. Does the company regularly update its website?
  - a. If yes, how often?
  - b. What is included in the updates?
7. Does the company alert consumers (current customers or not) of updated services and pricing? How?
8. Are customers offered pricing and plan options that are not available on your website if they call the company directly? If yes, provide a detailed explanation of how the company determines what plans to offer prospective customers, and what factors impact which plans are offered.

OCC looks forward to the company’s responses.

Sincerely,



Claire Coleman  
Consumer Counsel  
State of Connecticut

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<sup>1</sup> [Broadband Consumer Labels | Federal Communications Commission](https://www.fcc.gov/broadbandlabels), available at <https://www.fcc.gov/broadbandlabels>.