

FCC Consumer Advisory Committee Recommendation Regarding Consumer Complaint Data Reporting Recommendation

We respectfully recommend that the FCC improve the ways in which it provides anonymized consumer complaint data to the public. We make this recommendation in light of the Commission's recent request for input from the public regarding openness and efficiency, as well as the overall goals of the administration to improve government openness and transparency. Current quarterly reports only share the top five complaint areas and provide few other details. They are delivered in a non machine-readable format that greatly reduces the ability of outside groups to make use of the data.

In a recent review, we found a response by the FCC to a consumer FOIA request that included over two hundred complaints that displayed many fields of useful non-personally identifiable information. Therefore this information is available, but simply not being shared with the public without specific requests for the information.

This information can be used to frame consumer education efforts and to evaluate the effectiveness of agency messaging and initiatives. Improving public reporting of consumer complaints would not only help consumers but should reduce costs for the FCC by minimizing FOIA requests and significantly reducing the work associated with the current reporting process.

At a minimum, we recommend the following improvements in FCC Complaint reporting:

- A direct link to the Consumer Complaint Data on the home page to allow the public easy access to the data.
- The described data should be exportable in machine-readable format, such as spreadsheet or CSV form, and allow filtering of information so the public can review the information based on various criteria at their discretion. The Consumer Complaint data must contain a broader and more detailed breakdown than the current quarterly PDF based reports, which only provide a few general categories of complaints.
- In addition, the FCC should look to improve its aggregate and narrative reporting, providing a more detailed breakdown of complaints in a narrative format.
- The improved complaint data information provided should comply with 5 U.S.C.A. §522a (b)(5). This allows for the sharing of non-personally identifiable information such as: Complaint ID, Communications Sector (i.e. mobile services, internet, radio, television), Issue, State, Zip Code, Date Received, Date Investigated, Date Resolved, Response, Timeliness of Response, Consumer Satisfaction.
- The Commission should also take steps to ensure the data being shared is accurate and reflects the true nature of complaints being submitted. Processes should be developed to correct user self-selection errors and duplicate submission issues.
- The Commission should continue to find ways to separate out complaints and inquiries in its reporting.

- The Commission should develop specific timelines for release of more detailed complaint data and transitioning to machine-readable data, allocating specific resources to modernize its complaint reporting.
- Provide reports on minority and disability community participation in the complaint database, and take steps to encourage minority and disability community participation in the complaint database.

In its process of improving its publicly available data on complaints it receives, we urge the FCC to review and consider the accessibility and transparency of the Consumer Financial Protection Bureau's (CFPB) complaint reporting efforts. CFPB shares anonymous basic anonymous non-identifiable consumer complaint information, as permitted under U.S.C.A. §552a (b)(5) in an on-line database that can be viewed and searched based on a number of criteria. The CFPB complaint database can be found at the following URL, <http://www.consumerfinance.gov/complaintdatabase/>.

In the spirit of past CAC recommendations and discussions on improving consumer complaint reporting, we recommend that the FCC to utilizes an online database to give public access to non-identifiable consumer complaints and aggregated data. Improvements to complaint data reporting at the FCC could reduce costs for the agency in the long term, assist in its regulatory efforts, and make the FCC a leader in openness and making information available to the public. This effort would also improve public involvement and support of the agency's efforts.

We appreciate your consideration of these recommendations and respectfully urge adoption as soon as possible.