



**Before the Committee on Energy, Utilities and Technology**

**April 16, 2025**

**Testimony of Chris Hodgdon on behalf of Comcast**

***An Act to Update and Clarify Provisions Related to 9-1-1 Services***

Chair Lawrence, Chair Sachs, distinguished members of the Committee on Energy, Utilities and Technology, thank you for the opportunity to offer the following testimony. Neither for Nor Against LD1436 and request that the Committee include the statutory language included within this testimony to clarify our compliance with this legislation. My name is Chris Hodgdon. I am Comcast's Vice President of Government Affairs here in Maine. Comcast Cable serves 18 Maine communities in the Mid Coast region, from Freeport to Woolwich and along the New Hampshire border from Kittery to Sanford. We currently offer our gigabit broadband, video, voice and mobile services to more than 74,000 Maine homes, businesses and institutions including the public sector.

*Definition of Prepaid Wireless.* Comcast is concerned with the proposed revision to the bill's definition of "prepaid wireless telecommunication service" in Section 13, particularly the removal of key language from current statute. Under existing law, prepaid wireless is defined as a service that must be "paid for in advance" and sold in "predetermined units or dollars that decline with use in a known amount." Remitting this language would conflict with widely accepted industry definition, which hinges on the notion that the value of prepaid services declines with usage. This definition is essential in distinguishing prepaid from postpaid or fixed-rate service models. Altering the definition could unintentionally reclassify products that do not fit the traditional pre-paid model. For instance, NOW Mobile is a monthly service we offer that is paid for in advance, but its value does not decline based on use. We worry that remitting this language would unintentionally create an impractical landscape for the deployment of services like NOW Mobile. Therefore, we respectfully request that the original statutory language be retained.

*Display of Surcharges.* While we acknowledge and appreciate the legislature's goal of transparency through LD1436's proposal to itemize the 911 surcharge, we respectfully urge consideration of how this requirement interacts with Comcast's current "all-in" pricing approach. Our all-in pricing model is designed to provide customers with a clear, and predictable monthly cost, inclusive of fees and taxes. In fact, this model was created in response to customer frustration over complex billing. The FCC has already pushed for all-in pricing for cable and video service, which went into effect in December 2023<sup>1</sup>. And although this requirement does

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<sup>1</sup> <https://www.fcc.gov/document/fcc-adopts-all-cable-and-satellite-video-pricing>

not currently extend to telephone or mobile services, we are seeing a broader shift in customer expectation toward streamlined, understandable billing. Mandating line-item display of surcharges, even when the cost is already included in the advertised monthly service price, could inadvertently undermine these efforts and needlessly confuse consumers. Comcast suggests amending the language to say, "The amount of the 9-1-1 fee must be separately stated on an invoice, receipt or similar document that is provided to the consumer by the provider, when practicable. In circumstances in which disclosure of the 9-1-1 fee on an invoice, receipt or similar document is not practicable, the seller must make the information regarding the amount of the 9-1-1 fee available to the prepaid wireless consumer in another manner." This language is similar to the statutory section 35-A MRSA §7104-C, sub-§2, ¶A and therefore already in practice.

Without the inclusion of this important clarifying language, Comcast must oppose the legislation. We thank you for your time and attention to this testimony and are available to assist the Committee as it considers the legislation. Please do not hesitate to reach out with any questions.

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