

## CASE STUDY: MULTI-STATE REGULATED UTILITY TCPA & PRE-DISCONNECT CALLS

Andrew Cope  
Vice President  
860-830-7801  
acope@contractcallers.com

### The Situation

A large eastern utility, that has a multi-state regulated foot print, for many years had contacted their customer base with mandatory pre-disconnection outbound messaging, using their captive dialer system. In early 2015 when TCPA lawsuits started to heavily effect the utility industry, the legal department of this utility elected to stop all outbound contact for any reason, directly from the utility itself for fear of massive fines that were being levied by the FCC.

The effect on the utility from a pre-disconnection outreach perspective was dramatic; as regulatory complaints for proper notification on termination of service went up, customers claiming medical exceptions went up, additional / ineffective letter mail costs were added and ultimately a flood of avoidable bad debt ensued. The added difficulty from an outreach perspective was that, when messaging was permissible that half of the states within their regulatory footprint only allowed messages to be sent between 5PM and 8PM and the other half between 6PM and 8PM. This wasn't an issue per se when Agents and awkward scheduling were not needed on unattended messaging, but to do any manual type outreach even to landline telephone numbers was nearly impossible to staff to. The final stance to curb larger bad debt roll rates was a massive push at the end of 2015 of field disconnects; which proved to be an extremely expensive effort, with more strain placed on the Utility's field technicians who were also responsible to do other meter work outside of disconnects / reconnects.

In November of 2015, the executive group at the Utility commissioned CCI to do a detailed study and proposal of their situation. Their stipulation was that CCI create a program that filled the regulatory time slots allowed for outreach, was standardized, would be approved by their regulatory agencies and that wouldn't cause them to be fined by the FCC for TCPA violations. Their largest target for CCI; while abiding by the aforementioned conditions, was to be as effective as their previous unattended messaging was in collecting money due, prior to the expense of a truck rolling to do a field disconnection.

### CCI's Call Scriptor Solution

CCI set out our program in to methods of outreach for both landline telephone numbers and cellular telephone numbers; which would be even more interactive to the customer than just a message, be customized to that particular customer, and provide options for the customer to choose from in order to mitigate possible complaints or reasoning for non-payment. For the landline telephone numbers, we elected to still deliver unattended messaging with key stroke options to the payment vendor for immediate payments, to the Utility's IVR for payment arrangement approval, and to the customer's local 211 for hardship and medical recertification's. For all landline voicemails, the telephone number left was tied into our IVR which played the same specific options back to the Customer based on them entering their account number. This avoided a flood of inbound calls to the Utilities captive call center, and thus not disrupting their service levels. All of these calls were made within the regulated allowable times.



The Cellular volume; which represented 80% of all this Utility's telephone population, was the real issue at hand. CCI, utilizing LiveVox's Call Scriptor, built the same type of messaging system, only this time for their Agent's to call out as the Utility and at a keystroke transfer the Customer to the right option. All calls were recorded and monitored rigorously for quality and compliance, and most importantly all calls were manually launched via a separate platform in LiveVox call HCI Strict. Click Agents were assigned to the nightly team and large monitors with available agents and wait time ques are constantly monitored for pacing to ensure zero outbound abandonment or wait times occurred. Every customer was informed that their cellular number was manually dialed at the beginning of each call, and was given the option to opt out of any outreach in the future and flagged as such, to protect against an unjust regulatory complaint. The staffing for this project was tailored to penetrate 6,500 calls each night within the condensed period of time, so CCI adjusted the shift times of other project Agents to finish their day on this project. The Utility also wanted the effort to be cost effective so they elected to have a flat per FTE rate for the project and allow CCI to shift change based on daily volumes, so because of the scheduling issue it was like paying for 5 Agents and getting the condensed power of 17 to 20 Agents as needed.



***“We couldn’t be more pleased with our decision to partner with CCI and use their Live Agent Call Scriptor outbound program. The reduction in our debt is a tremendous win for us financially and has proven to pose vastly less risk for us from a regulatory point of view. Regardless of the recent TCPA exemption by the FCC for Utilities, for these call types our ROI is too hard to go back to our old system. All in all, a great success.”***

***Director of Credit Operations***

## The Results

After 10 months:

- ◆ Cut the cost of field termination specific complaints by 70%.
- ◆ Shrunk the population of complaints to the Utility or any regulatory authority by 60%.
- ◆ Achieved a liquidation rate of 82% save cure rate on arrangements made within 15 of live calls.
- ◆ Yielded an immediate payment rate of 22% of all live answered – live Agent calls.
- ◆ Decreased pre-2015 field disconnection levels by 17% (massive saving).
- ◆ Decreased bad debt reserve by 14% lower than pre-2015 levels, based on highest allocations.
- ◆ Decreased overall bad debt 2016 YTD, lower than 2014; which was this Utilities record year.
- ◆ Shrunk captive Utility inbound call center volumes by 6% over 2015.
- ◆ No TCPA violations or lawsuits.