

ILLINOIS-AMERICAN WATER COMPANY,

IAWC EXHIBIT 2.0

DIRECT TESTIMONY

OF

KAREN H. COOPER

(Docket 05-0681/06-0094/06-0095 (consol.))

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1 **DIRECT TESTIMONY**

2 **OF**

3 **KAREN H. COOPER**

4 **I. WITNESS IDENTIFICATION AND BACKGROUND**

5 **Q1. Please state your name and business address.**

6 A. My name is Karen H. Cooper. My address is American Water, 1410 Discovery Parkway,
7 Alton, Illinois 62002. My phone number is 618-433-4200.

8 **Q2. By whom are you employed?**

9 A. I am employed by American Water Works Service Company ("AWWSC" or "Service
10 Company.") The Service Company is a subsidiary of American Water Works Company,
11 Inc. ("AWWC" or "American Water"), and it provides shared services to American
12 Water's utility subsidiaries, including Illinois-American Water Company ("IAWC").

13 **Q3. What is your position with American Water Works Service Company?**

14 A. Manager, Business Services, for American Water's Customer Service Center ("CSC") in
15 Alton, Illinois.

16 **Q4. Please describe your professional experience and education.**

17 A. In 1985, I joined American Water as a Water Quality Superintendent with Indiana-
18 American Water Company. Prior to that time I worked with the Ohio Environmental
19 Protection Agency, Division of Public Water Supplies, and an engineering firm in
20 Massachusetts. I have held increasingly responsible management positions since joining
21 the American Water system. In 1997, I was named Division Manager for Illinois-
22 American Water Company's Southern Division, which includes the Alton, East St. Louis,
23 Granite City, Belleville and Cairo service areas. In October 2001, I accepted a position
24 as Vice President and Manager of Ohio-American Water Company, with responsibility

25 for the general management of statewide water and wastewater production, distribution,
26 office, and call center facilities and operations. In July 2003 I accepted my current
27 position: Manager of Business Services at the American Water CSC. I have a Bachelor
28 of Science degree in Agricultural Science from the Ohio State University. I am currently
29 pursuing a Masters Degree in Business Administration from Southern Illinois University
30 at Edwardsville.

31 **Q5. Have you previously testified before the Illinois Commerce Commission?**

32 A. Yes.

33 **II. PURPOSE OF TESTIMONY**

34 **Q6. What is the purpose of your direct testimony in this proceeding?**

35 A. The testimony of witnesses for the Office of the Attorney General for the State of Illinois
36 ("Attorney General") and the Village of Homer Glen ("Homer Glen") raises a number of
37 issues relating to the quality of the customer service offered by IAWC. The purpose of
38 my testimony is to explain the CSC's role in providing customer service, respond to the
39 concerns raised by the Attorney General and the Homer Glen witnesses, and demonstrate
40 that IAWC in fact provides a very high level of service.

41 **Q7. How will you address these issues?**

42 A. First, I will discuss the services that the CSC provides. Next, I will describe the CSC's
43 quality control procedures and recount the favorable results we have obtained on recent
44 customer service surveys. Third, I will explain how customer complaints are tracked in
45 our system, at which point I will also address Scott Rubin's allegation that the number of
46 customer complaints we reported in this case was inaccurate. Fourth, I will place the
47 "harassment" and "intimidation" that Homer Glen alleges into context. Along those lines,
48 I will identify and explain the procedures we have implemented to prevent customer

49 service representatives from making unfriendly or rude comments to customers in the
50 future.

51 **III. CSC SYSTEMS AND OPERATION**

52 **Background**

53 **Q8. What is the CSC?**

54 A. The CSC is a group within the Service Company that provides customer contact and
55 billing services in support of all of American Water's regulated subsidiaries, including
56 IAWC and its customers.

57 **Q9. Are you familiar with the CSC's operations and systems?**

58 A. Yes.

59 **Q10. Explain how you are familiar with the CSC's operations and systems.**

60 A. I have over 25 years of water industry experience, including 17 years with American
61 Water in various positions in operations. I have worked at the CSC since July 2003.

62 **Q11. What is the purpose of the CSC?**

63 A. Operating out of service centers in Alton, Illinois, and in Pensacola, Florida, the CSC
64 responds to virtually all customer inquiries nationwide from American Water's regulated
65 operations in 19 states, including customers located in Illinois who are served by IAWC.
66 Customer Service Representatives are available to customers 24 hours per day, seven
67 days per week, 365 days per year.

68 **Q12. Briefly describe the history of the CSC.**

69 A. In 1999, American Water examined its local customer service centers and made the
70 decision to consolidate all of its customer service functions at one national site. At that
71 time, American Water had 22 local call centers—each with different business processes,
72 hours of operation, technology and service offerings. Accordingly, the American Water

73 CSC in Alton, Illinois opened in April 2001, and the consolidation to one center for all of
74 American Water's regulated subsidiaries was completed in 2004. Full 24/7 service is
75 now available to all customers in the American Water system.

76 **Q13. Can you describe the CSC's operations?**

77 A. The CSC and IAWC work together to provide services to all of IAWC's customers.

- 78 • The CSC is responsible for greeting customers making inbound calls and handling
79 their requests. It also processes service orders and correspondence, bills accounts,
80 and collects on accounts.
- 81 • "Field Service" is responsible for reading meters and providing other field
82 services to customers.
- 83 • "CSC Call Handling" operates 24/7/365. It handles both general calls, such as
84 service inquiries and account inquiries, and emergency calls. In terms of volume,
85 the CSC handled approximately 4.2 million calls in 2005.
- 86 • "Billing" processes meter readings for billing.
- 87 • "Collections" is responsible for collecting unpaid bills and other collections-
88 related activities, such as bankruptcy.

89 To manage these functions, the CSC utilizes a number of systems and
90 technologies that distributes customer calls into the call center and enables the calls to be
91 routed to agents with the skills to handle the specific type of call. The CSC also has
92 technology that allows integration of voice and data within the center. For example, this
93 integration is used is to populate the agents' screens with certain data simultaneously with
94 the arrival of the calls.

95 Interactive Voice Technology ("IVR") is used to enable callers, through
96 automated menu options, to select the service appropriate to their needs. It provides
97 certain self-service options, such as the customer's account balance and payment due
98 date. The call center has a workforce management system that provides management
99 with the capability to forecast resources and schedule. "Quality monitoring" is used for

100 quality and training purposes. It includes software that enables us to record both the
101 voice and data transactions during a phone call. These and other technologies enable the
102 CSC to manage customer service on a real-time basis and provide information to monitor
103 performance.

104 **Q14. How many employees operate the CSC?**

105 A. Current CSC staffing is as follows: there are 413 employees in the Call Handling function,
106 85 employees in the Billing function, and 24 employees in the Collections function. This
107 includes both the Alton and Pensacola locations. Call Handling employees respond to
108 inbound customer contacts. Billing employees generate customer bills as scheduled.
109 Collection employees perform functions related to collecting customer accounts that are
110 past due.

111 **Q15. Describe the training the CSC personnel receive.**

112 A. CSC employees receive comprehensive training in customer service procedures and
113 processes. This training provides specific requirements for service orders, billing and
114 collections, and, where required, training in rates and rules, regulations, and conditions of
115 service applicable to customers in the Chicago Metro District. State-specific information
116 is readily accessible to agents via the on-line Service Order and Billing and Collections
117 resources, as well as the Call Handling Process Manual. CSC employees also receive
118 training on customer relations, courtesy, and handling upset or angry callers.

119 **Assessment of the CSC's Performance**

120 **Q16. Does American Water assess quality of its interactions with customers through the**
121 **CSC?**

122 A. Yes. Call quality monitoring is conducted by specialized quality assurance specialists.
123 The CSC monitors calls to ensure that agents resolve customers' issues efficiently and
124 courteously. Starting in 2006, the CSC enhanced its quality assurance process—
125 maintaining a focus on efficiency, but also strengthening the emphasis on the quality of
126 the customers' experience. Active listening, effective problem diagnosis and an emphasis
127 on first-call resolution are critical CSC metrics that were developed in response to
128 customer survey results.

129 **Q17. Does American Water assess customer satisfaction?**

130 A. Yes. Customer Satisfaction and Service Quality studies are conducted to provide both
131 strategic and tactical customer feedback. Customer satisfaction is a benchmarking
132 statistic that provides insight as to how American Water and its subsidiaries are meeting
133 customer expectations.

134 **Q18. Did American Water conduct a customer satisfaction survey in 2005?**

135 A. Yes. Each year American Water contracts with Opinion Research Corporation, an
136 independent research and consulting firm, to conduct a customer satisfaction survey of a
137 representative sample of residential customers. The purpose of the survey is to gauge
138 overall customer satisfaction with the service they receive from American Water's state
139 subsidiaries. The survey captures customer evaluations of broad service attributes at the
140 strategic level. As reported in IAWC's Performance Report, which is attached to Fred
141 Ruckman's testimony as IAWC Exhibit 1.03, 93% of American Water's customers
142 surveyed in 2005 reported that they were either "satisfied" or "very satisfied" with
143 American Water's customer service. In American Water's Central Region states—Illinois,

144 Indiana, Iowa, Missouri and Ohio—94% report of customers comparable levels of
145 satisfaction.

146 **Q19. How would you describe these results?**

147 A. Very good. They show high levels of customer satisfaction with the CSC, both
148 throughout the American Water System and with IAWC.

149 **Q20. Does American Water have any other means of assessing customer satisfaction?**

150 A. Yes. American Water also conducts a Service Quality Assessment.

151 **Q21. What is the Service Quality Assessment?**

152 A. The Service Quality Assessment is a research study conducted by the Opinion Research
153 Corporation on an ongoing basis. This study is designed to measure the overall level of
154 the quality of service provided to customers who have initiated contact with American
155 Water within the previous 7 days. Specific evaluations are gathered for the CSC and
156 field staff.

157 American Water launched the Service Quality Assessment in the third quarter of
158 2005. This survey was conducted by polling a representative sample of residential
159 customers who had contacted the company. The detailed questions were designed to
160 evaluate different aspects of the customers' experience, such as:

- 161 • Telephone Customer Service Representatives ("CSR");
- 162 • Written correspondence;
- 163 • Appointment setting for an on-site visit; and
- 164 • Field Service Representatives.

165 The study is designed to capture customers' top priorities—the company attributes that
166 are most closely related to customer satisfaction.

167 **Q22. What are the results of the Service Quality Assessment?**

168 A. The results of the Service Quality Assessment are compiled on a quarterly basis.
169 Preliminary third and fourth quarter (2005) data indicate that IAWC's performance is
170 improving, based on improved fourth quarter responses in the following areas:

- 171 • Company cares about its customers—22 percentage point increase in customers
172 agreeing with statement.
- 173 • Company anticipates customer needs—15 percentage point increase in customers
174 agreeing with statement.
- 175 • Company listens to and learns from customer feedback—17 percentage point
176 increase in customers agreeing with statement.

177 American Water has continued this survey into 2006. These data show improvement in
178 IAWC's customers' reported satisfaction with their contacts with IAWC, both in their
179 view of the company's performance, and their satisfaction with their phone and field staff
180 contacts.

181 **Q23. Does American Water have any other means of assessing customer satisfaction?**

182 A. Yes. The CSC also uses a post-call survey to assess customer satisfaction with the CSR
183 who handled the customer's call.

184 **Q24. Can you describe that post-call survey?**

185 A. Yes. At the end of every call, the CSR transfers the customer to a post-call survey which
186 consists of the following 5 questions:

- 187 • How would you rate your overall customer experience?
- 188 • How would you evaluate the level of expertise demonstrated by the CSR?
- 189 • How would you evaluate the professionalism of the CSR?
- 190 • How would you rate the length of time it took to have your call answered by a
191 CSR?
- 192 • How would you rate the CSR's ability to resolve your issue?

193 Customers respond on a scale of 1 – Poor, 2 – Fair, 3 – Good, 4 – Very Good, 5 –
194 Excellent.

195 Of 20,536 respondents (throughout the American Water system) in May and June
196 of 2006, 93.8% reported a "good" to "excellent" overall customer experience; 95.5%
197 reported a "good" to "excellent" level of expertise demonstrated by the CSR; 96.2%
198 reported "good" to "excellent" professionalism of the CSR; 90.4% responded with "good"
199 to "excellent" on the length of time it took to have their call answered by a CSR; and
200 95.5% responded "good" to "excellent" on the CSR's ability to resolve their issues.

201 **Q25. Are results available prior to May of 2006?**

202 A. Yes. There are results available from January 2003 to June 2005. However, there was a
203 period from July 2005 through April 2006 where data were unavailable while upgrades
204 were made to the post-call survey system.

205 **Q26. What were the results prior to July 2005?**

206 A. Prior to 2005, the post-call survey results are combined for all of the questions. January
207 2005 through June 2005 data indicate that customers responded with an average 96.2%
208 "good" to "excellent" to the questions regarding their CSR.

209 **Q27. Does American Water use any other means to assess its performance?**

210 A. American Water monitors and tracks a number of metrics to assess overall call center
211 performance and effectiveness. These include:

- 212 • Abandonment rate – the average percentage of calls that are dropped while the
213 callers wait in queue;
- 214 • Average Speed of Answer – the average time a customer waits in queue before
215 connecting to a CSR; and
- 216 • First call resolution – the percentage of calls handled with only one contact.

217 **Q28. How does American Water's customer service compare to other call centers in the**
218 **industry?**

219 A. The CSC stands up well alongside other call centers within the utility industry. For
220 example:

- 221 • Abandonment rate. In 2005, the CSC's overall call abandonment rate was 3.22%.
222 This compares favorably with data from the Customer Contact Council ("CCC")
223 and Purdue University. The CCC reports an average rate of 6.58%, while Purdue
224 reports an average rate of 5.28% with an industry best of 3.21%.
- 225 • Average speed of answer." Purdue reports an average speed of answer of 35
226 seconds, with an industry best of 29 seconds. American Water's average speed of
227 answer in 2005 was 28 seconds.
- 228 • First call resolution. The CCC reports an average first-call resolution of 74.38%.
229 Purdue reports an average of 72.3% with an industry best of 81.3%. Of American
230 Water's customers who participated in the 2005 Service Quality Assessment, 74%
231 reported that their issues were resolved on the first call. Internal statistics are
232 higher still.

233 American Water continuously measures these and other indicators, striving for continued
234 improvement.

235 **Q29. Has the Company taken any action as a result of information gained from its**
236 **customer satisfaction, service quality and post-call surveys?**

237 A. Yes. The Company has taken feedback from the various customer feedback sources and
238 taken a number of actions including:

- 239 • Launched the new service quality survey to better define customers' expectations
240 and priorities, and ensure that American Water's subsidiaries, like IAWC, perform
241 to our customers' standards.
- 242 • Added more than 100 new Customer Service Representatives to serve American
243 Water customers.
- 244 • Improved the customer call quality monitoring and coaching process to focus
245 more on the quality of the customers' experiences.
- 246 • Provided new technology and support resources tools to customer service
247 representatives.

- 248 • Provided a dedicated team of Customer Service Representatives to support
249 IAWC's Chicago- area customers' unique needs.

250 **Q30. What was the purpose of adding more than 100 new customer service**
251 **representatives?**

252 A. While the survey results indicated improvement in the quality of the service provided by
253 the representatives, the additional CSRs improved the service level of the CSC, which is
254 the percentage of calls answered within 30 seconds, and reduced wait times for customers.

255 **Q31. Have any of the actions taken resulted in measurable improvement?**

256 A. Yes. The 2005 service quality survey revealed improvements across the board. CSRs'
257 performance improved by four percentage points and Field Service Representatives'
258 performance improved by 12 percentage points.

259 **IV. RESPONSE TO SPECIFIC CONCERNS OF JOINT WITNESESS SCOTT RUBIN**

260 **Q32. Does Mr. Rubin make any allegations about the practices of the CSC?**

261 A. Yes. He alleges that the CSC's system for maintaining complaint logs omits thousands of
262 complaints.

263 **Q33. Is this accurate?**

264 A. No. Mr. Rubin, as I describe below, confuses records of customer "inquiries," which
265 may not be complaints, with the complaint records required under Illinois regulations.

266 **Q34. Can you identify and explain the Illinois regulation that governs the Company**
267 **obligation on keeping and maintaining complaint logs?**

268 A. 83 Illinois Admin. Code Section 600.170 requires water utilities to maintain records of
269 complaints. Section 600.170 defines complaint as a "substantial objection made to a
270 utility by a customer as to its charges, facilities, or service, the disposal of which
271 complaint requires investigation or analysis."

272 **Q35. Can you identify and explain the Company current practice for keeping and**
273 **maintaining such complaint records?**

274 A. Consistent with 83 Ill. Admin. Code 600.170(a), IAWC maintains two types of complaint
275 records. The first type includes records of customer complaints that cannot be resolved
276 by a customer service representative, and are referred to the Account Resolution Team
277 ("ART"), which follows up to resolve the issue. The second type includes records for
278 complaints that went directly to a manager or executive within Illinois American Water
279 and not to the CSC. A specialized Executive Resolution Team ("ERT") is responsible for
280 the follow-up and resolution of these complaints.

281 IAWC also maintains records of informal complaints made to the Commission,
282 although these complaints were not "made to a utility" as required by 83 Ill. Admin. Code
283 600.170(a). Such records are maintained separately by IAWC and not by the CSC.
284 However, American Water is working to develop a database that will include records of
285 informal complaints to the Commission so that such records can be accessed along with
286 complaint information maintained by the CSC.

287 **Q36. Is it true, according to Mr. Rubin on pg. 10, ln 240-41, that the Company likely has**
288 **omitted thousands of "complaints", including most of those from Homer Glen, that**
289 **it has received?**

290 A. No. IAWC, through the CSC, maintains records of all complaints as required by Section
291 600.170. However, not every customer inquiry to the CSC is a complaint. Mr. Rubin
292 may have erroneously concluded that the CSC should have been maintaining a record of
293 each inquiry or contact as a complaint record.

294 In fact, Illinois American has likely overstated the number of complaints based on
295 the fact that we record, track and have considered all issues transferred to ART as
296 responsive to inquiries regarding complaints, while not all of those issues might be
297 considered "substantial". For example, if a customer called to question their meter
298 reading and a service order is issued to re-read the meter, that is included in the complaint
299 records, regardless of the outcome.

300 **V. RESPONSE TO SPECIFIC CONCERNS OF HOMER GLEN WITNESSES**

301 **Q37. The Homer Glen witnesses make various allegations regarding poor customer
302 service from the CSC. Are their concerns justified?**

303 A. No. The CSC makes every effort to ensure that its representatives respond to customer
304 inquiries in a courteous and efficient manner. To the extent there are problems, CSC
305 supervisors act to address them quickly. That said, there was a period in 2005 when CSC
306 service declined due to high call volumes. The problems at that time have since been
307 addressed.

308 **Q38. On p. 13, lines 290-293 of Ms. Niemiec's testimony, she states that the Village
309 received complaints concerning attempts to harass and intimidate customers. How
310 do you respond?**

311 A. Customer service personnel do not conduct IAWC business by intentionally harassing or
312 intimidating customers. IAWC has a responsibility to collect amounts due for water
313 service provided. To this end, the Company, working with the CSC, attempts to contact
314 past due customers prior to disconnecting service in an effort to avoid the inconvenience
315 of service interruption and avoid fees associated with reconnection. Interactions
316 regarding the collection of unpaid amounts can be sensitive and uncomfortable for some
317 customers. Outbound calls are only made to customers when their account is past due.

318 These calls are made in accordance with Fair Debt Collection Practices Act ("FDCPA")
319 rules and regulations governing attempts to reach the customer. Any customer
320 interactions that are less than satisfactory and brought to a supervisor's attention are
321 reviewed. When necessary, such instances are reviewed with the individual agents
322 responsible in light of the Company's guidelines, and the individual is coached for
323 improvement.

324 **Q39. In general, do you think there is merit to any allegations that call center employees**
325 **attempt to harass and intimidate customers?**

326 A. No. I do not believe there is merit to the allegation that CSC employees attempt to harass
327 and intimidate customers.

328 **Q40. On p. 13, lines 301-304 of Ms. Niemiec's testimony, she does refer to one incident of**
329 **harassment as described in Paragraph 42 of Homer Glen's Complaint. Was that**
330 **case related to the call center?**

331 A. No. I have reviewed the contacts for the account referenced and found numerous entries
332 pertaining to meter change out, estimates, inquiries on rates and collection of past due
333 amounts. In my opinion, the entries documenting alleged harassment were related to an
334 interaction the customer had with a field service employee and not the CSC. Ms.
335 Niemiec's testimony is addressed further in Mr. Ruckman's testimony (IAWC Ex. 1.0).

336 **Q41. Ms. Niemiec's testimony also asserts that IAWC has admitted to problems at its call**
337 **center. What is your response?**

338 A. During the summer of 2005, the CSC was challenged by a high volume of customer calls
339 that, in some cases, caused our customer service metrics to decline below our traditional
340 standards. Since that time, the Centers have launched new efforts to:

- 341 • Expand and enhance our customer satisfaction surveys
- 342 • Redefine our quality metrics to better match our customers' expectations
- 343 • Increase staff, improve customer service tools, and enhance quality coaching to
- 344 improve our customers' experience – on the phone and in the field.

345 CSC staff recognized that summer of 2005 high call volumes was leading to
346 disappointing performance at the Centers. Customers spent too much time on hold, the
347 transition to a new interactive voice response system was difficult, and CSRs needed
348 better tools to help resolve customers' issues. Working in partnership with the states they
349 serve, the CSC staff identified the underlying issues and moved forward with new
350 programs that are already improving measured customer satisfaction levels. Between
351 August and November 2005, more than 100 new customer service representatives
352 completed the company's five-week training program and joined the American Water
353 Customer Service team.

354 **Q42. Homer Glen Witness Finnegan (p. 2) states that she contacted the call center to ask**
355 **how the supply charge was calculated and was told that they did not know. What is**
356 **your response?**

357 A. IAWC's Chicago Metro District has a number of complexities related to its tariff and the
358 unique circumstances surrounding the replacement of odometer-style meters. The 2005
359 summer drought, higher costs for Lake Water and the higher volume of calls at the CSC
360 generated a significant number of customer complaints in the Chicago area – particularly
361 in Homer Glen – that focused on these unusual circumstances. In response to the issues
362 in this area, IAWC established a Chicago-area "specialty desk" at the CSC. Beginning
363 June 4, 2006 calls coming from the Chicago area have been routed to specially trained
364 Customer Service Representatives. These representatives have received additional in-

365 depth training about Chicago systems, processes and billing, and are available to Chicago
366 Metro customers 24/7.

367 **Q43. Homer Glen Witness Ms. Litoborski reports several instances where the call center**
368 **had no record of her previous telephone calls to IAWC and instances where she had**
369 **difficulty locating someone to respond to her concerns. Did you investigate her**
370 **concerns?**

371 A. Yes. I have reviewed the records pertaining to Ms. Litoborski's account and noted a
372 numerous contacts recorded regarding meter change out, billing and collections.
373 Therefore, I believe CSC records support the conclusion that there were records of her
374 previous calls. As stated above, CSC staff would make every effort to be of assistance to
375 Ms. Litoborski when she called. The account records indicate that on May 24, 2006 Ms.
376 Litoborski's met with Tammy MacLaughlin, Billing Manager at a town hall meeting.
377 Company records indicate that Ms. MacLaughlin reviewed her information and
378 discovered that the errors were caused by the fact that two meters had been stamped by
379 the meter manufacturer with the same number which caused the billing errors. Company
380 records indicate that on June 7 she called Ms. Litoborski to explain how her account had
381 been corrected. Records indicate that the customer appeared satisfied with the action and
382 that issues with her account have been resolved.

383 I also noted that Ms. Litoborski also received a call from customer service
384 employee Karen Roney who apologized for all of the issues Ms. Litoborski experienced
385 in getting this unusual problem resolved.

386 **Q44. Ms. Litoborski also testified that she gave her cell phone number to a customer**
387 **service representative so a supervisor could return her call and then received two**

388 **calls from the IAWC collections department on her cell phone. What is your**
389 **response?**

390 A. Customer service associates are trained to verify customer telephone numbers and update
391 the customer information system accordingly each time a customer calls in to the CSC.
392 Telephone numbers on the account are also used for outbound calls made to notify
393 customers of past due accounts and how they can avoid shut off and related reconnection
394 fees. Therefore, it is possible that Ms. Litoborski's cell phone was used as a point of
395 contact.

396 **Q45. Please summarize your conclusions with regard to customer service issues in this**
397 **proceeding.**

398 A. American Water values customer satisfaction and has high rates of customer satisfaction
399 and service quality as measured by feedback from customers at both strategic and tactical
400 levels. Customer feedback is used to develop programs and individuals within the
401 organization. These actions have resulted in higher levels of satisfaction over time.
402 American Water also records, tracks and measures complaints received from customers.
403 Individual customer complaints made to the CSC are handled by ART effectively and
404 promptly, usually without need for escalation. Customer complaints that are escalated to
405 the executive level are also resolved and responded to promptly by ERT. Lessons
406 learned from complaints are shared with the responsible individuals and with
407 management in an effort to continuously improve.

408 **Q46. Does this conclude your testimony?**

409 A. Yes.