

March 27, 2013

Electronic Consumer Confidence Report (eCCR)

Best Practices GUIDE



PROVIDED BY  American Water Works Association

This best practices document was created with the assistance of a steering committee that included participants from both CWS's and State primacy agencies. It is meant to be a useful guide, however, it does not replace any guidance or regulation issued by EPA or the states. It is the responsibility of CWS's to communicate with primacy agencies regarding electronic delivery plans and other actions necessary to comply with the CCR Rule.

Background

In 2011, President Barack Obama issued Executive Review Order 13563, which asked Federal agencies to re-examine major legislation and look for ways to reduce their burden, streamline language or processes, enhance efficiencies, or when needed, expand for better clarity and inclusion. In response, the Environmental Protection Agency (EPA) conducted a retrospective review of the Consumer Confidence Report (CCR) Rule to look for opportunities to improve the effectiveness of communicating drinking water information to the public, while lowering the burden to Community Water Systems (CWS). During the process, stakeholders noted the increase in the number and type of communication tools available since the Rule first went into effect in 1998, and recommended that EPA take advantage of these new forms of communication. To that end, EPA has issued a new interpretation of the existing CCR Rule to allow electronic delivery of CCRs, so long as the delivery meets the regulatory requirement to “mail or otherwise directly deliver” the CCR to all bill paying customers.

It is of utmost importance that CWS's understand the meaning and the limitations of EPA's new interpretation of the CCR Rule. As a service to members, AWWA provides this best practices document to serve that very purpose, to clearly delineate for water systems, what can and cannot be done to satisfy the requirement. In addition, this document will also showcase best practices of comprehensive CCR delivery options for all audiences, as well as best practices for marketing the new delivery options.



CCR Delivery Methods

In order to meet the direct delivery requirements of the CCR Rule, the report must be provided directly to each bill paying customer. A complete list of CCR direct delivery methods for bill paying customers can be found in Table 1. The best approach for reaching all customers is one that incorporates a combination of strategies, to meet the needs of all customers.



Three elements must be met in order to satisfy direct delivery requirements:

1. The delivery is direct to the customer, meaning, if a URL is provided on the bill that is mailed to the customer, then the URL must point directly to the CCR.
2. If a customer is unable to receive the CCR electronically, for any reason, the CCR is provided by alternative means, such as a paper copy.
3. When a CWS provides notification of the electronic CCR availability, the notification must display the message and URL prominently and clearly. Examples are provided in the section titled Delivery Methods.



Electronic delivery methods that do not meet the requirement of direct delivery are:

1. URLs that do not take the customer directly to the report, but rather to a website that requires further search or navigation to access the CCR and all the associated required information.
2. Use of any social media tools such as Facebook and Twitter. Even though a direct link to the report could be distributed through these means, social media outlets do not satisfy the requirement for direct delivery because they are membership-based tools which likely do not include all customers. These tools can be used to supplement other efforts, and can help fulfill the good faith effort requirement to reach non-bill-paying consumers. They cannot be used to meet the direct delivery requirement.
3. Use of automated phone calls, such as an emergency telephone notification system. Even though a CWS may be able to reach many customers through this method, they will not be able to deliver the entire contents of the report over the phone.



Table 1. CCR Delivery Methods for Bill-Paying Customers

CCR DELIVERY METHOD	METHOD DESCRIPTION
 <p>Mail-paper copy</p>	<p>CWS mails a paper copy of the CCR to each bill-paying customer.</p>
 <p>Mail – notification that CCR is available</p>	<p>CWS mails to each bill-paying customer a notification that the CCR is available on a website via a direct URL where it can be viewed. The mail method for the notification may be, but is not limited to, a water bill insert, statement on the water bill, a postcard, or a community newsletter.</p>
 <p>Email – direct URL to CCR, as an attachment or as embedded image.¹</p>	<ul style="list-style-type: none"> • CWS emails to each bill-paying customer a notification that the CCR is available and provides a direct URL to the CCR. • CWS emails the CCR as an electronic file email attachment • CWS emails the CCR text and tables inserted into the body of an email (<i>not as an attachment.</i>)
 <p>Additional electronic delivery that meets “otherwise directly deliver” requirement.²</p>	<p>CWS delivers CCR through a method that “otherwise directly delivers” to each bill-paying customer and in coordination with the primacy agency.</p>

¹ This method may only be used for customers when a CWS has a valid email address to deliver the CCR electronically.

² This category is intended to encompass methods or technologies not included above. CWS's and primacy agencies considering new methods or technologies should consult with the EPA to ensure it meets the intent of “otherwise directly deliver.”



Important Considerations for Electronic Delivery

Every CWS knows their customers well and knows the best way to reach them. Most will take a CCR delivery approach that uses a combination of delivery methods to meet the needs of all its customers. Due to the efficiency and cost savings associated with electronic delivery, it is anticipated that most CWS's will want to use this option for as many customers as they can. As a CWS is evaluating whether and how to make electronic delivery one of those methods, there are several important considerations to keep in mind.

Most of the following ideas are not required by the CCR rule, and this list is not exhaustive, though these ideas will help maximize efficiencies in production and distribution of the CCR. For a list of required items, see page 3, the EPA memo, and any primacy agency guidance.

The Rules Have Not Changed

Electronic delivery of the CCR does not change **WHAT** must be done or **WHEN**, it only affects **HOW** delivery can be accomplished. For example, the relationship between Tier 3 Public Notifications and the CCR has not changed. CCRs must still be delivered by July 1, though it's a good idea to verify with your primacy agency whether any new interim deadlines are required for electronic delivery.

Anticipate the Unexpected

- If the CWS sends the CCR via email, it should prepare for receiving a bounce back message that the email failed to reach the recipient. The CWS should have a means to track and correct the email and to have an alternative means for delivering the CCR to these customers. CWSs can also consider tracking "hits" on their website pages to identify when and how many consumers access the report.
- A CWS with an email database for its customers will need to review their databases regularly to ensure its information is up-to-date. Customers should be able to easily update its email address in the CWS records should it change.





Meet the Needs of All Customers

- If electronic delivery is chosen for electronic bill-paying customers, an alternative means for reaching paper bill customers will also be needed.
- If a CWS is aware of customers who cannot receive a CCR electronically, it should provide the CCR through another means, such as a paper copy.
- A CWS that decides to mail or email a direct notification with a URL must also provide the customer a method to obtain a paper CCR (such as the utility's phone number). Conversely, a utility could continue to mail the paper CCRs by default and offer customers the ability to opt-in for electronic delivery.
- The CWS's should make sure the type size used for the direct URL is as large as other body text and that the URL is easy to type and short, to assure that customers will see the notification and make it easy for them to access the report. If a short URL cannot be achieved, a URL shortening service can be used to create a short and easy URL that points directly to the electronic CCR.
- CWS's should honor the CCR delivery preferences of their customers.
- Requests for paper copies of the CCR must be honored initially and on a recurring basis if a customer requests a paper copy by mail each year.



Alert for E-Bill or Automatic Bill Payers

Studies have shown that customers may ignore statements on their bill when they receive only electronic statements and their payments are automated. Therefore, it likely will not fulfill the direct delivery requirement to place a URL on electronic bill. A dedicated email or paper notification can be sent to these customers to fulfill the direct delivery requirement and assure they are all aware of the CCR. Check with your state primacy for direction on this.

Seize All Opportunities to Share the News

- The CWS can maximize the opportunity to alert customers to the electronic CCR by publishing the URL on everything it mails to the customer, whether a bill, a bill insert, etc., and by featuring this information on its website and in other customer outreach materials.
- The CWS should use the opportunity to also talk about the value and importance of the CCR to encourage readership. Because an electronic CCR does not require printing or postage costs, more information can be included in addition to the required elements, information could be updated more frequently, and the utility could link to other relevant features from the CCR.

To help a CWS evaluate which combination of delivery methods is best for its customers, Tables 2 and 3 illustrate the advantages and limitations of each delivery method.



Table 2. Advantages of CCR Delivery Methods

CCR DELIVERY METHODS					
ADVANTAGES*	Mail— Paper Copy	Mail—Notification that CCR is avail- able via direct URL	Email—direct URL to CCR	Email—CCR sent as an attachment	Email— CCR sent as an embedded image
Customers may have access to more information beyond what is required in the CCR because they are already on the Internet.		■	■		
CWS does not have to invest in new software, additional staff training or other new logistical needs for delivery.	■				
CWS has potential printing and mailing cost savings.		■	■	■	■
CWS with e-billing systems can use existing database and other resources.			■	■	■
Customer can view or receive CCR with limited or no Internet access.	■				
Customer expects the CCR to be delivered by this method based on CCR delivery history.	■				
Customer does not have to share a personal email account.	■	■			
CCR is directly available and customer does not have to take a second step to view (e.g., go to website or click link.)	■				■
Method consumes less of limited natural resources, including paper for production.		■	■	■	■
CWS may be able to use the same method to reach bill-paying and non-bill-paying customers.	■	■	■	■	■
Method assured to reach customer because it uses a reliable postal address.	■	■			
Use of e-bill customer email addresses to deliver CCR (reduction of inaccurate emails).			■	■	■

* Advantages are not in any ranked order.

Table 3. Limitations of CCR Delivery Methods

CCR DELIVERY METHODS					
LIMITATIONS*	Mail— Paper Copy	Mail—Notification that CCR is avail- able via direct URL	Email—direct URL to CCR	Email—CCR sent as an attachment	Email— CCR sent as an embedded image
CWS must dedicate staff to manage more than one delivery method, including collecting and updating email addresses.			■	■	■
CWS may have to invest in new software and train staff.		■	■	■	■
CWS incurs printing and mailing costs.	■	■			
CWS needs Internet access and adequate bandwidth to distribute large numbers of emails at once.			■	■	■
Customer may not receive CCR by email due to lack of software compatibility, spam filtering, firewalls or file size limitations.			■	■	■
Customer may be reluctant to download an attachment or click/visit a URL to an unfamiliar website.		■	■	■	
Customer may be reluctant to open email from an unfamiliar email address.			■	■	■
Customer may be reluctant to share personal email address.			■	■	■
Responsibility of customer to take the next step to view the CCR (e.g., access website, click URL or download attachment.)		■	■	■	
Customer needs Internet access to view or receive CCR.		■	■	■	■
Method consumes natural resources, including paper for production.	■	■			
Method uses email addresses, which are less reliable than postal addresses (unless part of e-billing system.)			■	■	■

* Limitations are not in any ranked order.

Don't stop the presses!

No single delivery method will work for all customers. A paper CCR may still be required in order to fulfill the requirements of "good faith efforts," and it must be available for those who prefer it. Depending on the approach used and the number of paper copies requested, fewer copies would need to be pre-printed, or possibly could be printed and mailed on demand when requested by the customer.

Electronic Delivery Options

Option 1. Electronic delivery with customer option for paper

Many water utilities are likely to gravitate towards this approach for CCR delivery. In most cases, it's faster, more economical and more efficient. The different methods for achieving electronic delivery are laid out in *Table 1* (page 4), and some examples of effective electronic delivery are offered in the section titled Electronic Delivery Samples (pages 18-20).

Paper copies will still need to be available as some customers will opt out of electronic delivery. Especially in early years, utilities may have a difficult time determining how many copies to print in advance and whether it would be possible to print copies quickly enough to be printed only "on demand" when customers request them.

That said, electronic delivery can facilitate faster delivery of the report and potentially attract more attention to and interest in the document. It also presents an opportunity to include additional information, provide interactive features (in addition to the required elements that must be present on the direct URL), update information more frequently, and otherwise communicate information more effectively to customers.





Option 2. Paper CCR with customer option for electronic delivery

Through this approach, a CWS would send the paper CCR to customers as it customarily has. However, in advance of this mailing and/or with each yearly mailing, they would let customers know they can opt in to receive it electronically instead. Samples of ways to accomplish this notification are included in the section titled Marketing and Outreach of Delivery Methods (page 14). Customers who did not identify a preference for delivery would default to a paper CCR delivery.

This approach provides a gradual transition to electronic delivery over time as more customers become comfortable with electronic delivery methods. On the downside for a CWS, this approach may require more resources and logistical oversight to track customer delivery preferences.



Considerations For All Delivery Options

The Good Faith Effort

The electronic CCR memo from EPA applies to the direct delivery requirement for all bill paying customers. The good faith effort is the other primary component of CCR outreach, and is intended for consumers who are served by a CWS but do not receive a bill. They may be apartment renters, members of retirement communities, or employees in office buildings. Under the CCR Rule, a CWS must make a good faith effort to reach these consumers through one or more of a variety of means. These efforts vary by state and utility, with some examples being bulk mailing of paper CCRs to a multi-unit address, Internet posting, advertisements in the local newspaper, and availability in public libraries or other municipal buildings. A CWS should endeavor to reach these communities and should seek to expand its CCR outreach. Electronic delivery of the CCR does not directly change any of these methods, although it is possible that primacy agencies and utilities may wish to adjust methods they use to assure these populations are being reached.



Multilingual Audiences

None of this interpretation of the Rule changes the requirement to provide CCRs or notifications in additional languages, if the customer base of the CWS warrants it or the primacy agency requires it. The CWS should ensure that any communications it provides about changes to delivery methods are translated in the same manner as the actual document. A CWS may want to research further, the preference and prevalence of electronic communications among their non-English-speaking audiences to anticipate and provide delivery methods based on the identified preferences.

Small Systems Waiver

The regulations regarding small system waivers have not changed, however, some small systems may want to explore e-delivery of the CCR with their primacy agency, as this option will improve and enhance the system's ability to ensure the customers are receiving the document, and may save costs for a smaller system (who may be currently paying to have it placed in a newspaper).

Delivery Certification

Within three months of CCR delivery, each CWS must certify to its primacy agency that delivery occurred, how it occurred and that the information contained in the CCR was correct and consistent with the compliance monitoring data submitted. The method of delivery certification may vary from state to state. A CWS should check with their primacy agency to understand whether there are any new requirements for delivery certification if they choose to do electronic delivery. Many primacy agencies will want to see examples of how electronic delivery was made and they will want to see a sample of the electronic version and paper copy. Some primacy agencies may move towards the certification being delivered in an electronic manner as well.



Social Media

Social Media is not a method for direct delivery, though it can be helpful as a way to get the word out about the new delivery method, if the CWS already has a robust social media program in place.



Marketing and Outreach of New Delivery Method

Before a CWS makes a change to the CCR delivery method, they should inform their customers of their plan to do so. An appropriate and effective message is one that (1) lets customers know the change is coming and when, (2) explains what the change is, and (3) provides instructions, if applicable, for the customer. This change to the CCR delivery method is a fantastic opportunity for all CWS's to raise awareness of the CCR, the important information it contains, and, to help them build understanding and value for the service of potable water delivery.

The change in CCR delivery method is a great opportunity to promote the CCR in existing communications to customers, such as bills, bill inserts, and websites. In addition, CWS's should notify their customers about the change in a separate, dedicated message. There are many ways this can be accomplished. Here are a few ways to do it and some considerations for each.



Email

If the CWS has email addresses for their customers, this message can be sent as an email. If this is the method selected, careful attention should be paid to the subject line content which will have significant influence over whether the email is read. A CWS might want to consider using the read receipt feature if their email service provides it, so they can track the number of emails read. This email can also serve as an effective means for testing the actual delivery of the CCR via email, because it will provide a good indication of bounce backs, or bad email addresses, which can be fixed before the actual CCR is sent.

Regular Mail

A CWS without email addresses or only a portion of email addresses, will want to consider sending a notice to each customer by regular mail. This can be an actual letter, a flier or a simple postcard. CWS's may consider inserting a return reply note that is pre-addressed back to the CWS with postage paid, to indicate a customer's preference for CCR delivery. Customers could check a box to indicate their desire to have it emailed, with a place to put their email address, or to have it mailed to them. This is also a great opportunity for a CWS to collect email addresses if the utility is interested in moving towards email communications or e-billing.

Traditional Media

The new delivery method is a newsworthy item and could be sent to the local media in the form of a press release. The only issue with this option is, if the media outlet also reaches customers of another CWS, it can cause confusion. A CWS that shares a designated media market with another CWS could collaborate with neighboring CWS's on the press release, or pitch, to minimize confusion and improve their chances of placing the news. A well-planned pitch could result in a feature story about the value of water and the importance of the CCR.

Advertising

It is also an option to run a paid advertisement in the publication or radio station that serves your customers. The same issues apply here as described in using traditional media, so you'll want to carefully construct your message to avoid confusion with another CWS, or better yet, try to collaborate to save on the cost.

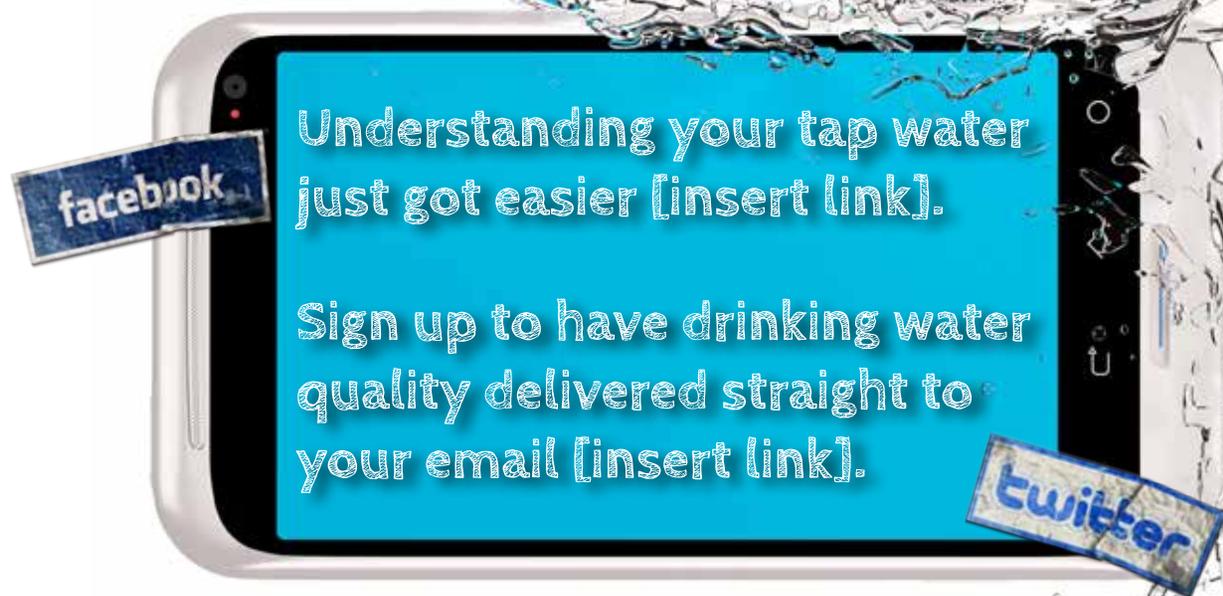


Social Media

If a CWS already has a robust and effective social media program, this news can be a great addition to the social content strategy.

Use of social media does not qualify as a direct delivery mechanism, however it makes a great tool for alerting customers to the change in delivery method. Since you won't be able to explain it all on a Tweet or a Facebook post, a CWS may want to consider creating a web page or blog post about it, then use Twitter or Facebook to promote a link to the info. Possible Tweets or Facebook posts to alert customers to the change are shown below:

Also consider Pinterest, the third largest and fastest growing social media platform. It's not just for remodeling kitchens and sewing pillows. Some companies are effectively using Pinterest to showcase information that's more easily captured with graphics and illustrations. YouTube and Vine both pose opportunities to get the news across creatively through video. These products and platforms are examples only, AWWA does not endorse or approve any specific products or services.





Other Outreach Opportunities

One of the most effective ways to reach community members is through the small, hyper-local community newsletters or newspapers that serve discrete communities. Sometimes these are provided by neighborhood associations or homeowner's associations. They can be online only, printed only or both. It's worthwhile to find out whether any of the many communities and neighborhoods within your service area have such a publication, find out its frequency and details of inserting information or advertising. These entities also tend to have their own social network sites on Facebook and Twitter, so make sure they are also in your social network and can easily share the information. These publications may pose another opportunity for a CWS to collect customer email addresses.



Delivery Samples

Sample 1 CCR Sent as Direct Link on Utility Bill

Anytown Water
8888 Electric Avenue
Anytown, USA

Account Number: 00000-258-6666
Service Address: 123 Main St.

Quarterly Bill: 00000-258-6666

Amount Due	\$63.53
Amount Due if Received After 07/14/12	\$66.10
Amount Enclosed	\$

Bill Date: 06/15/12
Payment Due Date: 07/14/12

John Doe
123 Main St
Anytown, USA

Anytown Water
8888 Electric Avenue
Anytown, USA

Please check the box if you would prefer a paper copy of your annual water quality report delivered to your home.
 Por favor, haga una marca en el encasillado si prefiere recibir a través del correo una copia de su más reciente reporte de calidad de agua.

QUARTERLY BILL

John Doe
03/17/12 - 06/11/12 - 06/15/12

SERVICE ADDRESS: 123 Main St.
SERVICE TYPE: TOWNHOUSE

Account Number	Water Meter	Water Usage	Water Charge	Water Usage Charge
00000-258-6666				

METER READINGS	Water Meter	Water Usage	Water Charge	Water Usage Charge
WATER	341	349	8.35	17.28
SEWER (BASED ON ACTUAL WATER CONSUMPTION)			5.50	62.40

CHARGES (SEE REVERSE FOR DESCRIPTIONS)

Item	Amount
WATER RATES - ESTABLISHED BY ANYTOWN WATER	
SERVICE CHARGE	8.35
WATER USAGE CHARGE 8 X 2.15	17.28
SUBTOTAL ANYTOWN WATER	\$25.63
SEWER RATES - ESTABLISHED BY HEALTHY COUNTY GOVERNMENT	
SEWER BASE CHARGE	5.50
SEWER USAGE CHARGE 8 X 6.50	62.40
SUBTOTAL HEALTHY COUNTY	\$67.90
TOTAL AMOUNT DUE	\$93.53

Annual Water Quality Report
In 2011, Anytown Water detected 53 contaminants in the drinking water and 5 of them were above the EPA accepted level for drinking water. Please go to www.anytownwater.org/2011waterreport.pdf to view your 2011 annual water quality report and learn more about your drinking water.

During the year 2011 the company of water Anytown detected 53 contaminants regulated in the drinking water. Five of the contaminants detected in the water are above the EPA accepted level for drinking water. Please go to www.anytownwater.org/2011waterreport.pdf to view your 2011 annual water quality report and learn more about your drinking water.

The Anytown Water annual water quality report is available on-line at www.anytownwater.org/2011waterreport.pdf for Anytown Water visiting the internet www.anytownwater.org/2011waterreport.pdf

Sample 2 CCR Directly Linked in Body of Email

IMPORTANT MESSAGE: Your Anytown Water 2011 Water Quality Report is Now Available!

Dear Mr. ABC,

Your 2011 annual water quality report is now available!

In 2011, Anytown Water detected 65 contaminants in the drinking water. However, these contaminants were at allowable levels and no health based violations were reported. Please go to www.anytownwater.org/2011waterreport.pdf to view your 2011 annual water quality report and learn more about your drinking water. This report contains important information about the source and quality of your drinking water. For a translation of the water quality report or to speak with someone about the report please call (555) 555-5555. If you would like a paper copy of the 2011 Annual Water Quality Report mailed to your home, please call (555) 555-5555.

For more information about how Anytown Water maintains the safety of your drinking water and to view previous year's reports go to www.anytownwater.org

Anytown Water Department

Spanish Translation:

Estimado Sr./Sra. ABC,

Su más reciente reporte anual de calidad de agua potable ya se encuentra disponible!

Durante el año 2011 la compañía de agua Anytown detectó 65 contaminantes regulados en el agua potable. Los contaminantes detectados están dentro de los niveles permitidos por la EPA y por lo tanto no se reportó ninguna violación a los estándares de salud pública.

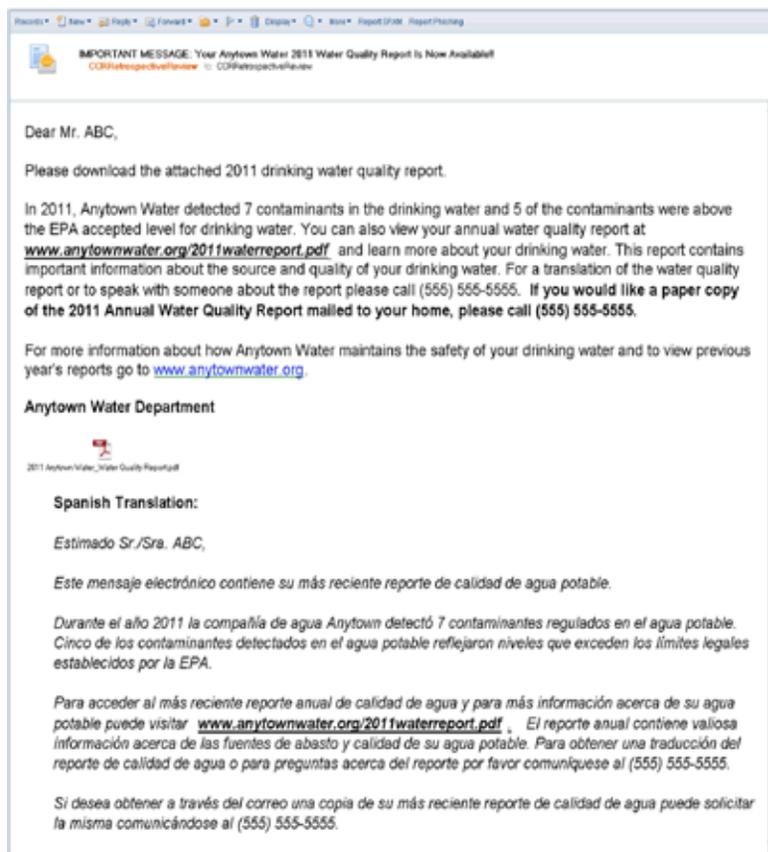
Para acceder al más reciente reporte anual de calidad de agua y para más información acerca de su agua potable puede visitar www.anytownwater.org/2011waterreport.pdf. El reporte anual contiene valiosa información acerca de las fuentes de abasto y calidad de su agua potable. Para obtener una traducción del reporte de calidad de agua o para preguntas acerca del reporte por favor comuníquese al (555) 555-5555.

Si desea obtener a través del correo una copia de su más reciente reporte de calidad de agua puede solicitar la misma comunicándose al (555) 555-5555.

USEPA, 2013a

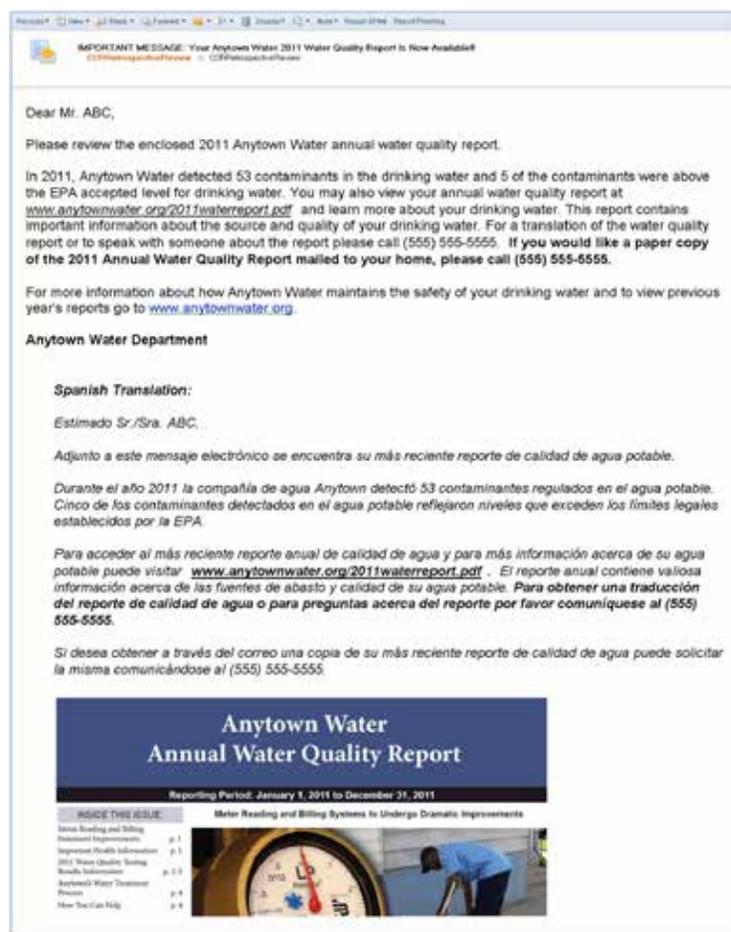
Delivery Samples

Sample 3 CCR Sent as Attachment to Email.



USEPA, 2013a

Sample 4 CCR Sent Embedded in Email.

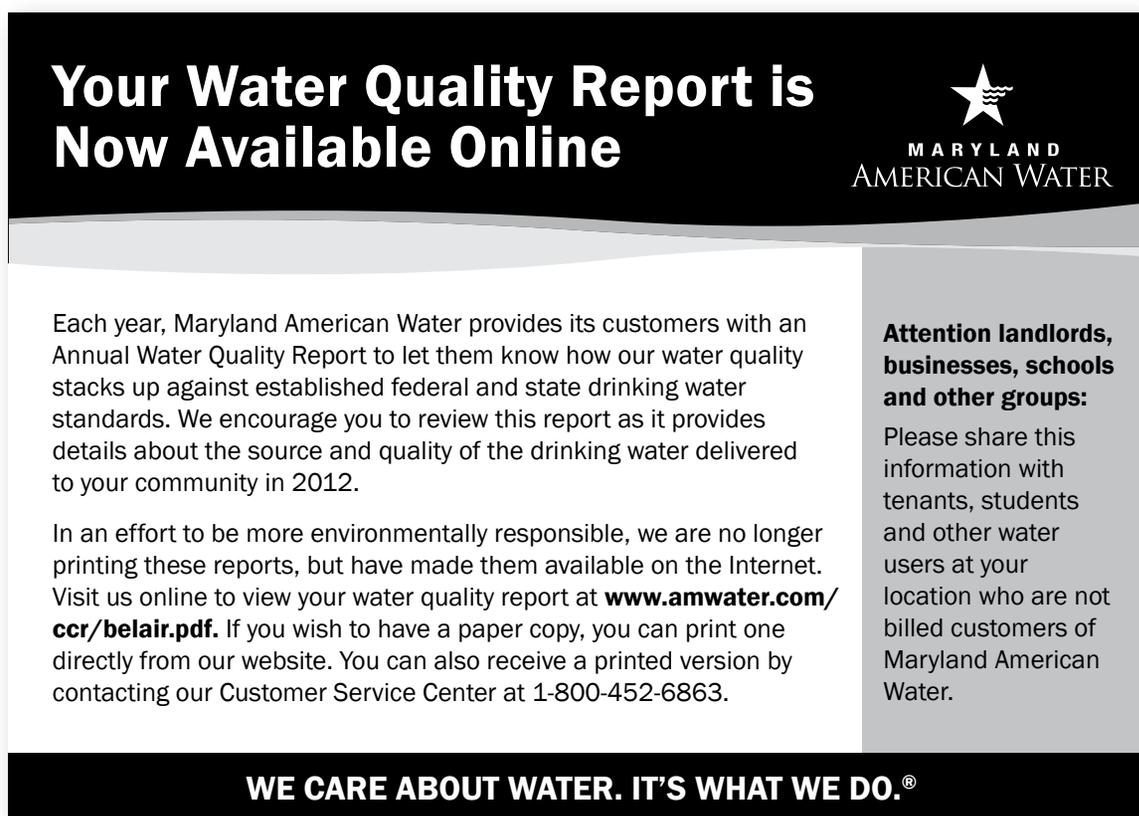


USEPA, 2013a



Delivery Samples

Sample 5 CCR Sent as Direct Link in Postcard



The postcard features a black header with white text and a logo. The main body is white with black text, and the bottom is a black bar with white text. The logo is a white star with wavy lines below it, set against a black background.

Your Water Quality Report is Now Available Online

MARYLAND AMERICAN WATER

Each year, Maryland American Water provides its customers with an Annual Water Quality Report to let them know how our water quality stacks up against established federal and state drinking water standards. We encourage you to review this report as it provides details about the source and quality of the drinking water delivered to your community in 2012.

In an effort to be more environmentally responsible, we are no longer printing these reports, but have made them available on the Internet. Visit us online to view your water quality report at www.amwater.com/ccr/belair.pdf. If you wish to have a paper copy, you can print one directly from our website. You can also receive a printed version by contacting our Customer Service Center at 1-800-452-6863.

Attention landlords, businesses, schools and other groups:

Please share this information with tenants, students and other water users at your location who are not billed customers of Maryland American Water.

WE CARE ABOUT WATER. IT'S WHAT WE DO.®

Courtesy of American Water





Electronic Consumer Confidence Report (eCCR) FAQ

Q: How do I know which electronic delivery method is best to use?

A: Each utility is likely to be different, there is no “one size fits all” solution. First, electronic delivery methods will have to meet the requirements laid out by EPA and any additional guidance or regulation by the appropriate primacy agency. Beyond that, utilities will have to analyze various factors to decide which method(s) to use. These include: whether the utility has or can obtain email addresses for most customers (and any other technological restrictions) if they choose email as their preferred distribution option, the costs of each option, the expected or known preferences of your consumers, and other factors. In all cases, utilities must have paper copies to provide customers that request them, either pre-printed or printable.



Q: Does the electronic CCR need to look exactly the same as the printed version?

A: No. Just like a paper CCR, the electronic CCR must contain all of the required information, but it does not need to be formatted in exactly the same way as the paper CCR. Having an electronic CCR opens up the possibility of having either additional information or other advanced features (such as interactive information). The CCR that the direct URL link goes to must contain all of the required information. Including additional information is not only possible, it is encouraged, where appropriate, as it may also be very helpful to customers.

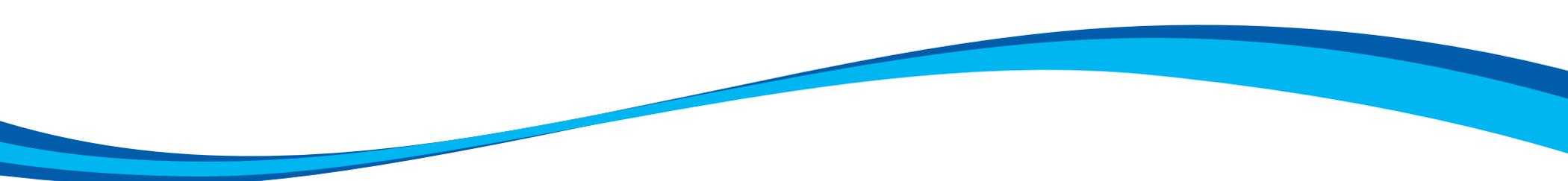
Q: I am a wholesaler, do I have to deliver CCRs electronically to customers of the utilities (consecutive systems) who purchase water from me?

A: The eCCR memo does not change any requirements about who is responsible for CCR delivery, only how the direct delivery requirement can be fulfilled. In this case, the consecutive system is responsible for delivering the CCR, the wholesaler should make sure that they provide any necessary information by April 1 to the consecutive system.

Q: I am responsible for several different systems. May I directly deliver just one notification of CCR availability to everyone across all the utilities?

A: Each customer must receive the CCR or notice of CCR availability specific to their utility. In order to qualify as “direct delivery,” the URL on the notification must go directly to the CCR for that customer’s utility. A link to a web site where the customer has to then click on or search for their particular community is not considered direct delivery. Check with your state primacy agency for additional clarification.



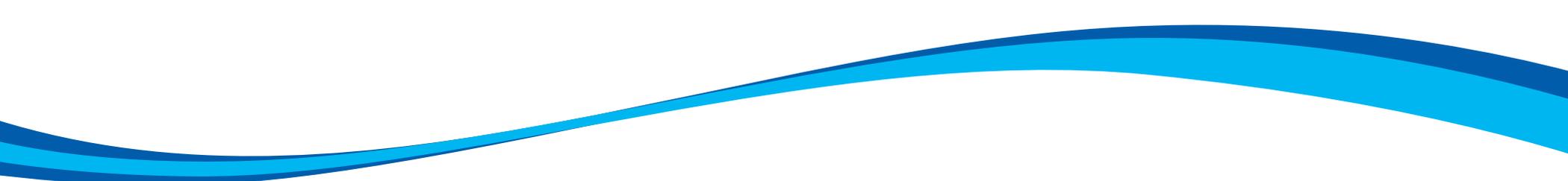


Q: What do I do if the email to one of my customers “bounces”?

A: An email bounce is similar to returned mail — if it comes back to you, the customer did not receive it. As a best practice, when email delivery is being used, it should be attempted far enough before the delivery deadline to identify any non-delivered emails and either correct the address and resend, or use another delivery method prior to the delivery deadline. In all instances, primacy agencies should be informed of plans to address bounced emails, as their requirements may involve specific procedures not covered here. There are several reasons why an email may bounce:

1. The email address is incorrect
 - If there is an obvious typo (such as omitting “.com” or “.net” at the end of an email address), it can be corrected and resent prior to the deadline. If it then goes through, the customer has received it. Otherwise, an alternative delivery method should be used (most likely paper).
 - If there is no obvious typo, the email address still may be incorrect because the customer may have closed the email account or the address may have been provided or transcribed incorrectly. If it can be updated by contacting the consumer, it can then be resent using the updated address (prior to the deadline). Otherwise, use another delivery method (most likely paper).
2. The address has blocked messages from your (sending) email address, or only accepts messages from certain sources. In this instance, the email may come back, and may or may not be distinguishable from an invalid email address. Attempt to update/correct the address through customer contact or use another delivery method (most likely paper).
3. The recipient’s email server may have incorrectly identified your sending email address as spam and blocked the message. This is possible if numerous emails from the same domain (the portion after the “@”) are returned, and may be difficult to correct. In this instance, that web service may have a contact number or address to report this type of error. For returned messages, use another delivery method (most likely paper).
4. The actual CCR attachment is too large for the recipient’s mailbox. This may happen if you include photos or graphics as part of your CCR design. Customers often have size limits on the attachments that they are able to receive. In this case, you will have to use another delivery method (most likely paper).





Q: Is it necessary to provide a separate eCCR for users on different internet platforms or with different operating systems?

A: In most cases, no. Web pages (HTML, XML, etc.) and the Portable Document Format (PDF) are both compatible across numerous operating systems and web browsers, and are also compatible with most smart phones. It is unlikely that cross-platform compatibility will be an issue in most circumstances, and the single direct URL will work for nearly all circumstances. If a customer is having difficulty accessing the electronic CCR and you cannot resolve it, offer to send them a paper copy.



AWWA is the authoritative resource for knowledge, information, and advocacy to improve the quality and supply of water in North America and beyond. AWWA is the largest organization of water professionals in the world. AWWA advances public health, safety and welfare by uniting the efforts of the full spectrum of the entire water community. Through our collective strength we become better stewards of water for the greatest good of people and the environment.

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References for Further Reading

EPA Memo

USEPA, 2013. Memorandum to USEPA Regions I-X, <http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/ccrdeliveryoptionsmemo.pdf> (accessed Feb. 20, 2013)

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USEPA, 2013b. Consumer Confidence Report (CCR) Rule Retrospective Review Summary. <http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/upload/epa816s12004.pdf> (accessed Feb. 20, 2013).

CCR Rule

USEPA, 1998a. Consumer Confidence Reports; Final Rule. Federal Register, 63:160:45512. <http://water.epa.gov/lawsregs/rulesregs/sdwa/ccr/index.cfm>

AWWA Electronic CCR Best Practices Guide

<http://www.awwa.org/eCCR/>



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eCCR BEST PRACTICES GUIDE

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