

ITEM NO. 1




PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: May 16, 2017

REGULAR  CONSENT  EFFECTIVE DATE \_\_\_\_\_ TBD \_\_\_\_\_

DATE: April 18, 2017

TO: Public Utility Commission

FROM: Stephen Hayes 

THROUGH: Jason Eisdorfer, Bryan Conway, and Bruce Hellebuyck   

SUBJECT: QWEST CORPORATION: Service Quality Performance Plan for Held Orders, Repair Clearing and Trouble Reports.

**STAFF RECOMMENDATION:**

Staff recommends that the Commission require Qwest Corporation dba Centurylink QC (Qwest) to submit a service quality performance plan to meet the Commission's minimum service quality standards for held orders for lack of facilities, repair clearing times and trouble reports within 45 days.

**DISCUSSION:**

Issue

Whether the Commission should require Qwest to submit a service quality performance plan to meet the Commission's minimum service quality standards.

Applicable Law

The Commission establishes minimum service quality standards to ensure safe and adequate services for all telecommunications carriers pursuant to Oregon Revised Statute (ORS) 759.450. Under Section (5) of this statute, the Commission is required to direct a telecommunications carrier, utility or competitive provider that is not meeting the minimum service quality standards to submit a plan for improving performance to meet the standards. The Commission is further required to review and approve or disapprove the plan.

Qwest is currently regulated under a Price Plan, which simplifies regulation, while maintaining the appropriate balance between regulation and competition. The Price Plan was approved by the Commission in Order No. 14-346 dated October 3, 2014 (Docket UM 1354). The Commission found that the current Price Plan "provides CenturyLink QC with pricing flexibility in more competitive markets, but installs price cap or customer notification protection for market segments with fewer options." One of the Price Plan's objectives is to "ensure that the quality of existing telecommunications services will stay at or above current levels."

Oregon Administrative Rule (OAR) 860-023-0055 provides the statutorily required retail service quality standards for large telecommunications utilities and also mirrors much of the relevant statute ORS 759.450. The relevant standards are:

1. **Provisioning and Held Orders for Lack of Facilities** per OAR 860-023-0055(4) (At least 90 percent of commitments for service must be met; Held orders for lack of facilities must not exceed the larger of two per wire center per month or five per 1,000 inward orders. Primary held orders for lack of facilities in excess of 30 days past the initial commitment date must not exceed 10 percent of total monthly held orders due to lack of facilities within the utility's Oregon service territory.
2. **Trouble Reports** per OAR 860-023-0055(5) Monthly trouble report rate may not exceed two or three per 100 working access lines per wire center more than three times during a sliding 12-month period, depending on number of access lines per wire center.
3. **Repair Clearing Time** per OAR 860-023-0055(6) 90 percent of all trouble reports within 48 hours of report for each repair center, with a weekend exception; use best efforts to complete out-of-service restorations for business customers; use best efforts to complete out-of-service restorations for residential customers who either have a medical necessity or no access to an alternative means of voice or E-911 communications.

The remaining service quality standards address: Provisioning, Blocked Calls, Access to Representatives, Interruption of Service Notification, Customer Access Line Testing, Customer Access Lines and Wire Center Switching Equipment, Special Service Access Lines, and Large Telecommunications Utility Interconnectivity.

## Analysis

### *Background*

There has only been one previous service quality performance plan required by the Commission under 759.450(5). The Commission found at its June 19, 2001 public meeting that a telecommunications utility (Qwest) was required to file a plan to improve its business office access performance. This resulted in the Commission adopting an MOU between Staff and Qwest on July 24, 2001, and approval of Qwest's Performance Plan.<sup>1</sup>

In addition to submitting monthly reports, Staff routinely works to support improvement in service quality. For example, Staff works to promote service quality improvement by conducting onsite visits of central offices and outside plant facilities and conducting field reviews of complaints indicative of reliability problems. Further, Staff shares information collected from Consumer Services and from field observations with Company officials. Staff processes monthly service quality information provided by companies as required by OAR 860-0023-0055 up to 45 days after the month end and posts selected information on the Commission website.<sup>2</sup>

In some cases, Staff has also worked to relax some service quality standards as warranted. For example, Staff supported and the Commission approved a decrease in the 48-Hour Repair Metric from 95 percent to 90 percent complete within 48 hours and allowed for a weekend exemption along with some added safety-net protections.<sup>3</sup>

Finally, Staff conducted an all-provider service quality workshop on January 15, 2015, with the goal raising awareness and improving service quality. Staff took further steps to assist Qwest on May 12, 2016 by requesting and conducting a meeting with its company representatives regarding deteriorating service quality.

In summary, Staff has been working with Qwest for over a year in an attempt to improve service quality on several metrics. On April 7, 2016, Staff sent a pre-performance plan letter of warning to Qwest and met with Company officials to discuss assigning more resources to resolving service quality issues. (Attachment No. 1). Initially Staff felt that Qwest was making progress, but its efforts have not corrected the underlying issues.

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<sup>1</sup> Commission Order No. 01-689, Docket UM 1026.

<sup>2</sup> Link to Qwest's latest service quality report information.

<sup>3</sup> Link to Qwest's latest service quality report information.

*Failure to Meet Service Quality Measurement Standards*

Qwest has failed to meet the following service quality standards for a prolonged period of time:

I. Held Orders For Lack of Facilities Over 30 Days (Attachment No. 2)

- Primary held orders for lack of facilities in excess of 30 days past the initial commitment date must not exceed 10 percent of total monthly held orders due to lack of facilities within the utility's Oregon service territory. Qwest has failed to meet this standard every month for the last 12 months.

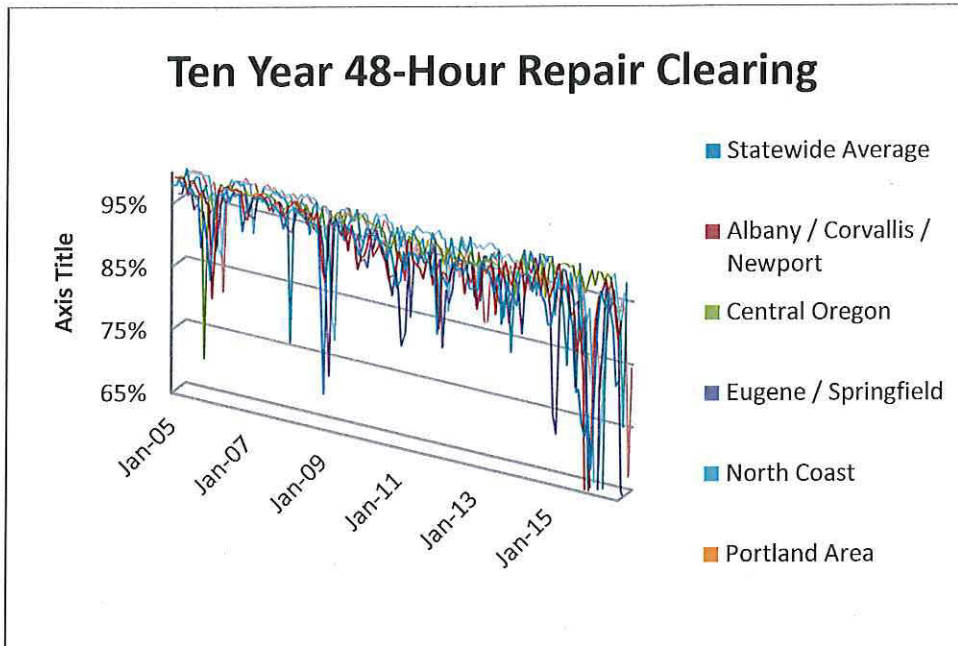
II. Trouble Report Standard (Attachment No. 3)

- A utility's monthly trouble report rate may not exceed two or three per 100 working access lines per wire center more than three times during a sliding 12-month period, depending on number of access lines per wire center. Qwest has failed to meet this standard for the Jacksonville wire center five months out of the last twelve and for the North Plains wire center, Qwest has failed to meet the standard in six months out of the last twelve.

III. Repair Clearing Time Standard (Attachment No. 4)

- Ninety percent of all trouble reports must be cleared within 48 hours. Qwest's performance has failed to meet this standard for 16 months out of the past 24 months in at least one repair center.
- The utility must use best efforts to complete out-of-service restorations for businesses and residential customers who either have a medical necessity or no access to an alternative means of voice or E-911 communications. The Consumer Services Division received 74 complaints from such customers between January 1, 2016 and March 4, 2017, which indicates the Company may not be employing best efforts to clear repairs.

As shown in the 10-Year 48-Hour Repair Clearing Graph below some results since January 2015 have been worse than any result in the past 11 years.



Qwest's most recent retail service quality results are available on the Commission website.<sup>4</sup>

#### *Jacksonville Area – Case Study*

The Jacksonville area provides an example of chronic repair problems and the time it took Qwest to remedy the problem presented a potential public safety concern.

Beginning in January 2014, the Commission's Consumer Services Division began receiving complaints from a relatively concentrated area south of Jacksonville, Oregon. Seven complaints were received in 2014. Eleven complaints were received in 2015. The complaints generally indicated that the customers' phones worked only intermittently or had very poor sound quality.

Due to the complaints and service quality measurements, Staff conducted an onsite inspection of the Jacksonville central office and the remote terminals in the area where the complaints originated, but that inspection did not reveal any problems. As part of a central office inspection, Staff typically accompanies a technician who is running tests or in the process of repairing someone's services. Staff accompanied a technician during its inspection in Jacksonville and during the repair, Staff discussed service quality concerns with three residents who were in the area. All three residents reported very similar issues. The technician suggested that the problem might be in the F2 pairs (i.e.,

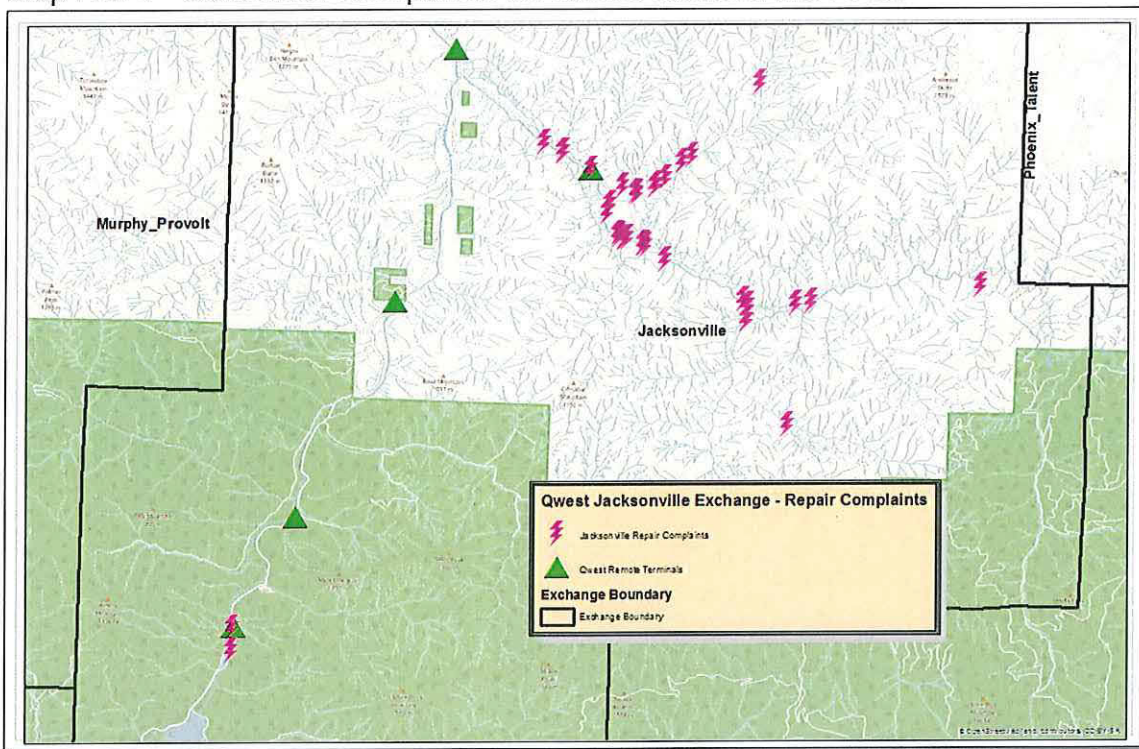
<sup>4</sup> <http://www.puc.state.or.us/telecom/squality/large/qwest.pdf>



facilities between the central office and the remote terminal). The problem did not appear to be in the facilities between the nearest remote terminal and the residence or the wire or telephones belonging to the customer.

Additionally, on December 9, 2016, Consumer Services received another 24 complaints of a similar nature. Over the course of the investigation started by Consumer Services thirty-five customers made complaints; some of those making more than one complaint. Based on the severity of number of complaints regarding poor service, I recently notified the manager of the Office of Emergency Management that there were chronic repair issues in this area and asked that he alert the responsible 9-1-1 dispatch center.

Map No. 1 - Consumer Complaints for Qwest Jacksonville Area

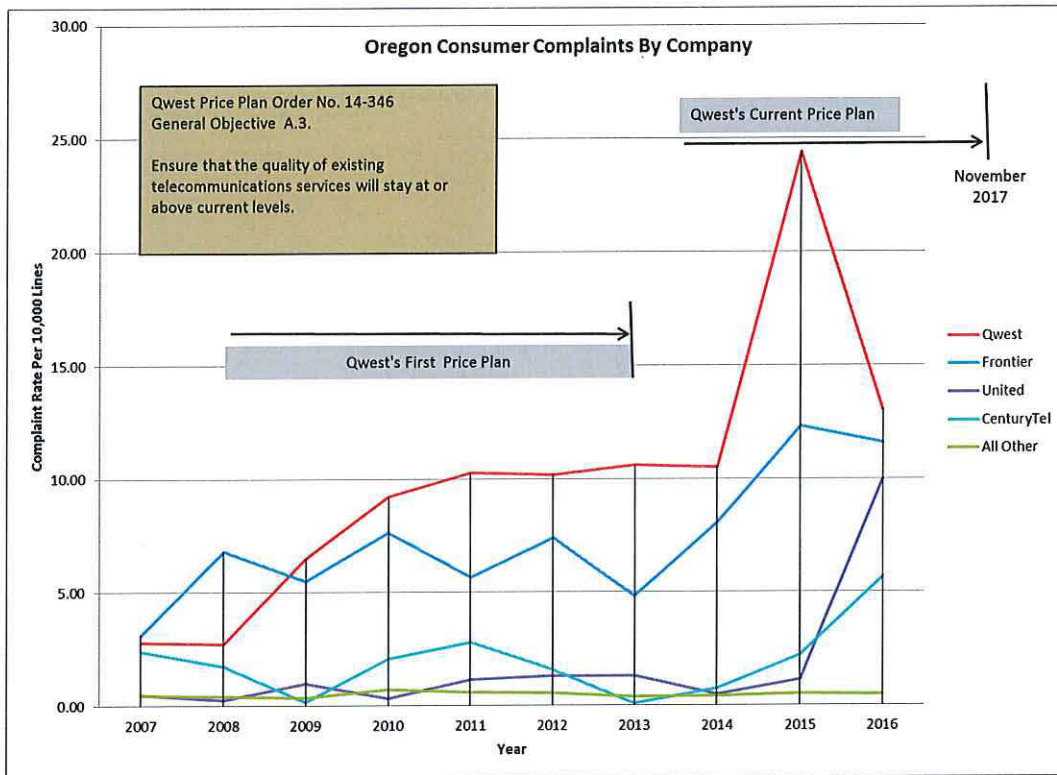


A performance plan ensures the Company's commitment to restore reliable service to areas like Jacksonville are completed and durable. A concentration of Jacksonville 2016-17 complaints are shown in Map No. 1 represented by purple lightning bolts. The remote terminals are the green triangles. It appears that some customers are experiencing service quality problems lasting for months.

While it is not necessarily indicative of a missed service quality metric, it appears that Qwest is receiving an increased number of complaints filed with our Consumer Services

section. A performance plan may help focus Qwest's attention on the service quality complaints at this critical time as it wrestles with increase complaints generally and its acquisition of Level 3 Communications.

Chart No. 1 - Comparison of ILEC Complaints filed with Consumer Services per ten-thousand lines. These are a sub-set that does not include deregulated services or complaints that are not related to service quality; for example billing complaints were not included.



Qwest's statewide complaints filed with Consumer Services have escalated during the second Price Plan; exceeding the rate experienced by other companies.

### Conclusion

Staff concludes that Qwest has persistently failed to meet three service quality standards, for held orders, repair clearing times and trouble reports and that informal efforts and outreach to the Company have not rectified the issue. ORS 759.450(5) states that the Commission shall require a telecommunications utility that is not meeting the minimum service quality standards to submit a plan for improving performance.

Staff concludes that it is necessary for Qwest to be required to submit such a plan for Commission consideration.

**PROPOSED COMMISSION MOTION:**

Require Qwest Corporation dba Centurylink QC (Qwest) to submit a service quality performance plan to meet the Commission's minimum service quality standards for held orders for lack of facilities, repair clearing times and trouble reports within 45 days.

Qwest.ServiceQuality.PerformancePlan





# Oregon

Kate Brown, Governor

## Public Utility Commission

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Salem, OR 97301

**Mailing Address:** PO Box 1088

Salem, OR 97308-1088

**Consumer Services**

1-800-522-2404

Local: 503-378-6600

**Administrative Services**

503-373-7394

April 7, 2016

Philip Grate  
Director Regulatory Affairs  
Qwest Corporation  
1600 7th Avenue, Room 1506  
Seattle, Washington 98191

Dear Mr. Grate:

The Oregon Public Utility Commission (Commission) is required by ORS 759.450 to both establish minimum retail service quality standards (MSQ Standards) and to require telecommunication utilities, among other entities, that do not meet these standards to submit a plan for improving performance to meet the established standards (Performance Plan). Because certain MSQ Standards are not being met, as discussed below, Staff provides this notification that it intends to request that the Commission order CenturyLink (Qwest or Company) to submit a Performance Plan related to Repair Clearing Time if changes in performance are not forthcoming.

**Repair Clearing Time.** OAR 860-023-0055(6) requires large telecommunications utilities to calculate the percentage of trouble reports cleared within 48 hours of receiving a report for each repair center, or alternatively, the large telecommunications utility may use certain weekend exceptions to calculate the percentage for trouble reports cleared for those reports that are received between 12 pm on Friday until 5 pm on Sunday. The Rule establishes that the objective service level for repair clearing time is at least 90 percent of all trouble reports must be cleared within 48 hours of receiving a report for each repair center, or alternatively, for reports received between 12 pm on Friday and 5 pm on Sunday, the large telecommunications utility may use certain weekend exceptions to calculate the percentage for trouble reports cleared. Specifically, 90 percent of all trouble reports received between 12 pm Friday and 5 pm Saturday must be cleared by the following Monday for each repair center, and 90 percent of all trouble reports received between 5 pm Saturday and 5 pm Sunday must be cleared by 5 pm the following Tuesday for each repair center. Refer to the table for the most current data.

### Qwest Repair Clearing Time

Repair Center	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16
Albany / Corvallis / Newport	97.9%	100.0%	97.0%	95.9%	97.1%	92.1%	93.2%	86.6%	90.4%	83.5%	51.2%	68.3%
Central Oregon	99.5%	99.6%	100.0%	100.0%	99.6%	100.0%	97.6%	99.6%	98.1%	96.1%	98.1%	100.0%
Eastern Oregon	98.9%	97.5%	98.5%	98.3%	98.7%	92.7%	94.1%	92.3%	97.9%	92.5%	87.5%	96.6%
Eugene / Springfield	91.5%	98.7%	98.6%	96.3%	95.6%	93.4%	94.2%	87.8%	92.0%	75.1%	66.1%	60.5%
North Coast	95.2%	90.7%	83.3%	98.2%	93.7%	79.3%	100.0%	85.5%	92.0%	59.7%	54.2%	47.9%
Portland Area	91.0%	95.4%	94.3%	97.1%	95.8%	91.1%	85.0%	59.8%	52.5%	41.7%	74.0%	85.3%
Salem Area	94.8%	96.2%	94.8%	98.3%	95.1%	92.4%	95.3%	90.4%	92.7%	80.0%	56.4%	67.3%
Southern Oregon	94.7%	94.4%	96.1%	94.6%	96.4%	96.3%	84.4%	84.8%	80.5%	90.9%	86.9%	80.0%
<b>STATEWIDE AVERAGE</b>	<b>93.8%</b>	<b>96.7%</b>	<b>96.2%</b>	<b>96.9%</b>	<b>96.5%</b>	<b>93.3%</b>	<b>91.1%</b>	<b>81.2%</b>	<b>81.0%</b>	<b>75.8%</b>	<b>73.8%</b>	<b>77.6%</b>

OAR Standard: Through January 2014 - 95% -- Beginning February 2014 - 90%

**DID NOT MEET STANDARD**

Commission Staff has been working with Qwest since August 2015 to bring carrier inquiry response times into compliance. The Company engaged in this effort and implemented measures to bring the response times down closer to standard. The Company provided information about how it was working to bring performance back into standard in its monthly service quality reports, but those mitigation efforts have not alleviated the out of standard results. Accordingly, Staff requests that the Company meet with Staff on April 26 in the afternoon to explain why Staff should not request the Commission place the Company on a Performance Plan pursuant to ORS 759.450(5). At this meeting, in order to assist Staff in understanding the measures the Company proposes and has proposed to remedy, Staff requests that the Company be prepared to provide a detailed explanation of how the calculations are made for Repair Clearing Time. Staff requests a full, detailed explanation of how the Company accepts calls for and produces a trouble report and under what circumstances it would not produce a trouble report. Staff further requests that the Company be prepared to explain how it has implemented the safety net procedures implemented in the AR 575 rulemaking docket that relaxed this metric beginning in January 2014.

Staff appreciates in advance the Company's willingness to meet and discuss mitigating the out-of-standard service quality metric.

Sincerely,



Bryan Conway  
Administrator  
Telecommunications and Water Division  
Oregon Public Utility Commission  
PO Box 1088  
Salem, Oregon 97308-1088

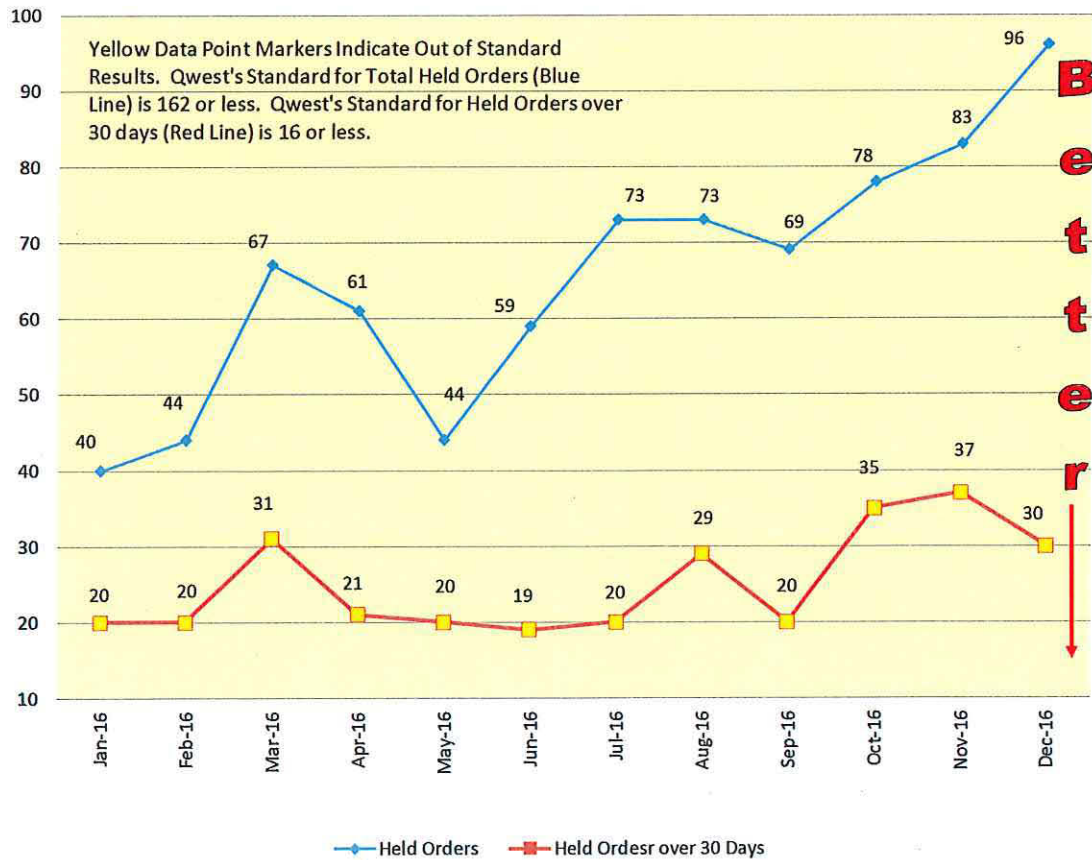


## Qwest Service Quality Information

### Held Access Line Service Orders Held for Lack of Facilities \*

Month	Total	Standard	>30 Days	Standard
Jan-16	40	162	20	16
Feb-16	44	162	20	16
Mar-16	67	162	31	16
Apr-16	61	162	21	16
May-16	44	162	20	16
Jun-16	59	162	19	16
Jul-16	73	162	20	16
Aug-16	73	162	29	16
Sep-16	69	162	20	16
Oct-16	78	162	35	16
Nov-16	83	162	37	16
Dec-16	96	162	30	16

\* Lack of facilities would include, for example, the lack of capacity at the serving central office or a lack of local cable plant.





This chart has been expanded from the normal 12-month rolling view of the trouble report rate measurements to a 24-month view. The expanded view helps to show how long two wire centers, North Plains and Jacksonville, have been undergoing chronic service quality problems. This view also shows that while some wire centers have an occasional miss of the service quality threshold Qwest is generally successful in remedying the problem so that the wire center is not considered as failing to meet the standard. The green highlight in the month columns indicates a miss of the threshold while a yellow highlight in the month columns indicates that a problem in the wire center has failed to meet standard during a 12-month period. Additional explanatory notes follow the table.

Wire Center <sup>1</sup>	MO >2.00 <sup>2</sup>	MO >3.00 <sup>2</sup>	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	24-Mth Median TRR
<b>Adair</b>		<b>0</b>	0.84	0.70	0.85	0.43	0.28	0.43	1.01	0.15	0.74	1.20	2.42	1.84	0.77	1.72	1.26	0.63	0.96	0.32	0.32	0.33	1.49	1.17	1.01	2.21	0.85
<b>Albany</b>	<b>2</b>		1.03	1.01	0.51	1.32	1.19	1.01	<b>2.50</b>	0.60	0.67	0.73	1.59	<b>2.05</b>	1.09	0.52	0.74	0.51	0.33	0.45	0.57	0.50	0.87	1.02	1.04	1.23	0.94
<b>Alpine</b>	<b>0</b>		0.94	0.77	0.73	0.72	0.55	0.77	0.67	0.59	0.58	0.41	0.68	1.38	0.86	1.33	1.10	0.86	0.90	0.77	0.56	0.65	0.73	1.50	1.43	1.01	0.77
<b>Ashland</b>	<b>0</b>		1.13	0.96	0.65	0.77	0.34	0.46	0.61	0.71	0.53	0.49	0.84	0.75	0.48	1.00	1.22	0.45	0.32	0.43	0.33	0.67	0.31	0.80	0.72	0.73	0.66
<b>Astoria</b>	<b>0</b>		0.93	0.51	0.68	0.52	0.49	1.32	0.40	0.33	0.33	0.71	0.69	0.93	0.74	0.51	0.83	0.68	0.64	0.82	1.03	0.37	0.60	0.87	1.53	0.75	0.69
<b>Athena</b>		<b>2</b>	1.89	0.96	0.73	1.22	<b>5.33</b>	1.99	2.89	1.89	1.53	1.15	0.64	<b>4.53</b>	1.43	0.39	0.66	0.80	1.33	1.47	1.22	1.34	2.80	2.70	1.63	1.23	<b>1.39</b>
<b>Atlantic</b>	<b>0</b>		0.42	0.48	0.42	0.35	0.21	0.38	0.45	0.32	0.38	0.40	0.60	0.83	0.65	0.79	0.57	0.47	0.36	0.52	0.40	0.47	0.44	0.56	0.72	0.77	0.46
<b>Baker</b>	<b>2</b>		0.57	0.38	1.02	0.47	0.71	1.28	<b>2.26</b>	0.84	0.79	0.58	0.40	1.02	0.84	0.62	0.88	0.72	0.83	0.87	0.49	0.89	0.73	<b>2.13</b>	0.84	0.89	<b>0.84</b>
<b>Belmont</b>	<b>0</b>		0.46	0.59	0.37	0.55	0.52	0.42	0.51	0.39	0.45	0.42	0.61	1.00	1.14	1.23	0.75	0.42	0.63	0.55	0.59	0.60	0.54	0.90	1.22	1.33	0.57
<b>Bend</b>	<b>0</b>		0.57	0.48	0.65	0.49	0.60	0.71	0.81	0.70	0.48	0.73	0.61	0.91	0.46	0.32	0.44	0.47	0.57	0.64	0.50	0.84	0.49	0.88	0.73	0.89	0.61
<b>Black Butte</b>		<b>0</b>	0.27	0.14	0.28	0.14	1.12	0.28	0.57	0.43	0.14	0.15	2.38	0.90	0.45	0.46	0.62	0.31	1.88	0.79	0.80	0.48	0.82	0.83	0.83	0.50	0.49
<b>Blue River</b>		<b>1</b>	1.89	0.87	0.87	1.40	1.24	1.06	1.06	1.07	0.90	1.44	1.28	2.19	0.92	<b>3.51</b>	1.66	0.37	0.92	0.74	1.11	0.74	1.11	1.65	1.47	0.38	<b>1.09</b>
<b>Burlington</b>		<b>6</b>	<b>3.57</b>	2.29	1.29	0.58	0.44	<b>3.35</b>	<b>7.75</b>	<b>4.85</b>	1.34	1.49	1.35	1.53	2.45	2.62	<b>4.20</b>	2.66	2.05	0.80	0.97	0.97	<b>4.21</b>	0.81	2.29	1.48	<b>1.79</b>
<b>Butler</b>	<b>1</b>		1.08	0.85	0.92	0.63	0.57	0.58	0.65	0.49	0.51	0.86	0.90	1.17	1.81	1.37	1.27	1.28	0.78	0.65	0.59	0.72	0.81	1.55	1.51	<b>2.10</b>	0.86
<b>Cannon Beach</b>	<b>0</b>	<b>0</b>	0.88	0.35	0.36	0.72	0.73	0.65	0.56	0.57	0.58	0.88	0.80	0.40	0.20	0.71	0.62	0.52	0.94	0.42	1.06	0.64	0.55	1.33	0.45	1.60	0.63
<b>Capitol</b>	<b>0</b>		0.12	0.15	0.15	0.12	0.18	0.16	0.08	0.09	0.15	0.10	0.13	0.18	0.14	0.28	0.16	0.22	0.28	0.19	0.27	0.32	0.23	0.34	0.41	0.36	0.17
<b>Central Point</b>	<b>0</b>		0.74	1.09	0.70	0.30	0.46	0.67	1.10	0.65	0.82	0.61	0.80	1.71	1.39	0.89	0.54	1.23	0.69	0.63	0.89	0.71	0.46	1.89	1.03	0.63	0.73
<b>Cherry</b>	<b>0</b>		0.65	0.90	0.70	0.65	1.32	0.60	0.43	1.03	0.55	0.70	1.05	1.86	0.86	1.99	1.37	0.88	0.85	0.85	0.67	0.92	0.93	1.07	1.03	1.51	0.89
<b>Corvallis</b>	<b>0</b>		0.77	1.06	0.69	0.48	0.41	0.55	0.35	0.40	0.50	0.93	0.73	0.95	0.81	0.70	0.72	0.79	0.75	0.49	0.67	0.41	0.44	0.90	1.28	1.00	0.71
<b>Cottage Grove</b>	<b>1</b>		1.23	0.72	0.87	1.01	0.62	0.58	0.62	0.92	0.67	0.54	0.88	1.50	<b>2.17</b>	1.20	0.90	0.68	0.27	0.57	0.55	0.89	0.65	0.66	0.76	0.45	0.70
<b>Culp Creek</b>		<b>0</b>	2.33	1.68	1.67	0.34	0.34	0.34	0.00	1.02	0.68	1.03	1.68	1.69	1.34	0.00	0.68	1.68	0.34	0.34	0.68	1.02	2.76	0.34	0.68	0.34	0.68
<b>Culver</b>		<b>1</b>	0.62	1.25	0.42	1.05	0.42	2.30	0.84	1.70	2.56	<b>3.03</b>	0.66	0.66	0.66	1.33	1.12	1.58	0.90	0.92	0.00	1.41	0.00	1.19	0.48	0.48	0.91
<b>Cypress</b>	<b>1</b>		1.46	1.11	0.42	0.73	0.58	0.50	0.32	0.33	0.47	0.52	0.39	0.94	1.52	1.25	1.05	1.51	0.42	0.81	0.58	0.56	0.53	1.05	0.74	<b>2.65</b>	0.66
<b>Dallas</b>	<b>3</b>		0.84	0.87	1.22	0.51	0.44	0.75	0.72	<b>2.70</b>	1.17	0.67	0.49	1.02	1.03	1.25	1.02	0.76	0.91	0.72	0.48	<b>2.27</b>	2.00	1.55	<b>2.14</b>	1.69	0.97
<b>Eugene</b>	<b>0</b>		0.78	0.91	0.68	0.73	0.62	0.89	0.84	0.55	0.70	0.58	0.64	0.84	0.86	1.57	0.98	0.92	0.56	0.56	0.59	0.75	0.77	1.68	1.13	0.83	0.78
<b>Falls City</b>		<b>0</b>	1.43	0.36	1.45	0.73	0.74	0.00	0.76	0.77	1.54	0.39	0.79	2.02	1.21	1.23	0.84	1.26	0.42	1.72	0.00	0.86	0.43	0.43	0.87	2.15	0.82
<b>Florence</b>	<b>2</b>		0.63	0.66	0.83	0.57	0.64	0.75	<b>2.38</b>	1.10	0.59	0.79	0.77	0.40	0.85	1.25	0.66	0.57	0.68	1.35	0.70	1.25	0.85	1.02	<b>2.37</b>	1.32	0.78
<b>Gold Hill</b>		<b>2</b>	1.01	0.45	1.13	0.69	0.69	0.70	1.91	1.94	1.84	1.11	1.50	2.78	2.17	1.03	1.43	1.68	0.79	<b>3.50</b>	0.54	0.95	0.96	0.83	<b>3.51</b>	2.82	1.12
<b>Grants Pass</b>	<b>0</b>		0.81	0.91	0.48	0.43	0.46	1.00	0.73	0.44	0.53	0.52	0.66	1.29	1.03	0.57	0.70	0.70	0.49	0.60	0.54	0.52	0.55	1.06	1.37	0.69	0.63
<b>Harold</b>	<b>0</b>		1.05	0.86	0.63	0.81	0.70	0.73	0.83	0.64	0.42	0.61	0.98	1.41	1.23	1.49	1.21	0.84	0.77	0.68	0.58	0.83	0.66	1.63	1.29	1.65	0.83
<b>Hermiston</b>	<b>1</b>		0.75	0.64	0.73	0.78	0.53	<b>2.24</b>	1.04	0.55	0.88	1.04	0.57	0.97	1.12	0.55	0.70	0.96	0.77	0.89	0.84	0.64	0.59	0.59	0.65	0.93	0.76
<b>Indep-Monm</b>	<b>2</b>		1.63	0.88	0.72	0.61	0.61	0.49	0.56	1.01	0.45	0.84	1.38	<b>2.32</b>	<b>2.09</b>	1.02	1.17	0.83	0.77	0.78	0.64	0.73	1.24	1.76	1.78	1.27	0.86
<b>Jacksonville</b>	<b>10</b>		1.24	<b>2.29</b>	1.79	0.52	0.83	1.66	1.38	0.54	<b>2.34</b>	<b>5.11</b>	<b>2.15</b>	<b>6.07</b>	0.81	<b>2.06</b>	<b>6.05</b>	1.10	1.19	1.64	1.92	1.14	1.96	<b>5.78</b>	<b>2.30</b>	<b>3.60</b>	<b>1.86</b>
<b>Jefferson</b>		<b>1</b>	0.67	0.67	0.79	0.68	0.68	1.02	0.23	0.58	0.59	0.12	0.73	<b>3.29</b>	1.86	1.77	0.76	0.51	1.03	1.04	0.00	0.14	0.27	0.56	0.70	1.42	0.68
<b>Junction City</b>	<b>3</b>		1.02	1.28	1.72	1.22	1.56	1.08	1.66	1.43	1.25	1.34	1.68	<b>2.83</b>	1.83	<b>2.69</b>	1.51	0.84	1.11	1.17	0.83	0.66	0.71	1.73	<b>2.95</b>	1.27	1.31
<b>Keizer</b>	<b>0</b>		0.60	0.83	0.67	0.63	0.40	0.68	0.57	0.55	0.60	0.61	1.21	1.28	1.04	0.95	0.56	0.67	0.63	0.86	0.40	0.48	0.87	1.09	1.18	1.16	0.67
<b>Klamath Falls</b>	<b>0</b>		1.06	0.82	0.64	0.45	0.53	0.66	0.80	0.89	0.85	0.84	0.54	0.97	0.89	1.00	0.87	0.80	0.92	0.56	0.41	0.91	0.56	1.49	1.26	1.20	0.85
<b>Lake Oswego</b>	<b>1</b>		0.91	0.79	0.62	0.69	0.58	0.83	0.68	0.57	0.63	0.56	0.78	0.98	1.21	1.74	0.84	0.77	0.78	0.82	0.67	0.78	0.58	0.93	1.15	<b>2.13</b>	0.78
<b>LaPine</b>	<b>0</b>		0.50	0.55	0.46	0.59	0.74	0.88	0.42	1.44	0.89	1.99	1.54	1.27	1.22	1.53	0.84	1.05	1.05	0.91	0.71	1.44	1.04	0.42	0.86	0.65	0.89
<b>Leaburg</b>		<b>2</b>	0.99	1.28	0.43	1.16	1.32	0.73	0.89	0.45	1.52	<b>3.50</b>	<b>3.55</b>	2.35	0.79	2.54	0.81	1.93	0.64	1.30	0.81	1.82	1.00	1.50	1.50	1.01	1.22
<b>Lowell</b>		<b>3</b>	3.00	2.35	1.45	<b>3.02</b>	1.45	1.12	1.37	1.39	1.63	1.53	1.31	0.84	2.15	2.29	3.15	0.73	0.86	0.98	1.49	1.49	<b>3.13</b>	1.01	1.88	0.62	<b>1.47</b>
<b>Madras</b>	<b>1</b>		0.63	0.35	0.30	0.83	<b>2.14</b>	1.26	1.20	0.73	0.80	0.75	0.57	1.92	0.83	0.39	0.26	0.53	0.47	0.67	0.75	0.81	0.68	0.62	0.55	0.56	0.68
<b>Mapleton</b>		<b>1</b>	1.79	1.12	1.35	1.61	1.38	2.51	1.15	0.47	1.17	1.17	0.95	0.24	1.70	1.94	2.95	1.71	1.46	1.47	1.46	0.74	0.73	0.98	<b>4.66</b>	2.91	1.42
<b>Marcola</b>		<b>0</b>	1.48	1.22	0.68	0.96	0.82	1.93	2.60	0.56	1.55	1.14	1.15	1.29	0.87	1.89	1.46	1.03	0.74	2.36	0.74	1.18	1.05	1.97	1.52	0.46	1.17
<b>Medford</b>	<b>0</b>		0.94	0.77	0.64	0.52	0.67	0.54	0.49	0.58	0.41	0.27	0.53	0.73	0.58	0.68	0.37	0.49	0.46	0.91	0.49	0.59	0.40	0.66	0.69	0.82	0.58
<b>Milton-Freewater</b>	<b>3</b>		<b>2.17</b>	1.32	0.76	0.70	0.77	1.39	0.85																		



Wire Center <sup>1</sup>	MO >2.00 <sup>2</sup>	MO >3.00 <sup>2</sup>	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	24-Mth Median TRR
Ontario	0		0.44	0.31	0.26	0.47	0.05	0.34	0.27	0.38	0.30	0.30	0.36	0.70	0.25	0.25	0.28	0.14	0.51	0.35	0.49	0.79	0.32	0.36	0.36	0.30	0.33
Oregon City	1		0.95	0.83	0.62	0.79	0.57	0.60	0.71	0.57	1.24	0.70	0.60	2.08	1.19	0.92	1.19	0.67	0.94	0.62	0.44	0.47	0.60	1.75	1.40	1.19	0.75
Oregon Slope		0	0.00	0.00	0.00	0.45	0.00	0.92	0.00	0.00	0.48	0.96	0.96	0.98	0.50	1.00	0.00	2.03	1.02	0.51	0.00	0.00	0.53	0.00	0.00	0.55	0.47
Pendleton	0		0.69	1.14	0.87	0.78	0.48	0.88	1.35	0.90	0.73	0.48	0.71	0.53	0.84	0.38	0.85	0.47	0.79	0.80	0.56	0.36	0.72	0.69	0.98	1.19	0.76
Phoenix-talent	1		1.55	0.71	0.86	0.58	2.28	0.65	0.72	1.36	0.42	0.59	1.02	1.42	0.55	1.67	1.01	0.46	0.53	0.95	0.60	0.55	0.31	1.20	0.90	0.84	0.78
Prineville	0		0.75	0.76	0.64	0.54	0.42	0.65	0.62	1.22	0.50	1.44	0.44	0.89	0.76	0.52	0.42	0.39	0.72	1.05	1.13	0.66	0.44	0.45	0.65	0.38	0.65
Prospect	0		0.56	0.81	1.04	0.94	0.66	0.88	0.69	0.68	1.00	0.64	0.88	1.51	1.36	1.40	1.01	0.82	0.68	0.81	0.78	0.66	0.72	1.54	1.40	1.22	0.85
Rainier	2		0.68	1.36	1.20	1.52	0.90	0.58	0.69	0.48	0.59	2.28	1.84	1.91	0.94	1.55	2.44	0.67	0.56	1.06	0.84	0.79	1.13	0.91	1.25	1.08	1.00
Redmond	0		0.65	0.60	0.87	0.52	0.59	0.63	0.70	1.17	0.89	0.42	0.55	0.59	0.65	0.52	0.55	0.27	1.01	1.01	0.87	0.53	0.58	0.73	0.69	0.90	0.64
River Road	1		1.34	1.18	0.98	0.62	0.69	0.82	0.61	0.96	0.73	0.67	0.74	0.63	0.64	2.09	1.20	0.72	0.63	0.64	0.53	0.67	0.72	0.76	1.43	0.50	0.72
Rogue River	1		1.27	1.07	0.52	0.68	2.59	0.90	1.50	0.77	0.45	1.14	0.58	1.16	1.40	1.48	0.60	0.42	0.61	0.68	0.57	0.58	0.73	0.94	0.60	0.61	0.71
Roseburg	0		1.04	0.58	0.87	0.59	0.53	0.62	1.04	0.98	0.69	0.54	0.49	1.19	1.48	0.49	0.87	0.95	0.51	0.56	0.50	1.00	0.52	0.72	0.93	0.79	0.71
Salem	0		0.79	0.85	0.83	0.73	0.46	0.53	0.54	0.53	0.71	0.59	0.90	1.26	1.02	0.85	0.79	0.65	0.68	0.48	0.52	0.83	0.77	0.91	0.83	0.75	0.76
Seaside	0		0.63	0.53	0.25	0.47	0.43	0.40	0.70	0.34	0.57	0.89	0.87	0.44	0.32	0.33	0.75	0.93	0.77	0.52	1.23	0.62	0.36	0.50	1.20	0.79	0.55
Siletz		0	2.23	1.24	2.14	1.13	0.68	0.34	0.81	0.35	1.06	1.64	2.49	0.83	1.08	2.54	1.59	2.22	1.72	0.99	1.61	0.87	0.50	1.39	1.52	1.79	1.32
Sisters <sup>4</sup>		0	0.29	0.00	0.29	0.69	0.69	0.19	0.49	0.41	0.51	0.84	0.53	0.32	0.65	0.76	0.11	0.22	0.68	0.45	0.68	0.11	0.93	0.58	0.95	0.24	0.50
Spring River	0		0.26	0.32	0.71	0.89	1.42	0.81	0.29	0.60	0.18	0.63	0.70	0.46	0.66	0.87	1.09	0.21	0.87	0.51	0.60	0.68	0.39	0.71	0.64	0.08	0.64
Springfield	1		1.09	1.36	0.89	1.24	0.87	0.67	0.73	0.59	1.01	0.85	1.09	1.07	0.98	2.28	1.43	0.96	0.71	0.85	0.86	1.21	0.85	0.87	1.54	0.82	0.93
St. Helens	0		0.53	0.57	0.63	0.51	0.32	0.78	0.52	0.79	0.60	0.60	0.91	1.25	1.43	1.07	0.60	1.27	0.36	0.29	1.05	0.95	0.48	0.41	1.08	0.75	0.62
Stanfield		1	0.37	0.38	2.73	0.39	1.95	0.78	0.39	0.80	1.17	0.77	0.77	0.78	1.98	0.40	0.40	1.96	0.40	0.41	0.83	0.83	2.52	0.42	3.03	0.87	0.78
Sutherlin	0		0.64	1.17	0.85	0.96	0.39	0.68	0.34	0.60	0.96	0.51	0.87	0.99	1.75	1.23	1.30	1.10	0.28	1.18	0.63	0.69	0.12	1.18	0.60	0.97	0.86
Toledo		1	0.51	0.90	0.26	0.91	0.53	1.20	0.80	0.54	0.55	1.10	0.98	2.68	0.86	1.17	1.76	0.59	1.04	0.90	0.15	0.30	1.56	1.11	3.69	0.97	0.91
Umatilla	0		0.75	1.24	1.04	0.56	0.57	0.79	1.24	0.84	1.18	0.88	1.05	1.72	0.67	0.68	0.85	0.34	0.34	0.35	0.89	1.44	0.91	1.11	0.93	0.57	0.87
Vale	0	0	0.45	0.72	0.36	0.36	0.73	0.46	0.74	0.37	0.65	0.47	0.28	0.77	0.38	0.77	0.19	0.49	0.29	0.29	0.59	0.59	0.20	0.70	0.20	0.41	0.46
Veneta	2		1.64	1.20	1.30	0.82	0.63	1.19	1.03	1.15	0.92	0.79	1.32	0.98	1.72	3.62	3.46	1.75	0.82	1.23	1.02	0.81	0.78	1.68	1.80	1.28	1.20
Warm Springs		0	0.37	1.12	0.38	0.00	0.00	2.75	0.78	0.78	0.80	0.00	0.44	1.77	0.00	0.00	0.93	0.00	0.00	0.50	0.49	0.99	1.49	2.00	1.95	0.99	0.64
Warrenton	3	0	1.18	1.04	0.33	0.41	0.25	0.08	0.51	0.51	0.43	2.26	0.80	0.62	0.45	3.60	1.11	0.47	0.95	1.82	2.90	0.68	0.79	1.73	0.31	2.28	0.74
Westport		1	0.90	0.45	0.00	0.90	1.80	0.45	2.28	0.45	0.92	0.46	1.37	0.93	4.17	0.92	0.95	0.00	0.95	0.96	1.91	0.48	0.49	1.44	0.00	0.49	0.91
Winston	0		1.52	1.88	0.76	1.35	1.28	0.90	0.46	0.99	1.81	0.64	0.92	1.80	1.22	1.35	0.96	0.81	0.93	1.31	1.02	0.54	0.49	1.56	1.07	1.08	1.05
Woodburn	0		1.03	1.28	1.14	0.92	0.48	0.74	0.75	0.39	0.63	0.67	1.02	1.80	1.29	0.99	0.90	0.76	0.62	0.70	0.38	0.83	0.57	1.39	1.25	1.07	0.87
Statewide Median <sup>5</sup>			0.88	0.85	0.71	0.68	0.62	0.73	0.72	0.60	0.68	0.73	0.84	1.17	1.02	1.03	0.87	0.73	0.75	0.78	0.63	0.72	0.71	1.02	1.08	0.90	0.74
Large Wire Center Count	3		2	1	0	0	4	1	3	1	2	3	3	7	3	8	4	0	0	0	1	2	0	4	5	4	
Small Wire Center Count		1	1	0	0	1	1	1	1	1	0	2	1	2	1	1	2	0	0	1	0	0	2	0	4	0	

NOTE 1: The small Qwest wire center names (1,000 or less access lines) are in red.

NOTE 2: The "MO>2.00" column is the number of times a wire center with over 1,000 access lines exceeded a 2.00 trouble report rate during a twenty-four month period. The "MO>3.00" column is the number of times a wire center with 1,000 or less access lines exceeded a 3.00 trouble report rate during the reported twenty-four month period.

NOTE 3: The number at the bottom of the monthly columns is the number of wire centers that exceeded either the 2.00 threshold for the large wire centers or the 3.00 threshold for the small wire centers during that month. This only indicates wire centers are over the threshold applicable for that size wire center. It does not necessarily indicate that wire centers failed to meet standard.

NOTE 4: Beginning in January 2014 the calculation of the statewide average changed . Since a range of months going back to February, 2013 is used to compare, those months also reflect the same calculation method to aid comparability.

NOTE 5: Cells with green fill and red numbers indicate the months for those wire centers where the measurements exceeded the threshold applicable for that wire center at the time of the measurement. It does not indicate that the wire center failed to meet standard.

NOTE 6: Cells with emboldened borders indicate where a wire center transitioned from a large wire center to a small wire center due to line losses.

NOTE 7: Only cells with values that would have been considered as failing to meet standard at any time during the 24 month period have yellow fill.

NOTE 8: The far right column is a simple conditional formating using a color range to highlight the median rate over the 24 months. Occasionally the conditional formating shows that a wire center that may not have had any months when a threshold was exceeded might still have some lingering problems as in the cases of Marcola and Silets.



This chart has been expanded from the normal 12-month rolling view of the repair clearing time measurements to a 24-month view. A yellow highlight indicates that a problem in the wire center has failed to meet the Commission's standard. The expanded view reveals chronic service quality problems that prompted staff to warn Qwest in April 2016. This view also shows that Qwest appears to be improving in this area recently. Additional explanatory notes follow the table.

Repair Center	FM																							
	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
Albany / Corvallis / Newport	96.0%	97.9%	100.0%	97.0%	95.9%	97.1%	92.1%	93.2%	86.6%	90.4%	83.5%	51.2%	68.3%	78.9%	93.0%	96.6%	97.3%	99.3%	97.7%	99.1%	95.6%	90.3%	93.3%	98.1%
Central Oregon	97.9%	99.5%	99.6%	100.0%	100.0%	99.6%	100.0%	97.6%	99.6%	98.1%	96.1%	98.1%	100.0%	97.7%	100.0%	100.0%	98.7%	100.0%	99.5%	96.6%	94.3%	94.4%	94.9%	97.7%
Eastern Oregon	98.1%	98.9%	97.5%	98.5%	98.3%	98.7%	92.7%	94.1%	92.3%	97.9%	92.5%	87.5%	96.6%	96.2%	89.4%	97.3%	97.1%	95.8%	86.2%	90.6%	90.5%	90.1%	76.0%	91.6%
Eugene / Springfield	72.2%	91.5%	98.7%	98.6%	96.3%	95.6%	93.4%	94.2%	87.9%	92.0%	75.1%	66.1%	60.5%	39.0%	81.5%	87.7%	98.1%	93.6%	95.3%	94.8%	90.4%	65.7%	64.2%	76.5%
North Coast	97.7%	95.2%	90.7%	83.3%	98.2%	93.7%	79.3%	100.0%	85.5%	92.0%	59.7%	54.2%	47.9%	62.0%	39.1%	79.3%	96.8%	94.6%	97.1%	91.3%	92.0%	75.6%	98.8%	93.8%
Portland Area	92.0%	91.0%	95.4%	94.3%	97.1%	95.8%	91.1%	85.9%	59.6%	52.5%	41.7%	74.0%	85.3%	67.3%	68.4%	90.6%	97.4%	97.7%	95.5%	97.0%	91.6%	91.2%	89.0%	94.2%
Salem Area	97.3%	94.8%	96.2%	94.8%	98.3%	95.1%	92.4%	95.3%	90.4%	92.7%	80.0%	56.4%	67.3%	77.1%	88.6%	94.2%	98.5%	99.2%	94.8%	90.4%	96.5%	95.0%	95.6%	94.9%
Southern Oregon	95.7%	94.7%	94.4%	96.1%	94.6%	96.4%	96.3%	84.4%	84.8%	80.5%	90.9%	86.9%	80.0%	84.6%	88.4%	94.6%	96.5%	90.1%	92.9%	95.2%	91.3%	67.0%	84.6%	90.6%
STATEWIDE AVERAGE	90.4%	93.8%	96.7%	96.2%	96.9%	96.5%	93.3%	91.1%	81.2%	81.0%	75.8%	73.8%	77.6%	68.7%	80.0%	92.0%	97.6%	95.9%	95.1%	95.0%	92.4%	83.0%	84.2%	91.6%

OAR Standard: Through January 2014 - 95% -- Beginning February 2014 - 90%

ALBANY / CORVALLIS	CENTRAL OR	EASTERN OR	EUGENE
Adair	Bend	Athens	Blue River
Albany	Black Butte	Baker	Cottage Grove
Corvallis	Camp Sherman	Hermiston	Culp Creek
Jefferson	Cuiver	Milton-Freewater	Eugene
Newport	Lapine	Nysa	Florence
Siletz	Madras	Ontario	Junction City
Toledo	Prineville	Oregon-slope	Leaburg
	Redmond	Penleton	Lowell
	Sisters	Starfield	Mapleton
	Spring River	Umatilla	Marcola
	Warm Springs	Vale	Oakridge
			River Road
			Springfield
			Veneta
NORTH COAST	PORTLAND AREA	SALEM AREA	SOUTHERN OR
Astoria	Alpine	Dallas	Ashland
Cannon Beach	Allandic	Falls City	Central Point
Seaside	Belmont	Indep-Mon	Gold Hill
Warrenton	Burlington	Kelzer	Grants Pass
Westport	Butler	Salem	Jacksonville
	Capitol	Woodburn	Klamath Falls
	Cherry		Medford
	Cypress		Phoenix
	Harold		Rogue River
	Lake Oswego		Roseburg
	Milwaukie		Sutherlin
	North Plains		Winston
	Oregon City		
	Prospect		
	Rainier		
	St.Helens		

The wire centers served by the eight repair centers are shown in the table to the left. Failures occur from time to time and it tends to be seasonal. One problem with the failure to meet the repair clearing standard shown in this table is that some measurements since September 2015 are worse than other missed standards in the previous eleven years. This is depicted in the Graph on page 5. The other problem is that one of the reasons Qwest gave staff for the misses was not weather but the company's emphasis on installing unregulated services.

An unfolding problem is that In December 2016 Qwest began declaring force majeure for weather related events. This meant that they could exclude some trouble reports from the 48-hour clearing time measurements. This could explain part of the improvement in the measurements. It also means that Qwest can stop issuing service guarantee credits to customers. The service guarantee was required to ensure that service quality would meet or be better than the levels prior to the approval of the Price Plan in October 2014.

Staff agrees that there were some days in December when the snow and ice made it unsafe and difficult to repair service. However, Consumer Services reports that CenturyLink declared a force majeure event for 60 days in some areas. This extended force majeure event seems unwarranted, but the criterion for determining the length of a force majeure exception is not clearly documented. Staff encourages the company to propose some clear guidelines for when, and for how long, exceptions like force majeure can be applied in the future. The FM in the December 2016 column indicates the month where force majeure started.

The table includes a statewide average row. This is somewhat helpful but it is not recognized as a standard. Staff's experience is that whenever service quality measurements are aggregated the results do not accurately reflect what is going on at the granular level. Consequently staff does not advocate rolling up the measurements into an aggregate. The State-wide average row in the table illustrates how aggregated results can mask more negative results.