

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1855**

In the Matter of

FRONTIER COMMUNICATIONS  
NORTHWEST INC.

Service Quality Performance Plan for Repair  
Clearing, Trouble Reports, and Access to  
Company Representative

FRONTIER COMMUNICATIONS  
NORTHWEST INC. SERVICE QUALITY  
PERFORMANCE PLAN PROPOSAL

In response to The Public Utility Commission of Oregon’s (Commission or PUC) Order No. 17 328, dated August 24, 2017, Frontier Communications Northwest Inc. (“Frontier”) proposes the following measures to improve its performance as measured by the Commission’s service quality metrics for large telecommunications utilities for repair clearing times, trouble reports, and access to utility representatives.

**Introduction.**

On July 25, 2017, Commission Staff provided a staff report to the PUC recommending that Frontier “submit a service quality performance plan to meet the Commission’s minimum service quality standards for repair clearing times, trouble reports and access to utility representatives...” As a threshold matter, Frontier respectfully submits that ORS §759.450, subsection (2) requires “minimum service quality standards that relate to the provision of retail telecommunications services” and “apply to all telecommunications carriers.” Despite that plain language in subsection (2), under subsection (9) and federal law, the minimum service quality standards do not apply to:

1. voice service provided by cable television companies;
2. voice service provided by nomadic VOIP providers;
3. radio communications service;
4. radio paging service;
5. commercial mobile radio service;
6. personal communications service;
7. cellular communications service;
8. telephone cooperatives;
9. telecommunications carriers serving less than 50,000 access lines.

Because (as a practical matter) these standards apply to only two ILECs in Oregon, both of which have lost significant market share since these rules were last revised, Frontier is considering a request for the Commission to initiate a separate rulemaking to consider revising its rules in light of the competitiveness of the market for voice communications.

Below, Frontier outlines its proposed performance improvement plan to improve the three service quality metrics discussed by the Staff in their report.

#### **I. Trouble Reports.**

Per OAR 860-023-0055(5), Frontier's monthly trouble report rate may not exceed two (or three for smaller wire centers) per 100 working access lines per wire center more than 3 times during a sliding 12-month period.<sup>1</sup> Staff identified that the Scholls wire center failed to meet the two per 100 trouble reports per working line standard in four months of the twelve-month period of June 2016 through May 2017. Given the current rate of line loss, the Scholls wire center is expected to fall below the 1,000 access line threshold in the near future, which will make the applicable trouble report objective a benchmark of three trouble reports per 100 working access lines. Assuming a benchmark of three troubles per 100 access lines, the Scholls wire center would have missed that metric in only two months since June 2015, both of which were in

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<sup>1</sup> (A) For wire centers with more than 1,000 access lines: two per 100 working access lines per wire center more than three times during a sliding 12-month period.

(B) For wire centers with 1,000 or less access lines: three per 100 working access lines per wire center more than three times during a sliding 12-month period.

periods of higher than normal precipitation levels, and only once in the past twelve months. However, in addition to weather related challenges, Frontier has identified two remote terminal locations where power may have also contributed to the issues. Therefore, Frontier will test and replace, if necessary, any backup batteries in these remote terminals before year end, which should result in continued improved performance beginning in early 2018. Finally, Scholls has already experienced improved performance and has met the two per 100 trouble report standard since May of this year.

## **II. Repair Clearing Time.**

OAR 860-023-0055(4), requires that Frontier complete at least 90 percent of all trouble reports within 48 hours of receiving a report for each repair center. Frontier has developed a three pronged plan to improve its ability to meet this metric. First, the company expects to hire twenty additional technicians over the next several months. While it takes time to recruit, screen and train a new technician, the Company has already begun this process. Based on past experience, the company expects to complete this process and have these additional new technicians in place by the end of the first quarter. Second, Frontier is in the process of implementing a new dynamic resource model which will allow for a more timely response to spikes in troubles or trouble hot spots on a going forward basis. Finally, Frontier will continue to review and enhance its processes associated with the prioritization of service impacting trouble tickets in its dispatch work priority system.

## **III. Access to Utility Representatives.**

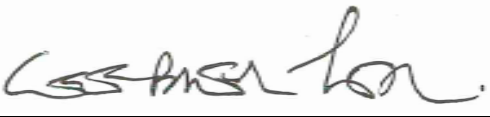
OAR 860-023-0055(8) requires that Frontier answer at least 80 percent of calls within 20 seconds or have an average speed of answer time of 50 seconds or less. Like most in the industry, Frontier partially relies on vendors to provide this service. Frontier has already begun a

review of certain of these vendor relationships and their expected performance. In addition, the company is augmenting its vendor onboarding training program, reviewing staffing levels with its partners and working to reduce attrition rates recently experienced by some of its vendor partners. The company believes these actions will improve its performance to the metric and in fact is currently meeting this metric for repair service center calls.

**IV. Conclusion.**

Frontier respectfully requests that the Commission approve its plan to improve service quality for the three measures noted by Staff.

RESPECTFULLY SUBMITTED,



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