

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Candace Shofstall
Legal Assistant
(360) 753-7012
candaces@localaccess.com

February 3, 2017

VIA E-FILING

Oregon Public Utility Commission
PO Box 1088
Salem OR 97308-1088

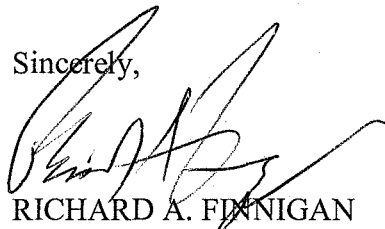
Re: Petition of Douglas Services, Inc. d/b/a Douglas FastNet

Dear Sir/Madam:

Enclosed for filing with the Public Utility Commission of Oregon is the Petition of Douglas Services, Inc. d/b/a Douglas FastNet for exemption from the Service Quality Reporting requirements of OAR 860-32-0012. This filing is being submitted through the Commission's electronic filing system.

If you or Commission Staff have any questions concerning this filing, please do not hesitate to contact me directly. Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)
Malia Brock (via e-mail)

1
2
3
4
5 **BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

6
7 In the Matter of the Petition of Douglas
8 Services, Inc. d/b/a Douglas FastNet for
9 Approval of an Exemption from all Service
10 Quality Reporting Requirements under OAR
11 860-032-0012

DOCKET NO. _____

PETITION FOR EXEMPTION FROM OAR 860-
032-0012

12 Pursuant to OAR 860-032-0012(5)(c), Douglas Services, Inc. d/b/a Douglas FastNet (DFN),
13 hereby petitions the Public Utility Commission of Oregon (Commission) for an exemption from the
14 monthly Service Quality Reporting Requirements found in OAR 860-032-0012, sections (4)
15 through (8).

16 In support of its Petition, DFN states the following:

- 17 1. DFN is certified as Competitive Local Exchange Carrier (CLEC) in the State of Oregon.
18 2. DFN has met all service quality objective service levels as set forth in sections (4) through
19 (8) of OAR 860-032-0012 for each of the twelve months preceding the filing of this Petition.

20 A report of the DFN's service quality levels for 2016 is included as Attachment A to this
21 Petition.

- 22 3. As a CLEC, DFN is subject to effective competition in all of the Oregon telephone
23 exchanges in which it operates. DFN's customers have been able to choose from a number
24

1 of telecommunications providers including the incumbent, CenturyLink. There are no
2 barriers to entry in the State of Oregon that would prevent competitors from competing with
3 DFN. Therefore, Oregon consumers will not be harmed should the Commission grant this
4 Petition.

- 5 4. Communications regarding this Petition should be directed to:

6 Richard A. Finnigan
7 2112 Black Lake Blvd. SW
8 Olympia, WA 98512
9 360-956-7001
rickfinn@localaccess.com

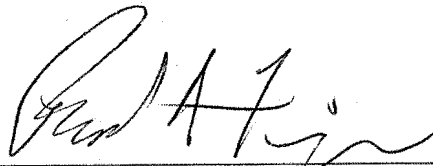
10 and,

11 Todd Way
12 Douglas FastNet
13 2350 NW Aviation Dr.
14 Roseburg, OR 97470
541-673-4242 Ext. 1002
tway@dfn.net

15 CONCLUSION

16 DFN respectfully requests that the Public Utility Commission of Oregon grant this Petition
17 for an exemption from the monthly Service Quality Reporting Requirements found in OAR 860-
18 032-0012, sections (4) through (8).
19

20 Respectfully submitted this 3rd day of February, 2017

21
22
23 

24 RICHARD A. FINNIGAN, OSB No. 965357
25 Attorney for Douglas Services, Inc. d/b/a Douglas FastNet
26

ATTACHMENT A

2016 Summary Oregon Telecommunication Service Quality
Report for Douglas Services, Inc. d/b/a Douglas FastNet



**Douglas Fast Net
SERVICE QUALITY REPORT**

CHARTS

**Business Office Center Answer Time
(Seconds)**

	2016	2017
January	93.7%	
February	96.5%	
March	97.0%	
April	98.3%	
May	97.2%	
June	98.5%	
July	95.8%	
August	96.7%	
September	100.0%	
October	100.0%	
November	100.0%	
December	100.0%	

**Repair Service Center Answer Time
(Seconds)**

	2016	2017
January	87.0%	
February	83.0%	
March	90.0%	
April	83.0%	
May	98.0%	
June	86.4%	
July	84.5%	
August	87.4%	
September	85.2%	
October	92.6%	
November	96.5%	
December	84.8%	

Standard: 80% of All Calls Answered Within 20 Seconds or Less

DID NOT MEET OAR STANDARD

Commitments for Service - Provisioning

	2016	2017
January	100.0%	
February	100.0%	
March	100.0%	
April	100.0%	
May	100.0%	
June	100.0%	
July	100.0%	
August	100.0%	
September	100.0%	
October	100.0%	
November	100.0%	
December	100.0%	

OAR Standard: 90%

DID NOT MEET OAR STANDARD

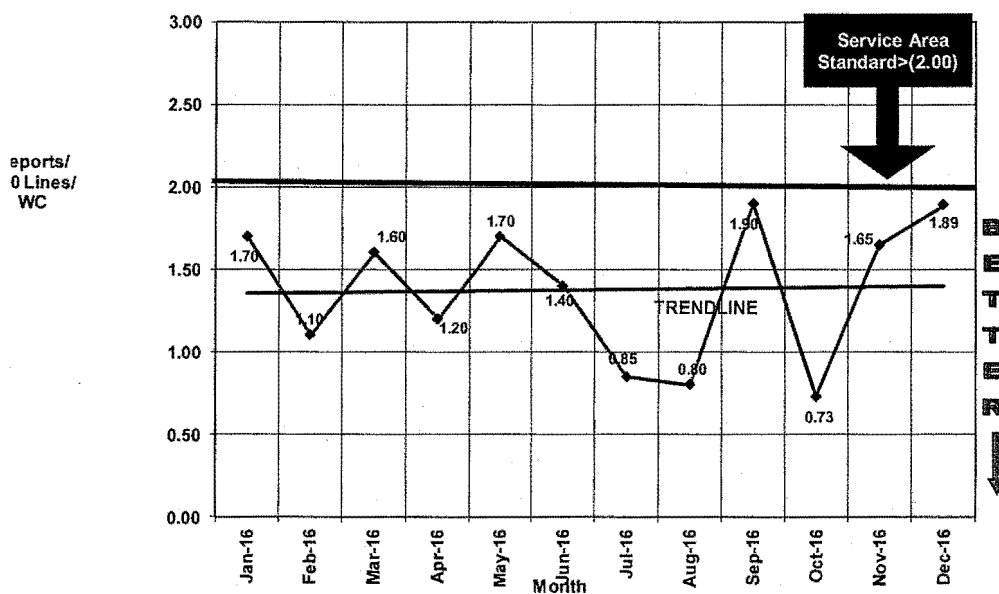
Repair Cleared Within 48-Hours

	2016	2017
January	97.0%	
February	95.0%	
March	95.0%	
April	95.0%	
May	100.0%	
June	92.0%	
July	93.0%	
August	100.0%	
September	100.0%	
October	100.0%	
November	100.0%	
December	100.0%	

OAR Standard: 90%

DID NOT MEET OAR STANDARD

Trouble Report Rate Monthly State Average



Service Area	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
Douglas Fast Net	1.70	1.10	1.60	1.20	1.70	1.40	0.85	0.80	1.90	0.73	1.65	1.89
Statewide Average	1.70	1.10	1.60	1.20	1.70	1.40	0.85	0.80	1.90	0.73	1.65	1.89
Service Area Count ²	0	0	0	0	0	0	0	0	0	0	0	0

NOTE 1: The "MO>2.00" column is the number of times a designated service area of over 1,000 access lines exceeded a 2.00 trouble report rate during the reported twelve month period. The "Designated Service Area Count" is the number the designated service area did not meet standard for the reported month.

NOTE 2: The number at the bottom of the monthly columns are the number of times the designated service area exceeded 2.00 for the reported month.