



Sharon Mullin
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April 30, 2019

VIA E-Filing at PUC.FilingCenter@state.or.us

Oregon Public Utility Commission
201 High St SE, Suite 100
Salem, OR 97301

Re: Petition of AT&T Corp.

Dear Sir/Madam:

Enclosed for filing with the Public Utility Commission of Oregon is the Petition of AT&T Corp. for exemption from the Service Quality Reporting requirements of OAR 860-32-0012. This filing is being submitted using the Commission's electronic filing system.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Sharon Mullin
Sharon Mullin
Director – Regulatory

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

In the Matter of

In the Matter of the Petition of AT&T Corp. for Approval of an Exemption from all Service Quality Reporting Requirements under OAR 860-032-0012

Docket No. _____

**PETITION FOR EXEMPTION FROM
OAR 860-032-0012**

Pursuant to OAR 860-032-0012(5)(c), AT&T Corp. (“AT&T”) hereby petitions the Public Utility Commission of Oregon (“Commission”) for an exemption from the monthly Service Quality Reporting Requirements found in OAR 860-032-0012, sections (4) through (8).

In support of its Petition, AT&T states the following:

1. AT&T is certified as Competitive Local Exchange Carrier (“CLEC”) in the State of Oregon.
2. AT&T has met all service quality objective service levels as set forth in sections (4) through (8) of OAR 860-032-0012 for each of the twelve months preceding the filing of this Petition. A report of AT&T’s service quality levels for April 2018 through March 2019 is included as **Attachment A** to this Petition.
3. OAR 860-032-0012(15)(c) states: "The Commission may grant a competitive telecommunications provider's petition for an exemption from service quality reporting requirements if the competitive telecommunications provider meets all service quality objective service levels set forth in sections (4) though (8) of this rule for the 12 months prior to the month in which the petition is filed."
4. As a CLEC, AT&T is subject to effective competition in all the Oregon telephone exchanges in which it operates. AT&T’s customers have been able to choose from many telecommunications providers including incumbents CenturyLink and Frontier

in the areas they serve. There are no barriers to entry in the State of Oregon that would prevent competitors from competing with AT&T. Therefore, Oregon consumers will not be harmed should the Commission grant this Petition.

5. Communications regarding this Petition should be directed to:

Sharon Mullin
Director-Regulatory
AT&T Services, Inc.
2003 Point Bluff
Austin, TX 78746
slmullin@att.com

David Collier
Area Manager-Regulatory
AT&T Services, Inc.
5250 S. Virginia St., Ste. 201
P.O. Box 11010
Reno, NV 89520
david.collier@att.com

CONCLUSION

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

Respectfully Submitted this 30th day of April, 2019,

By:


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AT&T CORPORATION SERVICE QUALITY REPORT

CHARTS

Business Office Center Answer Time (Seconds)

	2018	2019
January		29
February		20
March		22
April	14.0	
May	41.0	
June	13.0	
July	6.0	
August	7.0	
September	5.0	
October	7.0	
November	10.0	
December	42.0	

Repair Service Center Answer Time (Seconds)

	2018	2019
January		18
February		6
March		24
April	18.0	
May	3.0	
June	32.0	
July	49.0	
August	47.0	
September	20.0	
October	8.0	
November	21.0	
December	28.0	

Standard: Average Speed of Answer Time of 50 Seconds or Less

DID NOT MEET OAR STANDARD

Commitments for Service - Provisioning

	2018	2019
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*

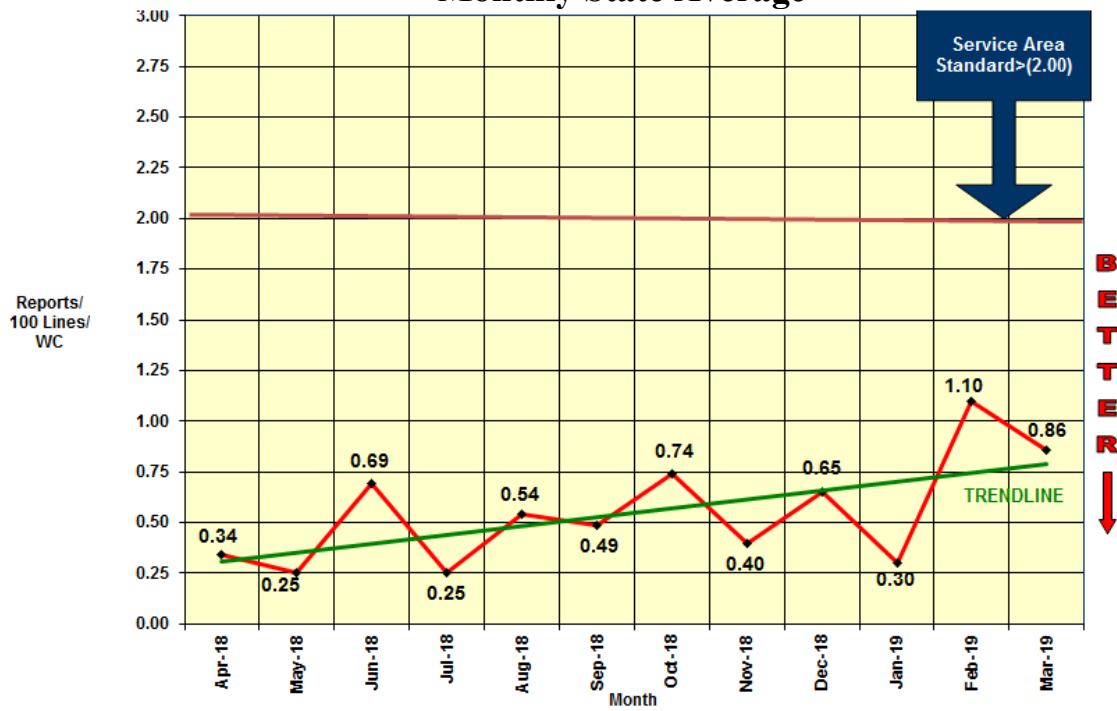
	2018	2019
January		83%*
February		94.0%
March		94.0%
April	71%**	
May	100.0%	
June	100.0%	
July	100.0%	
August	100.0%	
September	90.0%	
October	100.0%	
November	100.0%	
December	92.0%	

*AT&T cannot track exclusions as allowed by the Commission rules. month

OAR Standard: 90%

DID NOT MEET OAR STANDARD

Trouble Report Rate Monthly State Average



MONTHLY TROUBLE REPORT RATE

Service Area	MO >2.00 ¹	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19
AT&T Communications	0	0.34	0.25	0.69	0.25	0.54	0.49	0.74	0.40	0.65	0.30	1.10	0.86
Statewide Average		0.34	0.25	0.69	0.25	0.54	0.49	0.74	0.40	0.65	0.30	1.10	0.86
Service Area Count ²	0	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.