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Philip E. Grate
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June 29, 2017

Via eFiling Only

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Re: Docket UM 1836

Order No. 17-175 in Docket UM 1836 adopts Staff's recommendation that Qwest Corporation dba CenturyLink QC (Qwest) be required to submit within 45 days a service quality performance plan to meet the Commission's minimum service quality standards.

Attached please find Qwest's Service Quality Performance Plan. Please direct questions about the plan to me.

Sincerely,

A handwritten signature in black ink that reads "Philip E. Grate". The signature is written in a cursive style with a large, sweeping "P" and "G".

Philip E. Grate

PEG/cmb
Attachment

Qwest Corporation dba CenturyLink QC
Oregon Service Quality Performance Plan
June 29, 2017

Order No. 17-175 in Docket UM 1836 adopts Staff's recommendation that Qwest Corporation dba CenturyLink QC (Qwest) be required to submit within 45 days a service quality performance plan to meet the Commission's minimum service quality standards.

This document serves as Qwest's Service Quality Performance Plan.

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."

However under subsection (8) and federal law, the minimum service quality standards do not apply to:

- voice service provided by cable television companies;
- voice service provided by nomadic VOIP providers;
- radio communications service;
- radio paging service;
- commercial mobile radio service;
- personal communications service;
- cellular communications service;
- telephone cooperatives.

In practice, the minimum service quality standards promulgated pursuant to ORS 759.450 are limited to three classes of telecommunications carriers:

- large telecommunications utilities, as defined in OAR 860-023-0001(2);
- small telecommunications utilities, as defined in 860-034-0010(3)(a); and
- competitive telecommunications providers, as defined in ORS 759.005(1), but only those that maintain more than 1,000 access lines on a statewide basis.¹

¹ OAR 860-032-0012.

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As of June 30, 2016 these three classes of carriers provided retail telecommunications services to 13.5% of Oregon's retail voice subscriptions.² A year later, June 29, 2017, these carrier classes likely serve roughly 12.5% of Oregon's voice subscriptions.

At the end of 2001, Qwest served 1.354 million access lines in Oregon. Fifteen years later, at the end of 2016, Qwest served 0.396 million access lines. The loss of 1.058 million access lines—78% of the 2001 total—is a constant and compelling reminder of the intense competition Qwest faces. Qwest does not need service quality standards to motivate it to provide the best quality service possible.

From March 2015 to March 2017, CenturyLink has added a net additional 110 technicians and 4 Supervisors to its workforce in Oregon. During that same timeframe, we've also dramatically increased our customer facing contractor headcount with over 50 active contractors. We are in process of hiring additional technicians to meet demands of forecasted load in all regions of Oregon. In the past year, 399 Oregon technicians have received Instructor-Led training with the vast majority receiving training in Basic Installation & Repair of telephone service.

In its memo, Staff recommends that the Commission require Qwest to submit a service quality performance plan to meet the Commission's minimum service quality standards for: (I.) held orders for lack of facilities; (II.) repair clearing times; and (III.) trouble reports. Following is Qwest's plan for addressing each.

² Voice Telephone Services as of 06/30/16. Released 04/17. [State-Level Subscriptions](#) (Excel)

I. Held Orders For Lack of Facilities Over 30 Days

The Commission's standard for held orders greater than 30 days limits the total number of primary held orders for lack of facilities in excess of 30 days past the initial commitment date to 10 percent of the total monthly held orders for lack of facilities within the carrier's Oregon service territory.³ Of the 37 states where CenturyLink (Qwest's parent company) operates local telephone companies, 32 impose no standard for held orders greater than 30 days. Of the 32 states, 16 eliminated previous held order rules. Of the five CenturyLink states that have a 30-day held-order standard, Oregon's is, arguably, the most onerous. See Attachment A.

A careful review of Qwest's held orders from January 2016 through March 2017 revealed that several orders were incorrectly reported as primary orders held in excess of 30 days. The Corrected data is found in Attachment B. As reported to the Commission before correction, the 15 months of data show that on average primary held orders for lack of facilities greater than 30 days were 38% of total monthly held orders for lack of facilities within Qwest's service territory. After correction the monthly average fell to 16%.

Qwest's plan for meeting the Commission's standard is as follows:

- Qwest has developed an automated report that enables its Oregon managers to actively monitor all delayed held orders to better facilitate completion of held orders before the 30 day deadline.

³ OAR 860-023-055(4)(b)(B)(ii), OAR 860-032-0012(4)(b)(B)(ii), OAR 860-034-0390(4)(b)(B)(ii).

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- Qwest has modified the automated logic it uses to compute and report to the Commission Held Orders For Lack of Facilities Over 30 Days in order to more accurately calculate Qwest's results for this metric.
- Qwest discovered and corrected a weakness in its processes and procedures that prevented its Oregon managers from identifying held orders for regulated voice service bundled with other services. Under the processes and procedures before correction, managers were unaware of held orders for regulated voice service because the orders were bundled with other services.
- Qwest will review held order activity monthly to monitor compliance with processes and procedures, ensure that mitigation efforts are effective, apply insights gained to better manage future held orders and make necessary corrections.

II. Trouble Report Standard

The Commission's standard requires that the monthly trouble report rate, after approved trouble report exclusions, does not exceed:

(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.

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(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.⁴

In the year 2000 during the docket to implement ORS 752.450⁵ Sprint (now United Telephone of the Northwest dba CenturyLink), CenturyTel (now dba CenturyLink), USWC (now Qwest Corporation dba CenturyLink QC), GTE (Now Frontier), AT&T, and the Oregon Telecommunications Association argued that the proposed standard on trouble reports was too stringent in comparison to the then current national standards.⁶ That remains the case. 23 of the 37 CenturyLink states have no standard for trouble reports. By repeal, rescission, deregulation, rule change, waiver or other means, 18 of those 23 states eliminated standards that had been in place. Of the 14 CenturyLink states that still have a standard, Oregon's is the most onerous. See Attachment C.

North Plains wire center

The count of North Plains wire center access lines has fallen from a total of approximately 2,900 working access lines at the end of 2001 to 1,030. At the current rate of decline, the access line count in the North Plains wire center will fall below 1,000 lines in a matter of months. At that point the minimum standard applicable to North Plains trouble reports will change from 2 per 100 access lines per month to 3 per 100 access lines per month. Over the past 24 months ending

⁴ OAR 860-023-055(5)(b), OAR 860-032-0012(5)(b), OAR 860-034-0390(5)(b).

⁵ AR 375.

⁶ AR 375, Order No. 00 – 303, entered 6-8-00, page 26.

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April 2017, the North Plains wire center has averaged 1.94 trouble tickets per 100 access lines per month.

Qwest's plan for meeting the Commission's standard in the North Plains wire center is as follows:

- In order to assess possible causes of trouble reports in the North Plains wire center, management dedicated a cable technician and supervisor to review trouble tickets since January 2017 and then inspect and test the plant associated with the tickets. The cable technician and supervisor identified some minor, correctable plant deficiencies including pedestal splicing, gravel and grading, rebuild of some splices and some drop replacements. Qwest will continue to monitor the plant for appropriate corrections.
- Qwest has implemented a process where a location experiencing more than 2 trouble tickets in a 90 day period will be flagged for dispatch of a "chronic" tech to review, test and assess any systemic issues.

Jacksonville wire center

The count of Jacksonville wire center access lines has fallen from a total of approximately 3,800 working access lines at the end of 2001 to roughly 1,050. At the current rate of decline, the access line count in the Jacksonville wire center will fall below 1,000 within the year. At that point the minimum standard applicable to Jacksonville trouble reports will change from 2 per 100 access lines per month to 3 per 100 access lines per month. Over the past 24 months ending

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April 2017, the Jacksonville wire center has averaged 2.61 trouble tickets per 100 access lines per month.

Qwest has determined that a principal source of trouble tickets in the Jacksonville wire center is a few cross boxes and Digital Loop Carrier systems that fail recurrently as a result of problems with feeder cable stability and some electronics failures. Aware of these problems, Qwest conducted several maintenance activities in 2016 and 2017, including:

- All Digital Loop Carrier sites associated with high trouble ticket counts were given extensive power routines. Rectifiers were upgraded and changed out. Replacement batteries were installed.
- T-1 App cases were changed out and updated
- All span lines were tested and tagged
- Existing cable was rehabbed above ground
- Replaced 2000 feet of 600 pair cable at Hwy 238 and Forest Creek Rd
- Replaced 400 feet of 50 pair cable at 13000 Upper Applegate
- Replaced 300 feet of 50 pair cable at 1200 Little Applegate

Qwest's plan for meeting the Commission's standard in the Jacksonville wire center is as follows:

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- To reduce troubles caused by Digital Loop Carrier failures, Qwest recently replaced one Digital Loop Carrier with more robust equipment that is more tolerant of feeder cable instability.
- Replacement of a second Digital Loop Carrier with more robust equipment is underway.
- Qwest is sourcing additional systems and parts to be used to replace additional Digital Loop Carriers.
- Qwest is exploring the possibility of entering into a leasing arrangement that would allow it to use fiber in the area that is owned by another company. Qwest would use the fiber to backhaul from some of Qwest's Digital Loop Carriers to the Jacksonville and Medford central offices.

III. Repair Clearing Time Standard

The Commission's standard requires that each repair center clear 90% of all trouble reports within 48 hours of receiving a report. The standard allows, as an alternative, for those reports that are received between 12 pm on Friday and 5 pm on Sunday, the carrier may use a weekend exception to calculate the percentage for trouble reports cleared.⁷

In 2000 during the docket to implement ORS 752.450⁸, Staff proposed and the Commission adopted a more stringent standard than the then existing standard. Staff's proposed standard required 95% of trouble reports to be cleared within 48 hours. Also in 2000 the Commission expanded the then current statewide reporting requirement to a number reported for each repair

⁷ OAR 860-023-055(6)(b), OAR 860-032-0012(6)(b), OAR 860-034-0390(6)(b).

⁸ AR 375.

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center.⁹ In 2014 the Commission amended the standard “to alleviate compliance problems with weekend repair reporting requirements related to repair intervals and to align the service standard more closely with the standards in Washington and Idaho.”¹⁰

26 of the 37 CenturyLink states impose no standard for troubles cleared. 19 of those 26 states eliminated previously existing standards. Of the 11 CenturyLink states that still have a standard for troubles cleared, Oregon’s is the most onerous; Oregon’s standard applies to all trouble tickets, not just out of service trouble tickets. The other 10 CenturyLink states that have a clearance standard apply it to out of service trouble tickets only. See Attachment D.

Qwest’s plan for meeting the Commission’s standard is to implement a daily trouble ticket call to be held with those repair centers whose results indicate the standard may be missed. During those calls:

- Management will review all pending tickets for assignment, timeliness and any necessary oversight.
- Management will review any missed tickets for missed reason, gaps in proactive engagement on pending tickets, coding compliance and any systemic identified issues.
- Attendees will include Operations, Forecasting (balances incoming work with available resources) and Dispatch (tactical assignment/handling of tickets to technicians).

⁹ AR 375, Order No. 00 – 303, entered 6-8-00, pages 26-27.

¹⁰ AR 575, Order No. 14-016, entered January 21, 2014.

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- During field work crew meetings managers will review the status of clearance in 48 hours performance; ensuring keen awareness of tickets, timeframes to restore, and customer impact.

QWEST
OREGON SERVICE QUALITY PERFORMANCE PLAN
ATTACHMENT A
MINIMUM STANDARDS FOR HELD ORDERS GREATER THAN 30 DAYS

State	Standard	Measured By	Standard
OR	Allowable % of Primary Held Orders > 30 Days	State	10%
TX	Service Installation Orders Completed in 30 Days	Exchange	99%
GA	Installation Regular service orders completed in 30 Working Days if construction is required	State	85%
MT	Offered in 180 Days	State	100%
PA	Non-Designed, Primary Orders held for over 20 days	State	90%
AL	<i>AL Communications Reform Act of 2005</i>		
AR	<i>Deregulated - All exchanges declared competitive 3/2014.</i>		
AZ	No standard		
CA	No standard		
CO	<i>Deregulated - HB 1313 5/2014</i>		
FL	<i>Deregulated Effective July 1, 2011</i>		
IA	No standard		
ID	No standard		
IL	No standard		
IN	<i>The retail service quality standards were repealed on 9/1/10.</i>		
KS	No standard		
LA	<i>Eliminated by Rule Change April 2013</i>		
MI	<i>HB 4314, effective date 06-14-11</i>		
MN	No standard		
MO	No standard		
MS	<i>Deregulated: May 1, 2015</i>		
NC	<i>Market Regulation (HB 1180; Effective 04/2012)</i>		
ND	No standard		
NE	No standard		
NJ	No standard		
NM	No standard		
NV	<i>Deregulated - HB 518 in 2007</i>		
OH	<i>Rescinded 01-01-08</i>		
OK	<i>Deregulated Effective 3/9/12</i>		
TN	<i>Market Regulation as of September 26, 2011</i>		
SC	No standard		
SD	No standard		
UT	<i>Obtained rule waiver effective 07/15/13.</i>		
VA	<i>Deregulated May 2016</i>		
WA	<i>Repealed May 2015</i>		
WI	<i>New legislation (2011 Wisconsin Act 22), effective 6/9/11, deregulated local service.</i>		
WY	No standard		

QWEST
OREGON SERVICE QUALITY PERFORMANCE PLAN
ATTACHMENT C
MINIMUM STANDARDS FOR TROUBLE REPORTS

State	Description	Assessment Level	Standard
OR	Trouble Reports Per 100 Access Lines (<= 1000 lines)	Miss > 3 Months in sliding 12mo period	3
OR	Trouble Reports Per 100 Access Lines (> 1000 lines)	Miss > 3 Months in sliding 12mo period	2
WY	Non-Designed Trouble Report Rate	Wire Center; Miss > 3 Consecutive Months	5
TX	Customer Trouble Reports Per 100 Access Lines (>10k access lines)	Exchange; Miss >3 Consecutive Months	3
TX	Customer Trouble Reports Per 100 Access Lines (<10k access lines)	Exchange; Miss >3 Consecutive Months	6
GA	Trouble Reports per 100 lines	Exchange	4
MN	Trouble Reports per 100 Access Lines per Month	Exchange	6.5
AZ	Non-Designed Trouble Report Rate per 100 access lines	State	3
IL	Trouble reports per 100 lines	State	6
PA	Customer Trouble Reports Per 100 Access Lines	State; Miss >3 Consecutive Months	5.5
KS	Customer Trouble Reports per 100 Access Lines (> 10k access lines)	State; Miss > 3 Consecutive Months	6
KS	Customer Trouble Reports per 100 Access Lines (Between 1k and 10k access lines)	State; Miss > 3 Consecutive Months	8
KS	Customer Trouble Reports per 100 Access Lines (< 1k access lines)	State; Miss > 3 Consecutive Months	10
NE	Non-Designed Trouble Report Rate	Wire Center; 6 month average	<8
NJ	Customer Trouble Reports per 100 Access Lines	State	8
NM	Non-Designed Trouble Report Rate per 100 access lines	State Annual	5
SC	Trouble Reports Per 100 Access Lines (< 7.5k access lines)	State Monthly	7
SC	Trouble Reports Per 100 Access Lines (> 7.5k access lines)	State Monthly	5
WA	Non-Designed Trouble Report Rate	State Monthly	4
AL	<i>AL Communications Reform Act of 2005</i>		
AR	<i>Deregulated - All exchanges declared competitive 3/2014.</i>		
CA	No standard		
CO	<i>Deregulated - HB 1313 5/2014</i>		
FL	<i>Deregulated Effective July 1, 2011</i>		
IA	No standard		
ID	No standard		
IN	<i>The retail service quality standards were repealed on 9/1/10.</i>		
LA	<i>Eliminated by Rule Change April 2013</i>		
MI	<i>HB 4314, effective date 06-14-11</i>		
MO	No standard		

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ATTACHMENT C
MINIMUM STANDARDS FOR TROUBLE REPORTS

State	Description	Assessment Level	Standard
MS	<i>Deregulated: May 1, 2015</i>		
MT	<i>Waiver</i>		
NC	<i>Market Regulation (HB 1180; Effective 04/2012)</i>		
ND	<i>(not addressed in rules)</i>		
NV	<i>Deregulated - HB 518 in 2007</i>		
OH	<i>Rescinded 01-01-08</i>		
OK	<i>Deregulated Effective 3/9/12</i>		
SD	No standard		
TN	<i>Market Regulation as of September 26, 2011</i>		
UT	<i>Obtained rule waiver effective 07/15/13.</i>		
VA	<i>Deregulated May 2016</i>		
WI	<i>New legislation (2011 Wisconsin Act 22), effective 6/9/11, deregulated local service.</i>		

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OREGON SERVICE QUALITY PERFORMANCE PLAN
ATTACHMENT D
MINIMUM STANDARDS FOR TROUBLE REPORT CLEARANCE

ST	Description	Assessment Level	Standard
OR	All Troubles Cleared within 2 Business Days / 48 Hrs	Repair Center	90%
GA	Out-of-Service cleared in 24 hours (excluding unusual repairs)	State	100%
TX	Out of Service Trouble Reports Cleared Within 8 Working Hours (quarterly)	Rate Center Quarterly	90%
WY	Out of Service Non-Designed Troubles Cleared Within 24 Hrs	Wire Center	90%
IA	Out of Service Cleared within 72 Hours	State	99%
IL	Out-of-Service cleared in 30 hours	State	95%
SC	Out of Service Trouble Reports Cleared Within 24 Hours	State	85%
ID	OOS Cleared in 48 Hrs (Excluding Weekends & Extenuating Circumstances)	State	80%
MN	Out of Service Cleared within 24 Hours Excluding Force Majeure	State Annual	95%
AZ	Out of Service Cleared w/in 24 Hours Excl. Force Majeure	Statewide; 3-month period	85%
NM	OOS Non-Designed Troubles Cleared in 24 Hours	State Annual	85%
AL	<i>AL Communications Reform Act of 2005</i>		
AR	<i>Deregulated - All exchanges declared competitive 3/2014.</i>		
CA	No standard		
CO	<i>Deregulated - HB 1313 5/2014</i>		
FL	<i>Deregulated Effective July 1, 2011</i>		
IA	No standard		
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ST	Description	Assessment Level	Standard
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