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**Philip E. Grate**  
State Regulatory Affairs Director  
Public Policy

March 1, 2018

***Transmitted Via Email Only***

Filing Center  
Public Utility Commission of Oregon  
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Salem, Oregon 97301-3398  
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Re: Request for waiver of OAR 860-023-0055(8)(a)(B)

Greetings:

On behalf of CenturyTel of Oregon, CenturyTel of Eastern Oregon, Qwest Corporation and United Telephone Company of the Northwest (hereinafter "CenturyLink") I am requesting a waiver of subsection (8)(a)(B) of OAR 860-023-0055, Retail Telecommunications Service Standards for Large Telecommunications Utilities, which reads:

(B) Driven, Automated, or Interactive Answering System: The option of transferring to the large telecommunications utility representative must be included in the initial local service-screening message. The large telecommunications utility must measure the answering time from the point a call is directed to its representatives; e.g., when the call leaves the Voice Response Unit;

OAR 860-023-0000 subsection (2) provides: "Upon request or its own motion, the Commission may waive any of the Division 023 rules for good cause shown. A request for waiver must be made in writing, unless otherwise allowed by the Commission." Please consider this letter CenturyLink's written request. A discussion of the good cause for which I make this request follows.

The Oregon standard is based on two-decade-old thinking about such systems. In its 2000 rulemaking order, the Commission wrote:

The rule considers the customer connected to a representative when the customer is able to communicate with a person. The standard makes clear that the point of measurement is when a customer's call is directed to the representative. This comports with the 1996 ROC benchmarks recommendation and with the 1998 NARUC Annual Convention Policy Resolutions: "Average waiting time for all calls answered live, as measured from the time the customer chooses to talk to a live operator."

As do almost all large retail business, telecommunications carriers serving more than a few thousand customers utilize modern, interactive voice response ("IVR") systems that are far more advanced than the systems that were employed two decades ago. Modern IVR is a technology that allows a computer to interact with humans through the use of voice and DTMF tones input via keypad. In telecommunications, modern IVR systems allow customers to interact with a company's host system via a telephone keypad or by speech recognition, after which services can be inquired about through the IVR dialogue. IVR systems can respond with prerecorded or dynamically generated audio to further direct users on how to proceed. And IVR systems deployed in the network are sized to handle large call volumes.

Modern telecommunications carriers' IVR systems are highly sophisticated computer systems that gather important information from the caller and use that information to direct the call to the appropriate resource and to inform interaction between the caller and the carriers' live representatives.

Application of the Commission's standard requiring that callers be allowed to defeat IVR systems would result in inefficiencies and, in many cases, would worsen the customer experience. For example, the IVR system might first determine whether a caller is more comfortable with English or Spanish so that further IVR and human interaction is in the caller's language. If a caller is first given the option to speak with representative, Spanish speakers might be directed to a non-Spanish speaking resource. Likewise, telecommunications carriers' IVR systems gather information about the caller such as telephone number and the purpose of the call before directing the customer's call. Many callers mistakenly call the business office for repair issues and the repair line for billing or sales matters.

Furthermore, in many instances, the IVR system allows a caller to satisfy his or her need without ever speaking to a live representative – the result is that 20% of all calls to the CenturyLink business office and 23% of all calls to repair are satisfied without the need for the caller to speak to a representative. Customers actually can experience less frustration because the IVR system reduces the number of cases where they might otherwise be transferred by a live representative multiple times, or possibly have their call misrouted due to human error. And when a caller is ultimately routed to a live representative, the information that the IVR system collects is provided to those representatives in a carrier's various call centers helps the carriers' representative more efficiently address the caller's needs. IVR systems are also used to pre-fetch data in certain back end systems so that the representative is able to access the customer's

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information more quickly. CenturyLink's IVR system does not include promotional or marketing messages – its sole purpose to enhance customer service.

CenturyLink uses the same IVR system in all 37 states where it provides local telephone service. Modifying this national IVR system to satisfy an Oregon-specific rule would be expensive and degrade customer service across our entire national footprint.

Please contact me with any questions about this waiver request.

Sincerely,

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

Philip E. Grate

cc: Jason Jones, Department of Justice