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April 3, 2006

**VIA E-MAIL AND U.S. MAIL**

Christina Smith, Administrative Law Judge  
Oregon Public Utility Commission  
PO Box 2148  
Salem, OR 97301-2551

Re: UM 1217 – Request to Admit Record Requisitions

Dear ALJ Smith:

Pursuant to the direction during the hearing on March 9, 2006, RCC responded to OTA's Record Requisition Nos. 1 and 2. The purpose of this letter is to request that those two responses be admitted as the next two exhibits in order, which would be OTA/8 and OTA/9.

Thank you for your consideration of this request.

The original and five copies of the Responses have been filed with the Commission Record Center. Please note that portions of the responses are labeled confidential by RCC.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

Enclosures

cc: Service List (via e-mail)  
Brant Wolf (via e-mail)

## **OTA RECORD REQUISITION NO. 1**

Please provide the measurement standard used by RCC Minnesota for "inter-office" trunk groups (i.e., the trunks between cell sites and the switching facility). For this measurement, please identify the metric, the interval of measurement, and the measurement methodology. Please provide a sample of each and every report that is generated related to this standard.

### **RESPONSE:**

RCC objects to responding to "Record Requisitions," as the OPUC has no recognized procedure for Record Requisitions. At the hearing in this matter RCC agreed on a voluntary basis to answer, post-hearing, a question that was posed to Mr. Otto at the hearing regarding a standard that he knew existed, but the details of which he could not provide. RCC further objects to Record Requisition No. 1 on the basis that it goes beyond the question posed to Mr. Otto at the hearing and as such, constitutes an improper attempt at post-hearing discovery and to supplement the record with additional evidence from the witness after OTA concluded its cross examination of Mr. Otto. Subject to the foregoing objections, RCC's answer to the first sentence of the Record Requisition is provided in Attachment A, which is confidential and subject to the protective order in this docket.

**CONFIDENTIAL PER PROTECTIVE ORDER IN UM 1217**

**ATTACHMENT A**, RCC response to OTA Record Requisition No. 1

Question: Please provide the measurement standard used by RCC Minnesota for "inter-office" trunk groups (i.e., the trunks between cell sites and the switching facility).

Answer: The measurement standard for the trunks between cell sites and the switching facilities is 2% blocking. This is calculated by measuring the erlangs of the busiest hour and comparing that to the industry standard erlang B chart.

## **RECORD REQUISITION NO. 2.**

Please provide the internal measurement standard used by RCC for the goals for answering customer calls to the business office and customer service center (identify both standards, if standards are different for a different location (i.e., business office versus customer service center)). Please identify the metric used, the interval of measurement, and how the metric is applied. For reports that are generated using this metric, please provide a sample report for each and every type of report.

### **RESPONSE:**

RCC objects to responding to "Record Requisitions," as the OPUC has no recognized procedure for Record Requisitions. At the hearing in this matter RCC agreed on a voluntary basis to answer, post-hearing, a question that was posed to Mr. Otto at the hearing regarding a standard that he knew existed, but the details of which he could not provide. RCC further objects to Record Requisition No. 2 on the basis that it goes beyond the question posed to Mr. Otto at the hearing and as such, constitutes an improper attempt at post-hearing discovery and to supplement the record with additional evidence from the witness after OTA concluded its cross examination of Mr. Otto. Subject to the foregoing objections, RCC's answer to the first sentence of the Record Requisition is provided in Attachment B, which is confidential and subject to the protective order in this docket.

**CONFIDENTIAL PER PROTECTIVE ORDER IN UM 1217**

**ATTACHMENT B, RCC response to OTA Record Requisition No. 2**

Question: Please provide the internal measurement standard used by RCC for the goals for answering customer calls to the business office and customer service center (identify both standards, if standards are different for a different location (i.e., business office versus customer service center)).

Answer: The internal measurement standard for calls to the Customer Service Center is to maximize 'service level.' This metric is captured via our call management software, CMS Supervisor (v11.0). It is derived as the number of 'ACD calls offered' that are handled in 60 seconds or less. Our goal is to achieve an 80% service level or higher.

Customer calls to the Business Office are usually made directly to an employee extension, as first-time or general calls are handled by the Customer Service Center. Thus, if the employee is on the phone or away, the call will be routed to voicemail. There are no metrics regarding calls to individual employee extensions.

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**CERTIFICATE OF SERVICE**  
**UM 1217**

I certify that I have this day served the foregoing letter to Administrative Law Judge Christina Smith regarding request to admit record requisitions by electronic mail and U.S. mail to the following:

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FILING CENTER  
PUBLIC UTILITY COMMISSION OF  
OREGON  
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CHRISTINA SMITH, ADMINISTRATIVE  
LAW JUDGE  
PUBLIC UTILITY COMMISSION OF  
OREGON  
PO BOX 2148  
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christina.smith@state.or.us

I further certify that I have this day served the foregoing letter to Administrative Law Judge Christina Smith regarding request to admit record requisitions upon all parties of record in this proceeding by electronic mail pursuant to OAR 860-013-0070, to the following parties or attorneys of parties (only those persons who have signed the Protective Order were sent the confidential portion of the attachment):

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Dated at Olympia, Washington, this 3rd day of April, 2006.



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