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September 14, 2018

**VIA ELECTRONIC FILING**

Attention: Filing Center  
Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97308-1088

**Re: Docket UM 1961- XO Communications Services, LLC, Service Quality  
Performance Plan for Access to Competitive Telecommunications Provider  
Representatives**

Attention Filing Center:

Attached for filing in the above-captioned docket is an electronic copy of XO Communications Services' Service Quality Performance Plan Proposal.

Please contact this office with any questions.

Sincerely,

A handwritten signature in black ink that reads "Alisha Till".

Alisha Till  
Legal Assistant

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1961**

In the Matter of

XO COMMUNICATIONS SERVICES, LLC

Service Quality Performance Plan for  
Access to Competitive Telecommunications  
Provider Representatives

XO COMMUNICATIONS SERVICES, LLC  
SERVICE QUALITY PERFORMANCE  
PLAN PROPOSAL

1           In response to the Public Utility Commission of Oregon’s (“Commission”) Order No. 18-  
2 283, dated August 1, 2018, XO Communications Services, LLC (“XO”) proposes the following  
3 measures to improve its performance as measured by the Commission’s service quality metric  
4 for competitive telecommunications providers for access to utility representatives.

**Introduction**

5           On July 16, 2018, Commission Staff provided a staff report to the Commission  
6 recommending that XO “submit a service quality performance plan to meet the Commission’s  
7 minimum service quality standards for access to competitive telecommunication provider  
8 representatives in the repair center within 45 days.”

**Background regarding XO**

9           XO is a small competitive local exchange carrier in Oregon. XO primarily provisions  
10 Primary Rate Interface (“PRI”) trunks and high capacity circuits to a handful of large regional/  
11 national companies with operations in Oregon. These are high-speed, intelligent connections to  
12 the network, and while they support voice service, they are also used for data, video, and  
13 applications such as Internet Access, Remote LAN Access, Call Centers, and File Transfer  
14 applications because of the capability to support simultaneous voice and data over digital  
15 platforms. These are competitive services, provisioned to large national and multi-national

1 customers that are operating under multi-jurisdictional agreements. These are not typically basic  
2 local exchange service lines and they are not offered to residential customers.

**Performance Plan to Improve Access to Utility Representatives**

3 Oregon Administrative Rule (OAR) 860-032-0012(8) requires XO to either answer 80  
4 percent of calls to the business office or repair service center within 20 seconds or have an  
5 average speed of answer (“ASA”) time of 50 seconds or less. XO has opted to measure the ASA  
6 time. XO complies with the standard for access to the business office; however, XO has not  
7 consistently met the standard for access to the repair center. XO proposes two specific changes  
8 to improve customer experiences with the repair center and to meet ASA requirements  
9 prospectively:

- 10 1. First, XO will enhance customer education efforts related to XO's secure customer web-  
11 portal – myXO Customer Portal (“myXO”). The myXO portal is a premier online tool that  
12 allows customers to access their accounts, pay bills, open and monitor trouble tickets, and  
13 more. It provides immediate access from almost any device - smartphone, tablet or laptop  
14 - from anywhere and at any time. If a customer desires to speak with a representative,  
15 myXO also provides a callback option. When the representative calls back, they already  
16 have the customer's information ready to address any concerns. XO's efforts will be  
17 applied to all of its similarly situated customers nationally. It is expected that this additional  
18 reinforcement will drive down overall call volumes as customer queries move to the  
19 alternative platforms available.
- 20 2. Second, XO has identified alternate Verizon call centers with capacity and shorter ASA  
21 intervals to accept overflow XO repair calls. XO will train and then begin using these call  
22 centers to improve its ASA performance.

## Conclusion

1           XO anticipates that implementation of its performance plan will improve access to repair  
2 center representatives and will allow XO to consistently meet the Commission's service quality  
3 standard. XO respectfully requests that the Commission approve its performance plan to improve  
4 service quality for average speed to answer to the repair center as described above.

5           While XO strives for compliance with the Commission's rules—and has developed its  
6 performance plan to further this end—XO also believes that the service quality rules should be  
7 updated. As discussed at the Commission's July 31, 2018 Public Meeting, the Commission's  
8 existing service quality rules have not been modified in years, and in many cases, do not reflect  
9 the level of competition and available technologies in the current telecommunications services  
10 market. XO understands that the Commission may be considering updating its service quality  
11 rules in the near future, and XO looks forward to participating in such a rulemaking proceeding to  
12 help ensure that the service quality rules better reflect the current business and market realities  
13 of the telecommunications services industry in Oregon.

14           Respectfully submitted this 14<sup>th</sup> day of September, 2018.

**McDowell Rackner Gibson PC**

  
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Lisa Rackner  
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**XO COMMUNICATIONS SERVICES, LLC**

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Of Attorneys for XO Communications Services