

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 1962**

In the Matter of

CITIZENS TELECOMMUNICATIONS
COMPANY OF OREGON,

Service Quality Performance Plan for Repair
Clearing.

CITIZENS TELECOMMUNICATIONS
COMPANY OF OREGON,
SERVICE QUALITY
PERFORMANCE PLAN PROPOSAL

In response to The Public Utility Commission of Oregon’s (Commission or PUC) Order No. 18 282, dated August 1, 2018, Citizens Telecommunications Company of Oregon, (“Frontier”) proposes the following actions to improve its performance as measured by the Commission’s service quality metrics for small telecommunications utilities for repair clearing times.

Introduction.

On July 16, 2018, Commission Staff provided a staff report to the PUC recommending that Frontier “submit a service quality performance plan to meet the Commission’s minimum service quality standards for repair clearing times...” While Frontier continues efforts to improve performance relative to the repair clearing metric, it would note that the overall functionality and reliability of its network is very strong as measured by the trouble report metric, which is consistently well within the OPUC’s standards for each of the ten exchanges in the Citizens service territory. In addition, this ten-exchange rural service territory covers over

2,300 square miles and serves less than three access lines per square mile. In fact, all but a single exchange has an access line density of less than eight lines per square mile. Moreover, the largest exchange in terms of customers has approximately four lines per square mile and the largest exchange in terms of square miles has well under a single line per square mile. Frontier provides this data only to point out some of the challenges associated with managing its field resources over this rural low-density service territory. These challenges can increase during times of heavy rains and extreme weather.

Below is a summary of the measures Frontier has implemented in order to improve company performance on the metric discussed by the Staff in their report.

Service Improvement Plan

Frontier is subject to regulatory treatment as a small telecommunications utility per Order No. 15-383, Docket UM 1749. OAR 860-034-0390(6) requires that Frontier complete at least 90 percent of all trouble reports within 48 hours of receiving a report for each repair center. Frontier is focused on several process improvement efforts to determine and eliminate causes of non-productive dispatches and improvements in its resource allocation model to increase the productivity and timely response of its field work force. This includes parallel efforts on improving record accuracy, technician skillsets and continuous technology improvements to further reduce the trouble volumes in the network. The results of these efforts are beginning to be reflected in the OPUC's repair clearing time as the company has most recently met this metric in three of the most recent four months. This most recent three months of data has not yet been reported to the OPUC and therefore was not available to Staff for their report. In addition, the company has allocated additional technician resources and the use of overtime for its current field workforce in these rural markets. Finally, Frontier will continue to review and enhance its

processes associated with the prioritization of service impacting trouble tickets in its dispatch work priority system.

Conclusion.

Frontier respectfully requests that the Commission approve its plan to improve service quality for the repair clearing time metric noted by Staff.

RESPECTFULLY SUBMITTED,



George Baker Thomson, Jr.
Associate General Counsel
Frontier Communications
1800 41st St.
Everett, WA 98201
425-261-5844
george.thomson@ftr.com