



**Sharon Mullin**  
Director  
Regulatory

2003 Point Bluff  
Austin, TX 78746

T: 512-330-1698  
F: 832 213-0203  
[slmullin@att.com](mailto:slmullin@att.com)

March 29, 2019

**VIA E-Filing at PUC.FilingCenter@state.or.us**

Oregon Public Utility Commission  
201 High St SE, Suite 100  
Salem, OR 97301

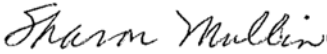
**Re: Petition of Teleport Communications America, LLC**

Dear Sir/Madam:

Enclosed for filing with the Public Utility Commission of Oregon is the Petition of Teleport Communications America, LLC for exemption from the Service Quality Reporting requirements of OAR 860-32-0012. This filing is being submitted using the Commission's electronic filing system.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Sharon Mullin  
Director – Regulatory

Attachment

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

In the Matter of

In the Matter of the Petition of Teleport  
Communications America, LLC for Approval  
of an Exemption from all Service Quality  
Reporting Requirements under OAR 860-032-  
0012

Docket No. \_\_\_\_\_

**PETITION FOR EXEMPTION FROM  
OAR 860-032-0012**

Pursuant to OAR 860-032-0012(5)(c), Teleport Communications America, LLC (“TCA”) hereby petitions the Public Utility Commission of Oregon (“Commission”) for an exemption from the monthly Service Quality Reporting Requirements found in OAR 860-032-0012, sections (4) through (8).

In support of its Petition, TCA states the following:

1. TCA is certified as Competitive Local Exchange Carrier (“CLEC”) in the State of Oregon.
2. TCA has met all service quality objective service levels as set forth in sections (4) through (8) of OAR 860-032-0012 for each of the twelve months preceding the filing of this Petition. A report of TCA’s service quality levels for March 2018 through February 2019 is included as **Attachment A** to this Petition.
3. OAR 860-032-0012(15)(c) states: "The Commission may grant a competitive telecommunications provider's petition for an exemption from service quality reporting requirements if the competitive telecommunications provider meets all service quality objective service levels set forth in sections (4) though (8) of this rule for the 12 months prior to the month in which the petition is filed."

4. As a CLEC, TCA is subject to effective competition in all the Oregon telephone exchanges in which it operates. TCA's customers have been able to choose from many telecommunications providers including incumbents CenturyLink and Frontier in the areas they serve. There are no barriers to entry in the State of Oregon that would prevent competitors from competing with TCA. Therefore, Oregon consumers will not be harmed should the Commission grant this Petition.
5. Communications regarding this Petition should be directed to:

Sharon Mullin  
Director-Regulatory  
AT&T Services, Inc.  
2003 Point Bluff  
Austin, TX 78746  
[slmullin@att.com](mailto:slmullin@att.com)

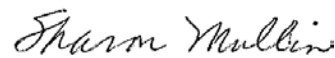
David Collier  
Area Manager-Regulatory  
AT&T Services, Inc.  
5250 S. Virginia St., Ste. 201  
P.O. Box 11010  
Reno, NV 89520  
[david.collier@att.com](mailto:david.collier@att.com)

## CONCLUSION

TCA respectfully requests that the Public Utility Commission of Oregon grant this Petition for an exemption from the monthly Service Quality Reporting Requirements found in OAR 860-032-0012, sections (4) through (8).

Respectfully Submitted this 29<sup>th</sup> day of March, 2019,

By:



Sharon Mullin  
Director-Regulatory  
AT&T Services Inc.  
2003 Point Bluff  
Austin, TX 78746  
Telephone: 512-330-1698  
Facsimile: 832-213-0203  
Email: [slmullin@att.com](mailto:slmullin@att.com)



# TELEPORT COMMUNICATIONS AMERICA LLC SERVICE QUALITY REPORT

## CHARTS

**Business Office Center Answer Time  
(Seconds)**

	2018	2019
January		17.0
February		13.0
March	5.0	
April	10.0	
May	11.0	
June	17.0	
July	13.0	
August	11.0	
September	12.0	
October	13.0	
November	9.0	
December	8.0	

**Repair Service Center Answer Time  
(Seconds)**

	2018	2019
January		16.0
February		13.0
March	15.0	
April	14.0	
May	14.0	
June	25.0	
July	14.0	
August	38.0	
September	31.0	
October	39.0	
November	33.0	
December	35.0	

Standard: Average Speed of Answer Time of 50 Seconds or Less

**DID NOT MEET OAR STANDARD**

### Commitments for Service - Provisioning

	2018	2019
January		100.0%
February		100.0%
March	100.0%	
April	100.0%	
May	100.0%	
June	100.0%	
July	100.0%	
August	100.0%	
September	100.0%	
October	100.0%	
November	100.0%	
December	100.0%	

OAR Standard: 90%

**DID NOT MEET OAR STANDARD**

### Repair Cleared Within 48-Hours\*

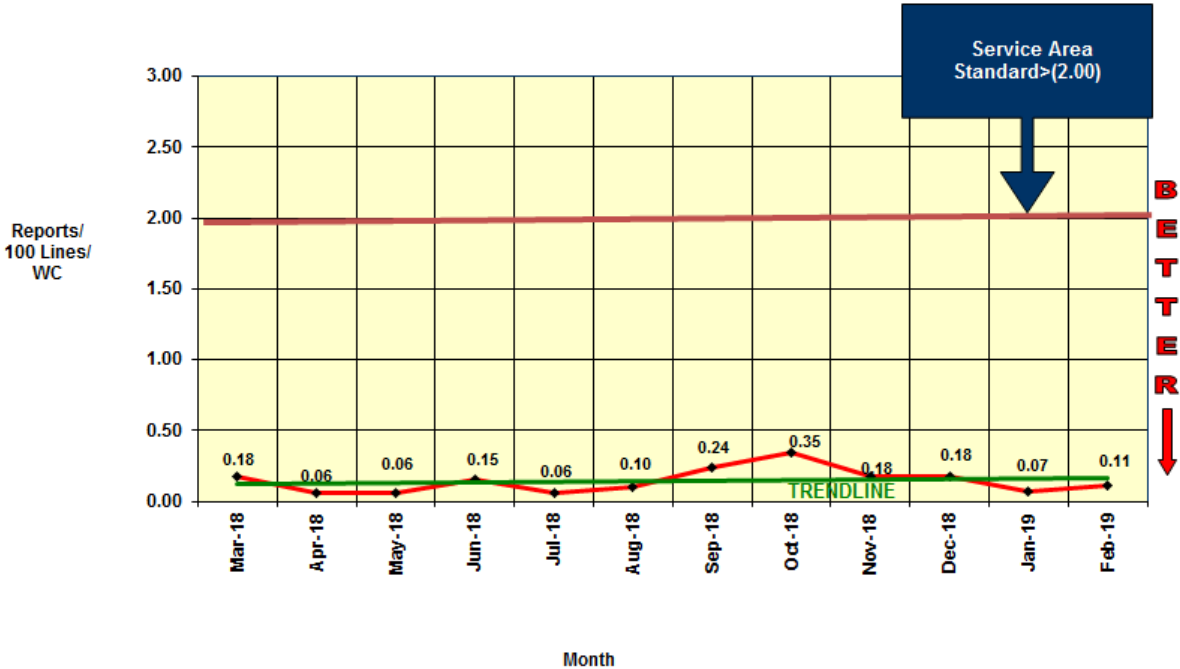
	2018	2019
January		100.0%
February		100.0%
March	100.0%	
April	100.0%	
May	100.0%	
June	100.0%	
July	100.0%	
August	100.0%	
September	100.0%	
October	100.0%	
November	100.0%	
December	100.0%	

OAR Standard: 90%

\*Exclusion to Standard per Order 14-016, less than 10 repairs for the month

**DID NOT MEET OAR STANDARD**

### Trouble Report Rate Monthly State Average



#### MONTHLY TROUBLE REPORT RATE

Service Area	MO > 2.00 <sup>1</sup>	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19
Teleport Communications America LLC	#REF!	0.18	0.06	0.06	0.15	0.06	0.10	0.24	0.35	0.18	0.18	0.07	0.11
<b>Statewide Average</b>		<b>0.18</b>	<b>0.06</b>	<b>0.06</b>	<b>0.15</b>	<b>0.06</b>	<b>0.10</b>	<b>0.24</b>	<b>0.18</b>	<b>0.18</b>	<b>0.18</b>	<b>0.07</b>	<b>0.11</b>
Service Area Count <sup>2</sup>	0	0	0	0	0	0	0	0	0	0	0	0	0

NOTE 1: The "MO > 2.00" column is the number of times a designated service area of over 1,000 access lines exceeded a 2.00 trouble report rate during the reported twelve month period. The "Designated Service Area Count" is the number the designated service area did not meet standard for the reported month.

NOTE 2: The number at the bottom of the monthly columns are the number of times the designated service area exceeded 2.00 for the reported month.