

PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: October 23, 2018

REGULAR  CONSENT  EFFECTIVE DATE Upon Approval

DATE: October 8, 2018

TO: Public Utility Commission

FROM: Malia Brock *MB*

THROUGH: Jason Eisdorfer *ap*, Bryan Conway *bc*, and Bruce Hellebuyck *BH*

SUBJECT: CITIZENS TELECOMMUNICATIONS COMPANY OF OREGON:  
(Docket No. UM 1962) Service Quality Performance Plan, Commission Review and Determination.

**STAFF RECOMMENDATION:**

Staff recommends that Oregon Public Utility Commission (OPUC or Commission) approve the Service Quality Performance Plan (Performance Plan) filed by Citizens Telecommunications Company of Oregon (Citizens or Company) with the performance review period to begin November 1, 2018 and end April 30, 2019, allowing the Company until June 15, 2019 to report its results for April, 2019.

**DISCUSSION:**

Issue

Whether the Commission should approve Citizens' Performance Plan describing how the Company will bring its performance for repair clearing time retail service quality metric into compliance within six months.

Applicable Law

The Commission establishes minimum service quality standards to ensure safe and adequate services for all telecommunications carriers pursuant to Oregon Revised Statute (ORS) 759.450. Under Section (5) of this statute, the Commission is required to direct a telecommunications carrier, utility or competitive provider that is not meeting the minimum service quality standards to submit a plan for improving performance to meet

the standards. The Commission is further required to review and approve or disapprove the plan.

Oregon Administrative Rule (OAR) 860-034-0390 provides the statutorily required retail service quality standards for small telecommunications utilities and also mirrors much of the relevant statute ORS 759.450. The relevant standard is:

**Repair Clearing Time**--Per OAR 860-034-0390(6)(a)(b), a small telecommunications utility must clear at least 90 percent of trouble reports within 48 hours of receiving the report.

The Commission found at its July 31, 2018, public meeting that Citizens was required to submit a plan to improve repair clearing times.<sup>1</sup>

## Analysis

### *Background*

Citizens timely filed its Performance Plan on September 14, 2018.

Staff notes that the Company, in its Performance Plan, states that 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 Commission's standards for each of the ten exchanges in the Citizens service territory.

Citizens further notes that the 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 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.

While the Company provided this data to illustrate the challenges associated with managing its field resources over this rural low-density service territory, with challenges increasing during times of heavy rains and extreme weather, Staff believes these statistics also serve to illustrate the plight of consumers in these areas of few or no other choices for access to 911 services and emphasizes the criticality of landline services in these remote, less populated rural exchanges.

Citizens' plan to improve service quality metrics for repair clearing time will focus on eliminating non-productive dispatches and improvements to its resource allocation

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<sup>1</sup> Commission Order No. 18-282, Docket No. UM 1962.

model to increase productivity and timely response of its field work force. This plan includes parallel efforts on improving record accuracy, technician skillsets and continuous technology improvements to further reduce the trouble volumes in the network. The Company states that the results of this effort are beginning to be reflected in their clearing times as the Company has met this metric in three of the four most recent months. As the most recent two months of data have not yet been reported to the OPUC, this is not available on Staff's report. Additionally, the Company has allocated additional technician resources in the use of overtime for its current filed workforce in these rural markets. The Company will continue to review and enhance its processes associated with the prioritization of service impacting trouble tickets in its dispatch priority system. In response to Staff's question relating to adding technicians, the Company's response indicates it has hired an additional technician dedicated to the Citizens market.

*The Required Commission Performance Plan Review*

Staff finds that Citizens has submitted a Performance Plan that may result in remedying the retail service quality standard deficiencies. The Company provides enough information to indicate that it has taken steps and has plans that have the potential to return its service quality metric results to meeting OPUC established standards.

While the Performance Plan is intended to remedy compliance for repair clearing times, Staff will continue to monitor all other metrics during the Performance Plan review period and take any necessary action to remedy deficiencies.

*Performance Plan Review Period Considerations*

The Performance Plan provides a plan to meet the Commission's minimum service quality standards for repair clearing times. The success or failure of the plan will be evaluated with compliance as the goal.

Because the service quality performance results have a significant consequence the timeframe for measurement of the Company's results should be established. All companies are allowed to report monthly service quality results up to forty-five days after the end of each data-month. For example, the April data-month is due on June 15. As a result of the data-month reporting delay, the statutorily required six-month Performance Plan time frame for the Company to remediate its service quality to meet standards may need to be defined or otherwise set by the Commission to allow for the normal course of reporting to reflect the success or failure of the Company's Performance Plan.

Staff proposes that the six-month statutory Performance Plan review period begin in November, 2018; the next full month after the Commission approves the Performance

Plan. If successfully implemented, the Company's Performance Plan should allow for the Company's reported results through April, 2019, to be consistent with the relevant service quality standards. This provides a standard timeframe for measuring whether or not the Company has met the goals of its Performance Plan.

The Company will have up to forty-five days from the end of each month reported to report service quality metrics during the six-month Performance Plan review period.

### Conclusion

Staff concludes that Citizens has submitted a plan that may result in remedying the repair clearing time service quality standard deficiency.

Staff concludes that it would be beneficial for the Commission to establish the objective measurement of Company progress by setting the beginning and ending month of the six-month Performance Plan review period and the due date for final reporting.

### **PROPOSED COMMISSION MOTION:**

Approve Citizens Telecommunication Company of Oregon's Service Quality Performance Plan and set the Performance Plan review period to begin November 1, 2018 and end April 30, 2019. Monthly service quality reports are due forty-five days from the end of the reported month with the final April, 2019, report due no later than June 15, 2019.