

PUBLIC UTILITY COMMISSION OF OREGON  
STAFF REPORT  
PUBLIC MEETING DATE: July 31, 2018

REGULAR  X  CONSENT       EFFECTIVE DATE                       N/A

DATE: July 16, 2018

TO: Public Utility Commission

FROM: Malia Brock *MB*

THROUGH: Jason Eisdorfer, Bryan Conway, and Bruce Hellebuyck *BAC*

SUBJECT: CITIZENS TELECOMMUNICATIONS COMPANY OF OREGON:  
(Docket No. UM 1962) Service Quality Performance Plan for Service Repair Clearing Time.

**STAFF RECOMMENDATION:**

Staff recommends that the Commission require Citizens Telecommunications Company of Oregon (Citizens) to submit a service quality performance plan to meet the Commission's minimum service quality standard for repair clearing time.

**DISCUSSION:**

Issue

Whether the Commission should require Citizens to submit a service quality performance plan to meet the Commission's minimum service quality standard.

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 telecommunication 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.

Citizens is subject to regulatory treatment as a small telecommunications utility per Order No. 15-383, Docket UM 1749. 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 remaining service quality standards address: Provisioning Commitments for Service, Trouble Reports, Blocked Calls, Interruption of Service Notification, Customer Access Line Testing, Customer Access Lines and Wire Center Switching Equipment, Special Service Access Lines, and Small Telecommunications Utility Interconnectivity.

## Analysis

### *Background*

There have been three instances in which the Commission required submission of a service quality performance plan under ORS 759.450(5). The Commission found at its June 19, 2001 public meeting that a telecommunications utility (Qwest) was required to file a plan to improve its business office access performance. This resulted in the Commission adopting a Memorandum of Understanding (MOU) between Staff and Qwest on July 24, 2001, and approval of Qwest's Performance Plan.<sup>1</sup> More recently, at its May 16, 2017 public meeting, the Commission required Qwest Corporation dba CenturyLink QC to submit a service quality performance plan.<sup>2</sup> This plan was extended an additional six months on May 30, 2018,<sup>3</sup> Frontier Communications Northwest Inc., was also required to submit a service quality performance plan at its August 22, 2017 public meeting.<sup>4</sup>

In addition to submitting monthly reports, Staff routinely works with companies to improve service quality. Staff processes monthly service quality information provided by companies as required by OAR 860-032-0012 up to 45 days after the month end and posts selected information on the Commission website.<sup>5</sup>

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<sup>1</sup> Commission Order No. 01-689, Docket UM 1026.

<sup>2</sup> Commission Order No. 17-175, Docket UM 1836.

<sup>3</sup> Commission Order No. 18-198, Docket UM 1836.

<sup>4</sup> Commission Order No. 17-328, Docket UM 1855.

<sup>5</sup> [Link to Citizens' most recent Service Quality Report posted to Commission website](#)

In some cases, Staff has also worked to relax some service quality standards as warranted. For example, Staff supported and the Commission approved a decrease in the 48-Hour Repair Metric from 95 percent to 90 percent complete within 48 hours and allowed for a weekend exemption along with some added safety-net protections,<sup>6</sup> and provided an exemption to the trouble reports cleared within 48 hours for months in which total repairs fall below ten.

Finally, Staff conducted an all-provider service quality workshop on January 15, 2015, with the goal of raising awareness and improving service quality.

Staff sent a pre-performance plan letter of warning to Citizens on January 4, 2018. (Attachment No. 1). The letter resulted in a conference call with Staff on January 25, 2018 during which Citizens indicated it was seeking to hire additional sales and service technicians in the Southern region to improve these metrics. Staff continued to monitor compliance and send Citizens the cumulative yearly service quality report posted on the OPUC website. When little progress was made on the Repair Clearing Time metric, Staff contacted Citizens to inquire whether the hiring of the technicians had occurred. Citizens' reply indicates that the hiring of sales and service technicians in the Southern region has not transpired. The underlying staffing issue has not been addressed, and the service quality metric shows little improvement as Citizens continues to miss the Repair Clearing Time metric.

*Failure to Meet Service Quality Measurement Standards*

Citizens has failed to meet the following service quality standard for a prolonged period of time:

Repair Clearing Time Standard

- Citizens performance has failed to meet the repair clearing time standard eleven out of the last twelve months and is found on the following page:

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<sup>6</sup> Commission Order No. 14-016, Docket No. AR 575, signed January 21, 2014.

### Trouble Report Cleared Within 48 hours

|           | 2017  | 2018  |
|-----------|-------|-------|
| January   |       | 53.3% |
| February  |       | 85.1% |
| March     |       | 54.7% |
| April     |       | 83.9% |
| May       |       | 95.8% |
| June      | 64.7% |       |
| July      | 63.9% |       |
| August    | 54.7% |       |
| September | 74.5% |       |
| October   | 87.1% |       |
| November  | 77.8% |       |
| December  | 58.7% |       |

OAR Standard: 90%

DID NOT MEET OAR STANDARD

Citizens' most recent retail service quality results are available on the Commission website.<sup>7</sup> Staff has used company reported results through May 2018 in this report. It is possible that the results could be better or worse at the time the Commission acts on Staff's recommendation.

#### Conclusion

Staff concludes that Citizens has persistently failed to meet the service quality standard for repair clearing time. Informal efforts and outreach to the Company have not rectified the issue. ORS 759.450(5) states that the Commission shall require a small telecommunication utility that is not meeting the minimum service quality standards to submit a plan for improving performance. Staff concludes that it is necessary for Citizens to be required to submit such a plan for Commission consideration.

#### **PROPOSED COMMISSION MOTION:**

Require Citizens Telecommunications Company of Oregon to submit a service quality performance plan to meet the Commission's minimum service quality standard for Repair Clearing Time within 45 days.

Citizens.ServiceQuality.PerformancePlan

<sup>7</sup> [Link to Citizens' most recent service quality report posted to Commission website.](#)



# Oregon

Kate Brown, Governor

## Public Utility Commission

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January 4, 2018

Via email to: Kim Douglas at: [kimberly.a.douglass@ftr.com](mailto:kimberly.a.douglass@ftr.com)

Kim Douglas  
Manager, Compliance  
Frontier Communications  
222 W Las Colinas Blvd  
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Ms. Douglas,

Citizens Telecommunications Company of Oregon (Citizens) has failed to meet two Minimum Service Quality (MSQ) Standards in Oregon: commitments for service provisioning and trouble reports cleared within 48 hours. A one month miss of any standard is considered a basis for a Performance Plan except for the trouble report rate, which must be missed over four consecutive months. Staff is concerned as Citizens has missed both service provisioning and the trouble reports cleared within 48 hours metrics on a regular basis for the past year.

Prior to requesting Citizens submit a formal Performance Plan, Staff would like to discuss the MSQ Standards with Citizens' management. During that call, Staff would like to discuss that Citizens begin reporting access to repair centers and business office representatives.

Please reference Staff's summary of Citizens business office and repair center access metrics reported over the past year:

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January 4, 2018

#### Commitments for Service-Provisioning

|           | 2016  | 2017  |
|-----------|-------|-------|
| January   |       | 81.0% |
| February  |       | 98.7% |
| March     |       | 82.3% |
| April     |       | 86.1% |
| May       |       | 88.3% |
| June      |       | 94.3% |
| July      |       | 93.2% |
| August    |       | 91.2% |
| September |       | 90.1% |
| October   |       | 94.6% |
| November  | 98.3% |       |
| December  | 76.1% |       |

OAR Standard: 90%

DID NOT MEET OAR STANDARD

#### Trouble Report Cleared Within 48 hours

|           | 2016  | 2017  |
|-----------|-------|-------|
| January   |       | 70.6% |
| February  |       | 85.7% |
| March     |       | 63.4% |
| April     |       | 58.1% |
| May       |       | 70.3% |
| June      |       | 64.7% |
| July      |       | 63.9% |
| August    |       | 54.7% |
| September |       | 74.5% |
| October   |       | 87.1% |
| November  | 92.9% |       |
| December  | 80.3% |       |

OAR Standard: 90%

DID NOT MEET OAR STANDARD

Staff is requesting a conference call on January 25, 2018 at 10 a.m. with Citizen's management to discuss Citizen's proposal to improve these metrics. Please confirm this meeting with Staff or make other arrangements to discuss these necessary improvements.

Thank you.

Malia Brock

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