

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2398

In the Matter of

ZIPLY FIBER NORTHWEST, LLC and
ZIPLY FIBER OF OREGON, LLC,

ORDER

Service Quality Performance Plan.

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

This order memorializes our decision, made and effective at our September 16, 2025 Regular Public Meeting, to adopt Staff's recommendation in this matter, modified to direct staff to work with the company on options to address or account for a customer's request for a later appointment time to ensure that customer service remains central. Staff shall bring recommendations to a future public meeting to amend the plan or otherwise address this issue. The Staff Report with the recommendation is attached as Appendix A.

Made, entered, and effective Sep 18 2025.



Letha Tawney
Chair



Les Perkins
Commissioner



Karin Power
Commissioner



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. RA3

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 16, 2025**

REGULAR	X	CONSENT	EFFECTIVE DATE	Upon Commission Approval
DATE:	August 25, 2025			
TO:	Public Utility Commission			
FROM:	Joseph Bartholomew			
THROUGH:	Bryan Conway and Russell Beitzel SIGNED			
SUBJECT:	<u>ZIPLY FIBER:</u> (Docket No. UM 2398) Service Quality Performance Plan.			

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Ziply Fiber of Oregon's (Ziply or Company) performance plan.

DISCUSSION:Issue

Whether the Public Utility Commission of Oregon (Commission) should approve Ziply's¹ performance plan, laying out how the Company will improve its performance to meet the minimum service quality metrics within six months.

Applicable Rule or 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

¹ Ziply Fiber is the parent of operating companies Ziply Fiber Northwest and Ziply Fiber of Oregon.

and approve or disapprove the plan.

Oregon Administrative Rule (OAR) 860-034-0390 provides the statutorily required service quality standards for small telecommunications utilities and mirrors much of ORS 759.450. Trouble Tickets per 100 customers per OAR 860-034-0390(5)(A) requires for wire centers with more than 1,000 access lines: two trouble tickets per 100 working access lines per wire center more than three times during a sliding 12-month period. OAR 860-034-0390(5)(B) requires for wire centers with 1,000 or less access lines: three trouble tickets per 100 working access lines per wire center more than three times during a sliding 12-month period. Repair Clearing Time per OAR 860-034-0390(6) requires 90 percent of all trouble reports to be cleared within 48 hours of report for each repair center.

On June 11, 2025, the Commission required Ziply by Order No. 25-215 to submit a service quality performance plan within 45 days to meet the minimum service quality standards for trouble tickets per 100 customers and 48-hour repair clearing time.

Analysis

Background

Ziply timely filed its Service Quality Performance Plan (Performance Plan) on July 23, 2025. On August 18, 2025 Ziply filed a Supplement to its service quality performance plan.

Previously, performance plans were required for both Ziply Fiber of Oregon² and Ziply Fiber Northwest.³ In 2017, Ziply Fiber Northwest was required to submit a Performance Plan to improve trouble reports per 100 access lines, repair clearing time, and access to utility representatives.⁴ In 2018, Ziply Fiber of Oregon was required to file a plan to improve its repair clearing time.⁵

The Required Commission Performance Plan Review

Staff finds that Ziply's a Performance Plan may result in remedying the service quality standard deficiencies. The Company provides enough information to indicate that it plans to take steps and has the potential to return its service quality metric results to meeting Commission established standards.

While the Performance Plan is intended to remedy compliance with trouble tickets per 100 access lines, and 48-hour repair clearing times, Staff will continue to monitor all other metrics during the Performance Plan review period and take any

² Known as Citizens Telecommunications Company of Oregon.

³ Known as Frontier Communications NorthWest Inc.

⁴ Order No. 17-328.

⁵ Order No. 18-282.

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necessary action to remedy deficiencies.

Performance Plan Action Items

The Company has submitted the following approach with the intention of improving its trouble tickets per 100 access lines and 48-hour repair time. The approach is as follows:

1. Ticketing assignments – System enhancements changed the numbers that had been previously reported for the first quarter of 2025. Specifically, incidents were initially misidentified as countable trouble tickets, but upon further review, it was determined that the issue was not related to voice access lines. Other incidents were included in the totals but did not contain the information necessary to be properly categorized. A closer review determined that they were excludable from the calculation. Examples of ticket types that were previously and incorrectly included are issues with customer inside wiring and customer premise equipment, no trouble found upon dispatch and issues related to third parties beyond Ziply Fiber's control (such as CLEC's, third party damages or cable cuts). Once Ziply excluded these tickets from our calculations, the Company saw a significant improvement in the results. Staff reviewed revised service quality information provided by the Company and found that the trouble tickets per 100 access lines have improved results due to the system enhancement's as shown in attachment A.
2. Systems Modifications – The improvements above were further enhanced when the Company could identify the steps taken by the technician and the ultimate disposition of the ticket. Ziply Fiber's systems previously included this detailed information; however, approximately 18 months ago, Ziply Fiber migrated ticketing and dispatch systems. In that migration, these key elements to tickets were not retained. Several tickets reviewed had neither a disposition code nor technician notes rendering it impossible to determine the reason for the ticket and the findings at dispatch. It is the Company's belief that even more tickets would have been excluded from their calculations had these elements been available for review. As described, the systems have been enhanced to ensure that tickets cannot be closed without both notes by the technician and a disposition code which the Company anticipates will further reduce countable tickets.
3. Access lines by Wire Center – Ziply Fiber identified a number of trouble tickets per 100 access lines were reported at the repair center level instead of the wire center level, therefore skewing its analysis when reporting to the Commission.

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4. Root Cause Analysis and Remediation – Ziply Fiber identified three root causes for its monthly 48-hour repair time performance. The first, customer behavior, was only discussed briefly but had a much larger impact on the performance. Originally, voice customers were presented with time options to schedule their repair beyond the required 48-hour restoration window. Customers chose appointments for their own convenience more than 48 hours from the reported trouble. To ensure restores occur within the 48-hour window, Ziply Fiber has updated its systems and procedures to limit available appointments to occur within 40 hours of reporting a trouble ticket. The second identified root cause for the monthly 48-hour repair time performance was technical staff allocations. Specifically, Ziply Fiber has reallocated copper trained staff to ensure availability for both evenings and weekends by authorizing necessary overtime and schedule modifications to ensure that we have staff available in order to meet restoral requirements. The third identified root cause was training, which refers to the system modifications and updates described above.

Performance Plan Review Period Considerations

The Performance Plan includes steps to meet the Commission's minimum service quality standards for trouble tickets per 100 access lines and 48-hour repair clearing times. The success or failure of the plan will be evaluated by Commission Staff with compliance as the goal, consistent with ORS 759.450(5) and Commission Order No. 25-215.

At the outset, Staff wishes to flag that the time frame for measuring the results of the Company's service quality performance plan does not align with the period in which the plan would be implemented, due to reporting lag. All companies are allowed to report monthly service quality results up to forty-five days after the end of each month. For example, April service quality data is due by June 15. As a result of the data reporting delay, the statutorily required six-month performance plan time frame for the Company to remediate its service quality 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.

For ease of administration, Staff proposes beginning the six-month performance plan review period in the next full month after the Commission approves the Performance Plan and allowing the Company up to forty-five days to report its results for the sixth month of the Performance Plan review period. If successfully implemented, the Company's Performance Plan should allow for the Company's reported results for March 2026 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. Staff anticipates a review period of October 2025

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– March 2026, with a Staff targeting the end of June 2026 for providing results to the Commission for review.

Staff plans to monitor Ziply's performance regularly and will obtain information on the Company's progress toward meeting the Performance Plan goals. If the Commission desired additional information in the interim, it could include in its order a requirement for additional reporting pursuant to OAR 860-034-0390(3), "The Commission may require a small telecommunications utility to submit additional reports on any item covered by this rule."

Conclusion

Staff concludes that Ziply has submitted a plan that provides a plausible path to reach compliance with the minimum service quality standard as outlined in OAR 860-034-0390.

Staff further concludes that it would be beneficial for the Commission to establish an objective measurement of Company progress by setting the beginning and ending month of the six-month performance plan review period, as well as the due date for final reporting.

PROPOSED COMMISSION MOTION:

Approve Ziply Fiber's service quality performance plan and set the performance plan review period to begin October 1, 2025, and end March 31, 2026. The Company has until May 15, 2026, to report its results for March 2026.

RA3 – UM 2398 Ziply Service Quality Performance Plan Submission