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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission's Own Motion into the Service
Quality Standards for All Telecommunications
Carriers and Revisions to General Order 133-B.

Rulemaking 02-12-004
(Filed December 5, 2002)

ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO

This ruling revises the scope of the proceeding consistent with the March 7, 2003 assigned Commissioner and Administrative Law Judge's (ALJ) ruling denying in part and granting in part motion to suspend. I request comments on whether the Commission should require and publish annual customer satisfaction surveys for telecommunications services, should continue to monitor service quality under the Uniform Regulatory Framework (URF), and should monitor service quality for other local exchange carriers (LEC). Comments on issues identified in this scoping memo are due on April 30, 2007 and reply comments are due on May 21, 2007.

Background

The Commission opened this rulemaking to adopt revisions to existing service quality measures and standards applicable to telecommunications carriers. The Commission stated the preliminary scope of this proceeding was to review, revise, supplement and expand, as necessary, those elements of General Order (GO) 133-B and to add new measures, procedures, standards and reports to the Commission's service quality rules. The general issues to be considered were listed in Attachment 1 to the Order Instituting Rulemaking (OIR). The

exact scope of the proceeding was to be determined in one or more scoping rulings issued by the assigned Commissioner. The March 7, 2003 ruling narrowed comments to four issues: 1) adoption of measures for specific services proposed in Exhibit A to Attachment 1 of the OIR; 2) parties' cost/benefit analyses for adoption of those measures; 3) whether publishing carriers' reported data for service quality measures is a reasonable alternative or interim step to establishing standards and measure-specific quality assurance mechanisms for some measures; and 4) whether workshops centered on implementation issues would be productive after draft rules issue. Comments on the more specific questions listed in Attachment 1 to R.02-12-004 were deferred until after a proposal was issued. The Commission received extensive comments on the four issues identified in the ruling in April and May of 2003.

Several decisions subsequently deferred service quality issues to this rulemaking. Decision (D.) 03-10-088, the New Regulatory Framework (NRF) service quality decision, found areas where service and measures of performance should improve, areas where standards might be necessary, and areas where no change was warranted; changes were deferred to this rulemaking. D.04-09-062, the Cingular investigation, deferred resolution of prospective standards for customer notification of wireless coverage and capacity to this proceeding. Finally, the URF proceeding, Rulemaking (R.) 05-04-005, deferred service quality issues, including service quality monitoring reports, to this proceeding.

Scope of this Proceeding

The record in this proceeding is almost four years old and needs to be updated before I can recommend a proposed decision to the full Commission. In D.06-08-030, the URF proceeding, the Commission found that regulatory policy should be consistent to the extent possible across market segments in light of

competition among wireline, wireless and Voice over Internet Protocol (VoIP) services. Service quality regulation should aim to 1) rely on competition, wherever possible, to promote broad consumer interests and 2) promote development of a wide variety of new technologies and services in a competitively and technologically neutral manner. To achieve those goals, I request comments on additional issues after addressing filed comments.

First, since a goal of state policy is to rely on competition, wherever possible, to promote broad consumer interests, then the Commission's approach to reviewing service quality should determine what service quality data and reports are needed to provide relevant information to the Commission as to consumer experiences regarding the quality of communications services so that the Commission can assess whether the competitive market adequately protects California consumers and which reports no longer serve the public interest. In addition, a review of the comments filed in this proceeding lends support to adopting fewer service quality measures than proposed in the revised Exhibit A attached to the March 2003 ruling. The comments also lend support to limiting service quality measures to basic local exchange access line service. Finally, the comments lend support to publishing carriers' service quality data. However, these comments were filed before issuance of D.06-08-030 and do not address the Commission's support for symmetric regulation among the classes of communications service providers regulated under URF and their competitors. (D.06-08-030; D.06-12-044, n.34.)

In light of the findings in D.06-08-030, it is clear the Commission's service quality regulations must change. As demonstrated in filed comments, current or revised service quality measures and standards cannot apply to all services. In order to achieve symmetric service quality regulation, new measures would have

to be adopted or old measures would have to be revised and/or eliminated. Fashioning measures that would apply to all services would be both difficult and time-consuming. A new approach should be examined.

Service quality reports generally cover key performance indicators. The Federal Communications Commission's (FCC) annual incumbent local exchange carrier (ILEC) service quality report, based on Automated Reporting Management Information System (ARMIS) data, reports on measures, complaints, and customer surveys.¹ Of the performance indicators analyzed, the indicator that could be adapted to both wireline and wireless services most easily is the customer satisfaction surveys, which measure satisfaction with installations, repairs and answering time. Customer satisfaction has the advantage of being easily understood by consumers and could be published on the Commission's website to permit comparison of satisfaction before the customer chooses and/or changes carriers. Publishing the results of customer satisfaction surveys would promote customer education and would not be designed to trigger investigations and resulting penalties. The Commission, with parties' input, would need to ensure that the survey follows professional norms and transmits data to the Commission staff in usable formats.

If the Commission requires and publishes the results of annual customer satisfaction surveys, it remains to be determined whether the Commission should continue to monitor some service quality for ILECs regulated under URF. The Commission currently monitors telephone service measures under GO 133-B and major service interruptions for all URF ILECs. The Commission also

¹ Not all ILECs file service quality data with the FCC. SureWest is not required to do so.

monitors the ARMIS-required customer survey for Pacific Bell Telephone Company (AT&T California). NRF-specific reports, including those addressing complaints, informal service, and summary of major service interruptions, were eliminated in D.06-08-030.²

Although this proceeding will consider service quality monitoring, I want to coordinate this review with efforts in R.05-04-005. In that proceeding, the Commission is considering the elimination of Commission-specific reports and their replacement by ARMIS reports, other reports filed by carriers with the FCC, or new Commission-specific reports that can meet a cost-benefit test. Consistent with that approach, if the Commission continues to monitor URF carriers' service quality, the Commission could monitor California-specific data reported by ILECs to the FCC by ARMIS or under the former requirements of the Merger Compliance Oversight Team (MCOT).³ Most of the measures proposed for consideration in this rulemaking are ARMIS or MCOT service quality indicators. Reporting California-specific ARMIS data to this Commission would not be burdensome for URF ILECs who report that data to the FCC. The Commission could continue to monitor major service interruptions as it has since 1977 as required by the Commission's Communications Division or could monitor California-specific switch downtime under ARMIS.

² AT&T, Verizon, SureWest, Frontier Monitoring Reports List prepared for February 16, 2007 URF Monitoring Workshop.

³ AT&T California continues to file MCOT data with the Commission in compliance with D.03-10-088. AT&T California and Verizon are no longer required to file service quality measures with the FCC.

Service quality monitoring would replace GO 133-B's exception reporting and required staff investigations and reports. Monitoring service quality measures for URF ILECs would permit the Commission to track the impact of increasing competition and reducing regulatory requirements on service quality for basic local exchange services. Residential basic services remain price regulated until 2009.

Although all telecommunications carriers are subject to GO 133-B's uniform reporting levels for installation, maintenance, and the quality of service, the comments filed in this proceeding support limiting measures required by GO 133-B, ARMIS, and MCOT to basic local exchange access line service. Non-URF ILECs and competitive local exchange carriers (CLEC) currently submit data when GO 133-B's reporting service levels are triggered. CLECs submit data on major service interruptions under D.96-02-072. The Commission needs to determine whether non-URF ILECs and CLECs should have the same reporting requirement as URF ILECs.

I request that parties comment on whether the Commission's service quality rules should be changed to require:

- Annual customer satisfaction surveys for all wireline and wireless services. If so, should the surveys focus on installation, repair and answering time or are there other relevant metrics that should be included? Should the surveys follow the ARMIS format for wireline carriers or should surveys be developed for wireline and wireless carriers? If surveys are developed, what questions should be included? Should the requirement to complete customer satisfaction surveys have a threshold determined by access lines and/or active numbers? How should the surveys be conducted? How should carriers transmit data to Commission staff for publishing on the Commission's website?

- URF service quality monitoring of existing California-specific ARMIS and MCOT measures. Should non-URF ILECs have the same reporting requirement? Should CLECs have the same reporting requirement? Should the Commission continue to monitor service quality under the MCOT requirements?
- Service quality monitoring of major service interruptions or California-specific downtime under ARMIS. Should all LECs report service quality interruptions in the same manner?
- Elimination or continuation of existing company-specific or California-specific measures and/or reports. Should whether the measures or reports provide consumers or the Commission with relevant information on the performance of a carrier govern whether measures and/or reports should be continued or eliminated? Explain your reasons for eliminating or continuing each measure and/or report.

To assist the parties in evaluating these proposals, the service quality measures attached to the March 2003 ruling are attached to this ruling with the source of the measure identified. Parties also should comment on whether the concerns identified in D.03-10-088 and D.04-09-062 are addressed by the proposed customer satisfaction surveys and URF service quality monitoring recommendations. After comments are received, I will consider ordering workshops to facilitate changes to the Commission's service quality rules.

Categorization and Hearings

In the OIR, the Commission preliminarily determined that this is a quasi-legislative proceeding and that no hearings are necessary. I affirm those preliminary determinations.

Schedule

Pursuant to the OIR, the undersigned assigned Commissioner and/or the ALJ may revise the schedule. I set the schedule as follows:

April 30, 2007	Parties file comments on scoping memo issues
May 21, 2007	Parties file reply comments
June 2007	Workshops, if necessary
September 2007	Mailing of Proposed Decision
October 2007	First possible Commission consideration of Proposed Decision

Ex Parte Communications

This proceeding is subject to Article 8, which specifies standards for engaging in *ex parte* communications and the reporting of such communications. Rule 8.2(a) applies to proceedings categorized as quasi-legislative. Accordingly, *ex parte* communications are allowed without restriction or reporting requirement in all phases of this rulemaking.

Filing, Service and Service Lists

The Commission's rules have changed since this rulemaking issued. The following reflect the current obligations of the parties with respect to filing, service and service lists.

Parties must file certain documents as required by the Rules or in response to rulings by either the Assigned Commissioner or the ALJ. All formally filed documents must be filed with the Commission's Docket Office and served on the service list for the proceeding. Article 1 of the Rules contains all of the Commission's filing requirements. Resolution ALJ-188 sets forth the interim rules for electronic filing, which replace only the filing requirements, not the service requirements. Parties are encouraged to file electronically whenever

Assigned Commissioner

REVISED EXHIBIT A WITH SOURCES

Service Quality Measures		Scoping Memo		
Service Category	Service Quality Measure	Existing Source/ Authority	Average Benchmark	Min/Max Benchmark
Installation	1. Held Access Line Service Orders	GO 133B, MCOT (under D.03-10-088)		
	2. Installation Commitments Met for Access Line Orders	GO 133B, MCOT, ARMIS		
	3. Installation Commitments Met for Other-Than Access Line Orders	None		
	4. Installation Interval for Access Line Service Orders	ARMIS		
	5. Installation Intervals for Other-Than Access Line Service Orders	None		
	6. Percent of Access Line Installations Completed Within 5 Working Days	MCOT		Y
	7. Access Line Installation Trouble Report Clearing Time	None		
	8. Access Line Installation Trouble Report Out-of-Service Clearing Time	None		
	9. Access Line Installation Trouble Report Commitments Met	None		
Maintenance	10. Customer Trouble Reports	GO 133B, ARMIS		
	11. Repeat Out-of-Service Trouble Reports	ARMIS		
	12. Repeat Other-Than-Out-of-Service Trouble Reports	ARMIS		
	13. Initial Out-of-Service Trouble Report Clearing Time	MCOT		
	14. Repeat Out-of-Service Trouble Report Clearing Time	MCOT		
	15. Initial Out-of-Service Clearing Time Commitments Met	MCOT		
	16. Repeat Out-of-Service Clearing Time Commitments Met	MCOT		
	17. Other-Than Out-of-Service Clearing Time Commitments Met	MCOT		
	18. Initial Out-of-Service Repair Interval	ARMIS		
	19. Repeat Out-of-Service Repair Interval	ARMIS		
	20. Other-Than Out-of-Service Repair Interval	ARMIS, MCOT		
	21. Total Four-Hour Appointment Requests	Civil Code § 1722(c)(1)		
	22. Four-Hour Appointment Commitments Met	Civil Code § 1722(c)(1)		
	23. Major service interruptions	1977 Communications Division requirement; D.96- 02-072		
Customer Services (Operator, DA, Repair and Business Offices)	24. Toll Operator Answering Time	GO 133 B		
	25. Directory Assistance Operator Answering Time	GO 133 B		
	26. Trouble Report Service Answering Time	GO 133 B		
	27. Business Office Answering Time - Non-Billing-Related	GO 133 B		
	28. Business Office Answering Time - Billing Inquiries	None		
	29. Percentage of abandoned calls	MCOT		
	30. Percentage of blocked calls	MCOT		

INFORMATION REGARDING SERVICE

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a copy of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the copy of the filed document is current as of today's date.

Dated March 30, 2007, at San Francisco, California.

/s/ ANTONINA V. SWANSEN

Antonina V. Swansen

***** SERVICE LIST *****
Last Update on 18-JAN-2007 by: SMJ
R0212004 INITIAL LIST

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