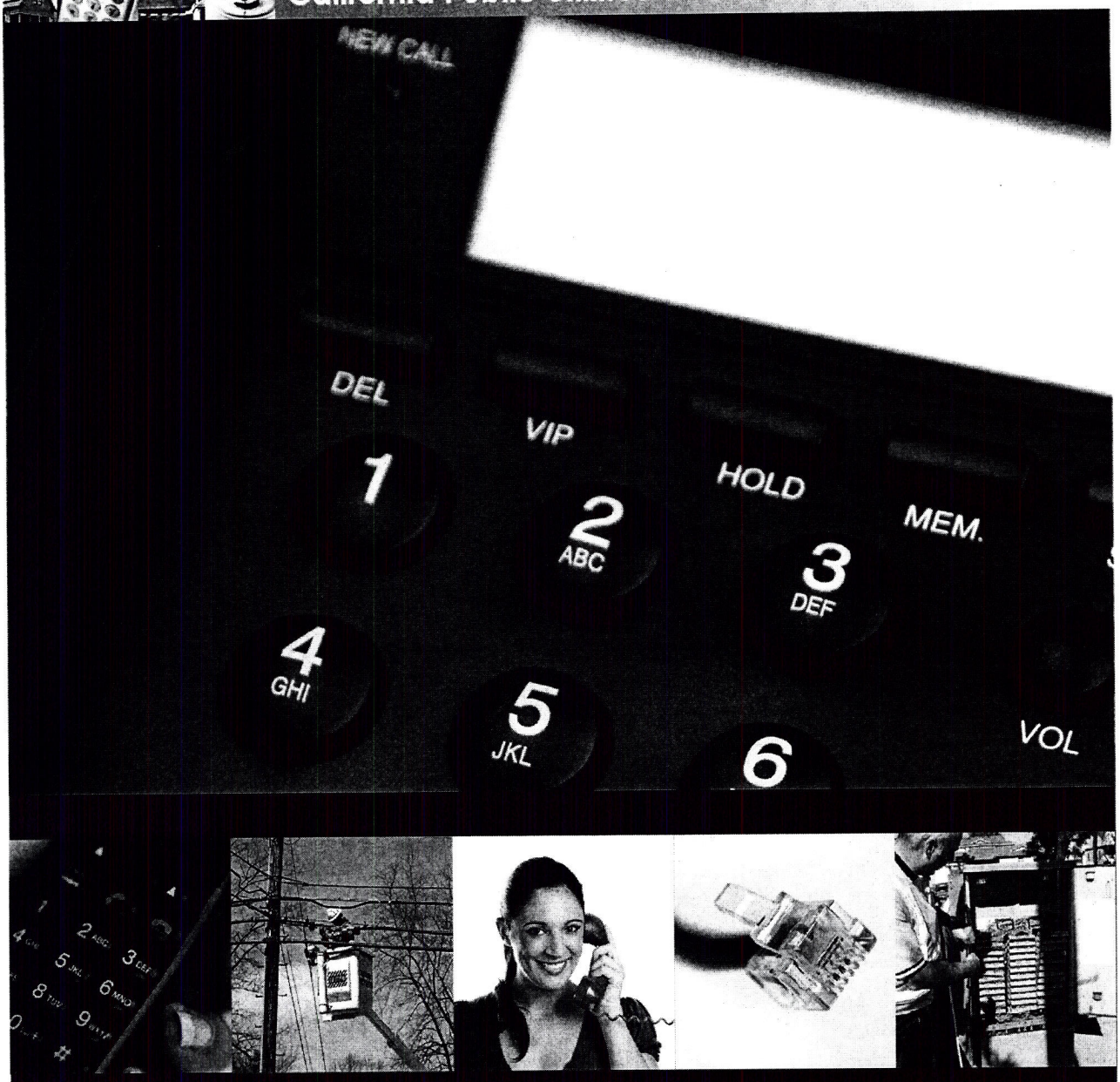
ATTACHMENT A

March 2011 Staff Report
Telephone Carrier Service Quality Report

Communications Division

California Public Utilities Commission



Telephone Carrier Service Quality Report

March 2011

Communications Division
Report on Telephone Carrier Service Quality for the Year 2010

I. Executive Summary

This report is prepared by the Communications Division (CD) pursuant to General Order (G.O.) 133-C §7 -Staff Investigations and Additional Reporting Requirements - which provides that staff may investigate any company that does not meet a minimum service quality reporting standard level, and any major service interruption, and may also recommend the Commission institute an investigation into a carrier's performance and alleged failure to meet the reporting service level for six or more consecutive months. There are no penalties if a carrier does not meet the minimum standards.

This report discusses telephone wireline carrier service quality in 2010 based on data submitted pursuant the 2010 G.O. 133-C, and AT&T-California's and Verizon California's service outages that resulted from rain storms in their respective service areas in Southern California beginning in late December 2010.

G.O. 133-C has five standards to measure telephone service quality that primarily apply to residential customers and small businesses with 5 or fewer lines: 1) Service Installation time (within 5-days), 2) Meeting Installation Commitments 95% of the time, 3) % of Trouble Reports per number of lines, 4) Out-of-Service Restoration Time (90% within 24 hours) for outages that were within the control of the utility, and 5) Answer Time to reach a live operator (80% of calls in less than 60 seconds). Measures 1-5 apply to the small local exchange companies (Small LECs) and measures 3-5 apply to the four large phone companies and competitive local carriers regulated under the Uniform Regulatory Framework (URF), collectively referred to as URF Carriers. Twenty seven wireline carriers (4 large, 8 CLEC, and 15 small LECs) submitted G.O. 133-C reports.

CD believes that the Trouble Ticket and Out-of-Service measures are the most important standards because they have public safety implications, relating to a customer's ability to make and receive calls. The following is a summary of carrier's performance in meeting the service quality standards, beginning with three standards that apply to all carriers.

Trouble Reports

All of the twenty seven wireline carriers met the Customer Trouble Report standard of between 6% and 10% per 100 lines, depending on the size of the reporting company.

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Out-of-Service

This standard proved the most difficult for carriers to meet, with the small telephone companies reporting the best results, and the four URF ILECs having the worst performance. Only one URF ILEC, SureWest, met this standard of restoring service within 24 hours 90% of the time, and that was in just four out of twelve months. AT&T, Verizon and Frontier never attained the 90% standard, with ATT lagging the quartet with restoral rates in 2010 ranging from 33% to 54%.

Regarding the eight CLECs, only three met the standard in six or more months of the year, and the other five met the standard in three or less months of the year. Conversely, thirteen of the fifteen small LECs met the standard between 9 and 12 months of the year. Most notably, Ducor, Frontier of the Southwest, Kerman, Sierra and Siskiyou met the standard in all twelve months of 2010. The remaining two small LECs met the standard for at least half of the year.

Operator Answer Time

None of the URF ILECs were able to meet the Answer Time goal of routing callers to a live operator within 60 seconds for each quarter of the year, SureWest achieved the goal 3 of 4 quarters in 2010, Citizens and AT&T achieved the goal 2 of 4 quarters, and Verizon did not meet the standard in any quarter.

Five of the eight CLECs met the Answer Time standard in all four quarters of 2010. One company met the goal 3 of 4 quarters, one company did not meet it in any quarter, and one company did not report anything.

Only 9 of the fifteen Small LECs provided Answer Time data, for 2010. All 9 of these reporting companies met the Answer Time standard.

The following two standards apply only to the small LECs. Of the fifteen companies, fourteen reported for all twelve months of the year. Frontier Communications of the Southwest had been acquired by Frontier Communications from Verizon earlier in 2010, and only reported for the last six months of the year.

Installation Interval

All of the fourteen small LECs that reported for the full year met the standard of installing service in five days or less in each of the twelve months. Frontier Communications of the Southwest met the standard in each of the six months reported.

Installation Commitments

Eleven of the fifteen small LECs met the standard to keep installation appointments 95% of the time for each of the twelve months, and the remaining three companies that

reported for all twelve months met the goal in eleven of the twelve months. Frontier Communications of the Southwest met the standard in each of the six months reported.

Winter Rainstorms in Southern California

The rainstorms in late-December 2010 and early-January 2011 in Southern California caused severe flooding in the service areas of AT&T and Verizon and over 250,000 people lost telecommunications service. The time that it took to restore service in these areas was not reflected in AT&T's and Verizon's out-of-service restoration time statistics because these outages are considered to be outside of the control of the companies and excluded from the calculation. To respond to the high number of service outages that resulted from the storm, both companies reassigned staff to restore service. AT&T also increased overtime for field repair personnel and hired more seasonal employees in anticipation of more storms. Verizon made software enhancements to their dispatch system and increased employee training.

Differences in How Carriers Calculate Measures and Report Data

After reviewing the G.O. 133-C reports and raw data submitted by the carriers and additional storm-related information, CD observes that there are differing interpretations for the treatment of excluded events in calculating Out-of-Service intervals, particularly during states of emergency. There is no definition of when a state or emergency ends, allowing subjectivity in calculating service restoration times.

Some carriers like Verizon, incorrectly included data and video services in calculating Trouble Tickets and Out-of-Service repair intervals, which are only supposed to reflect voice services. Some carriers do not provide raw data, as required, or the raw data was incomplete. Finally the details in the raw data lack sufficient specificity to allow staff to reproduce the carrier's reported results and verify that the reported data was calculated in compliance with applicable rules.

CD's Recommendations

Given that the three of the five largest telephone wireline carriers in the state did not meet the Out-of- Service standard of restoring service within 24 hours 90% of the time in any month of the year, and other carriers had varying degrees of difficulty meeting this standard and the operator answer time standard, CD believes that a review of G.O. 133-C is needed. Due to the public safety aspects of having quality, reliable service, the Commission should follow –up to examine why service quality standards are not being met and what needs to be done so that wireline carrier can provide reliable service to customers

CD recommends that the Commission initiate an Order Instituting Investigation (OII), and/or an Order Instituting Rulemaking (OIR) to review the G.O. 133-C standards, particularly with regards to Out-of-Service restoration times and assess why carriers consistently could not meet this standard, why carriers are not regularly meeting the

operator answer time standard of 60 seconds or less, consider adopting new standards or modify existing standards, and consider penalty mechanisms for companies that consistently fail to meet one or more standards.

II. Background

The California Public Utilities Commission (Commission) adopted Service Quality (SQ) reporting measures and standards in G.O. 133-C through Decision (D.) 09-07-019 on July 9, 2009 as a result of Rulemaking (R.) 02-12-004. This Rulemaking was opened in December 2002 to review and revise the G.O. 133-B service quality measures and standards. G.O. 133-C and D.09-07-019 relied on the changes in regulatory policies adopted in D.06-08-030 that favored a reliance on increased market competition as opposed to regulatory intervention to ensure quality services were provided to California consumers.

G.O. 133-C adopted five standards to measure service quality: (1) telephone installation intervals (2) installation commitments (3) customer trouble reports (4) out of service repair intervals and (5) billing, non-billing and trouble answer times. Measurements 1-5 apply to small local exchange carriers (or Small LECs), measures 3-5 apply to Uniform Regulated Framework (URF) incumbent local exchange carriers (URF ILECs) and competitive local exchange carriers (CLECs) [collectively referred to as URF carriers].

In addition to the reports, carriers are required to provide the underlying raw data used in calculating the reported results for every measure except answer times. Wireless carriers, voice over internet protocol (VoIP) carriers, resellers, and any ILEC or CLEC with less than 5,000 customers [unless they are a carrier of last resort] are exempt from reporting any of the five service quality measures required by G.O. 133-C. However, wireless carriers are required to provide coverage maps on both their websites and at their retail locations.

The service quality results are calculated on a monthly basis and reported quarterly, except for the Answer Time standard, which is calculated quarterly and reported annually on February 15th.

Twenty seven telephone carriers filed G.O. 133-C reports that had data on them for 2010, and CD posted these on the CPUC's website at Telecommunications Carrier' Service Quality Reports .

III. G.O. 133-C Reported Service Quality Performance for Calendar Year 2010

The G.O. 133-C telephone service quality standards adopted in D. 09-07-019 primarily apply to residential customers and small businesses, defined as those with five or fewer lines, and are as follows:

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- ***Telephone Installation Intervals***. Installation interval is the period between a customer requesting basic service, and the service becoming operational. The standard is 5 days or less. This measure applies only to residential and small business customers. All reporting carriers are required to provide the underlying raw data for this measure.

- ***Installation Commitments***. Installation commitments reflect a carrier meeting its promised installation date (customer actions which prevent carrier completion will not be considered missed). The standard is 95% or greater. This measure applies only to residential and small business customers. All reporting carriers are required to provide the underlying raw data for this measure.

- ***Customer Trouble Reports***. Customer Trouble Reports are reports by customers and users expressing dissatisfaction with telephone company services. This measure applies to residential and business customers. The standard is a ceiling of (a) 6 trouble reports per 100 working lines for reporting units with 3,000 or more lines, (b) 8 reports per hundred working lines for units with 1,001 – 2,999 lines, and (c) 10 reports per hundred working lines for units with less than 1,000 lines. Only general rate case ILECs and facilities based URF carriers with 5,000 or more lines, along with URF carriers with less than 5,000 lines that are carriers of last resort are required to report this measure. All reporting carriers are required to provide the underlying raw data for this measure.

- ***Out of Service Repair Intervals***. The out of service repair interval is a measure of the time between a carrier receiving an out of service trouble report and the time the service is restored for outages that were within a carriers control (e.g. did not occur on a Sunday, Federal Holiday, or during a catastrophic event). This measurement applies only to residential and small businesses customers. The standard is 90% of the reports restored in 24 hours or less. Only general rate case ILECs and facilities based URF carriers with 5,000 or more lines, along with URF carriers with less than 5,000 lines that are carriers of last resort are required to report this measure. All reporting carriers are required to provide the underlying raw data for this measure. The reported data is compiled monthly and reported quarterly. The Attachment to this report summarizes the out of service restoral results for the reporting carriers.

- ***Answer Times***. The answer time measure is a measure of billing, non-billing, and trouble report call answer times. This measure excludes specialized business account representatives that were established to address the needs of a single large business customer or group of such customers. The standard is 80% of the calls being answered by a live agent in 60 seconds, or 80% of the calls being routed to a live agent within 60 seconds if an automated voice response system is used. Only general rate case ILECs and facilities based URF carriers with 5,000 or more lines, along with URF carriers with less than 5,000 lines that are carriers of last resort are required to report this measure.

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IV. Summary of Results

Uniform Regulatory Framework Carriers (URF)

Customer Trouble Reports

The four URF ILECs (AT&T, Verizon, Citizens, and SureWest) all met the standard of having no more than 6 to 10 trouble reports per 100 lines based upon their respective line counts for each of the twelve months.

Out of Service Repair Intervals.

All of the URF ILECs had difficulty meeting the Out of Service Repair Interval standard in 2010.

SureWest, (42,000 access lines) met the Commission's goal of restoring service in 24 hours or less 90% of the time for four months of the year, and nearly made the goal for two months of the year (86% and 88%) . For the remaining six months of the year, their restorals within 24 hours were between 71% and 83%. SureWest's average monthly restoral time was 15-23 hours in 8 of 12 months, and in the remaining months the restoral time ranged from 27 – 69 hours.

Citizens of California (127,000 access lines) never achieved the goal of restoring service in 24 hours or less 90% of the time, but came close at 89% in one month. Citizens typically restored service in 24 hours or less between 71% and 84% of the time. Citizen's average monthly restoral time was 13 to 23 hours in 7 of the 12 months, and between 25 to 27 hours in the remaining 5 months.

Verizon (2.7 million access lines) also did not meet the goal of restoring service in 24 hours or less 90% of the time in any month of 2010; although it nearly reached the standard in two months (85% and 89%). Typically Verizon restored service in 24 hours or less between 60% and 80% of the time. Verizon's average monthly restoral time was between 15 and 23 hours nine out of twelve months and between 25 and 35 hours the remaining three months.

AT&T (7.6 Million access lines) did not meet the goal of restoring service in 24 hours or less 90% of the time in any month of 2010. In its best month, AT&T restored service in under 24 hrs just 76% of the time. Conversely in its worst month, AT&T only restored service in less than 24 hours 32% of the time. Typically AT&T restored service in under 24 hours between 33% and 54% of the time. AT&T's average monthly restoral time took between 28 and 55 hours nine out of twelve months and 18 to 23 hours in the remaining three months.

AT&T restated its reported data to Commission staff several times during the year, as result of inaccuracies in the data for various reasons. Additionally there were, and still are, interpretational differences between CD staff and AT&T regarding AT&T's practice of selectively excluding or including data in their reported results. G.O. 133-C provides that when outages occur on a Sunday, a Federal holiday, or during a catastrophic event, the time that it takes to restore service during these times is excluded from the service restoral time calculation.

Communications Division

AT&T wants to include in its reported results any service restoral that is made within 24 hours, regardless of whether the outage occurred during a day and/or event that is supposed to be excluded from the calculation. However, AT&T would exclude from the measurement calculation those service restoral times that exceeded 24 hours for outages that occurred during a day or event. CD believes that AT&T's approach is inconsistent and does not comply with the G.O. 133-C requirement that outages that occur on a Sunday, Federal holiday, or during an excluded event should be excluded from the measurement calculation regardless of the time that it took to repair the outage.

Answer Times.

None of the URF carriers achieved the Answer Time goal of routing customers to a live operator in 60 seconds or less 80% of the time in all four quarters. SureWest did the best in this category achieving the goal for 3 of the 4 quarters in 2010. Citizens and AT&T achieved the goal two of the four quarters, with the performance in the remaining quarters ranging from 68% – 79%. Verizon failed to meet the 80% standard in all four quarters of 2010, with results ranging from 60% - 75%.

Competitive Local Exchange Carriers

Customer Trouble Reports.

All of the 8 reporting CLECs met the standard of less than 6 to 10 trouble reports per 100 lines for all 12 months. The number of trouble reports per 100 lines to be reported is dependent upon the number of lines served by a reporting unit.

Out of Service Repair Intervals.

None of the eight reporting CLECs met standard of 90% within 24 hours in each of the 12 months in 2010.

Electric Lightwave LLC (19,990 access lines), met the standard on average for 10 of the 12 months. For the other two months they repaired service within 24 hours 83%-88% of the time. The average monthly restoral time ranged from 5 hours to 13 hours.

Advanced Telecom (11,026 access lines) met the standard in 9 months of the year, and restored service within 24 hours on average between 86% to 89% of the time for the remaining three months. Average monthly restoral times for Advanced Telecom ranged from 5 hours to 10 hours.

Cox California (687,290 access lines) met the standard in 6 months of the year. In the remaining 6 months, Cox restored service within 24 hours on average between 83% to 88% of the time. Average monthly restoral time for Cox ranged from 6 hours to 11 hours.

Communications Division

AT&T Communications of California (an affiliate of AT&T California with 1,625 access lines) met the standard in 3 of 12 months. In 5 months they restored service within 24 hours 82% - 86% of the time, and 35% to 64% for the remaining 4 months.. On average AT&T Communications' monthly service restoral times ranged from 4 hours to 18 hours for nine months of the year, and 22 to 52 hours for the remaining three months.

Astound Broadband (18,609 access lines) met the standard in two 12 months of the year and their restored service within 24 hours on average 83%-89% of the time in the other ten months. The average monthly restoral time for Astound Broadband was between 11 hours and 64 hours.

Access Point (335 access lines) met the standard in only two of the 12 months in 2010, while they restored service in under 24 hours on average 83%of the time in one month and between 20% and 55% of the time during the remaining 9 months. Access Point demonstrated the widest range of average monthly restoral times, they were between 10 and 123 hours.

Charter Fiberlink (180,339 access lines) met the standard in one month. They restored service within 24 hours on average 82% - 89% of the time during five months and on average 73% – 80% of the time for the remaining six months. . Charter Fiberlink's average monthly restoral time ranged from 11 – 20 hours during the year.

TelePacific (76,551 access lines) did not meet the standard in any month of the year. TelePacific restored service in less than 24 hours on average only 25% – 60% of the time during 2010. Their monthly average restoral time ranged from 38 hours to 151 hours.

Answer Times

The following three CLECs that did not meet the Trouble Report Answer Time standard (80% contact with an operator in less than 60 seconds) for all four quarters: 1) Electric Lightwave, 2) Astound Broadband, and 3) Cox California. Electric Lightwave met the standard three of the four quarters of the year. Astound did not meet the standard in any quarter. Cox did not report the measure at all.

Small Local Exchange Carriers

The fifteen small local exchange carriers (Small LECs) for the most part met or exceeded the standards for Installation Intervals, Installation Commitments, Customer Trouble Reports, Answer Times, and Out of Service restoral times for the months reported. One of the companies, Frontier Communications of the Southwest (Frontier SW) had recently been acquired by Frontier Communications from Verizon and only reported results for the last six months of the year.

Telephone Installation Intervals.

Fourteen Small LECs achieved installation intervals of 5 days or less for all in each twelve months of 2010. Frontier SW met this standard for each of the six months reported.

Communications Division

Installation Commitments.

Thirteen of the Small LECs met this standard in each of the twelve months. Three companies, Winterhaven, Foresthill, and Frontier Communications West Coast met the standard in 11 months of the year. Frontier Communications SW met this standard during five of the six months reported.

Customer Trouble Reports.

All fourteen of Small LECs that reported for the full year met the standard based upon their line counts, for each month of the year. Frontier Communications SW met the standard in each of the six months that they reported.

Out of Service Repair Intervals.

Four of the fifteen Small LEC's, Ducor, , Kerman, Sierra, and Siskiyou met the standard to restore service within 24 hours 90% of the time in each of the l twelve months . Frontier Communications SW met the standard in each of the six months reported. The average monthly outage duration for these five companies ranged from 1 hour to 10 hours.

Five companies, Calaveras, Cal-Ore, Happy Valley, Ponderosa, and Winterhaven met the standard in eleven months, with service restoral times in the remaining month ranging from 60% to 88%. The average monthly outage duration for these carriers ranged from 1 hour to 22 hours.

Two companies, Volcano and Hornitos met the standard in ten months, with their service restoral times during the remaining two months ranging from 75% to 88%. Their average monthly restoral time ranged from 2 hours to 23 hours.

Two companies, Frontier Communications West Coast and Foresthill met the standard for nine months with the balance of the year demonstrating restorals in the range of 79% to 89%. The monthly average outage duration for these two carriers ranged from 3 hours to 16 hours.

One company, Pinnacles, was only met the standard in seven months of the year, and restored service within 24 hours 50% - 83% of the time during the remaining five months. The average monthly duration of Pinnacles' outages ranged from 4 hours to 36 hours.

Answer Times

Nine of the Small LECs provided answer time data, and all met the standard for each of the 4 quarters of 2010. Six carriers: Calaveras Telephone, Ducor Telephone, Cal-Ore Telephone, Pinnacles Telephone, Ponderosa Telephone, and Siskiyou Telephone, did not report this information with their 4th quarter G.O. 133-C filing.

Communications Division

Performance Improvement Plans Submitted by Carriers

G.O. 133-C § 7 allows staff to require carriers with two or more measures below the reporting service level in one year, or with one measure below the industry average (e.g., service restoration 90% ≤ 24 hours) to meet with staff and present proposals to improve performance.

Because all four URF ILECs failed to meet the service restoration standard for out of service repairs, staff asked for their plans to improve performance. Three of the carriers provided performance improvement plans.

AT&T stated that it would improve service restoration times by increasing overtime hours, borrowing personnel from other workgroups and assigning them to maintenance fieldwork, while also increasing their seasonal workforce in anticipation of possible storms.

Verizon will improve restoration times by hiring contractors, workforce reassignments, software enhancements to better dispatch out of service tickets, and providing performance education to staff.

Citizens will improve restoration times by implementing additional reporting procedures for trouble tickets, revise their monitoring and communications process with outside technicians, and increase work hours to meet the workload.

SureWest has not provided a performance improvement plan to CD.

V. Service Quality and the Storms of 2010

In December 2010, a series of rainstorms battered Southern California resulting in flooding that caused over 250,000 people to lose telecommunications service for various periods of time. These rainstorms caused then Governor Arnold Schwarzenegger to declare states of emergency in twelve counties in Southern California. Because the outages were significant in their impact on consumers, Senator Alex Padilla held a hearing on February 4, 2011. The following section provides some information on the outages and telecommunications carriers' service restoral efforts. As a note, G.O. 133-C excludes *states of emergency* from the service restoral time statistics discussed in the prior section.

Carrier Responsiveness

Aging of Outages

AT&T had 187,159 outages, with a peak of 78,000 outstanding repair tickets for one day on January 1, 2011. 58% of its out of service tickets (109,000) were completed within four days and 78% (145,587) were completed within ten days. Approximately 800 lines remained out of service at the 30 day mark. AT&T reports that its maintenance load of tickets had returned to normal levels (between 8,000 and 10,000) as of January 22, 2011.

Verizon had approximately 73,047 storm related trouble tickets (both out of service and noise on the line) peaking at 30,860. Verizon's aging information showed that 41% (30,263) of the trouble tickets were cleared within 24 hours, and 75% (54,785) cleared within six days. Approximately 7,100 lines were out of service or having other problems for at least two weeks. Verizon reported that all of their storm related outages had been repaired as of January 28, 2011.

Carriers Actions in Response to the 2010 Storms

AT&T responded to the storm damage by: increasing overtime, moving 140 installation and maintenance technicians from the Bay Area to the Central Valley and Southern California, re-assigning 600 Construction and Engineering technicians to repair services, and redirecting 170 First Mile technicians to backup repair technicians. Also AT&T brought in 242 technicians from out of state, and re-hired 87 retirees which AT&T states will remain until the storm season ends. Additionally AT&T offered affected customers call forwarding to another telephone number, and if the outage lasted more than 24 hours, a credit to their bill.

Verizon extended workforce schedules to 10 hour days, six days a week, hired contractors, brought in technicians from other states, and redeployed internal staff from non-impacted sections of their company to assist in the repair effort. Verizon also provided affected customers call forwarding to another telephone number.

Both AT&T and Verizon stated that their priority for restoring service, was business or medical customer first, and residential customers thereafter.

VI. Communications Division Observations

After reviewing carriers' information, G.O. 133-C reports, raw data, and meeting with the carriers, CD has the following observations:

- There are different interpretations regarding calculating out of service intervals and the treatment of excludable events in the calculation (e.g., count all repairs made $\leq$ 24 hours, even those made during excluded events, but exclude from the calculation the service restoration times $>$ 24 hours made during an excluded event).
- There is a lack of specificity as to when a state of emergency ends, introducing subjectivity in calculating results.
- There are differing interpretations on whether a state of emergency constitutes an exemption for reporting anything for the entire company for one or more months, i.e., should a state of emergency definition be similar to a catastrophic event (e.g., 3% of total company access lines).
- Some carriers like, Verizon, include non-voice grade results (data/video) with small business and residential trouble tickets as well as out of service repair tickets that are only supposed to include voice services.
- Not all carriers provided raw data.

Communications Division

- The details in raw data do not contain sufficient specificity for staff to replicate carrier calculations.
- AT&T did not provide complete raw data that corresponded to the total number of outage tickets reported.
- Some carriers did not report data for each service quality measure.

VII. Communications Division Recommendations

Since some carriers are regularly failing to meet the service restoration time and trouble ticket answer time standards, CD recommends that the Commission initiate an Order Instituting Investigation (OII), and an Order Instituting Rulemaking (OIR) to address carriers' compliance with the service quality rules and evaluate whether:

- The adopted standards are appropriate and reasonable,
- Changes to the measures are needed,
- New standards should be adopted, or existing standards changed/ modified/ eliminated,
- More definition is necessary for calculating service restoration time intervals when states of emergency are declared,
- There should be any exclusions at all in calculating service restoration times,
- Standards are needed regarding the form and content of raw data.
- A penalty mechanism should be included for substandard service quality performance.

The recommended OII/OIR also would provide a forum for the Commission to get input from carriers as to what impediments they are faced with in regularly meeting the service restoration and answer time standards. The Commission could assess whether special requirements are necessary for reporting to staff the effects of severe storm or other catastrophic events and actions taken to restore service. Currently carriers do not have specific obligations to provide storm damage progress reports to the Commission, and the data provided was lacking in consistency and completeness.

Summary of Out-Of-Service Restoration Service Quality Results

URF Carriers of Last Resort

Year 2010

% Restored ≤ 24 hours*

Company Name	U-#		Lines	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
AT&T California	1001	Average # of access lines as of 6/30/10	7,635,575												
		% of repair tickets restored ≤ 24 Hours (monthly)		50.73	40.23	53.36	38.88	34.17	32.68	31.99	54.02	75.56	66.71	69.55	51.70
		Avg. outage duration in hours		34.6	43	27.8	38.9	47.9	51	54.9	32.5	17.7	22.8	22.9	39.6
Verizon California	1002	Average # of access lines as of 6/30/10	2,668,591												
		% of repair tickets restored ≤ 24 Hours (monthly)		77.48	89.11	69.27	79.14	85.18	77.63	71.08	83.26	81.04	59.73	62.86	73.39
		Avg. outage duration (hh:mm)		19:48	16:13	24:31	17:08	14:39	17:13	20:32	15:50	15:48	32:24	35:05	23:08
Citizens	1024	Average # of access lines as of 6/30/10	127,085												
		% of repair tickets restored ≤ 24 Hours (monthly)		60.59	73.59	80.95	83.97	81.76	79.43	88.54	81.83	83.25	75.67	78.36	71.27
		Avg. outage duration (hh:mm)		24:32	25:42	26:54	20:09	19:59	22:51	12:46	16:06	15:41	26:25	21:06	24:49
SureWest	1015	Average # of access lines as of 6/30/10	41,915												
		% of repair tickets restored ≤ 24 Hours (monthly)		95	96	96	79	78	79	73	71	83	90	88	86
		Avg. outage duration (hh:mm)		20:58	18:46	17:03	22:17	28:56	26:31	68:59	52:35	19:37	14:21	16:59	15:14
		*G.O. 133 Service Quality Standard = 90% ≤ 24 hours													

California Public Utilities Commission
Comparative Service Quality Results
Competitive Local Exchange Carriers - Year 2010

Company Name	U-#		Lines	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Access Point	5882	Average # of access lines as of 6/30/10	335												
		% of repair tickets restored ≤ 24 Hours (monthly)		100	83	100.00	33.00	35.00	55.00	26.00	36.00	36.00	23.00	20.00	42.00
		Avg. outage duration in hours		0:00	15:22	10:18	123.00	77.00	70.00	55.00	95.00	92.00	88.00	103.00	65.00
Advanced TelCom	6083	Average # of access lines as of 6/30/10	11,026												
		% of repair tickets restored ≤ 24 Hours (monthly)		100.00	95.70	100.00	89.70	85.70	96.70	89.30	92.60	97.90	97.60	93.60	100.00
		Avg. outage duration in hours		6:17	6:10	6:24	8:15	9:30	4:56	7:13	10:30	4:56	6:32	6:52	5:20
Astound Broadband	6184	Average # of access lines as of 6/30/10	18,609												
		% of repair tickets restored ≤ 24 Hours (monthly)		89.24	86.18	91.48	85.71	91.94	87.97	83.84	84.91	89.11	86.02	82.63	86.33
		Avg. outage duration (hh:mm)		11:26	20:14	10:50	12:25	10:20	16:26	16:19	11:16	14:29	11:16	20:38	16:19
AT& Communications of Calif Inc.	5002	Average # of access lines as of 6/30/10	1,625												
		% of repair tickets restored ≤ 24 Hours (monthly)		64.00	35.30	81.80	100.00	50.00	85.70	84.60	62.50	83.30	90.90	94.10	82.10
		Avg. outage duration (hh:mm)		22:55	4:06	16:05	13:24	6:33	13:14	13:41	12:18	13:11	4:36	6:04	18:21
Charter Fiberlink	6878	Average # of access lines as of 6/30/10	180,339												
		% of repair tickets restored ≤ 24 Hours (monthly)		72.83	73.11	82.25	84.40	79.71	73.47	75.83	75.36	81.81	85.93	90.89	88.86
		Avg. outage duration in hours		19:56	20:28	16:54	13:10	14:29	17:31	17:33	17:11	14:36	12:34	11:05	11:15
Cox California	5684	Average # of access lines as of 6/30/10	687,290												
		% of repair tickets restored ≤ 24 Hours (monthly)		85.00	85.00	88.00	83.00	87.00	88.00	94.00	97.00	97.00	95.00	97.00	90.00
		Avg. outage duration in hours		10:20	11:12	10:20	11:16	9:27	9:46	7:37	5:52	6:05	7:14	6:11	8:43
Electric Lightwave	5377	Average # of access lines as of 6/30/10	19,990												
		% of repair tickets restored ≤ 24 Hours (monthly)		87.60	92.00	97.80	90.40	94.90	92.10	94.20	93.00	96.60	97.10	90.30	82.60
		Avg. outage duration (hh:mm)		9:24	9:50	6:06	7:47	7:12	6:50	6:34	7:34	5:08	5:36	8:51	12:54
TelePacific	5721	Average # of access lines as of 6/30/10	76,551												
	5859	% of repair tickets restored ≤ 24 Hours (monthly)		32.00	28.00	26.00	28.00	26.00	25.00	29.00	59.00	60.00	35.00	53.00	30.00
	5248	Avg. outage duration in hours		52.77	52.11	48.08	46.75	53.89	59.05	63.79	39.22	38.23	55.63	49.05	151.18

California Public Utilities Commission
Comparative Service Quality Results
GRC Small LEC Carriers of Last Resort - Year 2010

Company Name	U-#		Lines	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Calaveras	1004 ok	Average # of access lines as of 6/30/10	2,794												
		% of repair tickets restored ≤ 24 Hours (monthly)		Blank	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
		Avg. outage duration in hours		Blank	6.92	3.36	4.28	0.93	3.53	2	1.5	1	1	3.33	2.25
Cal-Ore	1006	Average # of access lines as of 6/30/10	333												
		% of repair tickets restored ≤ 24 Hours (monthly)		100.00%	100.00%	93.75%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	88.75%
		Avg. outage duration in hours		10:48	20:45	18:43	16:25	4:49	10:39	11:53	9:30	21:50	22:00	0:17	7:46
Ducor	1007	Average # of access lines as of 6/30/10	1,152												
		% of repair tickets restored ≤ 24 Hours (monthly)		100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00	100.00
		Avg. outage duration (hh:mm)		8:54	8:25	7:58	2:48	5:30	2:00	1:58	1:15	1:24	12:20	1:45	6:15
Foresthill	1009	Average # of access lines as of 6/30/10	2,808												
		% of repair tickets restored ≤ 24 Hours (monthly)		100.00	87.10	100.00	90.91	100.00	100.00	93.33	100.00	100.00	92.86	78.57	88.37
		Avg. outage duration (hh:mm)		5:56	4:38	5:50	6:46	3:01	5:14	8:53	6:46	3:52	7:58	9:16	8:60
Happy Valley	1010	Average # of access lines as of 6/30/10	493												
		% of repair tickets restored ≤ 24 Hours (monthly)		87.23	94.12	91.67	100.00	92.31	100.00	100.00	100.00	100.00	95.00	100.00	100.00
		Avg. outage duration in hours		10.03	4.06	11.62	5.19	8.13	6.7	4.51	4.28	3.84	7.09	4.55	3.91
Hornitos	1011	Average # of access lines as of 6/30/10	189												
		% of repair tickets restored ≤ 24 Hours (monthly)		100.00	81.82	100.00	100.00	100.00	100.00	100.00	75.00	100.00	100.00	100.00	100.00
		Avg. outage duration in hours		4.44	24.33	2.91	5.49	0	4.94	2.62	13.21	2.39	2.25	5.43	9.98
Kerman	1012	Average # of access lines as of 6/30/10	6,176												
		% of repair tickets restored ≤ 24 Hours (monthly)		96.00	94.19	98.11	96.00	92.45	97.62	93.75	98.33	98.28	91.67	91.80	91.43
		Avg. outage duration (hh:mm)		5:69	6:33	8:30	6:51	7:21	7:13	6:33	4:23	6:32	7:24	5:11	10:06
Pinnacles	1013	Average # of access lines as of 6/30/10	248												
		% of repair tickets restored ≤ 24 Hours (monthly)		80.00	50.00	50.00	83.33	100.00	100.00	100.00	66.67	100.00	100.00	100.00	100.00
		Avg. outage duration in hours		19.20	13.25	35.50	12.71	21.25	7.33	5.25	11.68	12.75	10.88	7.58	3.80
Ponderosa	1014	Average # of access lines as of 6/30/10	8,641												
		% of repair tickets restored ≤ 24 Hours (monthly)		100.00	100.00	100.00	97.18	100.00	98.04	97.96	100.00	100.00	59.46	93.75	97.78
		Avg. outage duration in hours		6.51	5.88	6.28	6.44	7.43	6.78	7.51	4.15	6.01	24.03	11.06	5.36
Sierra	1016	Average # of access lines as of 6/30/10	20,574												
		% of repair tickets restored ≤ 24 Hours (monthly)		97.14	98.00	92.85	100.00	100.00	100.00	100.00	100.00	100.00	98.00	99.00	100.00
		Avg. outage duration (hh:mm)		4:45	5:29	6:33	2:53	2:09	3:25	3:33	2:30	4:28	5:56	2:33	3:21
Siskiyou	1017	Average # of access lines as of 6/30/10	3,347												
		% of repair tickets restored ≤ 24 Hours (monthly)		97.2	100	100	100	100	100	100	100	100	100	100	100
		Avg. outage duration (hh:mm)		4:19	1:40	2:13	3:01	3:41	5:03	3:25	2:31	2:15	3:35	3:54	5:28
Volcano	1019	Average # of access lines as of 6/30/10	10,440												
		% of repair tickets restored ≤ 24 Hours (monthly)		86.25	91.25	93	100	97.25	94.5	100	87.5	100	96.75	94.25	93.25
		Avg. outage duration (hh:mm)		12:31	23:42	6:53	6:42	10:46	11:14	6:43	8:46	9:25	10:52	5:32	12:19
Frontier Communications W, Coast	1020	Average # of access lines as of 6/30/10	11,094												
		% of repair tickets restored ≤ 24 Hours (monthly)		85.51	95.24	87.27	100.00	100.00	91.38	100.00	92.86	92.50	91.67	89.47	94.59
		Avg. outage duration (hh:mm)		12:21	13:40	12:49	10:05	10:51	11:08	16:31	13:39	13:03	12:31	14:18	12:12
Winterhaven	1021	Average # of access lines as of 6/30/10	982												
		% of repair tickets restored ≤ 24 Hours (monthly)		97.44	90.00	90.91	100.00	93.33	96.77	100.00	100.00	87.50	90.91	95.24	100.00
		Avg. outage duration in hours		5.18	14.04	13.77	5.05	5.47	3.92	3.02	6.64	5.98	9.49	6.95	3.66
Frontier of S.West	1026	Average # of access lines as of 12/31/10	8,586												
		% of repair tickets restored ≤ 24 Hours (monthly)		unavailable	unavailable	unavailable	unavailable	unavailable	unavailable	95.56	98.44	98.25	100.00	98.00	95.39
		Avg. outage duration (hh:mm)		unavailable	unavailable	unavailable	unavailable	unavailable	unavailable	11:47	16:41	12:16	10:18	10:19	9:17

(END OF ATTACHMENT A)

ATTACHMENT B
(Additional Service List)

ATTACHMENT B
Additional Service List

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(END OF ATTACHMENT B)