

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight and Program Branch**

**RESOLUTION T-17607
July 12, 2018**

R E S O L U T I O N

Resolution T-17607. Approval of advice letters setting forth fines for telephone service providers that failed to meet required service quality performance standards in Year 2017 pursuant to General Order 133-D.

SUMMARY

This Resolution approves the advice letters of AT&T Corporation (U-5002-C), Frontier Communications of the Southwest (U-1026-C), Foresthill Telephone (U-1009-C), and Volcano Telephone (U-1019-C) detailing their proposed fines totaling \$13,061 as a result of substandard service quality performance in Year 2017, pursuant to California Public Utilities Commission General Order 133-D. The carriers calculated their fines by applying the prescribed method for each month they failed to meet specific minimum levels for the *Out of Service Repair Interval* under General Order 133-D Section 3.4 and *Answer Time* under Section 3.5. Submission of these 2017 fines complies with the directions specified in Section 9.6 in the General Order and are a consequence of poor performance by facilities-based wireline carriers in serving their customers.

BACKGROUND

In General Order (GO) 133-D, *Rules Governing Telecommunications Services*, the California Public Utilities Commission (Commission) established uniform minimum standards of service for facilities-based wireline telephone carriers to achieve in their operations as public utility telephone corporations serving California customers. These minimum standards of service include quarterly reporting of five measures by some wireline carriers and near real-time reporting of major outages by all carriers.¹

¹ See the annual data in *Quarterly Service Quality Reports* posted at <http://www.cpuc.ca.gov/General.aspx?id=1107> on the Communications Division *Telecommunications Carriers' Service Quality Reports* webpage. (Site last visited May 31, 2018.)

1. Procedural History of the General Order

In March 2011, Staff issued a report detailing substandard levels of service quality reported by carriers for 2010. In response, the Commission opened Rulemaking (R.)11-12-001 to review carriers' performance, to assess the relevancy and effectiveness of GO 133-C² measures, and to determine the need for penalties for substandard performance.

On August 29, 2016, the Commission issued Decision (D.)16-08-021 which adopted GO 133-D. GO 133-D revised and replaced portions of GO 133-C by modifying and expanding on a number of its provisions and prescribing monetary penalties for violating the five service quality standards.³ Carrier performance determines fines, which apply only to carriers of traditional voice telephone service.⁴ GO 133-D became effective on August 18, 2016, with the exception of Section (§) 9 (*Fines*), which became effective January 1, 2017. GO 133 § 9.7 allows carriers to propose alternative proposals for corrective action to fine payment and instead to invest no less than twice the fine amount in projects that will improve service quality in a measureable way within two years.

2. Service Quality Reporting and Standards of Performance

General Order 133-D stipulates five telephone service quality measures with minimum standards that operators of public utility telephone corporations must meet: *Installation Interval*, *Installation Commitments*, *Customer Trouble Report*, *Out of Service Repair Interval*, and *Answer Time*. Each measure has an assigned Minimum Standard Reporting Level. When a carrier's performance falls below any of these minimum standards, the carrier is out of compliance and must report this information to the Commission.⁵

Under GO 133-D § 9.3, a carrier is subject to fines upon reaching "chronic failure status," which is defined as a failure to meet a Minimum Standard Reporting Level for three (3) consecutive months. Fines begin to accrue in the third month. A carrier exits "chronic failure status" when it meets the standard for two consecutive months. Until then, the carrier incurs fines for succeeding months it fails to meet the standard.

ADVICE LETTERS

The carriers below submitted their Advice Letters to pay fines and summarized their total year 2017 reporting targets with the fine calculations for standards not met as follows:

² The Commission approved GO 133-C in Decision 09-07-019 (July 9, 2009).

³ Fines apply to facilities-based telephone corporations regulated under the Uniform Regulatory Framework that possess a franchise or a Certificate of Public Convenience and Necessity.

⁴ GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."

⁵ See *Appendix A* for a list of all carriers' annualized reported service quality data, 2014-2017.

Advice Letter	Filed By	Utility No.	Date Filed	On Daily Calendar	Proposed Fine
4320	AT&T Corporation	U-5002-C	2/15/2018	2/21/2018	\$7,875
109	Frontier Communications of the Southwest	U-1026-C	2/16/2018	2/21/2018	\$3,636
337	Foresthill Telephone	U-1009-C	3/20/2018	3/26/2018	\$500
401	Volcano Telephone	U-1019-C	3/28/2018	4/4/2018	\$2,100

The Commission did not receive protests for these advice letters.

Volcano filed Advice Letter (AL) Supplement 401A on May 29, 2018, to correct its fine calculation which overstated two months in “chronic failure status” highlighted in a supporting spreadsheet, for April and May. Staff contacted Volcano to validate the data and Volcano submitted its Supplement with a corrected worksheet for a fine total of \$1,050.

DISCUSSION

Throughout 2017, AT&T Corporation (AT&T), Frontier Communications of the Southwest (Frontier Southwest), Foresthill Telephone (Foresthill), and Volcano Telephone (Volcano) submitted their quarterly service quality reports for *Customer Trouble Reports*, *Out of Service Repair Intervals*, *Answer Time*, *Installation Interval*, and *Installation Commitment* standards in accordance with GO 133-D, § 3.⁶ The end data of monthly performance compared to the minimum standard levels determines whether a carrier is subject to fine penalties. Those data and a unique scaling factor for each carrier determine the fines, as described below.

1. 2017 Scaling Factor

GO 133-D assigns fine amounts using base values specified in §§ 9.3, 9.4, and 9.5, adjusted through a formula expressing the relative size of the carrier within the California market.⁷ The scaling factor and fine formulas are as follows:

$$(\text{Carrier's Access Lines} / \text{Total CA Access Lines}) = \text{Carrier's Scaling Factor}$$

$$(\text{Carrier's Scaling Factor}) \times (\text{Monthly Base Fine per Measure}) \times (\text{Number of Months Measure Was Not Met}) = \text{Fine}$$

⁶ GRC ILECs only must report *Installation Interval* and *Installation Commitment*, §§ 3.1 and 3.2, respectively.

⁷ Annually, the Communications Division prepares a list of the total number of working telephone access lines in California from carriers subject to GO 133-D requirements. Based on carrier size relative to the number of access lines it serves at the end of June in the reporting year, a carrier receives its unique Scaling Factor, the percentage of its customers relative to all California telephone customers. The table of carriers, working lines, and the percentage of working lines served by each carrier appears as a PDF document titled *Total Number of Access Lines in California for June 2017 from Carriers Reporting Under G.O. 133-D* found under Reference Information at <http://www.cpuc.ca.gov/General.aspx?id=1107>. (Site last visited May 31, 2018.)

2017 Working Lines and Scaling Factor for Carriers Paying Fines Under GO 133-D		
Carrier	2017 Lines	Scaling Factor
AT&T	10,057	0.15%
Frontier Southwest	5,363	0.08%
Foresthill	2,419	0.04%
Volcano	9,563	0.14%

2. GO-133-D Standards

A. Out of Service Repair Interval

The *Out of Service Repair Interval*, defined in § 3.4, measures the average interval between the time a carrier responds to an out of service trouble report and the restoration of the customer’s service. A carrier measures its average interval by taking the sum of the total number of out of service repair tickets restored within 24 hours and dividing by the total number of reports received. The Minimum Standard Reporting Level for the *Out of Service Repair Interval* is 90% of outages restored within 24 hours or less.

The fine structure is as follows:

Base Out of Service Repair Interval Fine, GO 133-D, Section 9.3		
	1 or 2 Consecutive Months Standard Not Met	3 or more Consecutive Months Standard Not Met
Fine Per Day	\$0 per day	\$25,000 per day
Days in a Month (for all months)	30 days	30 days
Base Fine per Month	\$0	\$750,000 per month

AT&T, Frontier Southwest, Foresthill, and Volcano failed to meet the *Out of Service Repair Interval* standard for the following months in 2017:

2017 Reporting for <i>Out of Service Repair Interval</i> , GO 133-D, Section 3.4 – 90% minimum												
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
AT&T	34.8%	36.1%	51.2%	60.6%	56.5%	59.0%	54.5%	74.2%	68.1%	83.6%	62.0%	60.5%
Frontier Southwest	62%	75%	77.6%	71.4%	82.9%	68%	63.2%	76.7%	84.5%	92.9%	75%	65%
Foresthill	87.5%	97.1%	75%	80%	89.5%	94.5%	94.8%	95.5%	100%	100%	100%	91.2%
Volcano	92%	80%	77%	70%	95%	93%	38%	67%	95%	77%	70%	93%

AT&T failed to meet the minimum standard every month in 2017. AT&T explained that due to severe winter storms in January and February, Governor Edmund G. Brown Jr. issued State of Emergency Proclamations. As a result, under GO 133-D § 3.4(b), AT&T excluded the months of January through March when calculating its fine.⁸ AT&T reported a 1st quarter *Out of Service Repair Interval* average of 39.7%, far below the standard 90% of tickets restored within 24 hours or less. In the 2nd quarter, AT&T missed achieving the minimum performance standard for April and May. The third consecutive month of June put AT&T in “chronic failure status” and it failed to achieve the 90% minimum standard for the remainder of 2017. AT&T’s reported 3rd and 4th Quarter results show continued “chronic failure status.”

Consequently, AT&T calculated its fine on seven months from June through December for failure to meet the *Out of Service Repair Interval* standard. Staff agrees that AT&T’s calculations proposed in its advice letter are accurate.

AT&T incurs fines for unmet performance:

$$(\text{Carrier's Scaling Factor } .0015) \times (\text{Monthly Base Fine per Measure } \$750,000)$$

$$\times (\text{Number of Months Measure Was Not Met } 7) = \text{Fine } \$7,875$$

Frontier Southwest excluded the months of January through March from its reported GO 133-D results due to the severe winter storms. However, it failed to meet the minimum *Out of Service Repair Interval* standard in eleven months of 2017, October being the only month it met the standard. Frontier entered “chronic failure status” in June and did not exit “chronic failure status” in November because it did not achieve meeting the minimum standard for two consecutive

⁸ Under Section 3.4(b), a carrier may exclude months when a catastrophic event occurs, such as a declared state of emergency, which affects its ability to achieve the minimum standard(s). A catastrophic event ends when the trouble ticket level returns to the average level three months prior to the catastrophic event. The Governor issued two Emergency Proclamations on January 23, 2017, and another on March 19, 2017, due to the severe winter storms and significant rainfall.

months. Therefore, it continued to incur fines for succeeding months it failed to meet the standard.

Frontier Southwest incurred fines based on the six months it failed to meet the *Out of Service Repair Interval* standard, June through September, November, and December. Staff agrees with the proposed *Out of Service* fine calculated as:

$$(.0008) \times (\$750,000) \times (6 \text{ Months}) = \text{Fine } \$3,600$$

Foresthill failed to meet the minimum standard in four months and entered into “chronic failure status” only for March and calculated a fine of:

$$(.0004) \times (\$750,000) \times (1 \text{ Month}) = \text{Fine } \$300$$

Acknowledging that § 9.6 sets a minimum payment, Foresthill will pay a fine of \$500.⁹

Volcano corrected its worksheet in AL Supplement 401A. The revised worksheet showed it missed the minimum standard seven months of the year but was in “chronic failure status” only in the month of April. Staff agrees with the revised proposed fine calculated as:

$$(.0014) \times (\$750,000) \times (1 \text{ Month}) = \text{Fine } \$1,050$$

B. Customer Trouble Reports

The *Customer Trouble Reports* standard, defined in § 3.3, measures the number of reports a carrier receives from its customers regarding their dissatisfaction with telephone company services. The Minimum Standard Reporting Level for the *Customer Trouble Reports* measurement varies based on the number of working lines per reporting unit.

In 2017, AT&T, Frontier Southwest, Foresthill, and Volcano all met the *Customer Trouble Reports* standard.

C. Answer Time for Trouble Reports and Billing and Non-Billing Inquiries

The *Answer Time* standard, defined in § 3.5, measures the amount of time it takes for an operator to answer the phone when customers call a business office for billing and non-billing inquiries or a repair office for trouble reports. The value is calculated as an average answer time of a sample of the answering interval of calls to business and repair offices that is representative of the reported period.

The Minimum Standard Reporting Level for *Answer Time* is 80% of calls answered by an operator within 60 seconds when speaking to a live agent, or 80% of calls answered within 60 seconds when speaking to a live agent after completing an interactive voice response or automatic response unit system.

⁹ GO 133-D § 9.6 states the minimum annual fine shall be no lower than the registration fee for a Certificate of Public Convenience and Necessity. The minimum annual fine is equal to all fines totaled for a carrier in a year. Currently CPCN registration is \$500, under PU Code § 1001 for CLECs. See webpage *Information for Communications Applicants and Registrants in California* at <http://www.cpuc.ca.gov/General.aspx?id=1019>.

Base Answer Time Fine, GO 133-D, Section 9.5					
	1 or 2 Consecutive Months	3 to 5 Consecutive Months	6 to 8 Consecutive Months	9 to 11 Consecutive Months	12 or More Consecutive Months
Fine Per Day	\$0 per day	\$500 per day	\$1,000 per day	\$1,500 per day	\$2,000 per day
Days in a Month (for all months)	30 days	30 days	30 days	30 days	30 days
Base Fine per Month	\$0	\$15,000	\$30,000	\$45,000	\$60,000

The carriers' results follow:

2017 Reporting for Answer Time, GO 133-D Section 3.4 – 80% minimum												
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
AT&T	88.2%	90.2%	91.4%	84.3%	92.0%	89.7%	92.2%	94.4%	92.3%	88.7%	92.5%	92.9%
Frontier Southwest	71.6%	55.5%	73%	85.5%	90.7%	90.3%	81.1%	68.5%	62.5%	45%	53.1%	70.9%
Foresthill	-	-	-	-	-	-	-	-	-	-	-	-
Volcano	86%	84%	86%	88%	87%	86%	78%	86%	90%	79%	83%	84%

AT&T met the *Answer Time* minimum standard for all months in 2017.

Frontier Southwest failed to meet the standard from January through March and August through December. The company excluded January through March from its reported *Answer Time* results per § 3.4(b) for catastrophic event due to the severe winter storms and the subsequent Governor's Emergency Proclamations. As a result, it entered "chronic failure status" beginning in October and incurred fines for its substandard performance during the last three months of the year. Staff agrees with the proposed fine calculated as:

$$(.0008) \times (\$15,000) \times (3 \text{ Months}) = \text{Fine } \$36$$

Foresthill did not submit data because it reported less than the minimum 10,000 working lines required under the GO for the *Answer Time* standard.¹⁰

Volcano failed to meet the standard for two months in 2017 but did not reach “chronic failure status.” No fine incurred.¹¹

D. Installation Interval

The standard for *Installation Interval* applies only to the GRC ILECs. Foresthill and Volcano both met the standard in 2017.

E. Installation Commitments

The standard for *Installation Commitments* applies only to the GRC ILECs. Foresthill and Volcano both met the standard in 2017.

3. Total Fine Amount per Carrier

Based on scaling factors and numbers of months failing to meet the performance levels, the total fines for these carriers’ service quality performance in Year 2017 follow:

Service Quality Standard	AT&T Corporation (U-5002-C)	Frontier Communications of the Southwest (U-1026-C)	Foresthill Telephone (U-1009-C)	Volcano Telephone (U-1019-C)
Out of Service Repair Interval	\$7,875	\$3,600	\$500	\$1,050
Answer Time	\$0	\$36	\$0	\$0
TOTAL	\$7,875	\$3,636	\$500	\$1,050

The carriers should prepare payment for the assessed fines to the Commission, as specified in their advice letters, within 30 days of this Resolution’s adoption date. The Commission will deposit the payments into the California General Fund.

Fines must be paid by a check or money order payable to the California Public Utilities Commission, and mailed or delivered to:

California Public Utilities Commission
Fiscal Office
505 Van Ness Avenue, Room 3000
San Francisco, CA 94102

Carriers should write on the face of the check or money order:

“For deposit to the State of California General Fund, per Resolution T-17607.”

¹⁰ § 3.5 for the *Answer Time* standard applies to TDM-based voice services provided by GRC ILECs, facilities-based URF carriers with 5,000 or more customers, and any URF carrier with fewer than 5,000 customers that is a carrier of last resort.

¹¹ Volcano voluntarily reported its *Answer Time* data even though it reported fewer than the minimum 5,000 customers and 10,000 working lines.

SAFETY CONSIDERATIONS

Failure to meet GO 133-D service quality standards limits customers' ability to contact E9-1-1 services and seriously restricts public safety personnel from communicating with each other in daily emergencies or major disasters.

CONCLUSIONS

Staff recommends Commission approval of these advice letters for their Year 2017 GO 133-D fines according to the calculations discussed in this Resolution. The total amount of 2017 fines payable from these carriers is \$13,061.

COMMENTS

In compliance with Public Utility Code § 311(g), the Commission emailed a notice letter on June 11, 2018, informing all parties on the carrier service list of the availability of this Resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at this same website.

FINDINGS

1. General Order 133-D, Section 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually by February 15 of the following year a Tier II Advice Letter that shows by month each service quality measurement that it did not meet the minimum standard and the applicable fine.
2. AT&T Corporation (U-5002-C), Frontier Communications of the Southwest (U-1026-C), Foresthill Telephone (U-1009-C), and Volcano Telephone Company (U-1019-C) filed advice letters with proposed fines for *Out of Service Interval* and *Answer Time* standards.
3. Each company met the *Customer Trouble Reports*, *Installation Interval*, and *Installation Commitments* standards in 2017.
4. AT&T Corporation, Frontier Communications of the Southwest, Foresthill Telephone, and Volcano Telephone Company should pay the assessed fines, based on their respective failures to meet the minimum General Order 133-D service quality standards for the *Out of Service Interval* and *Answer Time*.

5. The total fines for 2017 is \$13,061 and calculated for each carrier as follows:

Service Quality Standard	AT&T Corporation (U-5002-C) AL 4320	Frontier Communications of the Southwest (U-1026-C) AL 109	Foresthill Telephone (U-1009-C) AL 337	Volcano Telephone (U-1019-C) AL 401
Out of Service Repair Interval	\$7,875	\$3,600	\$500	\$1,050
Answer Time	\$0	\$36	\$0	\$0
TOTAL	\$7,875	\$3,636	\$500	\$1,050

6. Staff reviewed the carriers' advice letters and accepts the proposed fine calculations as correct based upon the methodology defined in General Order 133-D, Section 9.3.
7. The carriers should remit their fines to the Commission within 30 days of this Resolution's adoption date. The Commission will deposit the fine payments into the California General Fund.
8. On June 11, 2018, the Commission emailed a draft of this Resolution to all parties in the carrier service list for public comments.

THEREFORE, IT IS ORDERED that:

1. The California Public Utilities Commission approves the advice letters from AT&T Corporation (U-5002-C), Frontier Communications of the Southwest (U-1026-C), Foresthill Telephone (U-1009-C), and Volcano Telephone Company (U-1019-C), which calculate their respective service quality fines under General Order 133-D for Year 2017 totaling \$13,061.

Service Quality Standard	AT&T Corporation (U-5002-C) AL 4320	Frontier Communications of the Southwest (U-1026-C) AL 109	Foresthill Telephone (U-1009-C) AL 337	Volcano Telephone (U-1019-C) AL 401
Out of Service Repair Interval	\$7,875	\$3,600	\$500	\$1,050
Answer Time	\$0	\$36	\$0	\$0
TOTAL	\$7,875	\$3,636	\$500	\$1,050

2. The carriers shall pay their assessed fines to the California Public Utilities Commission as specified in their advice letters within 30 days of this Resolution's adoption date. The California Public Utilities Commission shall deposit the fine payments into the California General Fund.
3. Fines shall be paid within 30 days from the effective date of this Resolution by a check or money order payable to the California Public Utilities Commission, and mailed or delivered to:

California Public Utilities Commission
Fiscal Office
505 Van Ness Avenue, Room 3000
San Francisco, CA 94102

The telephone corporation shall write on the face of the check or money order:

“For deposit to the State of California General Fund, per Resolution T-17607.”

This Resolution is effective today, July 12, 2018.

I hereby certify that the California Public Utilities Commission adopted this Resolution at its regular meeting on July 12, 2018. The following Commissioners approved it:

ALICE STEBBINS
Executive Director

Appendix

Annualized GO 133-C and GO 133-D Reported Service Quality Results, 2014 - 2017

T Y P E	Company Name	Utility Number	2014			2015			2016			2017												
			Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Average Time	Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Average Time	Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Average Time							
URF ILEC	AT&T California	U-1001-C	Exempt	Exempt	1.45%	60%	79%	Exempt	Exempt	1.39%	65%	88%	Exempt	Exempt	1.50%	56%	82%	Exempt	Exempt	1.72%	48%	81.5%		
	Frontier Citizens	U-1024-C			0.88%	82%	74%			0.86%	77%	71%			0.78%	83%	70%			0.82%	65%	71%		
	Frontier Southwest	U-1026-C			1.15%	83%	74%			0.97%	88%	71%			1%	84%	70%			1.1%	75%	71%		
	Surewest/Consolidated	U-1015-C			1.28%	93%	89%			0.77%	86%	53%			0.85%	87%	71%			0.79%	93%	77%		
	Verizon/Frontier California	U-1002-C			0.98%	68%	64%			0.90%	73%	72%			0.77%	57%	56%			0.82%	63%	71%		
URF CLEC	ACN Communications	U-6342-C			1.08%	5%	63%			0.72%	3%	60%			1.12%	5%	64%			1.17%	5%	58%		
	Advanced Telecom	U-6083-C			0.65%	70%	--			--	--	--			--	--	--			--	--	--		
	Astound	U-6184-C			2.27%	94%	48%			--	--	--			--	--	--			--	--	--		
	AT&T Corporation	U-5002-C			1.52%	76%	80%			1.60%	72%	71%			2.45%	75%	--			1.65%	52%	91%		
	Time Warner Cable	U-6674-C			--	--	--			--	--	--			0.51%	91%	94%			8.10	99%	70%	85%	93%
	Charter Fiberlink	U-6878-C			--	--	--			--	--	--			--	--	--			5.58	98%	4.19%	72%	73%
	Bright House	U-6995-C			--	--	--			--	--	--			--	--	--			2.73	95%	25%	64%	80%
	Cox California	U-5684-C			2.30%	92%	--			1.70%	89%	86%			1.70%	88%	--			1.46%	95%	93%		
	Electric Lightwave	U-5377-C			0.92%	73%	--			--	--	--			--	--	--			--	--	--		
	Paetec Communications	U-6097-C			0.94%	94%	64%			0.96%	95%	56%			0.98%	94%	--			0.4%	94%	62%		
GRU ILEC	Sonic Telecom	U-7002-C	0.93%	59%	62%	0.13%	43%	78%	0.34%	56%	82%	0.42%	48%	94%										
	Telcape Communications	U-6589-C	4.40%	40%	61%	3.19%	25%	60%	--	--	--	--	--	--										
	Calaveras Telephone	U-1004-C	1.18	100%	0.43%	100%	--	2.21	100%	0.29%	100%	--	1.46	100%	0.19%	100%	--	1.37	100%	0.12%	98%	--		
	Cal-Ore Telephone	U-1006-C	2.39	97%	1.67%	95%	--	2.15	99%	1.94%	95%	--	1.96	98%	1.82%	98%	--	2.11	97%	1.33%	100%	--		
	Frontier West Coast	U-1020-C	2.22	98%	0.72%	83%	74%	2.31	98%	0.68%	84%	--	--	--	--	--	--	--	--	--	--			
	Ducor Telephone	U-1007-C	1.93	100%	0.86%	95%	--	0.22	100%	0.89%	98%	--	2.4	100%	0.13%	99%	--	0.14	100%	0.2%	99%	--		
	Foresthill Telephone	U-1009-C	1.49	100%	0.99%	98%	--	1.5	100%	1.06%	99%	--	1.54	100%	1.14%	95%	98%	1.83	97%	1.44%	93%	--		
	Happy Valley Telephone	U-1010-C	2.66	99%	1.33%	94%	75%	2.74	100%	3.05%	95%	85%	2.8	100%	1.11%	92%	--	3.0	100%	1.60%	94%	--		
	Horaitos Telephone	U-1011-C	4.07	96%	2.53%	95%	75%	2.89	99%	4.82%	94%	85%	2.72	100%	3.39%	92%	--	3.32	100%	2.7%	94%	--		
	Kerman Telephone	U-1012-C	3.52	99%	0.90%	99%	--	2.86	100%	0.76%	97%	--	1.95	98%	1.54%	97%	99%	1.60	98%	1.03%	93%	--		
	Pinnacles Telephone	U-1013-C	0.52	100%	0.16%	100%	--	0.71	100%	0.50%	100%	--	0.45	100%	0.24%	100%	--	1.14	100%	0.80%	100%	95%		
	Ponderosa Telephone	U-1014-C	2.36	100%	0.79%	93%	--	2.51	100%	0.68%	97%	--	2.27	100%	1.28%	91%	--	2.32	99%	1.47%	98%	--		
	Sierra Telephone	U-1016-C	1.08	100%	0.58%	98%	91%	1	100%	0.65%	98%	--	0.96	99%	0.82%	98%	88%	2.16	99%	0.9%	99%	93%		
	Siskiyou Telephone	U-1017-C	0.93	100%	0.31%	98%	--	0.91	100%	0.26%	100%	--	0.74	100%	0.25%	100%	--	0.70	100%	0.04%	98%	--		
Volcano Telephone	U-1019-C	1.02	100%	0.54%	95%	92%	1.3	100%	0.30%	89%	90%	1.44	100%	0.29%	76%	83%	1.20	100%	0.8%	71%	85%			
Winterhaven Telephone	U-1021-C	1.96	100%	1.99%	96%	76%	2.18	100%	1.89%	98%	89%	3.17	100%	1.82%	98%	--	3.29	98%	2.52%	98%	--			

Reported data is In Compliance or Out of Compliance