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Decision No. 80082

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Investigation into the Need and  
Requirements for a General Order  
Governing Standards of Telephone  
Service to be Furnished by Telephone  
Utilities in the State of California }

Case No. 9353  
(Filed March 21, 1972)

OPINION AND ORDER

This proceeding was initiated March 21, 1972 as a result of the recommendation of a committee under Commission staff supervision and composed of the Commission staff and representatives of California telephone companies. The committee was formed pursuant to the Commission's direction in Decision No. 77947 dated November 10, 1970. The order instituting investigation contained an attached proposed General Order governing standards of telephone service to be furnished the public by telephone utilities in the State of California. The order made all telephone corporations in the state respondents and was served on each of the respondents. Respondents and interested parties were invited to submit written comment on the proposed General Order within 30 days of the date of issuance of the order.

The committee recommended and the Commission included in the proposed General Order eight service measures covering the installation and maintenance of telephone service and the quality of dial and operator services. The measures were developed by the committee with the purpose of establishing adequate standards of service to be observed by telephone utilities and to inform the Commission on a current basis as to the quality of telephone service being furnished.

The proposed General Order sets forth standard service ranges and reporting levels of service for defined reporting units.

The standard service range was established so as to define a range of performance wherein service would be considered to be adequate. Each individual reporting unit would be expected to generally provide service at levels within the standard range. Reporting service levels are established so as to indicate reporting units which are performing significantly below standard service ranges and to provide an indication of inadequate service.

Written comments were received by the Commission from the City of Los Angeles, the City of Long Beach, The Pacific Telephone and Telegraph Company, General Telephone Company of California and West Coast Telephone Company of California. These comments relate to a wide range of portions of the proposed General Order as discussed below.

In its comments the City of Los Angeles expresses the view that having a uniform set of standards for all telephone companies might well result in a degrading of service in the major metropolitan areas of which Los Angeles, of course, represents by far the largest in California. The purpose of the proposed General Order is directly opposite to the concern expressed by Los Angeles. It has as a goal the achievement of superior service quality in the metropolitan areas as well as in the balance of the state, and a requirement that the Commission be notified whenever a reporting unit, as defined in the General Order, falls below a specified service level. In any case, the respondent utilities are cautioned that in no manner whatsoever is the adoption of the proposed service rules to be interpreted as a vehicle by which service may be degraded since it is to the best interest of the utilities and the public that service be maintained at the highest feasible level. With these service rules in effect, the Commission will be in a position to keep careful watch on indications of service deterioration and take appropriate action, if needed.

Los Angeles also compares the actual experience of Pacific on customer trouble reports, dial tone speed and toll operator answer performance to indicate that the proposed service standards are below

these actual performances. In reviewing these comments, however, it is most important to take cognizance of the General Order's requirement that reports be submitted by relatively small reporting units rather than as an average figure for a large area. The Pacific service comparisons made by Los Angeles are related to the large Los Angeles metropolitan area as contrasted with the relatively small reporting units specified in the proposed General Order. So long as the reporting unit is relatively small, potential weak spots can be readily identified in order to avoid a company-wide degradation of service. In addition, the levels of standard service and reporting in the proposed General Order will be subject to ongoing review in order to arrive at an ideal level to provide the best feasible service. The comment by Los Angeles that there is no assurance that the standard service range will meet the customers' service needs is most pertinent, but such a determination can only be attained as a result of experience based on review of results flowing from application of the General Order.

Los Angeles points out that the level of General Telephone Company's objectives for customer trouble reports per 100 stations was 6 while the General Order sets a standard service range of at or below 6.5. Los Angeles points out that General was directed to meet its service objective by Decision No. 79367. Decision No. 79367 is a final order of this Commission and full compliance by General Telephone Company is, of course, required by the Public Utilities Code. We do not see the standard service ranges as in disagreement with the order to General. Certain utilities in specific locations may be expected to operate in higher portions of the standard service range. Decision No. 79367 is the first action by this Commission directing a utility to meet certain levels of telephone service as measured by service indexes. The service standards of this General Order will not change the force of Decision No. 79367 nor bar the Commission from considering similar stringent service levels in other instances. In our opinion, the service standards will provide a valuable framework for the guidance of the Commission in evaluating future specific service problems.

In conclusion, Los Angeles urges rejection of the proposed General Order but indicates that such an order with more stringent service standards for General Telephone and Pacific Telephone would be acceptable. Consideration of more stringent levels of service standards is a matter for future review based upon experience in use of the General Order. Based on experience under the service rules, the Commission's goal is to have standards that meet the public's requirements.

The comments from the City of Long Beach question the lack of explanation of the service standard criteria; the lack of correlation between the service criteria and customer satisfaction; the lack of any criteria related to transmission noise; the lack of criteria on trouble when the phone does not ring when called; and on billing errors. These comments cover areas of service quality which were discussed at length in the staff-utility committee sessions which led to the proposed General Order. In the interest of having a uniform, relatively easily administered and useful set of criteria, the proposed service rules are, of necessity, limited to the major items of measurement that indicate the quality of service. The equipment trouble items cited by Long Beach would appear in measurement of customer trouble reports. As far as the relationship between the criteria and customer satisfaction, this relationship can only be determined through experience in use of these rules and standards.

Long Beach requests that all reporting units report periodically instead of receiving reports only from units failing to meet service criteria. The intent of the proposed General Order was that reports be received only from those units that have substandard service, thereby alerting the Commission and the utilities that action is to be taken in those specific areas. Of course, the General Order also will require that records be maintained on all reporting units, but it is felt that the ordered procedures will reduce excessive reporting volume and thereby permit more effective regulation of service levels.

Long Beach objects to there being no provision for making service reports available on a regular basis to interested parties other than to the Commission. In response to this comment, the compliance reports will be available for public inspection.

Finally, Long Beach objects to the lack of prescription of sampling techniques and requests that parties should be given the opportunity to question the technical measurements. In its continuing concern that telephone service quality be at a wholly acceptable level, the Commission welcomes participation by interested parties. We suggest that Long Beach observe results under the General Order and after such observation and review, furnish its further comments to the Commission.

The Commission particularly appreciates the helpful comments submitted by the above cities and trusts that their representatives' review of the effects of this General Order will materially contribute to better telephone service throughout California.

The comments of Pacific Telephone Company and West Coast Telephone Company concern suggested technical corrections relative to the statement of standard service range for customer trouble reports and a restatement of the section relating to deviations from the rules. Modifications reflecting these comments have been made to the proposed service rules.

General Telephone Company of California recommends less stringent standards for customer trouble reports and installation commitments. We see no justification, at this time, to reduce the proposed standards. General also proposes substitute language for Rule 1.1.c., Absence of Civil Liability. We do not agree with General's proposal. The proposed rule specifically maintains the status quo as to the liability of the utilities in civil actions, after adoption of the General Order as compared to before such adoption. Continental Telephone Company of California and California-Oregon Telephone Company expressed agreement with the proposed General Order.

The General Order as proposed provides no schedule for implementation. Such a schedule is necessary because of the time required to establish record keeping procedures for the measurements

and the effort required to provide measurement capability for offices not now equipped. All utilities have records available for the measurement and reporting of held orders, installation commitments and customer trouble reports. However, some central office entities and operator traffic offices do not now have the measurement equipment or the service observation positions necessary to measure dial tone speed, dial service and toll and directory assistance operator answering time.

We will require all respondent telephone utilities, for all reporting units having the necessary measurement capability, to implement the requirements of the General Order commencing October 1, 1972. For those utilities and their reporting units presently lacking the capability to undertake certain of the measurements required by the General Order, we will require that they forthwith initiate action so as to be able to undertake measurement commencing July 1, 1974.

This General Order represents a completely new approach to this area of regulation. We believe it is extremely desirable that a group of experts continue to cooperate, as was done in the preparation of the proposed General Order, in reviewing the effectiveness of the General Order. We will require that a committee assume this undertaking and report to the Commission at annual intervals on the results of application of the General Order as well as on comments of interested parties, together with recommendations as to any necessary modification, revision or change in the document.

The Commission finds that:

1. The public interest will be served by the establishment of rules governing telephone service to be furnished the public by telephone utilities in the State of California.
2. The many constructive and comprehensive comments on the proposed General Order have been fully considered by the Commission.
3. The rules contained in the General Order adopted herein are reasonable and are the ones deemed essential at this time.

4. The Commission staff should organize a committee composed of staff members and representatives of telephone utilities to review results of the General Order adopted herein and to prepare recommendations on such modification, revision or change of the General Order as the committee may deem appropriate and necessary. We will require the committee to report to us at annual intervals.

5. Case No. 9353 should be terminated.

The Commission concludes that the General Order attached hereto and the rules contained therein should be adopted, that a public hearing thereon is not necessary and that the public interest will best be served by their early adoption.

IT IS HEREBY ORDERED that:

1. General Order No. 153, attached hereto as Attachment A, be and it is hereby adopted.

2. Respondent telephone utilities shall comply with the requirements of the General Order adopted herein commencing October 1, 1972, except respondent telephone utilities, with respect to reporting units lacking the capability of measuring dial tone speed, dial service and toll and directory assistance operator answering time, shall forthwith initiate action to comply with the requirements of the General Order adopted herein commencing no later than July 1, 1974.

3. Reports required by the General Order adopted herein shall be filed by each respondent telephone utility within 45 days after the end of each calendar quarter, the first such reports being due February 15, 1973.

4. The Commission's staff shall organize a committee composed of staff members and representatives of telephone utilities in California, said committee to review results flowing from the General Order adopted herein and, as the committee deems appropriate and necessary, to present recommendations to the Commission for the revision, modification or change of the General Order adopted herein.

The first report of said committee shall be made to the Commission not later than July 1, 1973, and annually thereafter, until further order.

5. Case No. 9353 is hereby terminated.

The effective date of this order shall be twenty days after the date hereof.

Dated at San Francisco, California, this  
11<sup>th</sup> day of MAY, 1972.

Chairman  
William J. Quince  
Vernon L. Sturgeon  
Commissioners

Commissioner J. P. Vukasin, Jr., being necessarily absent, did not participate in the disposition of this proceeding.



C. 9353

ATTACHMENT A

GENERAL ORDER NO. 133

Public Utilities Commission  
of the  
State of California

RULES GOVERNING TELEPHONE SERVICE

Adopted MAY 18, 1972. Effective October 1, 1972.

Decision No. 80082, Case No. 9353.

RULES GOVERNING TELEPHONE SERVICE

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1. GENERAL

1.1 Intent

- a. Purpose. The purpose of these rules is to establish uniform standards of service to be observed in the operation of telephone utilities.
- b. Limits of Order. These rules do not cover the subjects covered in the filed tariff rules of telephone utilities.
- c. Absence of Civil Liability. The establishment of these rules shall not impose upon utilities, and they shall not be subject to any civil liability for damages, which liability would not exist at law if these rules had not been adopted.
- d. Revision of Scope. These rules may be revised in scope on the basis of experience gained in their application and as changes in the art of telephony may require.

1.2 Applicability. These rules are applicable to all telephone utilities providing service within the State of California.

1.3 Definitions.

- a. Central Office Entity. A group of lines using common originating equipment.
- b. Commission. In the interpretation of these rules the word "Commission" shall be construed to mean the Public Utilities Commission of the State of California.
- c. Commitment. The date agreed to by a customer and a utility for the completion of requested work.
- d. Equivalent Main Line. A line terminated on equipment other than a station.

- e. Order Taken Date. The date on which customer requests service, assuming prior compliance with utility's rates, rules and regulations.
- f. Plant Installation Center. A centralized control point for installation orders.
- g. Plant Maintenance Center. A centralized control point for customer trouble reports.
- h. Primary Service Order. Service orders for all business and residence main stations or equivalent main lines connected directly to central office switching equipment and identified by a local exchange telephone number.
- i. Regrade Service Order. Changes between individual and party line service as identified under Primary Service Order.
- j. Reporting Service Level. A specified service level of performance for each reporting unit. If performance is at or below this level the utility will submit periodic reports to the Commission.
- k. Standard Service Range. A service range which encompasses adequate service to the user.
- l. Station. Those in-service telephones and equivalent main lines maintained by the local plant maintenance center.
- m. Telephone Plant. Equipment and wiring, excluding that located on a customer's property, required to connect a telephone service to the exchange network.
- n. Telephone Utility. A public utility telephone corporation providing public landline telephone service as further defined by Sections 216 and 234 of the Public Utilities Code.

o. Trouble Report. A customer's report about dissatisfaction with his telephone service.

1.4 Information Available to the Public.

The utility shall maintain, open for public inspection at its main office in California, copies of all reports submitted to this Commission in compliance with these rules. Reports shall be held available for one year. A copy of these reports will also be maintained and be available for public inspection at the Commission's San Francisco and Los Angeles offices.

1.5 Location of Records.

All records required by these rules shall be kept available to representatives, agents or employees of the Commission upon reasonable notice.

1.6 Reports to the Commission.

The utility shall furnish to the Commission, at such times and in such form as the Commission may require, the results or summaries of any measurements required by these rules. The utility shall furnish the Commission with any information concerning the utility's facilities or operations which the Commission may request and need for determining quality of service.

1.7 Deviations from Any of These Rules.

In those cases where the application of any of the rules incorporated herein results in undue hardship or expense to the utility, it may request specific relief by filing a formal application in accordance with the Commission's Rules of Procedure, except that where the relief to be requested is of minor importance or temporary in nature, the Commission may accept an application and showing of necessity by letter. Requests for deviations provided for by Rule 3.4.e may be made by letter.

1.8 Revision of Rules.

Telephone utilities subject to these rules, may individually or collectively file application with this Commission for the purpose of amending these rules. The application shall clearly set forth the changes proposed and the reasons therefor. Other interested parties shall have the same rights to propose modifications by appropriate procedure.

2. STANDARDS OF SERVICE

2.1 General. These rules establish uniform standards of service for the installation, maintenance and quality of telephone service. The service measures established are as follows:

<u>Service Measure</u>	<u>Type of Service</u>
Held Primary Service Orders	Installation
Held Regrade Service Orders	Installation
Installation Commitments	Installation
Customer Trouble Reports	Maintenance
Dial Tone Speed	Dial Service
Dial Service	Dial Service
Toll Operator Answering Time	Operator Services
Directory Assistance Operator Answering Time	Operator Services

2.2 Description of Service Ranges and Levels.

a. Standard Service Range. Standard service ranges are established for each of the service measures except held orders. Service performance within the standard service range is considered to be adequate. Each individual reporting unit should generally attain service levels within the standard range.



- b. Service Below Standard. Individual reporting units are subject to influences which may cause them to occasionally fall below the standard range of performance. Such variations indicate inadequate service only where the substandard performance indications are frequent and substantially below the standard range.
- e. Reporting Service Level. These levels have been established so as to indicate units which are performing significantly below standard service ranges and to provide an indication of inadequate service. Reporting service levels are established for each of the service measures except held orders. Reporting Service levels are applicable to each individual reporting unit.

### 3. TELEPHONE SERVICE MEASURES

#### 3.1 Held Primary Service Orders.

- a. Description. Requests for Primary (main) telephone service delayed over 30 days because of lack of telephone utility plant. An order will count as held when service is not provided within 30 days after commitment date. Alternatively the date the order is taken from the customer may be used in lieu of commitment date where it is not the utility's practice to establish commitment dates. Orders requiring the customer to meet specific prerequisites (e.g., line extension charges) will be measured from the time the prerequisites have been met.

- b. Measurement. Count once a month the total primary service orders held over 30 days for each reporting unit.
- c. Standard Service Range. Not applicable.
- d. Reporting Service Level. Not applicable
- e. Reporting Unit. Exchange or plant installation center, whichever is lesser.
- f. Reporting Frequency. Compiled monthly, reported quarterly for all reporting units.

3.2 Held Regrade Service Orders.

- a. Description. Requests for change in grade of an existing primary service delayed over 30 days because of lack of telephone utility plant. An order will count as held when service is not provided within 30 days after the commitment date. Alternatively the date the order is taken from the customer may be used in lieu of commitment date where it is not the utility's practice to establish commitment dates. Orders requiring the customer to meet specific prerequisites will be measured from the time the prerequisites have been met.
- b. Measurement. Count once a month the total held regrade service orders held over 30 days for each reporting unit.
- c. Standard Service Range. Not applicable.
- d. Reporting Service Level. Not applicable.
- e. Reporting Unit. Exchange or plant installation center, whichever is lesser.
- f. Reporting Frequency. Compiled monthly, reported quarterly for all reporting units.

### 3.3 Installation Commitments.

- a. Description. Requests for establishment or changes in non-key telephone individual and party line service that normally involve plant activity. Requests for disconnects are not included in the measuring base. Commitments will not be considered missed when resulting from customer action. The measurement will be expressed in terms of percent of commitments met.
- b. Measurement. Count once a month the total commitments and the commitments missed. Commitments met equal total, minus missed commitments.
- c. Standard Service Range. At or above 94% commitments met.
- d. Reporting Service Level. 90% commitments met.
- e. Reporting Unit. Plant Installation Center.
- f. Reporting Frequency. Compiled monthly, reported quarterly for those reporting units at or below the reporting service level for any month.

### 3.4 Customer Trouble Reports.

- a. Description. Reports from customers and users of telephone service relating to dissatisfaction with telephone company-provided equipment and/or service. Reports not relating to the quality of telephone service, reports that can't be completed because of a lack of access to customer's premises, requests for operator assistance in placing calls, requests for busy verification, reports relating to toll private services and employee reports will not be included. Reports received will be counted and related to the total stations including lines within the reporting unit in terms of reports per 100 stations.

- b. Measurement. Customer trouble reports received by the utility will be counted monthly and related to the total stations, including lines, within a reporting unit.
- c. Standard Service Range. At or below 6.5 per 100 stations.
- d. Reporting Service Level. 8 per 100 stations.
- e. Deviation for smaller Reporting Units. When a deviation relative to customer trouble reports is authorized for reporting units smaller than 10,000 stations, the standard service range for these units shall be at or below 8 per 100 stations and the reporting service level shall be 10 per 100 stations.
- f. Reporting Unit. Plant maintenance center.
- g. Reporting Frequency. Compiled monthly, reported quarterly for those reporting units at or above the reporting service level for any month in accordance with record retention requirements.
- h. Exclusion. Central offices of less than 1,000 stations need not be included in reports. However, records will be maintained on these offices.

3.5 Dial Tone Speed.

- a. Description. A measure of the adequacy of the central office equipment to provide dial tone to the subscriber. Measurements are taken to obtain the percentage of originating average busy hour call attempts receiving dial tone within 3 seconds.
- b. Measurement. Measurements are accomplished by utilizing a Dial Tone Speed Recorder, Timed All Trunks Busy Meters or the equivalent.

- c. Standard Service Range. At or above 97.7% within 3 seconds.
- d. Reporting Service Level. 97.0% within 3 seconds.
- e. Reporting Unit. Each central office entity over 3,000 primary stations where equipped for making measurements. All offices over 3,000 stations shall be equipped when economically feasible.
- f. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units at or below the reporting service level for any month.

3.6 Dial Service.

- a. Description. A measure of the ability of the equipment to complete a customer dialed call over the local and toll message network without the call encountering an equipment malfunction and/or all paths busy condition. A sample of originating calls over customer lines or originating trunks is taken through service observations to obtain the percentage of calls being effectively completed.
- b. Measurement. Count all observed calls and determine the percent of calls not encountering an equipment malfunction and/or all paths busy condition.
- c. Standard Service Range. At or above 98.0%
- d. Reporting Service Level. 97.0%
- e. Reporting Unit. Each central office entity over 3,000 primary stations where equipped for making measurements. All offices over 3,000 stations shall be equipped when economically feasible.
- f. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units at or below the reporting service level for any month.

3.7 Toll Operator Answering Time.

- a. Description. A measure of time for the operator to answer on toll and assistance calls. A sample of the answering interval is taken to obtain the percentage of toll and assistance calls answered within 10 seconds.
- b. Measurement. Sample of the answering interval on toll and assistance calls that is representative of the measurement period utilizing an answering time recorder, force administration data system (FADS), or equivalent. When FADS is used as a measurement device, measurement data of average answering time will be converted to percent answer within 10 seconds.
- c. Standard Service Range. At or above 87% within 10 seconds.
- d. Reporting Service Level. 83% within 10 seconds.
- e. Reporting Unit. Each traffic office handling toll and assistance calls and having an annual average business day call volume of 2,000 or more calls.
- f. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units below the reporting service level for any month.

3.8 Directory Assistance Operator Answering Time.

- a. Description. A measure of the time for the operator to answer on directory assistance calls. A sample of the answering interval is taken to obtain the percentage of directory assistance calls answered within 10 seconds.
- b. Measurement. Sample of the answering interval on directory assistance calls that is representative of the measurement period utilizing an answering time recorder, forced administration

data system (FADS), or equivalent. When FADS is used as a measurement device, measurement data of average answering time will be converted to percent answer within 10 seconds.

- c. Standard Service Range. At or above 82% within 10 seconds.
- d. Reporting Service Level. 78% within 10 seconds.
- e. Reporting Unit. Each traffic office handling directory assistance calls and having an average business day volume of 2,000 or more calls.
- f. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units at or below the reporting service level for any month.

#### 4. RECORDS AND REPORTS

4.1 Reporting Units. Service measurements shall be maintained by reporting units. Reporting units will be exchange, plant installation center, plant maintenance center, central office entity or traffic office as required. The reporting unit for each service measure is defined in Section 3. and summarized in Appendix B.

4.2 Reporting Levels. Reporting levels are established by these rules as set forth in Section 3. Service measurements with levels of service at or below the reporting level in any given month will be considered indications of possible inadequate service.

4.3 Reporting Requirements. Reports shall be made to the Commission quarterly of all reporting units providing service at or below the reporting service level on any measure in any month during the quarter. Summaries of held primary and regrade service orders by reporting unit shall be submitted quarterly for each month during the quarter. Small reporting units will be excepted from reporting

on certain service measures as set forth in Section 3. and summarized in Appendix B. Reports shall be filed within 45 days of the end of each quarter. Reports to the Commission of performance at or below reporting level shall state the levels of service for each service measure and the months being reported, a description of the cause of performance at the reported level and a statement of action being taken to improve service and the estimated date of completion of the improvements. A sample form is included as Appendix D. A sample form for reporting held primary and regrade service orders is included as Appendix C.

- 4.4 Retention of Records. Monthly summary records of service measurements for each reporting unit will be retained for two years. All summary records will be available for examination by Commission representatives during the retention period and special summaries of service measurements may be requested by the Commission.

PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA

*William R. Johnson*

By: William R. Johnson, Secretary



APPENDIX A

Standard Service Ranges and Reporting Levels

<u>Service Measure</u>	<u>Standard Service Range at or above</u>	<u>Reporting Level</u>
Held Primary Service Orders	NA	NA
Held Regrade Service Orders	NA	NA
Installation Commitments	94%	90%
Customer Trouble Reports		
Under 10,000 Stations	8* #	10*
Over 10,000 Stations	6.5#	8
Dial Tone Speed	97.7%	97.0%
Dial Service	98.0	97.0
Toll Operator Answering Time	87.0	83.0
Directory Assistance Operator Answering Time	82.0	78.0

\* When Authorized

# At or Below

APPENDIX B

Record Keeping and Reporting Requirements

<u>Service Measure</u>	<u>Reporting Unit and Minimum Reporting Size</u>
Held Primary Service Orders)	Exchange or Plant Installation Center - whichever smaller
Held Regrade Service Orders)	
Installation Commitments	Plant Installation Center
Customer Trouble Reports	Plant Maintenance Center - Central Office under 1,000 stations need not be included in performance reports.
Dial Tone Speed	Central Office entity
Dial Service	Central Office entity
Toll and Assistance Operator	Traffic Office handling toll and assistance calls - average business day call volume of 2,000 or more.
Answering Time	
Directory Assistance Operator	Traffic Office handling directory assistance calls - average business day call volume of 2,000 or more.
Answering Time	
Compilation of Data - Monthly	
Frequency of Reporting - Quarterly	
Retention of Measurements - Two years	

APPENDIX C

Held Primary and Regrade Service Order Reports

Reports on held primary and regrade service orders shall set forth the following:

1. Reporting unit name and further identification if name does not convey geographic location.
2. Total telephones in service within reporting unit. This figure may be supplied once yearly as a year-end number.
3. Number of held orders for each month of the quarter.

APPENDIX D

Reporting Level Performance Report

Reports on all service measures except held orders shall set forth the following:

1. Reporting unit name and further identification if name does not convey geographic location.
2. Service measure, level and months being reported.
3. Cause of performance at the reported level. For installation commitments and customer trouble reports, indicate locations affected if cause is localized within a reporting unit.
4. Corrective action and completion date.