ALJ/AVG/rmn

Decision 88 11 018 NOV 9 1988

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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In the Matter of the Joint Application of Pacific Bell (U 1001 C), a corporation; General Telephone Company of California (U 1002 C), a corporation; AT&T Communications of California, Inc. (U 5002 C), a corporation; and the Western Burglar and Fire Alarm Association to Revise Public Utilities Commission of the State of California General Order 152 Regarding Rules Governing Private Line Alarm Service.

Application 87-09-025 (Filed September 18, 1987)

<u>OPINION</u>

Summary of Decision

This decision revises General Order 152 regarding Rules Governing Private Line Alarm Service.

Background

On September 18, 1987, Pacific Bell (Pacific), General Telephone Company of California (GTE), the Western Burglar and Fire Alarm Association (WBFAA), and AT&T Communications of California, Inc. (AT&T) (jointly Applicants), filed Application (A.) 87-09-025 requesting to revise General Order (GO) 152 in accordance with §1.9 of GO 152.

On October 20, 1982, the Commission adopted GO 152, <u>Rules</u> <u>Governing Private Line Alarm Service</u>, which became effective on November 19, 1982. These rules established uniform standards of service for the installation, maintenance, and the operation of private line alarm service.

GO 152 established the following service measuring units to evaluate the level of private line alarm service:

- a. Alarm Held Orders
- b. Installation Commitment
- c. Installation Trouble Report
- d. Service Trouble Report
- e. Repair Response

According to GO 152, the service performance of a utility within a standard service range is considered to be adequate. GO 152 requires a report to the Commission when the level of service falls substantially below the standard.

Section 1.9 of GO 152 allows telephone utilities to, individually or collectively, file application for amending these rules.

Quarterly Meetings

Section 1.10 of GO 152 requires representatives from telephone utilities, the Division of Ratepayer Advocates $(DRA)^1$ and the alarm industry to meet periodically to discuss generic problems associated with the installation and maintenance of private line alarm service. Accordingly, the parties met on a quarterly basis. Applicants are the only parties which have continuously actively participated in these quarterly meetings. Revision of GO 152

In 1986, the alarm industry felt the need to revise GO 152 to reflect the effects of the state of the art technology and telephone utilities' current operational procedures. Therefore, a GO 152 Review Committee (Review Committee) was established to examine the needed changes and recommend appropriate revisions to the general order. The Review Committee included

1 GO 152 requires representatives from telephone utilities and the alarm industry to meet with the Commission staff. However, DRA has been the active participant from the Commission.

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Section 2.3 "<u>Plant Control Office</u>" has been added to the GO to recognize the varying responsibilities for circuits that came into existence as a result of the divestiture of AT&T. The current general order does not consider the different responsibilities of the utilities for a jointly provided service.

3.1. <u>Alarm Held Orders</u>. Section 3.1.5 has been added to require utilities to use the same "due date interval" for all customers. Due date interval is the duration of time between the date of receiving an order for installation of an alarm system and the date the installation is committed to be performed. Section 3.1.5 also prohibits a utility from changing its due date interval without notifying the interested parties.

The measurement for reporting alarm held orders has remained substantially unchanged. The standard service and reporting service levels have not been modified. Such a change may result in a modification of the performance levels.

In the original general order the reporting service level for alarm held orders was phased in and had different standards for calendar years 1983 and 1984 and thereafter. References to 1983 and 1984 have been deleted as they are no longer applicable.

3.2. Installation Commitments. The measurement of installation commitments met has remained unchanged. The description of the measurement has been expanded to require the utilities to inform the customers regarding their due date interval or any changes thereto.

3.3. <u>Service Trouble Reports</u>. Section 3.3.1 has been added to require the utilities to provide the alarm company with a toll-free trouble reporting number to report service operation problems. Although it was not a requirement of the original general order, the utilities have had provisions allowing all service troubles to be reported by dialing 611. The standards for the measurement of service trouble reports in § 3.3.2 have been revised to accommodate the current measurement practices used by the utilities. The

standard service and reporting service levels and the nature of the measurement remain unchanged.

3.4. <u>Repair Response</u>. This section has the most substantive revisions. Under the existing general order, the standard service level and the reporting service level were measured for two different types of data gathering systems. In addition, since the inception and implementation of the general order, there has been a continuing difficulty in comparing the results reported by the utilities and the generally less satisfactory results being reported by the alarm companies. This difficulty stems in part from different interpretations of the procedures for measuring the duration of repair responses. Therefore, § 3.4 has been modified to have a uniform system of measuring repair responses so that the results reported by the utilities and the alarm companies will be comparable. The standard service and reporting service levels have also been changed to reflect the new procedures and measurements.

4. <u>Records and Reports</u>. This section has remained substantially unchanged. The minor modification to this section requires utilities to file their reports within thirty (30) days after the end of each quarter instead of forty-five (45) days, and to retain the records for three instead of two years. This proposed change is expected to facilitate record keeping and provide timely information to the Commission staff.

DRA's Recommendation

Representatives of DRA participated in the development of the proposed revisions to the general order and the proposed modifications were developed with DRA's concurrence. Accordingly, in a memorandum dated March 15, 1988, DRA provided the Administrative Law Judge (ALJ) its recommendation to adopt the proposed modifications to GO 152.

By a ruling dated March 24, 1988, the ALJ provided parties an opportunity to comment on DRA's recommendation. No party has filed comments.

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DRA recommends that the revised GO 152 should be adopted as proposed.

Discussion

Since the proposed revisions to GO 152 reflect the state of the art technology and current operational procedures of the telephone utilities and are jointly recommended by the telephone utilities, DRA, and the alarm industry, we will adopt them. Accordingly, we will adopt Appendix A as a revision to GO 152. Findings of Fact

1. Applicants filed A.87-09-025 requesting revisions to GO 152.

2. The proposed modifications to GO 152 reflect the state of the art technology and current operational procedures of the telephone utilities and are jointly recommended by the telephone utilities, DRA, and the alarm industry.

3. The revised general order contained in Appendix A incorporates the proposed modifications to GO 152. Conclusion of Law

The general order included in Appendix A should be adopted.

ORDER

IT IS ORDERED that:

1. Appendix A is adopted as General Order 152-A of the Commission.

2. This proceeding is closed.

This order becomes effective 30 days from today. Dated <u>NOV 9 1988</u>, at San Francisco, California.

> STANLEY W. HULETT President DONALD VIAL FREDERICK R. DUDA G. MITCHELL WILK JOHN B. OHANIAN Commissioners

I CERTIFY THAT THIS DECISION WAS APPROVED BY THE ABOVE COMMISSIONERS TODAY

Victor Weisser, Executive Director

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GENERAL ORDER 152-A

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

RULES GOVERNING PRIVATE LINE ALARM SERVICE

(The provisions of this General Order supersede the provisions of General Order 152 adopted October 20, 1982, effective November 19, 1982, by Decision 82-10-069; amended December 7, 1983, effective December 7, 1983, by Decision 83-12-006; amended March 7, 1984, effective March 7, 1984, by Decision 84-03-006 in Application 59849 et al.)

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- 1.1 Intent.
 - 1.1.1 <u>Reason for Adoption</u>. These rules are adopted by the Commission as a result of and in compliance with Ordering Paragraph 3 of Decision 93367 dated August 4, 1981.
 - 1.1.2 **Purpose.** The purpose of these rules is to establish uniform standards for the installation and maintenance of private line alarm service provided by telephone utilities on file with this Commission.
 - 1.1.3 Limits of Order. These rules are not intended to revise or modify any of the provisions, rules, or special conditions contained in the tariffs of the telephone utilities on file with this Commission. It is desirable that the alarm companies and utilities work together at the local level to resolve mutual concerns.

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- 1.1.4 <u>Revision of Scope</u>. 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. Revisions in scope shall be proposed by a joint committee comprised of the Commission staff, telephone utilities, and alarm industry representatives.
- 1.1.5 Absence of Civil Liability. The establishment of these rules shall not impose upon the telephone 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.
- 1.2 Applicability. These rules are applicable to all telephone utilities providing service within California having more than 100 private line alarm company serving links.

1.3 Definitions.

- 1.3.1 Addition. Adding a new customer to an existing private line alarm service, typically a new segment added to a bridged or multi-point private line alarm service.
- 1.3.2 Alarm Company. A company engaged in providing the monitoring of electronic and electrical protection systems for burglary, fire and holdup detection systems using private line alarm services.
- 1.3.3 Alarm Company Subscriber. A subscriber of alarm company services that is billed for private line alarm services by the alarm company and <u>not</u> the telephone utility.
- 1.3.4 Alarm Held Order. An order for a new service or an addition which is not completed on or before the commitment date not due to the fault of the customer (e.g., an order delayed due to a lack of telephone utility facilities).

- 1.3.5 <u>Alarm Service Order</u>. An order placed with a telephone utility by a customer or an alarm company for a new service or an addition to a private line alarm service.
- 1.3.6 Alarm Trouble Report. A customer's communication to a telephone utility indicating dissatisfaction with the operations of a private line alarm service.
- 1.3.7 <u>Commission</u>. The Public Utilities Commission of the State of California.
- 1.3.8 <u>Customer</u>. The party billed by the telephone utility for a private line alarm service. Said party may be an alarm company or a private party that is serviced by an alarm company but is billed directly by the telephone utility for private line alarm services.
- 1.3.9 <u>Due Date</u>. The latest date agreed to by the customer and the telephone utility for the completion of an installation of a new service or an addition. Same as commitment date.
- 1.3.10 **Elapsed Time**. The time used within a 24-hour clocking system that represents the total time involved in a trouble report, from the time reported to the utility to the time closed out with the alarm company.
- 1.3.11 Interexchange Carrier. A post-divestiture telephone utility whose purpose is to serve as an inter-LATA (Local Access Transport Area) interconnect for local telephone utilities when a private line alarm service appears in more than one LATA.
- 1.3.12 <u>Jeopardy Notice</u>. Notification to the customer by the utility of an anticipated delay in the completion of their private line alarm service order.

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- 1.3.13 Joint Meet. Date and time of an agreed meet between utility and alarm company technicians.
- 1.3.14 <u>Local Telephone Utility</u>. The telephone utility which provides the local facilities to reach the customer and/or subscriber premises.
- 1.3.15 <u>New Service</u>. The establishment of a new private line alarm service.
- 1.3.16 Plant Control Office (PCO). The telephone utility office responsible for tracking provisioning and maintenance of a primary alarm service order. This lead party designation is assigned by the utility and designates the area serving the primary circuit location with the exception of orders dealing with an interexchange carrier. The interexchange carrier assumes PCO responsibilities whenever a private line alarm service uses its facilities. If a multi-point or bridged service contains at least one segment which uses interexchange carrier facilities and the entire service is billed by the interexchange carrier, then the interexchange carrier assumes PCO responsibilities over all segments on that service, including those segments not using its facilities which segments are provided and maintained by a local telephone utility.

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Examples:

- 1. GTE to GTE Intra-LATA: Regional GTE entity serving the alarm company master station is PCO.
- 2. Pacific Bell to Pacific Bell -Intra-LATA: Regional Pacific Bell entity serving the alarm company master station is PCO.
- 3. GTE to Pacific Bell Intra-LATA: Where billed party is in GTE serving area, GTE is PCO.
- 4. Pacific Bell to GTE Intra-LATA: Where alarm company master station is in Pacific Bell serving area, Pacific Bell is PCO.
- 5. GTE to interexchange carrier to GTE, or Pacific Bell to interexchange carrier to Pacific Bell - Inter-LATA: Interexchange carrier is PCO.
- 6. GTE to interexchange carrier to Pacific Bell, or Pacific Bell to interexchange carrier to GTE - Inter-LATA: Interexchange carrier is PCO.
- 1.3.17 **Private Line Alarm Service.** For the purposes of this general order, a private line alarm service shall be defined as a private line service provided by a telephone utility for the transmission of customer-generated alarm signals. This encompasses services that are monitored by alarm companies as well as fire and police departments, but excludes any service that is connected to the public (switched) exchange network.

- 1.3.18 <u>Regional Reporting Units</u>. Units assigned by geographic location to compile and record data in accordance with the service measurements of General Order 152. See Figure A for the Pacific Bell Company, Figure B for the General Telephone Company of California, and Figure C for the Continental Telephone Company of California. American Telephone and Telegraph will report on a statewide basis.
- 1.3.19 <u>Service Measurement</u>. A specified service category to be measured by the telephone utility reporting units and reported to the Commission when set service levels are not met.
- 1.3.20 <u>Serving Link</u>. The local cable pair from the telephone utility's serving central office to a customer's or alarm company subscriber's premise.
- 1.3.21 <u>Telephone Utility</u>. A public utility telephone corporation providing telephone service as further defined by Public Utilities Code Sections 216 and 234.
- 1.4 Information Available to the Public. Telephone utilities shall maintain, open for public inspection at their main offices in California, copies of all reports submitted to this Commission in compliance with these rules. Reports shall be held available for one year. Copies of these reports shall also be maintained and be available for public inspection at the Commission's San Francisco and Los Angeles offices. Copies of such reports shall be sent to interested parties by the telephone utilities upon request.
- 1.5 <u>Location of Records</u>. All records required by these rules shall be made available to representatives, agents, or employees of the Commission and to interested parties upon reasonable notice.

- 1.6 <u>Reports to the Commission</u>. Telephone utilities shall furnish to the Commission at such times and in such form as the Commission may require, the results of summaries of any measurements required by these rules. Telephone utilities shall furnish the Commission with any information concerning telephone utility facilities or operations which the Commission may request and need for determining quality of service.
- 1.7 Deviations From These Rules. In those cases where the application of any of the incorporated rules results in undue hardship or expense to a telephone utility, it may request specific relief by filing a formal application in accordance with the Commission's Rules of Practice and 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. All requests for deviations from any of these rules shall also be mailed to interested parties.
- 1.8 <u>Interested Parties</u>. A person wishing to become an interested party under these rules shall notify the telephone utilities and Commission in writing.
- 1.9 <u>Revisions of Rules</u>. 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 for them, and shall be served upon all interested parties. Interested parties shall have the same rights to propose modifications by appropriate procedure.
- 1.10 <u>Meetings</u>. Representatives of the telephone utilities, the Commission staff, and the alarm industry shall meet periodically to discuss generic problems associated with the installation and maintenance of private line alarm service.

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2. STANDARDS OF SERVICE

2.1 <u>General</u>.

These rules establish uniform standards of service for the installation, maintenance, and operation of private line alarm services. The four service levels listed below are applicable to each of the service measurements. The service measurements established are as follows:

Service MeasurementType of ServiceAlarm Held OrdersInstallationInstallation Due DateInstallationService Trouble ReportMaintenanceRepair ResponseMaintenance

2.2 Description of Service Levels.

2.2.1 <u>Standard Service Level</u>. The standard service level reflects the average or basic level of service provided to the customer. Service within this level is considered adequate.

> Performance below the standard service level that is on the verge of becoming a reporting service level will be given immediate attention by the telephone utility.

2.2.2 <u>Reporting Service Level</u>. This level has been established to indicate reporting units which are performing significantly below the standard service level. Service that falls within this level will be considered inadequate and will require a report to be made to the Commission. Reporting service levels are applicable to each individual reporting unit.

2.3 Plant Control Office (PCO)-

2.3.1 PCO responsibilities are as follows:
1. Oversee and assure that alarm service orders are completed on time.
2. Be the main contact for the customer for provisioning and maintenance.

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 Oversee the repair of any network problem in a timely manner.
 Report the completion of alarm service orders and the repair of troubled service to the customer or reporting party.

2.3.2 <u>Determining PCO/Reporting Unit</u>. The telephone utility will designate a PCO/Reporting Unit within the area serving the alarm company master station, except for alarm services involving an interexchange carrier. When private line, multipoint, or bridged alarm service is ordered from or billed by an interexchange carrier, the interexchange carrier assumes PCO/Reporting Unit responsibilities.

2.4 Installation Trouble Reports.

- 2.4.1 **Description.** Any operational trouble reported on a new or rearranged service within 7 business days of the order completion date.
- 2.4.2 **Procedure.** The utility shall be notified by the alarm company of an installation trouble report problem 30 days in advance of the GO 152 committee meeting. Sufficient details will be furnished to enable the utility to investigate the complaint and be prepared to reply. The item will be placed on the agenda of the next GO 152 meeting.

3. PRIVATE LINE ALARM SERVICE MEASUREMENTS

3.1 Alarm Held Orders.

3.1.1 <u>Description</u>. This measurement indicates the total number of alarm service orders not installed within 30 days of the due date. The reason for an order being held shall be determined as soon as the due date has been missed. Due dates missed as a result of a customer's action or request (i.e., building not ready or access-related delays) will not be counted as a missed order for this measurement.

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- 3.1.2 **Procedure.** A tracking function will collect data as well as track the held order's status. An alarm service order given an immediate held-order status, (i.e., no available facilities determined at order processing center) will have a Jeopardy Notice drawn up at that time and the alarm company will be notified prior to the order's due date of the expected relief date.
- 3.1.3 <u>Measurement</u>. Count once a month for each reporting unit the total alarm orders not installed within 31 to 60 days, 61 to 90 days, and over 90 days of the due date. Divide by the monthly average of the alarm service orders due for the month being measured, plus the five previous months.

3.1.4 <u>Standard Service Level</u>.

31 days to 60 days 61 days to 90 days Over 90 days Reporting Service Level.	less	than	2≵
31 days to 60 days 61 days to 90 days Over 90 days	more	than	4&

3.1.5 Installation Due-date Intervals.

The Alarm Held Orders measurement is based, in part, upon the telephone utilities' installation due-date intervals that are in effect at the time the Standard and Reporting Service Levels are adopted. A utility that elects to change its installation due-date intervals shall notify the Interested Parties of such a change. A change of an installation due-date interval may result in a modification of the performance levels set forth in Section 3.1.4.

3.1.6 Reporting Unit. Regional reporting entity.

3.1.7 <u>Reporting Frequency</u>. Compiled monthly. Reports submitted quarterly to the Commission for any reporting unit which does not meet the reporting service level for any month during the quarter.

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3.2 Installation Commitments.

- 3.2.1 <u>Description</u>. This measurement indicates the number of new services and additions that are installed on or before the due date. Requests for disconnects and inside-move orders (i.e., a request to move the private line alarm service termination within the premises) are not included in this measurement. Due dates missed as a result of a customer's action, such as a building not being ready or access-related delays, will not be counted. This measurement will be expressed as a percent of the orders completed.
- 3.2.2 <u>Measurement</u>. Count once a month the total alarm service orders completed, the due dates missed, and the due dates met. Divide the due dates met by the total orders completed.
- 3.2.3 Standard Service Level.....at or above 90%.
- 3.2.4 Reporting Service Level.....at or below 85%.
- 3.2.5 Reporting Entity. Regional reporting unit.
- 3.2.6 <u>Reporting Frequency</u>. Compiled monthly. Reports submitted to the Commission quarterly for any reporting unit which performs at or inferior to the reporting service level for any month during the quarter.

3.3 Service Trouble Reports.

3.3.1 <u>Trouble Reporting Number</u>. The telephone utility will provide the alarm company with a toll-free trouble reporting number to report service operation problems.

- 3.3.2 <u>Description</u>. This measurement indicates the rate of service alarm trouble reports from customers relating to dissatisfaction with the operation of a private line alarm service. Reports received during the reporting month will be counted and related to the total serving links in place in terms of per 100 serving links. Trouble that is found to be caused by customer error or customer provided equipment will not be counted in this measurement.
- 3.3.3 **Procedure.** Upon reception, alarm trouble reports are entered into a computerized data base. At month's end, applicable trouble reports will be tallied and related to the total serving links in place for the reporting month. The total serving links in place shall be updated each quarter to provide an accurate service measurement.
- 3.3.4 <u>Measurement</u>. Count the total number of service trouble reports received by the reporting unit during the reporting month and divide by the total number of serving links in place during the reporting month.
- 3.3.5 <u>Standard Service Level</u>....at or below 6.5 per 100 serving links in place.
- 3.3.6 <u>Reporting Service Level</u>.....at or above 8 per 100 serving links in place.
- 3.3.7 Reporting Entity. By company, by region.
- 3.3.8 <u>Reporting Prequency</u>. Compiled monthly. Reports submitted to the Commission quarterly for any reporting unit which performs at or inferior to the reporting service level for any month during the quarter.



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3.4 <u>Repair Response</u>.

- 3.4.1 <u>Description</u>. The average time taken by a telephone utility to clear an alarm trouble report is indicated by this measurement and is expressed in hours per trouble report. This measurement is intended to further indicate the number of alarm trouble reports which require greater than 48 hours to clear, and is expressed in percent of total alarm trouble reports received during the reporting month. Alarm trouble reports determined to be caused by customer error or customer provided equipment, as identified by standard trouble isolation and identification techniques, will not be included in this measurement.
- 3.4.2 **Procedure.** For the purposes of GO 152, alarm trouble reports can be said to be of three basic dispositions: (1) Involves found trouble attributable to the telephone utility's facilities or equipment and will be counted in this measurement as well as in the reports per hundred measurement, (2) trouble reports that involve non-found trouble (test okay; found okay in; found okay out) will also be counted in this measurement as well as in the reports per hundred measurement, and (3) trouble isolated to customer provided equipment. CPE disposition will not be counted in this measurement.

Duration time will start with the reception of a trouble notification by the utility. The time will be continuously tracked via a computerized system until closed out by the alarm company. (Reports concerning chronic, intermittent-type trouble will be escalated to management at the alarm company and utility for resolution.)

The utility will test the circuit and report the results to the alarm company. The alarm company will elect to dispatch their technician or request a utility dispatch.

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If the alarm company does not elect a utility dispatch, the trouble report will be closed by the utility.

If the alarm company elects a utility dispatch:

- The protected premises open-hours will be 1. furnished. If out of these hours, the alarm company must arrange access to test the circuit (end of the utility's facility).
- If access cannot be arranged, the report may 2. be held open until the normal business hours for the protected premise.

Should this interval extend beyond 6 hours, the report will be closed out and the alarm company will be required to initiate a new report when access is obtained.

- Measurement. Compile the total elapsed time to 3.4.3 clear all alarm trouble reports received by the reporting unit during the reporting month using a 24-hour clock. Such amount will then be divided by the total number of alarm trouble reports received by the reporting unit during the reporting month. The reporting unit will also count the total number of alarm trouble reports received for each reporting month which require more than 48 hours to clear. That amount will be divided by the total number of alarm trouble reports received by the reporting unit during each reporting month. This 48-hour measurement will be expressed as a percentage.
- Standard Service Level. Average elapsed time of 3.4.4 8 hours or less. More than 48 hours in elapsed time....less than 28-
- Reporting Service Level. Average elapsed time of 3.4.5 10 hours or more.

More than 48 hours in elapsed time....over 5%.



- 3.4.6 Reporting Entity. By company, by region.
- 3.4.7 **<u>Reporting Frequency</u>**. Compiled monthly. Reports submitted to the Commission quarterly for any reporting unit which performs at or inferior to the reporting service level for any month during the quarter.

4. <u>RECORDS AND REPORTS</u>

- 4.1 <u>Reporting Units</u>. Service measurements shall be maintained by reporting units. Reporting units will be regional reporting entities. A description of the reporting units for Pacific Bell, General Telephone and Continental Telephone is shown on Figures A, B and C, respectively. Telephone utilities with more than 100 but less than 2,000 serving links shall file one statewide report. Those utilities reporting on a statewide basis shall show the actual number of occurrences for missed installation commitments and held orders.
- 4.2 <u>Report Levels</u>. Reporting levels are established by these rules as set forth in Section 3. Service measurements with levels of service at or inferior to the reporting levels in any given month will be considered inadequate service.
- 4.3 <u>Reporting Requirements</u>. Quarterly Reports shall be made to the Commission for all reporting units providing service at or below the reporting service level on any measurement for any month during the quarter. Reports shall be filed within 30 days after the end of each quarter. Reports to the Commission of performance at or below a reporting level shall state the levels of service for each such measurement, the month being reported, a description of the cause of performance at the reporting level, a statement of action being taken to improve such performance, and the estimated date of completion of the improvement.

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4.4 <u>Retention of Records</u>. Monthly summary records of service measurements for each reporting unit will be retained for three years. All summary records will be available for examination by the Commission and other interested parties during the retention period; special summaries of service measurements may be requested by the Commission.

Dated November 9, 1988, at San Francisco, California.

PUBLIC UTILITIES COMMISSION STATE OF CALIFORNIA

By VICTOR WEISSER Executive Director

representatives from the telephone utilities, DRA, and the alarm industry. The Review Committee identified certain items in GO 152 which had been rendered obsolete by the advancement of measuring system technology. After several months of meetings and negotiations among its members the Review Committee proposed revisions to §§ 1 through 4 of GO 152. A copy of the revised GO 152 incorporating the proposed modifications is included in Appendix A. The proposed revisions do not change the order's intent or purpose.

Proposed Changes to GO 152

Following is a brief summary of the proposed changes in various sections of the general order. Sections not referred to have remained substantially unchanged.

1. <u>General</u>. Several definitions have been added to accommodate changes set forth in other sections of the general order. They are in §§ 1.3.3, 1.3.5, 1.3.9, 1.3.10, 1.3.11, 1.3.12, 1.3.13, 1.3.14, 1.3.16, and 1.3.19. Existing definitions have been renumbered so that all definitions are set forth in alphabetical order.

2. <u>Service</u>. The existing general order provides service measurement for alarm held orders, installation commitments, installation trouble reports, service trouble reports, and repair response. The existing method for measuring installation trouble reports has proven to be unworkable, and there seems to be no workable alternative for capturing the necessary data. Therefore, the measurement system for installation trouble reports has been deleted in the revised general order. However, the applicants have agreed to address specific instances of installation trouble that are reported to the utilities by the alarm companies during the quarterly meetings required by GO 152. The new procedure is set forth in § 2.4.

The method of measuring the remaining service categories remains substantially unchanged.

- 3. -