

DEC, 3 1992

Decision 92-12-007 December 3, 1992

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of Amending Certain )  
Clauses in General Order 133-A, )  
Governing Service Standards for )  
Telephone Companies. )

Application 91-07-041  
(Filed July 30, 1991)

ORDER ON LIMITED REHEARING AND PETITION  
FOR MODIFICATION OF DECISION 92-05-056

Background

Call America Business Services Corporation (Call America), MCI Telecommunications Corporation (MCI), and Sprint Communications Company (Sprint) filed Applications for Rehearing of Decision (D.) 92-05-056, which amended General Order (GO) 133-A. GO 133-A established the proper and adequate measurement standard indices for all telephone utilities providing service within the State of California. Based on recommendations from the GO 133-A Review Committee (Review Committee), D.92-05-056 updates GO 133-A and retitles it GO 133-B. The decision also specifically directs all interexchange carriers (IECs) providing operator service in California to fully comply with the amended GO.

Call America and MCI alleged in their Applications for Rehearing that their due process rights had been violated because they never received notice of an Administrative Law Judge (ALJ) ruling issued in this proceeding which solicited comments on four issues<sup>1</sup> from a supplemented service list<sup>2</sup> which included all

1 "a. Does G.O. 133-A, as amended, ignore the current competitive regulatory environment?

(Footnote continues on next page)

Review Committee members, interested parties, and all the IECs operating in California.

MCI and Sprint in their Applications also raised the question of whether D.92-05-056 is inconsistent with previous orders of the Commission delineating the proper approach to regulation of non-dominant interexchange carriers (NDIEC). Specifically, Sprint maintained that D.92-05-056 contains errors regarding the current competitive environment and the scope of operations of the NDIECs.

Pursuant to D.92-08-047, the Commission granted limited rehearing to "allow all those on the Appendix A and Appendix B service lists in this proceeding who have not heretofore done so to comment on the four questions raised by the Administrative Law Judge's November 14, 1991 ruling in this proceeding." Accordingly, Sprint, MCI, and the California Association of Long Distance Telephone Companies (CALTEL)<sup>3</sup> filed comments on the questions. Pacific Bell (Pacific) filed reply comments.

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(Footnote continued from previous page)

"b. Should G.O. 133-A, as amended, continue to apply to all telephone utilities?

"c. Should all interexchange carriers be exempted from amended GO 133-A?

"d. Should those provisions of the General Order which apply to interexchange carriers apply solely to AT&T?"

2 Identified as Appendix A and Appendix B service lists.

3 By letter dated August 24, 1992, CALTEL declared that while Call America filed an application for rehearing of D.92-05-056, the company would be participating in the limited rehearing as a member of CALTEL. A September 4, 1992 ALJ ruling accepted the comments CALTEL had submitted in its representative capacity.

On June 22, 1992, GTE California Incorporated (GTEC) petitioned for modification of D.92-05-056 on the ground that the delays in the effective date<sup>4</sup> of the decision have made the existing compliance dates for the category of Business Office Answering Time (GO 133-B, Section 3.9) unworkable. GTEC requests that the order be modified to specifically extend these compliance dates.

Positions of the Parties and  
Representative in the Limited Rehearing

CALTEL

CALTEL submits that "no reasons exist to apply the reporting requirements set forth in GO 133-A to interexchange carriers." (CALTEL Comments at 1.) It maintains that the Commission created the reporting requirements under GO 133 to ensure that telephone services meet certain quality standards. Further, CALTEL argues that the reporting requirements only serve "as a meaningful means of monitoring service quality when applied to monopoly providers of telephone services." (Id.) (Emphasis in the original.) CALTEL contends also that since IECs operate within a highly competitive marketplace, they are inherently motivated to provide consistent high quality service. CALTEL asserts that imposing the GO 133 reporting requirements on IECs will "merely create costs without providing any related service benefits for customers." (Id. at 2.)

Sprint

Sprint maintains that "no public interest is served" by applying the requirements of GO 133 to long distance companies such

<sup>4</sup> The Review Committee originally contemplated that the amended GO would become effective 1/1/92. D.92-05-056 was issued May 20, 1992. Pursuant to Section 1733(a) of the Public Utilities Code, the applications for rehearing created an automatic stay in the proceedings which has continued.

as itself. It contends that "the forces of competition set the prices, terms, and conditions for interLATA services provided by non-dominant interexchange carriers." (Sprint Comments at 2.) Further, Sprint argues that the NDIECs do not have jurisdictionally-specific infrastructure, such as California-specific recording and reporting systems. Therefore, they submit, NDIECs should not be required to develop them without a determination that a significant consumer problem exists that can be addressed no other way.

Sprint contends that GO 133-A ignores the competitive environment faced by NDIECs in California today. It argues that application of the GO to NDIECs is duplicative of the discipline imposed by market forces. Further, Sprint maintains that all NDIECs should be exempted from GO 133-A because it is unnecessarily burdensome without "serving any useful public purpose." (Sprint Comments at 4.) Sprint states that application of "traditional regulatory requirements to non-dominant firms would impose substantial burdens on both the firms, and the commission and its staff, without creating any offsetting public benefit." (Id.) Finally, Sprint asserts that many aspects of GO 133-A do not apply to the way an NDIEC does business.

MCI

MCI maintains that the record evidence in this proceeding contains no adequate factual basis for the imposition of GO 133-B regulatory requirements to IECs. It argues that the application of

the amended GO to NDIECs "effectively undermine(s) clearly-stated Commission goals for the California telecommunications market...without furthering any other Commission goal or policy purpose." (MCI Comments at 4.) MCI asserts that IECs operate in a highly competitive market in which application of technical standards promulgated by, and for, local exchange carriers furthers no rational public policy purpose.

MCI also points out that many of the provisions of GO 133-B are inappropriate or irrelevant to the way in which IECs offer service in California. In addition, it notes that D.92-05-056 silently assumes that the authorization of intraLATA competition is imminent in California, and contends that there is no adequate basis for imposing "burdensome and unnecessary regulatory requirements on NDIEC market participants in California." (MCI Comments at 4.) Finally, MCI submits that compliance with GO 133-B will increase the cost of doing business for NDIECs in the state.

#### Pacific

Pacific was the only party to file reply comments pursuant to D.92-08-047. Pacific states that Application (A.) 91-07-041 was "designed to clarify and revise specific portions of GO 133-A and replace it with GO 133-B." It asserts that one of the sections of GO 133-A that the Application does not attempt to modify is Section 1.2. Pacific submits that Section 1.2 clearly states, both in its current and amended forms, that GO 133-A applies "...to all telephone utilities providing service within the State of California."

Pacific notes that the commenters do not take issue with or otherwise address the merits of the specific amendments to GO 133-A requested in the Review Committee's Application. Rather, Pacific points out, Sprint and MCI claim that GO 133-A requirements should not apply to them at all and that D.92-05-056 will somehow increase competitive firms' regulatory burdens. Pacific argues

that the commenters ignore the fact that they are already required to follow GO 133-A. It continues:

"(t)he issue of excluding certain telephone utilities from the requirements of G.O. 133-A is clearly beyond the scope of the Application, and the applicability of G.O. 133-A to all interexchange carriers is unambiguously covered in Section 1.2." (Pacific Reply Comments at 3.)

Pacific maintains that Section 1.7 of the GO establishes the appropriate procedure for telephone utilities to follow in requesting a deviation from GO 133 rules. The company submits that the commenters have the burden of establishing that they are entitled to a change in the Commission's rules. It notes that they have not met that burden.

Pacific contends that GO 133-B does not ignore the current competitive regulatory environment. It argues that by requiring the same standards of all telephone companies in California, unless specifically exempted by the Commission, GO 133-B "fosters the concept of a level playing field which is the foundation for true competition." (Id. at 4.) Pacific observes that while the commenters complain that GO 133-B may cost them money, they do not quantify how much it will cost them and present no facts which will allow the Commission to weigh the benefits and costs.

Pacific cites case law refuting the commenters' implication that the Commission has exempted them from meeting regulatory requirements. Moreover, it asserts that the commenters' arguments that customers can "vote with their feet" ignore the fact that customers can incur costs when they "vote" or change from their presubscribed IECs. Pacific maintains that it does not object to an ongoing review of GO 133-B as the competitive nature of the marketplace is further defined by the Commission. However, it submits that any such ongoing review is most appropriately performed by the Review Committee.

Pacific argues that the requirements of GO 133-B need to apply to all telephone companies. Pacific notes that the commenters' submissions imply that they do not comply with GO 133-A today. It characterizes the issue as one not of content but of compliance. Pacific contends that the commenters have failed to present any facts that support exempting them from rules to which they are already subject.

Finally, the company asserts that eliminating the service standards or monitoring requirements for one group of competitors is inappropriate. Pacific submits that the provisions of the GO which apply to IECs should not apply solely to AT&T. It observes that the purpose of GO 133-B is not to disadvantage any particular IEC or local exchange company, but rather: "...to establish uniform standards of service to be observed in the operation of telephone utilities."<sup>5</sup> Pacific requests that GO 133-B continue to be held applicable to all telephone utilities, including IECs, authorized to provide service in California. In the alternative, it requests that if the Commission elects to exempt any IECs from the requirements of the GO, that Pacific's and all other local exchange companies' competing services also be exempted.

#### Discussion

We have carefully considered all the comments filed. Notwithstanding, we substantially concur with Pacific's comments. D.92-05-056 does not expand the application of GO 133-B. It simply gives notice to all telephone utilities providing service within California that the Commission expects full compliance with the amended GO. The IECs are specifically directed because, with the exception of AT&T, they have consistently ignored GO 133-A. Although Sprint and MCI's sharp comments insist without legal

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<sup>5</sup> Section 1.1(a).

support that the IECs are being newly and irreparably burdened by GO 133-B, the facts, the law and the words of the GO itself indicate otherwise.

When the Commission:

"found that the public interest will be served by the establishment of rules governing telephone service to be furnished the public by telephone utilities in California and adopted G.O. 133"<sup>6</sup>

long distance service was provided by one company --- AT&T. In November 1983, the first time GO 133 was amended,<sup>7</sup> AT&T was about to succeed to the interstate and interLATA operating authority of the Bell Operating Companies and a competitive market for intrastate interLATA authority was emerging in California. We acknowledged the changing environment and specifically addressed the potential new entrants:

"Since issuance of this OII, a number of applications have been filed with the Commission by persons seeking to offer long-distance, resale, and other forms of telephone service in competition with telephone companies presently providing public utility service. If authorized to provide service, such persons would be telephone companies subject to the revised GO 133." (Emphasis added.)

Moreover, we anticipated that some of the new competitors might be interested in providing service of a lesser grade from that established by GO 133-A. Therefore, we recommended the procedural method through which this issue would best be presented to us:

"It may be that some such competitive telephone companies would desire to offer a different

6 D.80082 (May 18, 1972).

7 D.83-11-062, 13 CPUC 2d 220 (November 22, 1983).



grade of service not meeting GO 133 standards. If so, the Commission would entertain applications for exemption from all or portions of the revised GO 133. It should be clear, however, that the Commission has reached no conclusions as to whether any such exemptions should be granted."<sup>8</sup> (Emphasis added.)

The only other time we specifically addressed this matter was in our recent D.92-05-056.<sup>9</sup>

As Pacific correctly points out in its reply comments, Section 1.7 of the GO itself establishes the appropriate procedure for telephone utilities to follow in requesting a deviation from its rules:

"Deviations From Any of These Rules.

"In those cases where 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."

In addition, the GO details the procedure by which affected or interested parties may amend GO 133:

"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. Other interested parties shall have the same rights to propose modifications by appropriate procedure."<sup>10</sup>

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8 Id.

9 Mineo. at 7.

10 Section 1.8.

MCI and Sprint argue that NDIECs should not have to comply with amended GO 133-A because many of its provisions are "inappropriate" or "irrelevant" to the way in which IECs provide service in California. We find their argument puzzling. There are at least two specific measurement standards that could apply to IEC services today: Toll Operator Answering Time and Directory Assistance Operator Answering Time<sup>11</sup>. If an IEC provides either or both services, we expect it to report on the applicable service index or indices. If an IEC provides neither service, we do not expect it to submit reports. The Commission staff is available to respond to IEC questions of whether or not it should file a report for one or both of the service measurement standards.

MCI maintains that D.92-05-056 extends GO 133-A beyond its original intent by applying the GO to IECs providing service within the state and "silently assumes that the authorization of intraLATA competition is imminent in California."<sup>12</sup> MCI is wrong. D.92-05-056 amends certain technical service quality standards and gives notice to all telephone utilities in California, particularly IECs providing operator service, that this Commission expects compliance with amended GO 133-A. Notwithstanding the commenters' contentions, we have given no blanket exemptions to the IECs, dominant or nondominant, operating in this state, to simply pick and choose among the rules governing telephone utilities for the ones with which they wish to comply. The deviations from traditional regulation for AT&T and the NDIECs have been based upon

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11 In D.92-05-056, we identified Section 3.7 on Toll Operator Answering Time as the sole service index applicable to the IECs. In its reply comments, Pacific correctly noted that there are two specific measurement standards that could apply to IEC services today: Section 3.7 on Toll Operator Answering Time and Section 3.8 on Directory Assistance Operator Answering Time.

12 MCI Comments at 6.

records substantiated by evidence, not invectives. No less is acceptable with respect to amended GO 133-A. Accordingly, we deny the requests of CALTEL, Sprint, and MCI.

GTEC's Petition For Modification

GTEC asserts that the Review Committee particularly contemplated implementation periods for Business Office Answering Time that were an integral part of the proposed schedule of A.91-07-041. The company further submits that the proposed scheduling language was adopted unchanged in D.92-05-056, notwithstanding an unanticipated delay in the effective date of the decision. GTEC notes that the situation may be unintentionally aggravated once the decision on rehearing is issued.

The Review Committee proposed a compliance schedule for Business Office Answering Time<sup>13</sup> that required:

"70% answered within 20 seconds starting from January 1, 1992;

"75% answered within 20 seconds starting from October 1, 1992;

"80% answered within 20 seconds starting from July 1, 1993."

GTEC maintains that the schedule assumed compliance with the 70 percent answer time on or about the anticipated effective date of the order, January 1, 1992. The company states that the proposed schedule also specifically contemplated a ten-month implementation period for the progression from the 70 percent answer time to the 75 percent answer time, with an additional nine-month interval before the 80 percent answer time standard would take effect.

GTEC contends that when the Commission issued D.92-05-056 and ordered all local exchange carriers to comply with

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13 A measure of the time required for a business office representative to answer business office calls.

GO 133-B by June 30, 1992, we inadvertently shortened to four months the ten-month implementation period for the 75 percent answer time originally recommended. The company asserts that we unknowingly also shortened to twelve months the original nineteen-month implementation period for 80 percent answer time. GTEC submits that the originally intended periods of time are necessary to implement the changes in systems and personnel needed to meet the new standards. Consequently, GTEC requests that D.92-05-056 be modified to specifically extend the compliance dates for Business Office Answering Time:

"70% answered within 20 seconds starting from the effective date of the order;

"75% answered within 20 seconds starting from a date ten (10) months from the effective date of the order;

"80% answered within 20 seconds starting from a date nineteen (19) months from the effective date of the order."

GTEC's petition is appropriate in these circumstances and should be granted. We did not intend to shorten essential implementation periods for Business Office Answering Time.

Findings of Fact

1. Call America, MCI, and Sprint filed Applications for Rehearing of D.92-05-056.
2. Pursuant to D.92-07-089, the stay of D.92-05-056 was extended until further order of the Commission.
3. On August 11, 1992, the Commission issued D.92-08-047 granting limited rehearing to allow all those on the Appendix A and Appendix B service lists in A.91-07-041 who had not previously done so to comment on the four questions raised by the Administrative Law Judge's November 14, 1991 ruling in this proceeding.
4. Sprint, MCI, and CALTEL, as representative for Call America, filed comments pursuant to D.92-08-047.

5. Pacific filed reply comments on September 2, 1992, and the record in this proceeding was closed on September 3, 1992.

6. The appropriate procedures for seeking an exemption or deviation from amended GO 133-A have not been followed.

7. GTEC filed a petition for modification of D.92-05-056 on June 22, 1992.

8. Ordering Paragraph 4 of D.92-05-056 ordered all local exchange and IECs providing service within California to comply by June 30, 1992, inadvertently shortening the implementation periods for the compliance dates of the Business Office Answering Time.

Conclusions of Law

1. Upon careful consideration of the comments filed by CALTEL, Sprint, MCI, and Pacific, no changes should be made in D.92-05-056 with respect to IECs providing service within California.

2. The stay of D.92-05-056, pursuant to D.92-07-089, is lifted.

3. GTEC's petition should be granted.

4. This order should be effective on the date signed because it has previously been stayed 90 days.

**IT IS ORDERED that:**

1. The requests of Sprint Communications Company, MCI Telecommunications Corporation and California Association of Long Distance Telephone Companies, Inc., as a representative of Call America Business Services Corporation, with respect to Decision (D.) 92-05-056, are denied.

2. GTE California Incorporated's Petition to Modify D.92-05-056 is granted.

3. D.92-05-056 dated May 20, 1992 is modified as follows:  
General Order 133-B is changed to read:

"3.9 Business Office Answering Time.

c. Reporting Service Level. 70% answered within 20 seconds starting from December 3, 1992; 75% answered within 20 seconds starting from October 4, 1993; 80% answered within 20 seconds starting from July 5, 1994."

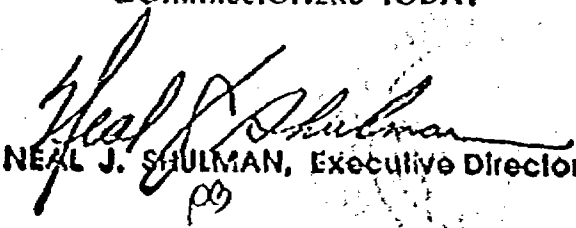
This order is effective today.

Dated December 3, 1992, at San Francisco, California.

DANIEL Wm. FESSLER  
President

JOHN B. OHANIAN  
PATRICIA M. ECKERT  
NORMAN D. SHUMWAY  
Commissioners

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

  
NEAL J. SHULMAN, Executive Director

GENERAL ORDER NO. 133-B  
(Supercedes General Order No. 133-A)

APPENDIX II

PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA

RULES GOVERNING TELEPHONE SERVICE

Adopted May 20, 1992. Effective June 19, 1992.  
Decision 92-05-056 in A.91-07-041  
as modified by Decision 92-12-007.

Table of Contents

<u>Title</u>	<u>Page</u>
1. General .....	1
1.1 Intent .....	1
1.2 Applicability .....	1
1.3 Definitions .....	1
1.4 Information Available to the Public .....	6
1.5 Location of Records .....	6
1.6 Reports to the Commission .....	6
1.7 Deviations from any of these Rules .....	7
1.8 Revision of Rules .....	7
2. Standards of Service	
2.1 General .....	7
2.2 Description of Reporting Levels .....	8
3. Telephone Service Measures	
3.1 Held Primary Service Orders .....	8
3.2 Installation-Line Energizing Commitments .....	9
3.3 Customer Trouble Reports .....	10
3.4 Dial Tone Speed .....	11
3.5 Dial Service (Service Observing) .....	12
3.6 Toll Operator Answering Time .....	12
3.7 Directory Assistance Operator Answering Time .....	13
3.8 Trouble Report Service Answering Time .....	14
3.9 Business Office Answering Time .....	15

GENERAL ORDER NO. 133-B  
(Supercedes General Order No. 133-A)

Table of Contents

<u>Title</u>	<u>Page</u>
4. Records and Reports	
4.1 Reporting Units .....	16
4.2 Reporting Levels .....	16
4.3 Reporting Requirements .....	16
4.4 Retention of Records .....	17
4.5 Commission Staff Investigations .....	17
4.6 Commission Staff Reports .....	17
5. General Order Review Committee	
5.1 Intent .....	18
5.2 Participation .....	18
Appendix A - Standard Reporting Levels .....	20
Appendix B - Record Keeping and Reporting Requirements .....	21
Appendix C - Held Primary Service Order Reports ...	22
Appendix D - Reporting Level Performance Report ...	22



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. Billing Center--Location where customer inquiries regarding billing items are handled.

b. Business Office--A Centralized Service Group which receives Small Business and/or Residence Customer requests for new installation or change in existing

- service. This does not include billing center inquiries.
- c. Central Office Entity--A Group of lines using common-originating equipment or under stored program control.
  - d. Central Office Wire Center--A facility composed of one or more central office switches which are located on the same premises and which may or may not utilize common equipment. In the case of a digital switch, all remote processors that are hosted by a central processor are to be included in the central office wire center.
  - e. Centrex--A service for customers with many stations that permits station-to-station dialing, generally one listed directory number for the customer, direct-inward dialing, and station identification on outgoing calls. The switching functions are performed in the central office entity.
  - f. Commission--In the interpretation of these rules, the word "Commission" shall be construed to mean the Public Utilities Commission of the State of California.
  - g. Commitment--The date agreed to by a customer and a utility for the completion of requested work.
  - h. Customer-Provided Equipment--Terminal equipment provided by the customer.
  - i. Customer Trouble Report--Initial line reports from customers or users of telephone service relating to a

malfunction or dissatisfaction with telephone company-provided lines.

- j. Demarcation--Point at which telephone company-maintained equipment and wiring terminates at the customer's premises.
- k. Electromechanical--A class of switching systems which is primarily based on electrically activated movement of mechanical switches.
- l. Electronic (Analog or Digital)--A class of switching systems in which the control functions are performed principally by electronics. There are two types in use: time division and space division.
- m. Employee Report--A trouble report from a telephone company employee who detects a trouble condition while performing duties independent of any conversation with a customer regarding the trouble.
- n. Installation--The provision of telephone service at the customer's request.
- o. Installation Center--The location responsible for the installation of the customers' loop facilities and the administration of installation field work by scheduling, dispatching, and tracking the progress of field forces.
- p. Line--An access line (hardwire and/or channel) which provides dial tone and which runs from the local central office (Class 4/5, Class 5, or a remote) to the subscriber's premises.

- q. Maintenance Center--A location responsible for the testing, dispatching, and tracking of trouble indications generated by customer reports, abnormal conditions, and routine analysis and the administration, scheduling, dispatching, and tracking of maintenance field work.
- r. No Access--A condition where an employee cannot gain access to the telephone company demarcation point at the customer's premises.
- s. Order Taken Date--The date on which customer requests service, assuming prior compliance with utility's rates, rules and regulations.
- t. Primary Service Order--Service orders for all business and residence main lines which are identified by a local exchange telephone number.
- u. Regrade Service Order--Changes between individual and party-line service as identified under Primary Service Order.
- v. Reporting Service Level--A specified service level of performance for each reporting unit. If performance is not meeting this level, the utility will submit periodic reports to the Commission.
- w. Service Observing, Manual--A direct measurement of service provided to the customer, obtained by an evaluator sampling an actual call. The observers do not listen to conversations.
- x. Service Observing, Mechanized--A direct measurement of

service provided to the customer obtained by a mechanized system without requirement for observation personnel.

- y. Small Business--Those business accounts which are not designated by the Utility for special handling.
- z. Special Services--Telephone or line circuits such as foreign exchange, local intraexchange private line, interexchange private line, exchange data, radio-telephone, other common carrier, INWATS, OUTWATS, off-premises extension lines, and answering service lines.
  - aa. Subsequent Report--A customer contact relating to a previously reported trouble which occurs prior to the time the initial or first customer trouble report has been cleared and the customer notified. Customer contacts changing or canceling appointments and/or providing additional information to a previous report are not subsequent reports.
  - bb. Telephone Plant--Equipment and wiring, excluding that located on a customer's property, required to connect a telephone service to the exchange network.
  - cc. Telephone Utility--A public utility telephone corporation providing public telephone service as further defined by Public Utilities Code Sections 216 and 234.
  - dd. Traffic Office--A group of operators which receives incoming calls from direct trunk groups or by means of an automatic distributing system.

ee. Traffic Sector--A group of traffic offices linked together by automatic call distribution equipment to form a service network.

ff. Trouble Report--Any oral or written notice by a customer or their representative to the telephone utility which indicates dissatisfaction with their telephone service, telephone qualified equipment, and/or telephone employees.

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. Copies shall also be made available to interested parties for a nominal fee to cover the cost of processing and reproduction. The availability shall be limited to reports provided by the local serving company.

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 Procedures, 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.

**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 for them. 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 reporting levels 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
Installation-Line Energizing Commitments	Installation
Customer Trouble Reports	Maintenance
Dial Tone Speed	Dial Service
Dial Service (Service Observing)	Dial Service
Toll Operator Answering Time	Operator Services
Directory Assistance Operator Answering Time	Operator Services
Trouble Report Service Answering Time	Repair Services
Business Office Answering Time	Business Office

### 2.2 Description of Reporting Levels.

These levels have been established so as to indicate units which are not meeting the standard thereby providing 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. The date the order is taken from the



customer shall be used in lieu of commitment dates where the utility cannot establish commitment dates. Orders requiring the customer to meet specific prerequisites (e.g., line extension charges), will be measured from the time prerequisites have been met.

b. Measurement. Count once a month the total primary service orders held over 30 days for each reporting unit. Separate the results between four categories as follows: 31-60 days, 61-90 days, 91-180 days, and over 180 days.

c. Reporting Service Level. Not Applicable

d. Reporting Unit. Exchange or plant installation center, whichever is lesser.

e. Reporting Frequency. Compiled monthly, reported quarterly for all reporting units.

### 3.2 Installation-Line Energizing 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 or requests for the installation, change, or transfer of PBX, PABX, EPABX, or other multiline lines and special services are not included in the measuring base. Commitments will not be considered missed when resulting from customer action.

b. Measurement. Count once a month the total commitments and the commitments missed. Commitments met, expressed as a percent, will equal total commitments minus

- missed commitments divided by total commitments.
- c. Reporting Service Level. 95% commitments met.
  - d. Reporting Unit. Central office wire center which handles at least 250 inward movements per month. In the event that the wire center does not meet the criteria, it should be combined with all other wire centers not meeting the criteria within the same plant installation center area and reported as a unit under the plant installation center.
  - e. Reporting Frequency. Compiled monthly, reported quarterly for those reporting units not meeting the reporting service level for any month.

### 3.3 Customer Trouble Reports.

- a. Description. Initial 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 cannot be completed because of a lack of access to customer's premises, subsequent reports, requests for operator assistance in placing calls, requests for busy verification, reports relating to toll private services, special services, customer-provided equipment, and employee reports will not be included. Reports received will be counted and related to the total working lines within the reporting unit in terms of reports per 100 lines.

- b. Measurement. Customer trouble reports received by the utility will be counted monthly and related to the total working lines within a reporting unit.
- c. Reporting Service Level. Six reports per 100 working lines (excluding terminal equipment reports) for units with 3,000 or more working lines, eight reports per 100 working lines (excluding terminal equipment reports) for units with 1,001-2,999 working lines, and 10 reports per 100 working lines (excluding terminal equipment reports) for units with 1,000 or fewer working lines.
- d. Reporting Unit. Central Office entity.
- e. 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.

#### 3.4 Dial Tone Speed.

- a. Description. A measure of the adequacy of electro-mechanical or hybrid central office equipment to provide dial tone to the subscriber. Measurements are taken to obtain the percentage of originating 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. Reporting Service Level. 97.4% within 3 seconds.

- d. Reporting Unit. Each electromechanical or hybrid central office entity over 3,000 working lines. Electronic analog and digital central office entities are not reporting units for this index.
- e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units at or below the reporting service level for any month.

### 3.5 Dial Service (Service Observing).

- 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.
- b. Methods and Procedures. Detailed methods for the evaluation of calls and the compilation of results are contained in each utility's respective Service Evaluation Practice, a copy of which is on file with the California Public Utilities Commission.
- c. Reporting Service Level. 98.0% for the Home Number Plan Area (HNPA)/Service Area Measurement.
- d. Reporting Unit. Each central office entity over 3,000 lines.
- e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units not meeting the reporting service level for any month.

### 3.6 Toll Operator Answering Time.

- a. Description. A measurement of time for the operator to answer toll and assistance calls. A sample of answering interval is taken to obtain the percentage of toll and assistance calls answered within 10 seconds.
- b. Measurement. A sample of the answering interval on toll and assistance calls that is representative of the measurement period using a force administration data system (FADS), or an equivalent measuring device.
- c. Reporting Service Level. 85% answered within 10 seconds. If measurement data of average answering time is used, it will be converted to the percent answered within 10 seconds.
- d. 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.
- e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units not meeting the reporting service level for any month.

### 3.7 Directory Assistance Operator Answering Time.

- a. Description. A measurement of time for the operator to answer directory assistance calls. A sample of answering interval is taken to obtain the percentage of directory assistance calls answered within 12 seconds.
- b. Measurement. A sample of answering interval on

directory assistance calls that is representative of the measurement period using a force administration data system (FADS), or an equivalent measuring device.

c. Reporting Service Level. 85% answered within 12 seconds. If measurement data of average answering time is used, it will be converted to the percent answered within 12 seconds.

d. Reporting Unit. Each traffic office handling directory assistance calls and having an average business day call volume of 2,000 or more calls.

e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units not meeting the reporting service level for any month.

### 3.8 Trouble Report Service Answering Time.

a. Description. A measurement of the time for the trouble report service attendant to answer trouble report calls. A sample of the answering interval is taken to obtain the percentage of trouble report calls answered within 20 seconds.

b. Measurement. A sample of the answering interval on trouble report calls that is representative of the measurement period using a force administration data system (FADS), or an equivalent measuring device.

c. Reporting Service Level. 80% answered within 20 seconds. If measurement data of average answering time is used, it will be converted to the percent answered within 20 seconds.

- d. Reporting Unit. All centralized service groups which support 10,000 or more lines.
- e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units not meeting the reporting service level for any month.

3.9 Business Office Answering Time.

- a. Description. A measurement of time for the business office representative to answer business office calls. A sample of the answering interval is taken to obtain a percentage of business office calls answered within 20 seconds.
- b. Measurement. A sample of the answering interval on business office calls that is representative of the measurement period using a force administration data system (FADS), or an equivalent measuring device.
- c. Reporting Service Level. 70% answered within 20 seconds starting from December 3, 1992; 75% answered within 20 seconds starting from October 4, 1993; and 80% answered within 20 seconds starting from July 5, 1994. If measurement data of average answering time is used, it will be converted to the percent answered within 20 seconds.
- d. Reporting Unit. All business offices which serve 10,000 or more lines.
- e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units not meeting 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, central office entity, wire center, traffic office, trouble report service office, or business 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 not meeting the reporting level in any given month will be considered indications of possible inadequate service. The reporting level for each service measure is summarized in Appendix A.

4.3 Reporting Requirements. Reports shall be made to the Commission quarterly of all reporting units providing service not meeting the reporting service level on any measure in any month during the quarter. Summaries of held primary 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



30 days of the end of each quarter. Reports to the Commission of performance not meeting the reporting level shall state the levels of service for each service measure and the months being reported; reports on reporting units for two or more consecutive months shall also include a description of the cause of performance at the reported level, a statement of action being taken to improve service, and the estimated date of completion of the improvements. A sample format is included as Appendix D. A sample format for reporting held primary 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.

4.5 Commission Staff Investigations. The staff shall investigate, time and resources permitting, every report unit which is reported for six or more consecutive months.

4.6 Commission Staff Reports. The staff shall compile and present to the Commission a quarterly report as to the adequacy of telephone service in California. The report shall (a) point out areas where service problems surface repeatedly, (b) discuss utility and/or staff-proposed

remedies to the problems, and (c) shall evaluate the utilities' proposed remedies to the problem and if believed to be inadequate, suggest appropriate courses of action. The utility shall retain the right to file comments on the staff's report. In the event of a Commission directive on any particular area, the staff shall prepare the appropriate compliance report.

## 5. GENERAL ORDER REVIEW COMMITTEE

### 5.1 Intent.

- a. Purpose. The purpose of the committee is to review the state of the art in telephony, to examine the measurements set forth in this General Order, and to suggest revisions, additions, and deletions to said measurements.
- b. Methodology. The committee shall meet at least once a year; meeting minutes shall be taken and in the event that changes to the General Order are recommended, an appropriate report shall be submitted to the Commission with a suggested course of action.

### 5.2 Participation.

- a. Commission. The Commission shall be represented on the committee by at least one member of the staff who shall chair the proceedings.
- b. Industry. The telephone utilities shall be represented by individuals or joint representatives.

c. Public. The public may be represented by any individuals or interested parties knowledgeable in the science of telephony and/or this General Order.

Approved and dated May 20, 1992, at San Francisco, California.

PUBLIC UTILITIES COMMISSION

STATE OF CALIFORNIA

By /s/ NEAL J. SHULMAN  
Executive Director

## Appendix A

## Standard Reporting Levels

Service Measure	Reporting Level
Held Primary Service Orders	See Section 3.1
Installation-Line Energizing Commitments	95%
Customer Trouble Reports For Central Office Entity with	
3,000 and More Working Lines Excluding terminal equipment reports	6 per 100 lines.
1,001 - 2,999 working lines Excluding terminal equipment reports	8 per 100 lines.
1,000 or Fewer Working Lines Excluding terminal equipment reports	10 per 100 lines.
Dial Tone Speed	97.4% within 3 seconds.
Dial Service (Service Observing)	98.0%
Toll Operator Answering Time	85% answered within 10 seconds.
Directory Assistance Operator Answering Time	85% answered within 12 seconds.
Trouble Report Service Answering Time	80% answered within 20 seconds.
Business Office Answering Time	70% answered within 20 seconds starting January 1, 1992; 75% answered within 20 seconds starting October 1, 1992; and 80% answered within 20 seconds starting July 1, 1993.

Appendix B

Record Keeping and Reporting Requirements

Service Measure	Reporting Unit and Minimum Reporting Size
Held Primary Service Orders	Exchange or Plant Installation Center, whichever is smaller
Installation-Line Energizing Commitments	Central Office Wire Center with 250 inward movements/month or Plant Installation Center
Customer Trouble Reports	Central Office Entity
Dial Tone Speed	Each electromechanical or hybrid Central Office Entity over 3,000 lines.
Dial Service (Service Observing)	Central Office Entity over 3,000 lines.
Toll and Assistance Operator Answering Time	Traffic Office handling toll and assistance calls --average business day call volume of 2,000 or more.
Directory Assistance Operator Answering Time	Traffic Office handling directory assistance calls--average business day call volume of 2,000 or more.
Trouble Report Service. Answering Time	Centralized group supporting 10,000 or more lines.
Business Office Answering Time	Centralized group supporting 10,000 or more lines.
Compilation of Data--Monthly	
Frequency of Reporting--Quarterly	
Retention of Measurements--2 years	

Appendix C

Held Primary Service Order Reports

Reports on held primary 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.
4. Reason for the held order if carried over 180 days.

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 if reported for two consecutive months. For installation commitments and customer trouble reports, indicate locations affected if cause is localized within a reporting unit.
4. Corrective action taken and anticipated completion date for (3) above.