

Decision 82 06 064 JUN 15 1982**ORIGINAL**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of GENERAL TELEPHONE COMPANY OF CALIFORNIA, a corporation, for authority to increase certain intrastate rates and charges for telephone service.

Application 60340
(Filed March 10, 1981;
amended April 6, 1981)

Investigation on the Commission's own motion into the rates, tolls, rules, charges, operations, costs, separations, practices, contracts, service, and facilities of GENERAL TELEPHONE COMPANY OF CALIFORNIA, a California corporation; and of THE PACIFIC TELEPHONE AND TELEGRAPH COMPANY, a California corporation; and of all the telephone corporations.

OII 88
(Filed April 7, 1981)

ORDER EXTENDING TIMESynopsis of Decision

This is a supplemental order to Decision (D.) 82-04-028, dated April 6, 1982.

This order partially grants General Telephone Company of California (General) extensions of time to comply with Ordering Paragraphs 6 through 10, inclusive, of D.82-04-028.

This order approves a plan submitted by General under Ordering Paragraph 12 of that decision for a quarterly filing imposing or removing surcredits in accordance with the level of telephone service being provided.

This order also approves a proposal for interim modification of requirements spelled out in Ordering Paragraphs 7 through 10, inclusive, of D.82-04-028, for the purpose of expediting the implementation of the quality of service criteria measurement system.

Introduction

Ordering Paragraphs 6 through 10, inclusive, and Ordering Paragraph 12 of D.82-04-028 directed General to:

"6. General shall present a report, within 60 days, on the feasibility and cost of converting within 6 months its dial service measurement system to a fully automated system capable of taking and tabulating measurements during peak hours without the attendance or intervention of manual operators.

"7. Commencing May 1, 1982 General shall commence collecting data on customer trouble reports per 100 telephones and dial service indices during the daily two-hour period of maximum call volume on a central-office-by-central-office basis.

"8. The data collected in accordance with Ordering Paragraph 7 is to be submitted for Commission review and evaluation on a quarterly basis within 15 days of the last day of the quarter.

"9. A surcredit of \$1.40 a line shall be imposed for each line in a central office where in two of the three months of the quarter the customer trouble reports per 100 telephones exceeds 8.0 and in two of the three months of the quarter (not necessarily the same two months) the dial service index during the daily two-hour period of maximum call volume is less than 97%.

"10. The surcredit imposed by Ordering Paragraph 9 shall remain in effect until a subsequent quarterly report indicates improvement in one or both of the indices to the acceptable level."

"12. General and staff shall submit a plan within 60 days for a quarterly filing imposing or removing surcredits on a central office by central office basis in accordance with the level of service being provided as indicated by the level of customer trouble reports per 100 telephones and the dial service index during the two-hour daily period of maximum call volume."

On April 29, 1982 General filed a Petition for Extension of Time to comply with Ordering Paragraphs 7 through 10, inclusive, of D.82-04-028 (Petition). In that Petition General requested an extension of time to October 15, 1982 within which to comply with those ordering paragraphs. The extension was requested primarily because of the time that General alleged would be required to acquire and install the additional equipment and to hire and train the personnel needed to make the mandated dial service measurements during the two-hour period of maximum call volume on a central-office-by-central-office basis.

General also requested through a separate petition filed June 4, 1982 an extension of time to comply with the requirements of Ordering Paragraph 6 because it is unable to provide by the filing deadline reliable data on the feasibility and cost of converting within six months its dial service measurement system to a fully automated system.

General estimates that it will not be able to comply with Ordering Paragraphs 7 through 10 until October 15, 1982. However, since filing the Petition, General has had discussions with the Commission's staff regarding the possibility of modifying the paragraphs on an interim basis so that procedures could be implemented prior to October 15 for determining whether or not a service penalty should be imposed. Based on these discussions, two proposals have been developed, one by General and the other

by the staff, which could be implemented prior to October 15, yet still meet the spirit of the ordering paragraphs. General's proposal is entitled "Basic Service Index" (BSI). The Staff proposal is entitled "Interim Staff Proposal" (ISP).

Basic Service Index

The BSI is based on the present General Order (G.O.) 133 Dial Service and Customer Trouble Reports levels. By this methodology, General would continue to take dial service measurements throughout the day in accordance with current industry practice, rather than just during the two-hour period of maximum call volume. The measurements would also only be taken in central offices with 3,000 lines (primary stations) or more, again in accordance with current G.O. 133 criteria. The measurements derived from these two indices would then be converted into numerical values using a point scale for the purpose of measuring the level of service provided by each reporting central office. In making this conversion both services indices would be given equal weight.

In order to determine whether the customers served by a particular central office may be entitled to a surcredit under Ordering Paragraph 9 of the decision, General proposes to measure the points earned by that office using the BSI point scale during each month of the reporting period. Whenever the total points earned by the central office during two out of the three months in the reporting period equal or fall below an arbitrarily selected level of 168.16, the Commission could order General to give a surcredit of \$1.40 to each customer line served from that office.

General estimates that, based on first quarter 1982 results, the BSI point system would have resulted in surcredits to customers served by central offices in Santa Monica, Perris, Ocean Park, West Los Angeles, and Malibu in the total sum of \$720,000.

Interim Staff Proposal

The other procedure which could be implemented prior to October 15, 1982 was proposed by the Commission staff. Under the ISP, General would take measurements during the two-hour period of maximum call volume, but only at those central offices where customer trouble reports per 100 stations are trending at or exceed 7.5 per month. The Commission could order a surcredit whenever the dial service index and customer trouble reports at one of these central offices falls below the reporting levels found specified in Paragraph 9 of D.82-04-028 during any two of the three months of the reporting period.

In implementing the ISP methodology, General states that the following are required:

(1) General would require 10 working days to implement the ISP following a decision by the Commission approving its use. Ten days are necessary in order to meet the requirements of the collective bargaining agreement between General and the Communications Workers of America regarding employee scheduling.

(2) General's work force assigned to making the service measurements would have to be scheduled to work continuous overtime in order to make the necessary measurements at each reporting office during the two-hour period of maximum call volume.

(3) The Dial Service measurements would only be taken at central offices with 3,000 or more primary stations in accordance with current G.O. 133 standards.

(4) Customer Trouble Reports Per 100 Stations would only be measured at those central offices with 3,000 or more primary stations.

(5) The sample size to compute the Dial Service index would consist of a minimum of 300 calls. The measurements would be made manually.

(6) The Dial Service index would be reported on a month-by-month basis.

(7) The Dial Service index would be based on the dial service performance of intracompany facilities within the Home Numbering Plan Area.

(8) Forty-five days will be required from the end of the report period for the preparation and submission to the Commission of the required report to determine whether a surcredit should be imposed. This time period is consistent with the current G.O. 133 reporting system. Initially the necessary reports would have to be assembled on a manual basis.

At present neither General nor the staff can estimate what, if any, surcredits would result from implementation of the ISP. General, however, favors the BSI over the ISP because the latter methodology would rely on dial service measurements taken during the two-hour period of maximum call volume which, as General claims, do not properly reflect the adequacy of the service actually provided.

The two proposals described above are intended to provide the Commission with an alternative method to achieve the objectives set forth in Ordering Paragraphs 7 through 10 prior to October 15, 1982.

In regard to Ordering Paragraph 6 on the subject of a report on mechanizing the dial service measurement system, General alleges that the GTE Service Corporation (GTE), along with representatives from General and other GTE telephone operating companies,

has developed specifications for the equipment necessary to mechanize the present manual dial service measurement systems in the various GTE operating companies, including General. On August 13, 1982, GTE plans to issue bid specifications to vendors for the equipment necessary to implement the mechanization program. Responses from the vendors will be due on September 10, 1982. The selection of a vendor is currently scheduled to take place on October 8, 1982. Therefore, General requests that the deadline for filing the report in compliance with Ordering Paragraph 6 be extended to November 1, 1982. By that date General expects to be able to provide the Commission with a reliable feasibility study.

General, in compliance with Ordering Paragraph 12 of D.82-04-028, has filed a plan for the quarterly filing for imposing or removing surcredits. General alleges that the time required for implementation of the plan is the same whether the Commission grants an extension of time for complying with Ordering Paragraphs 7 through 10, inclusive, as requested in General's original Petition, or whether it authorizes the extension subject to one of the interim proposals contained in General's Supplement to Petition.

General submits that once the Commission has advised General of its decision regarding the Petition for Extension of Time on Ordering Paragraphs 7 through 10, General will require 45 days from the end of the reporting period to prepare and submit to the Commission the necessary report to determine whether or not a surcredit should be imposed. As soon as the Commission orders General to provide the customers served from a reporting central office with a surcredit (or that a surcredit previously ordered should be removed), General will then require 15 days to update its billing master file

and identify those customers entitled to a surcredit (or who no longer are eligible for a credit). The surcredits (or surcredit deletions) will then appear beginning with the first billing cycle (approximately the third day of the month) of the month immediately following the month in which the surcredit or removal of surcredit was ordered.

Discussion

The date for commencing the collection of data (May 1, 1982), as ordered in Ordering Paragraph 7, has already passed. It is also evident that General's proposal for an extension of time until October 15, 1982 would cause an unacceptable delay considering General's past service performance.

The two alternate proposals that were developed by General and our staff offer interim means to accelerate the implementation of the service penalty system. We are not satisfied with General's proposal because its dial service measurement would still rely upon measurements taken throughout the day, rather than during the two-hour period of maximum call volume. Our staff's proposal would provide for measurements taken during the period of maximum call volume and would cover, during the interim period, those central offices most likely to be impacted by the penalty plan.

In Ordering Paragraph 8 of D.82-04-028, we ordered the data to be submitted for our review within 15 days of the last day of the reporting quarter. General has stated that 45 days would be required. General claims that this time period would be consistent with the G.O. 133 reporting system.

In our opinion, the collection and preparation of data for the first two months of the reporting quarter need not be deferred until the end of the quarter. Therefore, the 30 days' time period found reasonable in Finding 38 of D.82-04-028 is appropriate.

Since General would require only 10 working days for notice to the union to implement the staff's proposal, it seems appropriate to defer the commencement date for collection of the data to July 1, 1982. This will enable General to make measurements at the beginning of a regular quarter.

Our staff has reviewed General's plan for a quarterly filing for imposing or removing surcredits and is in agreement with General on all the provisions of the plan with the exception of the time requirement for the reporting system of 45 days. As discussed above, we are persuaded that 30 days would be an appropriate period. The plan shall be so adopted as modified.

General's request on the compliance with Ordering Paragraph 6, regarding a feasibility study on mechanizing the dial service measurement system, appears to be reasonable. A vendor selection process is under way and is scheduled to be completed by October 8, 1982. In view of this, it is appropriate to extend the time of Ordering Paragraph 6 to November 1, 1982.

Findings of Fact

1. General's request for an extension of time to October 15, 1982 for compliance with Ordering Paragraphs 7 through 10, inclusive, of D.82-04-028, is unreasonable.
2. General's Basic Service Index proposal for an interim plan to implement a measurement system does not take into consideration peak-hour measurements.
3. The Commission staff's proposal for an interim plan to implement a measurement system on the central offices most likely to require rate penalties is reasonable.
4. General would require 10 working days after a Commission decision to implement the staff's proposal.

5. Dial service measurements for the plan should only be taken at central offices with 3,000 or more primary stations. Sample size for the manually taken measurements shall be a minimum of 300 calls per month per central office.

6. The Dial Service Index should be reported on a month-to-month basis and should be based on the dial service performance of intracompany facilities within each Home Numbering Plan Area.

7. Customer Trouble Reports per 100 stations for this plan should only be measured at those central offices with 3,000 or more primary stations.

8. Ordering Paragraph 7 of D.82-04-028 should be revised to read "Commencing July 1, 1982 ...".

9. A period of 30 days for submitting the required reports to the Commission is reasonable, thus requiring a change in Ordering Paragraph 8 of D.82-04-028.

10. General's plan for a quarterly filing imposing or removing surcredits is reasonable and should be adopted with the exception of the 30-day period allowed by Paragraph 9 above.

11. General's request for time extension for complying with Ordering Paragraph 6 of D.82-04-028, on a feasibility study for mechanizing dial service measurements, is reasonable and should be allowed with a new date set for November 1, 1982.

Conclusions of Law

1. The Commission staff's proposal for an interim plan to implement a dial service measurement system is reasonable and should be adopted. General should be given a minimum of 10 days to implement the plan which should become effective on July 1, 1982.

2. General should make an advice letter filing on August 1, 1982, setting forth its plan for a quarterly filing imposing or removing surcredits. The filing should be made as per General's proposal with the exception of the time limit of 30 days for reports to be filed.

IT IS ORDERED that:

1. Ordering Paragraphs 6, 7, and 8 of Decision 82-04-028 are revised to read as follows:

"6. General shall present a report by November 1, 1982 on the feasibility and cost of converting within 6 months its dial service measurement system to a fully automated system capable of taking and tabulating measurements during peak hours without the attendance or intervention of manual operators.

"7. Commencing July 1, 1982, General shall collect data on customer trouble reports per 100 telephones and dial service indices during the daily two-hour period of maximum call volume on a central-office-by-central office basis pursuant to the interim staff plan of measurement. Commencing October 15, 1982, General shall measure dial service performance on all central offices of more than 3,000 primary stations."

"8. The data collected in accordance with Ordering Paragraph 7 are to be submitted for Commission review and evaluation on a quarterly basis within 30 days of the last day of the quarter."

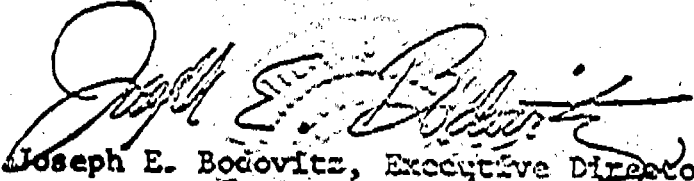
2. By August 1, 1982, General shall file tariff schedules containing its proposed plan for a quarterly filing for imposing or removing surcredits. The filing shall also contain the methodology of the pertinent service measurements, to include use of the interim proposal of the Commission's staff until October 15, 1982 and dial service measurement of all central offices of 3,000 or more primary stations thereafter.

This order is effective today.

Dated JUN 15 1982, at San Francisco, California.

JOHN E. BRYSON
President
RICHARD D. GRAVELLE
LEONARD M. GRIMES, JR.
VICTOR CALVO
PRISCILLA C. GREW
Commissioners

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


Joseph E. Bodovitz, Executive Director