

Decision 82 10 063 OCT 20 1982

ORIGINAL

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Application of
THE PACIFIC TELEPHONE AND TELEGRAPH
COMPANY, a corporation, for author-
ity to increase certain intrastate
rates and charges applicable to
telephone services furnished within
the State of California.

Application 59849
(Filed August 1, 1980;
amended August 28, 1980
and October 14, 1980)

In the Matter of the Application of
THE PACIFIC TELEPHONE AND TELEGRAPH
COMPANY, a corporation, for author-
ity to increase certain intrastate
rates and charges applicable to
telephone services furnished within
the State of California.

Application 59269
(Filed November 13, 1979;
amended November 15, 1979)

Re Advice Letter (PT&T) No. 13640
to reprice certain telephone
terminal equipment and Resolution
No. T-10292 granting approval of
said changes.

Application 59858
(Filed August 1, 1980)

In the Matter of Advice Letter
Filing No. 13641 of THE PACIFIC
TELEPHONE AND TELEGRAPH COMPANY
for authority to increase certain
rates for key telephone service by
\$30.1 million.

Application 59888
(Filed August 19, 1980)

Investigation on the Commission's
own motion into the rates, tolls,
rules, charges, operations, costs,
separations, inter-company settle-
ments, contracts, service, and
facilities of THE PACIFIC TELEPHONE
AND TELEGRAPH COMPANY, a California
corporation; and of all the tele-
phone corporations listed in
Appendix A, attached hereto.

OII 63
(Filed December 18, 1979)

Investigation on the Commission's
own motion into the rates, tolls,
rules, charges, operations, costs,
separations, inter-company settle-
ments, contracts, service, and
facilities of THE PACIFIC TELEPHONE
AND TELEGRAPH COMPANY, a California
corporation; and of all the tele-
phone corporations listed in
Appendix A, attached hereto.

OII 81
(Filed August 19, 1980)

Investigation on the Commission's
own motion into the Matter of
Revision of the Accounting for
Station Connections and related
Ratemaking Effects and the Economic
Consequences of Customer-owned
Premise Wiring.

OII 84
(Filed December 2, 1980)

(See Decisions 93367, 93728, and 82-08-01
for appearances)

OPINION ON PROPOSED GENERAL ORDER TO ESTABLISH
INSTALLATION AND REPAIR STANDARDS

In Decision (D.) 93367 issued August 4, 1981, in this matter, the Commission, in its discussion on service considerations, addressed service complaints made by the Western Burglar and Fire Alarm Association (WBFA) against The Pacific Telephone and Telegraph Company (Pacific). At mimeo. pages 148 and 149 in D.93367 the Commission stated:

"...the more serious complaints came from WBFA and concerned the repair and installation of private line services. WBFA contends Pacific has failed to provide adequate service for the installation and repair of private line services used by the alarm industry. WBFA witnesses presented evidence of this failure and it appears it has been a recurring and unsolved problem since 1975. Testimony shows the number of new installation orders that are not installed on assigned due dates have increased dramatically recently. Evidence reflects that less than one-half of the installation due dates are met and long delays are not uncommon. Art Nettles, a staff engineer and witness for the staff on quality of service, stated he did not prepare an independent study of the quality of service for private line circuits. He did, however, make a limited telephone survey of the large metropolitan areas in California on burglar and fire alarm companies and telephone answering services. He contacted 30 burglar and fire alarm companies and his findings reflect that about 50% of the companies polled said their service was unsatisfactory. Nettles testified the main reason given was installation commitments not met. WBFA claims Pacific's performance in repairing alarm circuits has been steadily declining since the early 1970s. Because alarm circuits must be operational 24 hours per day in order to do the job they are designed for, Bell System practice requires that out-of-service conditions should be cleared within two hours. As a result of these problems, and in an attempt to improve the situation, WBFA recommends that a committee be formed with representation from the alarm industry, Pacific, and the staff. The

committee would establish reasonable standards for the installation and repair of private line services used by the alarm industry and such standards could be incorporated into a Commission General Order. We will adopt the recommendation."

On this subject we made the following three findings in

D.93367:

- "54. There are serious problems with the service of Pacific in repairing and installing private line services.
- "55. A committee should be established with representation from the alarm industry, Pacific, and the staff to determine and recommend reasonable standards for the installation and repair of private line services used by the alarm industry.
- "56. The committee referred to in the previous finding should incorporate its recommendations into a proposed general order and present it to the Commission."

Ordering Paragraph 3 of D.93367 required the following:

- "3. Pacific and the staff together with any representatives of the burglar and fire alarm industry and any other parties who may wish to participate shall form a committee to:
 - "a. Meet and confer to determine reasonable standards for the installation and repair of private line services used by the alarm industry.
 - "b. Incorporate the determinations of Paragraph 3.a. into a proposed general order.
 - "c. Present the proposed general order to the Commission within 120 days from the effective date of this decision."

Under Ordering Paragraph 3, the required submission to the Commission was due December 8, 1981. Pacific and WBFA made good progress on the proposed general order but asked for additional time to complete their work. By D.93842 dated December 15, 1981, the

Commission changed the time in Ordering Paragraph 3 from 120 to 210 days, thus extending the filing date to March 8, 1982. At a hearing in this proceeding on March 3, 1982, Pacific and WBFA indicated that although they were close to an agreement on a general order, there were some provisions on which they could not agree. With the concurrence of the parties, the assigned administrative law judge (ALJ) set the matter for hearing on April 1, 1982 with the understanding that Pacific and WBFA would file their proposed orders on or before March 8, indicating the differences that still existed between them. The filings were timely made, the hearing was held on April 1, and a letter of clarification relating to identification of regional reporting units was received from WBFA on April 9, 1982. The matter is now ready for decision.

Petition of County of Los Angeles

By letter dated March 17, 1982 to the ALJ, the County of Los Angeles (LA County) stated it was in general agreement with the proposal of WBFA. However, LA County requested the proposal be modified so it would apply to all private line services, not just to the alarm industry. In support of its position, LA County cited Finding 54 of D.93367 (see quote above), and stated that establishment of standards which apply to only one class of customer would be in violation of Public Utilities (PU) Code § 453(a). At the hearing on April 1, the ALJ correctly concluded Ordering Paragraph 3 of D.93367 applied only to the burglar and fire alarm industry and suggested LA County could petition the Commission to open establishment of the general order to all private line services. LA County filed such a petition April 12 and the ALJ gave all parties until April 30 to reply. WBFA, County of San Diego, Pacific, and General Telephone Company of California (General) replied.

LA County in its petition repeats the argument in its letter of March 17, concerning Finding 54 of D.93367 and PU Code §§ 453(a) and (c), and, in addition, claims that failure of utilities to provide timely installation or maintenance of private line services for other customers such as governmental agencies,

hospitals, etc., can have as detrimental an impact upon the public health, safety, and welfare as failure to provide such services to the alarm industry.

In its reply, WBFA states it does not oppose LA County's request provided that the standards it proposes for the alarm industry are not modified and/or implementation and enforcement of the standards are not delayed. WBFA takes exception to several of the arguments of LA County. WBFA maintains that although Finding 54 does indicate problems with provision of private line services in general, it is clear from mimeo. page 148 that the preponderance of evidence on the quality of service for private lines was offered by WBFA and the telephone answering service industry. WBFA contends its proposed general order is not in violation of §§ 453(a) and (c) because the general order does not preclude utilities from providing reasonable and adequate service to all private line users based on the needs of the users, the nature of the circuits, and the services provided. The proposed general order does not, in WBFA's opinion, discriminate or provide a better class of service to the alarm industry but only guarantees service levels that are reasonable and adequate as required by PU Code § 451.

County of San Diego supports the petition of LA County.

Pacific does not oppose expansion of the general order to include all private line services if the standard service ranges and the reporting levels for the various measurements are set at the levels proposed by Pacific in its March 8 filing or as modified by Pacific at the April 1 hearing. Pacific claims it may be easier and possibly less costly for it to make measurements on a generic private line basis rather than on an alarm industry only basis. However, Pacific also maintains that the procedures it has contemplated for the alarm industry only may be unworkable if all private line installations are included in the program. Also, Pacific brings up the problem of the presently contemplated lower limit of 100 or fewer

installations exempting utilities from the general order; if all private line installations were included, the smaller independents would be brought under the general order.

General strongly opposes including all private line services under the general order proposed by either Pacific or the alarm industry. General estimates that by the end of 1982 it will have about 150,000 private line circuits in service. 100,000 of these fall into the intra-exchange or local private line category and 15,000 of those are the type of circuit used for alarm purposes. In order to equip these local alarm services with the remote test capabilities required if the standards proposed by Pacific and the alarm industry are adopted, General will be required to spend an estimated \$3.9 million over the two-year period 1983-84. If the order were expanded to cover all private line circuits, the cost would increase proportionately, $(100,000/15,000)$, and the time for completing the work would increase by up to five years. General believes adoption of any new standards will be costly and require higher rates. Although some private line circuits may require priority installation and maintenance, not all private line customers need such service nor would they be willing to pay the higher rates required.

We will not grant the petition of LA County to expand the proposed general order to all private line services. Although the suggestion may have merit, the record in this proceeding to date does not provide enough information to make the requisite findings and conclusions. For instance, if Pacific's ratio of alarm circuits covered by the present proposal to total circuits is similar to General's, then it appears there would be significant expense and time involved in setting up the proposed procedures for all private line installations. There is no doubt from the representations of the parties that there would be a delay in implementation and the record to date convinces us that rectification of the alarm industry

problems, at the least, is long overdue. Finally, we do not understand why LA County waited so long, August 1981 to March 1982, to suggest that the negotiations we ordered in D.93367 should have been applicable to all private line circuits and not just those of the alarm industry. Although the petition will be denied, it will be without prejudice to further filings and/or evidence by parties on the feasibility of LA County's proposal.

Major Issues

Based on the filings made by the parties and the hearing on April 1, only a few issues remain before a general order can be adopted. These are:

1. How a utility's cost of complying with the general order should be recovered.
2. Whether adoption of a general order can be construed as creating priority services for select customers.
3. Filing of reports on reporting service levels.
4. Service measurements.
5. Reporting service levels.

Cost of Compliance

Pacific proposes a provision in the general order that customers affected by the order shall bear any expense of the utility's compliance. Such expenses would be defined as "abnormal expenses, including but not limited to both developmental and operational expenses" and would be recovered through tariff rates and charges for the customers affected. WBFA takes the position that any such costs should be borne by the utility and "not be an element of cost in ratemaking."

We believe general orders should not contain provisions for how the cost of compliance with the order should be handled. The establishment of a general order may or may not result in increased expenses for a utility. How the expense, if any, should be determined, who should pay for it, and in what manner, are all proper

considerations in utility general rate cases or specific proceedings brought for that purpose. Neither of the suggestions by Pacific and WBFA should be included in the general order adopted.

Creation of Priority Services

WBFA recommends the general order contain a specific statement that adoption of the standards it proposes not be construed as creating priority services but that private line alarm services be considered candidates for priority repair. Current Bell System practice is that alarm service circuits are candidates for priority service which is defined as a repair completed in less than two hours.

Pacific's version of the general order contains no section similar to WBFA's. Its position is that no provision like WBFA's should be included; it appears from Pacific's contentions at the hearing that it might prejudice Pacific from later using the priority services contention as an argument supporting special rates for special services.

We view this issue similarly to the issue of who pays for costs of compliance. We see no valid argument for including in a general order, in isolation from all other services, a clause describing the priority level of service that order provides.

Filing of Reports on Reporting
Service Levels

A reporting service level is a specified level of performance for a given service measurement. Performance at or below that level is an indication of inadequate service. WBFA urges that the utilities should submit performance reports to the Commission regardless of whether the standard set had or had not been achieved because it would ensure the reports are complete and accurate. Pacific believes that if it meets the service standards set, it is a waste of time to submit reports to the Commission. It argues that the results of its monitoring will be available to the Commission and any of its customers or customer organizations such as WBFA. We

agree with Pacific. Submission of routine reports to the Commission is necessary as long as the information is compiled and maintained by the utility for review and inspection.

Service Measurements

WBFA recommends six service measurements and Pacific five:

<u>Type of Service</u>	<u>Service Measurement</u>	
	<u>WBFA</u>	<u>Pacific</u>
Installation	Alarm Held Orders	Alarm Held Orders
Installation	Installation Commitment	Installation Commitment
Installation	Installation Alarm Trouble Report	Installation Trouble Report
Maintenance	Maintenance Alarm Trouble Report	Maintenance Trouble Report
Maintenance	Duration of Service Interruption	Repair Response
Maintenance	Duration of Location Report	

Other than the service measurement descriptions the recommendations of WBFA and Pacific are similar with the exception of the last one, Duration of Location Report, which is recommended by WBFA but not by Pacific. We will accept Pacific's descriptions which we believe to be more indicative of the service to be measured. ✓

WBFA agreed to delete its last recommended measurement if the Commission would adopt its recommended service levels for the other five criteria and the utilities would make an effort to obtain the location of a reported trouble within two hours which is the current criterion of the Bell System. WBFA recognizes that even though the trouble may not be corrected within the two hours, at least customers would have the opportunity to take alternate security measures pending repair. Pacific agreed to this on the record and the other utilities present had no comment so we will assume they agree also.

As noted in the section which follows on Reporting Service Levels, we will adopt the service level recommendations of WBFA; therefore, the sixth measurement criterion will be deleted.

Reporting Service Levels

Almost all of the differences between the proposals of WBFA and Pacific on reporting service levels were agreeably worked out at the April 1 hearing.

The reporting service level for the Installation Commitment measurement is at or below 85% by WBFA and 70% by Pacific. This measurement indicates the number of new services and additions installed on or before the commitment date, i.e., the date service is promised by the utility. Commitments missed as a result of customer action are not counted. WBFA argues that the utility is usually the one to set the number of days needed to complete an installation. This is worked out with the customer and any other phone companies involved. WBFA points out that 90% is the reporting service level in General Order (GO) 133 with a standard service range of 94% for the installation of simple non-key telephone sets. Pacific claims that alarm service is more complex than regular telephone service and Pacific has no experience history with measurement of alarm service commitment levels. Because the utility sets the time intervals we will adopt the recommendation of WBFA. It will be up to the utilities to adjust their estimates if they find current time intervals are not reasonable.

The main difference between WBFA and Pacific on maintenance trouble reports and repair response criteria is that WBFA proposes measurement levels be established in the general order and Pacific proposes additional time for study before actual levels are established. WBFA proposes the levels in effect in GO 133 for Maintenance Trouble Reports. Pacific contends it will not be ready even to measure its performance before the end of the third quarter

of 1982. The first reports required under the general order would not be filed until after the first quarter of 1983. WBFA argues that if the standards set are too stringent, then Pacific can petition for a revision to the general order; Pacific's rejoinder is that it is imprudent to set standards with no history or guidelines for doing so. Also, Pacific fears that guidelines set and not met could be used as an argument for penalizing Pacific in a general rate case. Under Pacific's proposal the general order would have to be amended in any case by the addition of the actual guidelines found reasonable. We will adopt WBFA's proposal and if, after experience, Pacific finds the guidelines should be adjusted, it can file a petition to do so.

Regional Reporting Entities

At the close of the hearing on this matter, the participants had not agreed on a definition for the regional reporting entities. By letter dated April 9, 1982 WBFA suggested the boundaries proposed by Pacific with a modification of the area of the State left over after taking out the San Francisco Bay, Los Angeles, and San Diego areas. WBFA felt this was too large and should be broken into three parts. This leftover area comprises primarily the State north of the San Francisco Bay Area and the Sacramento and San Joaquin Valleys. We believe it would suffice to break that area into two parts instead of three. For convenience we will break it between north and south by the 209/714-916 area code boundaries. This produces then Figure A contained in the adopted general order. As agreed with the parties, only utilities having over 500 serving links as defined in Appendix A will be required to file by the five reporting units shown; utilities with fewer than 500 links but more than 100 will file on a statewide basis; utilities with 100 or less will not be required to file at all. ✓

Findings of Fact

1. As required by Ordering Paragraph 3 of D.93367, the alarm industry, Pacific, and the staff have presented to the Commission a proposed general order containing standards for the installation and repair of private line services used by the alarm industry and furnished by telephone utilities.

2. A public hearing on the proposal was held at which all interested parties had an opportunity to appear and be heard.

3. LA County petitioned the Commission to make the proposed general order applicable to all private line services, not just those provided to the alarm industry.

4. This record does not contain enough information to act favorably on LA County's petition to expand the general order to all private line installations.

5. The establishment of a general order will not necessarily result in increased expenses for those utilities required to comply with the general order.

6. A utility's expense, if any, of complying with a general order is a proper consideration in a general rate case of the utility or in a proceeding brought expressly for that purpose and should not be provided for in the general order at issue.

7. There is no need for a utility to file service standard reports to the Commission if it meets the standards set by the Commission provided that data concerning compliance with the standards are maintained by the utility for review by the Commission and interested parties.

8. The service measurements and reporting service levels proposed by the parties as modified by the discussion in this decision are reasonable and should be adopted.

Conclusions of Law

1. Under PU Code § 761 the Commission may establish the general order provided for by the following order.

2. LA County's petition for expansion should be denied.

O R D E R

IT IS ORDERED that:

1. The petition of LA County to expand the general order adopted by this decision to all private line services is denied.
 2. Appendix A is adopted as a general order of the Commission. This order becomes effective 30 days from today.
- Dated OCT 20 1982, at San Francisco, California.

RICHARD D. GRAVELLE
LEONARD M. CRIMES, JR.
VICTOR CALVO
Commissioners

Commissioner JOHN E. BRYSON

Present but not participating.

Commissioner Priscilla C. Crow,
being necessarily absent, did
not participate

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


Joseph E. Bodovitz, Executive Director

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GENERAL ORDER 152

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

RULES GOVERNING PRIVATE LINE ALARM SERVICE

Adopted 10/20/82. Effective 11/19/82.
(Decision 82-10-069, Application 59849 et al.)

1. GENERAL

1.1 Intent

- 1.1.1 Reason for Adoption. 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 to their customers.
- 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.
- 1.1.4 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. 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.

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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.
- 1.3.2 Alarm Company. A company engaged in providing monitoring of electronic and electrical protection systems including burglary, fire, holdup, and emergency alert systems, using private line alarm services. ✓
- 1.3.3 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.
- 1.3.4 Alarm Trouble Report. A customer's communication to a telephone utility indicating dissatisfaction with the installation or operation of a private line alarm service. Trouble, which after investigation is determined to be caused by customer-provided equipment, will not be considered an alarm trouble report.
- 1.3.5 Commission. The Public Utilities Commission of the State of California.
- 1.3.6 Commitment Date. The date agreed to by the customer and the telephone utility for the completion of an installation of a new service or an addition.
- 1.3.7 Customer. Alarm company or customer of an alarm company using a private line alarm service.
- 1.3.8 New Service. The establishment of a new private line alarm service.

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- 1.3.9 Primary Alarm Service Order. An order placed by a customer with a telephone utility for new service or an addition to private line alarm service.
- 1.3.10 Private Line Alarm Service. A private line service provided by a telephone utility to be used by a customer for the transmission of alarm signals. Such service does not include any service which is connected to the public exchange network.
- 1.3.11 Regional Reporting Entity. See Figure A.
- 1.3.12 Reporting Service Level. A specified service level of performance for each reporting unit. Performance at or below this level is an indication of inadequate service and the utility shall submit periodic reports to the Commission.
- 1.3.13 Service Interruption. The existence of a fault, outage, interruption, foreign voltage, noise, or other defect on a private line alarm service.
- 1.3.14 Serving Link. The local cable pair from the telephone utility's serving central office to a customer's premise.
- 1.3.15 Standard Service Range. A service range which encompasses adequate service to the user.
- 1.3.16 Telephone Utility. 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.

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- 1.5 Location of Records. 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 Reports to the Commission. 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. Telephone utilities shall begin filing reports required by these rules for the first quarter of 1983.
- 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 Interested Parties. A person wishing to become an interested party under these rules shall notify the telephone utilities and Commission in writing.
- 1.9 Revisions 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, and shall be served upon all interested parties. Interested parties shall have the same rights to propose modifications by appropriate procedure.
- 1.10 Meetings. 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 General. These rules establish uniform standards of service for the installation, maintenance, and operation of private line alarm service. The service measurements established are as follows:

<u>Service Measurement</u>	<u>Type of Service</u>
Alarm Held Orders	Installation
Installation Commitment	Installation
Installation Trouble Report	Installation
Service Trouble Report	Maintenance
Repair Response	Maintenance

2.2 Description of Service Ranges and Levels.

- 2.2.1 Standard Service Range. Standard service ranges are established for each of the service measurements. Service performance within the standard service range is considered to be adequate. Each individual reporting unit should generally maintain service levels within the standard range.
- 2.2.2 Service Below Standard. Individual reporting units are subject to influences which may cause them to occasionally fall below the standard range of performance. Such variations indicate inadequate service only where the substandard performance indications are frequent and substantially below the standard range.
- 2.2.3 Reporting Service Level. These levels have been established to indicate reporting units which are performing significantly below standard service ranges and to provide an indication for inadequate service. Reporting service levels are established for each of the service measurements. Reporting service levels are applicable to each individual reporting unit.

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3. PRIVATE LINE ALARM SERVICE MEASUREMENTS

3.1 Alarm Held Orders.

3.1.1 Description. This measure indicates the total number of primary alarm service orders not installed within 30 days of the commitment date. Commitment dates missed as a result of a customer's action or request will not be counted as a missed order for this measurement. This measurement will be expressed in terms of percent of such orders held compared to the monthly average of orders due for the month measured plus the five preceding months, i.e., a six-month moving average.

3.1.2 Measurement. Count once a month for each reporting unit the total primary alarm service orders not installed within 31 to 60 days, 61 to 90 days, and 91 and over days of the commitment date. Divide such numbers by the monthly average of the primary alarm service orders due for the month measured plus the five preceding months.

3.1.3 Standard Service Range.

31 days to 60 days - Less than 3%
61 days to 90 days - Less than 2%
More than 90 days - Less than 1%

3.1.4 Reporting Service Level.

	<u>1983</u>	<u>1984</u>	<u>After 1984</u>
31 days to 60 days -			
Less than	15%	10%	5%
61 days to 90 days -			
Less than	7%	6%	4%
More than 90 days -			
Less than	5%	3%	3%

3.1.5 Reporting Unit. Regional reporting entity.

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- 3.1.6 Reporting Frequency. 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.

3.2 Installation Commitments.

- 3.2.1 Description. This measurement indicates the number of new services and additions that are installed on or before the commitment date. Requests for disconnects are not included in this measurement. Commitments missed as a result of a customer's action will not be counted. The measurement will be expressed as a percent.
- 3.2.2 Measurement. Count once a month the total primary alarm service orders completed, the commitments missed, and the commitments met. Divide the commitments met by the total orders completed.
- 3.2.3 Standard Service Range. At or above 90%.
- 3.2.4 Reporting Service Level. At or below 85%.
- 3.2.5 Reporting Unit. Regional reporting entity.
- 3.2.6 Reporting Frequency. Compiled monthly. Reports submitted to the Commission quarterly for any reporting unit which does not meet the reporting service level for any month during the quarter.

3.3 Installation Trouble Reports.

- 3.3.1 Description. This measurement indicates the rate at which each reporting unit of a telephone utility receives alarm trouble reports relating to the installation of private line alarm services during the reporting month. Each customer will be given a special toll-free number to report to the telephone utility any trouble with the installation of a private line alarm service. Such customer reports will be the sole basis of this measurement. This measurement will be expressed on a per 100 primary alarm service order installation basis.

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- 3.3.2 Measurement. Count the total number of alarm trouble reports received by each reporting entity during the reporting month relating to the installation of private line alarm services and divide by the total number of primary alarm service orders completed by each reporting entity during the reporting month.
- 3.3.3 Standard Service Range. At or below 5 per 100 primary alarm service orders completed.
- 3.3.4 Reporting Service Level. At or above 15 per 100 primary alarm service orders completed for 1983, and 8 per 100 thereafter.
- 3.3.5 Reporting Units. Regional reporting entity.
- 3.3.6 Reporting Frequency. Compiled monthly. Reports submitted quarterly for any reporting unit which does not meet the reporting service level for any month during the quarter.

3.4 Service Trouble Reports

- 3.4.1 Description. This measurement indicates the rate of service alarm trouble reports from customers relating to dissatisfaction with telephone utility service for private line alarm services. Reports received will be counted and related to the total service links in place in terms of per 100 service links.
- 3.4.2 Measurement. Count the total number of service trouble reports received by the reporting unit during the reporting month and divide by the total number of service links in place during the reporting month.
- 3.4.3 Standard Service Range. At or below 6.5 per 100 service links.
- 3.4.4 Reporting Service Level. At or above 3 per 100 service links.
- 3.4.5 Reporting Units. Regional reporting entity.

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- 3.4.6 Reporting Frequency. Compiled monthly.
Reports submitted to the Commission quarterly for any reporting unit which does not meet the reporting service level for any month during the quarter.

3.5 Repair Response.

- 3.5.1 Description. The measurement indicates the average time taken by a telephone utility to clear an alarm service trouble report, and is expressed in hours per trouble report. The average time to clear a service trouble report may include up to four hours of time spent by the customer to clear the trouble independent of the telephone utility. This measurement is intended to further indicate the number of alarm service trouble reports which require greater than 48 hours to clear, and is expressed in percent of total alarm service trouble reports received during the reporting month. If, after communicating the alarm service trouble report to the telephone utility, the customer elects to independently investigate the cause of the service problem and does not report back to the telephone utility within four hours of such election, the trouble will be assumed to be caused by customer-provided equipment.
- 3.5.2 Measurement. The telephone utility will compile the total duration time to clear all alarm service trouble reports received by each reporting unit during the reporting month. Such amount will then be divided by the total number of alarm service trouble reports received by each reporting unit during the reporting month. The telephone utility will also count the total number of alarm service trouble reports received by each reporting unit during each reporting month which requires more than 48 hours to clear. That amount will be divided by the total number of alarm service trouble reports received by the reporting unit during each reporting month.

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3.5.3 Standard Service Range.

Six-hour average duration.	
More than 48 hours in duration.	Less than 2% of total service trouble reports.

3.5.4 Reporting Service Level.

Eight-hour average duration.	
More than 48 hours in duration.	Less than 5% of total service trouble reports.

3.5.5 Reporting Units. Regional reporting entity.

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

4. RECORDS AND REPORTS.

- 4.1 Reporting Units. Service measurements shall be maintained by reporting units. Reporting units will be regional reporting entities. A description of the reporting units for telephone utilities with at least 500 service links is shown on Figure A. Telephone utilities with more than 100 but less than 500 service links shall file one statewide report.
- 4.2 Report Levels. Reporting levels are established by these rules as set forth in Section 3. Service measurements with levels of service at or below the reporting levels in any given month will be considered indications of possible inadequate service.
- 4.3 Reporting Requirements. Reports shall be made to the Commission quarterly of all reporting units providing service at or below the reporting service level on any measurement for any month during the quarter. Reports shall be filed within 45 days after the end of each

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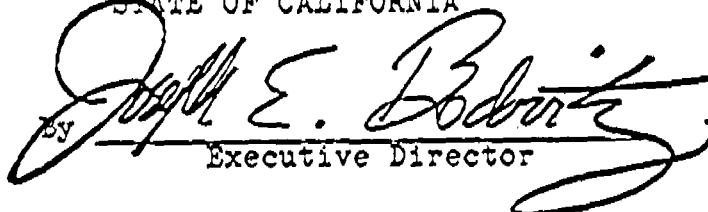
quarter. Reports to the Commission of performance at or below a reporting level shall state the levels of service for each such measurement, the month being reported, a description of the cause of performance at the reporting level, a statement of action being taken to improve such performance, and the estimated date of completion of the improvement.

- 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 the Commission and other interested parties during the retention period; special summaries of service measurements may be requested by the Commission.

Dated OCT 20 1982, at San Francisco,

California.

PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA

By  Executive Director

(END OF APPENDIX A)

FIGURE A
REPORTING UNITS



agree with Pacific. Submission of routine reports to the Commission is necessary as long as the information is compiled and maintained by the utility for review and inspection.

Service Measurements

WBFA recommends six service measurements and Pacific five:

<u>Type of Service</u>	<u>Service Measurement</u>	
	<u>WBFA</u>	<u>Pacific</u>
Installation	Alarm Held Orders	Alarm Held Orders
Installation	Installation Commitment	Installation Commitment
Installation	Installation Alarm Trouble Report	Installation Trouble Report
Maintenance	Maintenance Alarm Trouble Report	Maintenance Trouble Report
Maintenance	Duration of Service Interruption	Repair Response
Maintenance	Duration of Location Report	

Other than the service measurement descriptions the recommendations of WBFA and Pacific are similar with the exception of the last one, Duration of Location Report, which is recommended by WBFA but not ^{by} Pacific. We will accept Pacific's descriptions which we believe to be more indicative of the service to be measured.

WBFA agreed to delete its last recommended measurement if the Commission would adopt its recommended service levels for the other five criteria and the utilities would make an effort to obtain the location of a reported trouble within two hours which is the current criterion of the Bell System. WBFA recognizes that even though the trouble may not be corrected within the two hours, at least customers would have the opportunity to take alternate security measures pending repair. Pacific agreed to this on the record and the other utilities present had no comment so we will assume they agree also.

of 1982. The first reports required under the general order would not be filed until after the first quarter of 1983. WBFA argues that if the standards set are too stringent, then Pacific can petition for a revision to the general order; Pacific's rejoinder is that it is imprudent to set standards with no history or guidelines for doing so. Also, Pacific fears that guidelines set and not met could be used as an argument for penalizing Pacific in a general rate case. Under Pacific's proposal the general order would have to be amended in any case by the addition of the actual guidelines found reasonable. We will adopt WBFA's proposal and if, after experience, Pacific finds the guidelines should be adjusted, it can file a petition to do so.

Regional Reporting Entities

At the close of the hearing on this matter, the participants had not agreed on a definition for the regional reporting entities. By letter dated April 9, 1982 WBFA suggested the boundaries proposed by Pacific with a modification of the area of the State left over after taking out the San Francisco Bay, Los Angeles, and San Diego areas. WBFA felt this was too large and should be broken into three parts. This left over area comprises primarily the State north of the San Francisco Bay Area and the Sacramento and San Joaquin Valleys. We believe it would suffice to break that area into two parts instead of three. For convenience we will break it between north and south by the 209/714-916 area code boundaries. This produces then Figure A contained in the adopted general order. As agreed with the parties, only utilities having over 500 serving links as defined in Appendix A will be required to file by the five reporting units shown; utilities with fewer than 500 links but more than 100 will file on a statewide basis; utilities with 100 or less will not be required to file at all.

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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.
- 1.3.2 Alarm Company. A company engaged in providing monitoring of electronic and electrical protection systems including burglary, fire, hold-up, and emergency alert systems, using private line alarm services.
- 1.3.3 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.
- 1.3.4 Alarm Trouble Report. A customer's communication to a telephone utility indicating dissatisfaction with the installation or operation of a private line alarm service. Trouble, which after investigation is determined to be caused by customer-provided equipment, will not be considered an alarm trouble report.
- 1.3.5 Commission. The Public Utilities Commission of the State of California.
- 1.3.6 Commitment Date. The date agreed to by the customer and the telephone utility for the completion of an installation of a new service or an addition.
- 1.3.7 Customer. Alarm company or customer of an alarm company using a private line alarm service.
- 1.3.8 New Service. The establishment of a new private line alarm service.

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- 1.3.9 Primary Alarm Service Order. An order placed by a customer with a telephone utility for new service or an addition to private line alarm service.
- 1.3.10 Private Line Alarm Service. A private line service provided by a telephone utility to be used by a customer for the transmission of alarm signals. Such service does not include any service which is connected to the public exchange network.
- 1.3.11 Regional Reporting Entity. See Figure A.
- 1.3.12 Reporting Service Level. A specified service level of performance for each reporting unit. Performance at or below this level is an indication of inadequate service and the utility shall submit periodic reports to the Commission.
- 1.3.13 Service Interruption. The existence of a fault, outage, interruption, foreign voltage, noise, or other defect on a private line alarm service.
- 1.3.14 Serving Link. The local cable pair from the telephone utility's serving central office to a customer's premise.
- 1.3.15 Standard Service Range. A service range which encompasses adequate service to the user.
- 1.3.16 Telephone Utility. A public utility telephone corporation providing telephone service as further defined by Sections 216 and 234. ~~of the Public Utilities Code.~~
- SS
- 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.