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ORIGINAL

Decision 83 11 062 NOV 22 1983

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Investigation on the Commission's own motion into the rates, tolls, rules, charges, operations, cost, 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 listed in Appendix A, attached hereto.	OII 88 (Filed April 7, 1981)

(Appearances are listed in Appendix 1.)

O P I N I O N

By Application (A.) 60340, filed March 10, 1981, General Telephone Company of California (General) sought authority to effect step rates to increase its intrastate gross revenues approximately $296 million for test year 1982 and an additional $90 million attrition allowance for test year 1983. To enlarge the scope of the proceedings to cover essentially all aspects of General's public utility operations, this Commission issued Order Instituting Investigation (OII) 88 into the rates, tolls, rules, charges, operations, costs, separations, practices, contracts, service, and facilities of General, The Pacific Telephone and Telegraph Company (Pacific), and of all the California telephone utilities that interconnect with General. Decision (D.) 82-04-028, dated

April 6, 1982 in A.60340 and OII 88, set a prehearing conference for the purpose of determining the nature of and times and places for future hearings on OII 88 in connection with modifying, adding to, supplementing, and/or deleting portions of this Commission's General Order (GO) 133, Rules Governing Telephone Service. At the prehearing conference, the Commission staff (staff) was requested to prepare a report and present testimony setting forth its proposed modifications to GO 133.

After due notice, eight days of hearings were held in Los Angeles before Administrative Law Judge N. R. Johnson during the period July 13, 1982 to December 1, 1982, and the matter was submitted subject to concurrent opening briefs due March 1, 1983 and concurrent reply briefs due April 1, 1983. Opening briefs were received from Pacific, General, and staff and reply briefs were received from Pacific and General. Testimony was presented on behalf of staff by supervising utilities engineer Harry Strahl; on behalf of General by its general network engineering manager-Traffic Engineering, Raymond E. Shultz; on behalf of Pacific by one of its assistant vice presidents, MacLellan Edgar King, Jr., by a Bell Laboratories supervisor-Traffic Engineering, Joseph G. Kappel; and on behalf of Continental Telephone Company of California (Continental) by one of its region directors-Network Services, J. Richard Jones.

I. BACKGROUND

D.77947, dated November 10, 1970, on General's A.49835 for a general rate increase, among other things, ordered staff to organize a committee composed of staff members and representatives of telephone companies in California, such committee to formulate standard telephone indexes. As a result of the recommendation of the committee thus formed, the Commission, on March 21, 1972, issued an OII, Case 9353, into the need and requirement for a general order governing telephone service standards. The OII contained an attached proposed general order governing telephone standards and made all telephone corporations in the state respondents. D.80082, dated May 18, 1972, 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 GO 133. In D.82-04-028 we found as follows:

> "25. The quality of service provided by General as perceived by the subscriber differs from the quality of service as measured by existing indices indicating the necessity for review and possible revision of existing measuring indices.
>
> "26. It is desirable to review GO 133 standards with the participation of all respondent telephone companies and other parties to the proceeding who wish to participate in the revision of GO 133.
>
> "27. OII 88 should remain open for the purpose of resolving the matter of establishing proper and adequate measurement standard indices for all California telephone utilities." (Mimeo. page 158.)

As a result, OII 88 was left open to review GO 133. It progressed concurrently with meetings of the GO 133 statewide Review Committee made up of representatives from staff, each of the telephone utilities, and from various governmental agencies and customer groups. The efforts of the Review Committee participants and the participants in A.60340 and OII 88 culminated in general agreement being reached by staff, the telephone utilities, and the other interested parties as how to modify the major part of GO 133 to produce a workable, practical, and effective set of criteria for measuring telephone company service levels.

II. POSITION OF PARTIES

Position of Commission Staff

Staff witness Harry Strahl presented his proposed modifications to GO 133 (Exhibit 1), as subsequently modified by his Exhibit 10 and Exhibits 14 and 15 submitted by Pacific. On the next to last day of hearing on November 30, 1982, the morning was taken up with a meeting of the GO 133 Review Committee resulting in tentative agreement regarding proposals for dial service measurement revisions to GO 133. It was agreed that Pacific would present a Dial Line Service Evaluation Practice which, if adopted, would place all reporting telephone utilities on an identical reporting basis. All parties were given two weeks after receipt of the proposal to request hearings to cross-examine witnesses regarding the proposed practice. No such hearings were requested.

In its brief staff argues that the staff-proposed modifications to GO 133 set forth in Exhibit 10, as modified at the hearing, should be adopted. Emphasized in the brief were the adoption of the Dial Line Service Evaluation Practice developed by Pacific, the staff trouble report proposal, and the staff answer time recommendations for toll operator, directory assistance operator, trouble report service, and business offices.

Position of Pacific

In its brief Pacific argues that the purpose of GO 133 is to provide the Commission with an indication of when a utility may be providing inadequate or poor service in a particular area, as reflected in D.80082 establishing the order and reemphasized consistently by the various utilities, intervenors, and staff. Pacific states that the utilities consistently espoused the position that technological advances should allow for cost reductions while maintaining service at current levels as contrasted to the staff witness's proposal that technological advances should allow the service levels to rise and that the utility should forego potential cost savings.

Pacific believes that the following major factors should be considered in the modification of GO 133:

1. The proposed revisions must measure service as the customer views that service.
2. The reporting units must be of sufficient size to be indicative of a possible problem area but not so large as to mask poor results nor so small as to provide meaningless data.
3. A buffer zone exists between the reporting level selected and the objective levels for which a utility must strive in order to ensure that it consistently provides adequate service to its customers.

4. Standard methods and procedure should be applied by the Commission to all members of the industry.

5. The Commission should concentrate on standardizing the service levels for today and not attempt to guess at levels which might be appropriate four or five years from now.

Pacific disagrees with staff's proposed modifications regarding establishing measurements for speed of answer in the business office, the reporting unit recommended for customer trouble reports and certain aspects of the standard proposed for installation commitments met, and directory assistance service speed of answer. Pacific also suggests staff's recommendations be modified with respect to staff's reports and annual meetings of the GO Review Committee.

Position of General

In its brief General indicates that the efforts of the GO 133 statewide Review Committee participants culminated in a general agreement being reached by staff, the telephone utilities, and the other interested parties as how to modify the major part of GO 133 to produce a workable, practical, and effective set of criteria for measuring telephone company service levels with the exception of service measurement levels for customer trouble reports. General considers the customer trouble report a crucial element of GO 133 and has proposed a practice entitled "CPUC General Order No. 133 Customer Trouble Report Measurement Plan" (CTR Practice) which it attached to its brief. General believes the Commission should entertain comments from the parties to this proceeding on the CTR Practice and should either adopt this practice or establish another such specific practice incorporating any appropriate suggestions or proposals received from other parties.

As subsequently discussed, General recommends some modifications to the staff's proposed order with respect to installation commitments and the GO 133 Review Committee, but concurs with the staff's proposals relating to held primary and regrade service orders, dial tone speed, toll operator answering time, directory assistance operator answering time, and business office answering time.

Position of Continental

The position of Continental, as testified to by its Regional Director-Network Services, exclusive of the changes agreed to by all parties subsequent to that witness's testimony, is that:

1. Further sophistication in the methodology of providing telephone service would not necessarily change what was identified as adequate service, but would enable the telephone company to continue to provide that level of service more effectively and at reasonable rates consistent with normal increases in the cost of doing business.
2. Where present service indexes are consistently met, customer dissatisfaction is virtually nonexistent.
3. Any extension of regularly reported information would only increase utility costs and, therefore, ultimately impact the ratepayers, yet have little effect on the service levels they enjoy.
4. The reporting unit for customer trouble reports should continue to be plant maintenance centers and the graduated index for smaller number of stations should be maintained.

5. The use of a formula to convert percent answer time for cordboard operators to average answer time would necessitate complete revision of Continental's present methodology for force adjustment and budget considerations.
6. A nine-second average answer time is an appropriate index for directory assistance operator answer time.
7. There should be no change to the present installation commitments met index.
8. Conversion to a uniform statewide 611 repair service code would serve no useful purpose and should not be adopted.
9. Continental disagrees with the staff-proposed report levels for repair service and business office answer time.

III. DISCUSSION

General

Proposed revised GO 133, Rules Governing Telephone Service, was submitted in the record and/or by briefs by staff, Pacific, and General. In addition, proposed modifications were testified to by Continental's witness. The following paragraphs discuss by paragraph number the provisions of the existing order, the proposed changes submitted by staff, Pacific, General, and Continental, and the bases for our adoption of the various rules and sections.

Section 1 - General

No changes were proposed for Section 1.1 - Intent, nor Section 1.2 - Applicability, so no changes will be made.

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.

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

Section 1.3 - Definitions. A number of changes and/or additions were proposed by the various parties to the proceeding. The following tabulation summarizes existing definitions, definitions proposed by the parties, and the adopted definitions. The footnotes which follow the tabulation set forth the bases for the adoption of the various definitions. In those instances where a new definition was proposed which appeared reasonable and justified, it was adopted without a footnote reference as such reference would be superfluous. The word "same" indicates the definition shown, as proposed by one of the parties, was the same as presently contained in GO 133.

Item	Changes to GO 133	CPUC Staff	Pacific	General	Adopted	Footnote
Billing Center	No			Original	General	
Business Office	No			Original	General	
Central Office Entity	Yes	Same	Yes	Yes	General	(1)
Central Office Wire Center	No	Yes	Yes	Yes	General	(2)
Centrex	No	No	Yes	No	Pacific	
Commission	Yes	Same	Same	Same	No Change	
Commitment	Yes	Same	No	Yes	No Change	(3)
Customer-Provided Equipment	No	Yes	No	No	Staff	
Customer Trouble Report	No	No	No	Yes	General	
Demarcation	No	No	No	Yes	General	
Electromechanical	No	No	Yes	No	Pacific	
Electronic	No	No	Yes	No	Pacific	
Employee Report	No	Yes	Yes	Yes	Staff	(4)
Equivalent Main Line	Yes	No	No	No	Delete	(5)
Installation	No	Yes	Yes	No	Staff	
Installation Center	Yes	Yes	Yes	Yes	Pacific	(6)
Line	No	Yes	Yes	Yes	Staff	(7)
Maintenance Center	Yes	Yes	Yes	Yes	Pacific	(8)
No Access	No	Yes	No	Yes	General	(9)
Order Taken Date	Yes	Same	Same	No	No Change	
Primary Serv. Ord.	Yes	Yes	Yes	Yes	Staff	(10)
Regrade Serv. Ord.	Yes	Same	Same	Yes	No Change	
Reporting Service Level	Yes	Yes	Same	Yes	Staff	(11)
Service Observing, Manual	No	No	Yes	No	Pacific	
Service Observing, Mechanized	No	No	Yes	No	Pacific	
Special Services	No	Yes	Yes	Yes	General	(12)
Standard Service Range	Yes	No	No	No	Delete	
Station	Yes	No	No	No	Delete	
Subsequent Report	No	Yes	Yes	Yes	Staff	(13)
Telephone Plant	Yes	Same	Same	Same	No Change	
Telephone Utility	Yes	Same	Same	Same	No Change	
Traffic Office	No	Yes	Yes	Yes	Staff	(13)
Traffic Sector	No	No	No	Yes	General	
Trouble Report	Yes	Yes	Yes	No	Staff	(13)

(1) General's proposed definition is "a group of lines using common originating equipment <u>or under stored program control</u>" with the underlined portion as a proposed addition to the existing definition. Such an addition appears reasonable and will be adopted.

(2) Pacific adopted the staff's proposed definition. General included for digital switches remote processors that are hosted by a central processor as a part of the central office wire center. Such an addition to the other proposals appears fully justified and will be adopted.

(3) General proposes a commitment date to be applicable for the establishment of line service rather than requested work. We are not persuaded that such a change is justified as reasonable.

(4) Pacific adopted staff's proposed definition. General eliminated clause "independent of any conversation with a customer" which we believe should be included.

(5) Present definition becomes ambiguous with advent of deregulation of terminal equipment.

(6) "Installation Center" replaces "Plant Installation Center" in GO 133. The three proposed definitions are generally similar. Pacific's proposal was adopted because of superior sentence structure.

(7) Staff defines "Main Line" rather than "Line". The three definitions are essentially similar. Staff's was the original proposal and is, therefore, adopted.

(8) Included in GO 133 as Plant Maintenance Center. Pacific's was adopted in preference to GO 133's definition as being more complete.

(9) General's definition was adopted because it relates access to the demarcation point rather than customer's premises.

(10) Staff's definition adopted in preference to GO 133's definition because of its conciseness.

(11) Changes requirement for periodic reports from "at or below" to "below" which was original intent.

(12) Adopted as most comprehensive of three proposed definitions.

(13) Proposals not significantly different.

Section 1.4 - Information Available to the Public. Staff proposes that this section be expanded to provide that copies of the GO 133 reports to the Commission be made available to interested parties for a nominal fee to cover the cost of processing and reproduction. The availability is to be limited to reports provided by the local serving company. The staff's proposal was fully supported on the record, appears reasonable, and will be adopted.

No changes were proposed by any of the parties to the balance of Section 1 - General, including Section 1.5 - Location of Records, Section 1.6 - Reports to the Commission, Section 1.7 - Deviations From Any of These Rules, and Section 1.8 - Revision of Rules, as presently contained in GO 133. Consequently, these provisions will be maintained unchanged.

Section 2 - Standards of Service

Under Section 2.1 - General, the present order provides that the rules establish uniform standards of service for the installation, maintenance, and quality of telephone service. Pacific proposes to change "uniform standards" to "uniform reporting levels". The present order provides a "standard service range" which has been omitted in the proposed modifications to GO 133. Consequently, the present "uniform standards" is no longer appropriate and, therefore, Pacific's proposal will be adopted.

The present order provides for the measurement of Held Primary Service Orders, Held Regrade Service Orders, Installation Commitments, Customer Trouble Reports, Dial Tone Speed, Dial Service, Toll Operator Answering Time, and Directory Assistance Operator Answering Time. Staff proposes the addition of Repair Service Answering Time and Business Office Answering Time. As subsequently discussed, we will adopt a new standard for Repair Service Answering Time but not for Business Office Answering Time. Section 2.1 of our adopted order will be modified accordingly.

Section 2.2 - Description of Service Ranges and Levels. The present order has been modified by the parties to "Description of Reporting Levels" to reflect the elimination of "Standard Service Range" and "Service Below Standard" from the order. The description of reporting levels proposed by staff, Pacific, and General is essentially the same as the present "Reporting Service Level". The staff's proposal will be adopted as reflective of the adopted modifications of GO 133.

Section 3 - Telephone Service Measures

Section 3.1 - Held Primary Service Orders, subsection "a", is a description of held primary service orders. The present order and proposals by staff, General, and Pacific are essentially the same. The staff's proposal containing minor clarifying changes to the present order will be adopted.

The staff proposal, generally agreed to by Pacific, General, and Continental, would modify the present subsection "b" - Measurement, to separate the service orders held over 30 days into four categories: 31-60 days, 61-90 days, 91-180 days, and over 180 days. This proposal is reasonable and will be adopted.

Subsection "d" - Standard Service Range, of the present order will be deleted as inappropriate.

Staff and Pacific recommend no change and General recommends only minor modification to subsections of GO 133 relating to Reporting Service Level, Reporting Unit, and Reporting Frequency. Consequently, no changes to these subsections will be made.

Section 3.2 - Held Regrade Service Orders. The changes to the existing order for Held Regrade Service Orders proposed by the parties essentially parallel the changes proposed for Held Primary Service Orders and generally reflect minor clarifying modifications to GO 133. Consequently, the staff's proposed Section 3.2 will be adopted.

Section 3.3 - Installation Commitments. Staff recommends that the section title be changed to "Installation-Line Energizing Commitments" to reflect the deregulation of terminal equipment and technological advances. This position is well taken and will be adopted.

Section 3.3a. - Description. Staff recommends the retention of the existing section; Pacific recommends that the existing language, excluding disconnects and customer action from the base figures, be moved to the section on exclusions; and General recommends the section be revised to describe installation commitments as a "measure of the company's ability to meet the date established by the company and the customer for installation, ..." and that multiline lines and special services be added to the exclusions included in this section. We will retain the present wording as recommended by staff modified to reflect the additional exclusion of "requests for the installation, change, or transfer of PBX, PABX, EPABX, or other multiline lines and special services. . . ."

Section 3.3b. - Measurement. Staff recommends retention of the present wording, Pacific recommends the present wording plus "The measurement will be expressed in terms of commitments met", and General recommends replacement of the present phrase with "The measurement will be expressed in terms of commitments made." The latter sentence is included in Section 3.3a. of the present order. We will delete the sentence from Section 3.3a. and adopt for Section 3.3b. - Measurement, the following: "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."

Section 3.3c. - Standard Service Range. This section presently in GO 133 has been recommended for elimination by the various parties as no longer appropriate. We agree and will delete it from the order.

The present reporting level is 90% of commitments met. Staff recommends that this be raised to 94% and Pacific, Continental, and General concur. We agree and will raise the reporting level to 94%. Staff makes the following further recommendations:

a. 95% commitments met after January 1, 1984 or until depletion of the instruments' inventory.

b. 97% commitments met for reporting units equipped with electronic switches and dedicated outside plant.

c. One-day (24-hour) service for inward movement into a reporting unit described in "b" above where there are no requirements for additional outside plant facilities, prewiring, or jack installations.

Pacific and Continental are opposed to raising the reporting level from 94% to 95% after January 1, 1984 on the basis that no justification for such an increase is shown on the record. We agree and will not adopt the 95% reporting level at this time. We will, however, request further consideration be given this item by the committee at the next annual review. Pacific, General, and Continental all object to the 97% level for reporting units equipped with electronic switches and dedicated outside plant and the 24-hour service for inward movement where there are no requirements for additional outside plant facilities, prewiring, or jack installations. Such objections are generally based on a position that the requirements are premature in that there are currently no telephone utilities in California fully equipped with electronic switches and fully dedicated outside plant. This position is well-taken and we will not adopt these specific staff-recommended provisions.

At the present time, GO 133 provides for the plant maintenance center as the reporting unit. Staff recommends that the reporting unit be: "Central office wire center which handles an average of at least 250 inward movements per month. In the event that the wire center does not meet the criteria, then the present plant installation center shall be the reporting unit." The staff recommendation appears reasonable and will be adopted.

GO 133 presently sets forth the installation commitment reporting frequency as "compiled monthly, reported quarterly for those reporting units at or below the reporting level for any month." Staff recommends deletion of "at or" so that only those units below the reporting level will be reported. This suggested change is well taken and will be adopted.

Section 3.4 - Customer Trouble Reports. It is generally agreed among the parties to the proceeding that the dial service and customer trouble reports are key indicators of telephone service being provided customers. As subsequently discussed, a consensus has been reached by the parties to the proceeding as to an appropriate index for dial service measurement. No such consensus has been reached regarding customer trouble reports. General considers the customer trouble report index a crucial element of GO 133 deserving a status at least equal to the dial service index and has therefore prepared a proposed practice entitled "CPUC General Order No. 133 Customer Trouble Report Measurement Plan" which it attached as Appendix A to its brief.

General believes that the Commission should entertain comments from the parties to this proceeding on its proposed CTR Practice and either adopt it or establish other such specific practices or proposals received by other parties. Both staff and Pacific believe that any review of General's CTR Practice should be accomplished in the context of the GO 133 Review Committee. According to Pacific, such a procedure would permit a thorough review of General's proposed plan, together with input from staff, interested parties, and other utilities, resulting in a resolution of any further questions that may be pending in this area. We agree that such a procedure should be followed and the ensuing order so provides.

It is noted that neither our adopted Section 3.4 - Customer Trouble Reports, nor General's proposed CTR Practice reflects the time lapse required for resolving the trouble being experienced by the customer, the period of time the customer is out of service, the priority assigned the various types of troubles experienced by the customer, and the effect of the utility's holiday and weekend servicemen scheduling on the time required to restore service to a normal level. Obviously, these four factors radically affect the customer's perception of the level of service being provided and should receive careful consideration. Consequently, the GO 133 Review Committee should include in its first annual review of the order recommended additional indexes to this section to reflect:

a. Time from receipt of trouble report to time employee commences review of matter.

b. Maximum time to effect repairs.

c. Time lapse for customer confirmation of repairs to line.

At this time, staff basically proposes four changes to the present practice:

1. Elimination of the Standard Service Range.

2. Changing the report level from eight reports per 100 stations for units of more than 10,000 stations to one report per 10 working lines for units with over 3,000 working lines, and from 10 reports per 100 stations for units of less than 10,000 stations to 13 reports per 100 lines for units with 3,000 working lines or less.

3. Excluding from trouble reports counted requests for repairs to special services and customer-provided equipment.

4. Changing the reporting unit from the plant maintenance center to the central office entity.

The elimination of the Standard Service Range for customer trouble reports is consistent with the changes made in other indexes and will be adopted.

Pacific concurs in the establishment of the reporting level of one report for every 10 working lines. General, however, argues that the record does not support such a level. According to General, the ratio of stations to lines is approximately 1.6 to 1. Applying this ratio to the present reporting level, eight reports per 100 stations, yields a reporting level of 13 reports per 100 lines which General believes should be used for units of more than 3,000 lines. In support of his position, staff witness Strahl testified

that his recommendation was based on data submitted to him by Continental, Citizens Utilities Company, Pacific, General, and Roseville Telephone Company. This data compared the reporting levels on reports per 100 stations as compared to reports per 100 lines and indicated to this witness that 10 trouble reports per 100 working lines would be a reasonable standard considering the fact that the recommended level excludes trouble related to customer-provided equipment and trouble associated with the toll network outside the control of the operating company. We are persuaded the proposed reporting level is reasonable and it will be adopted as subsequently modified to reflect the exclusion of terminal equipment. Consistent with the provisions of the existing order, the reporting level for reporting units of 3,000 or less operating lines will be raised to 13 reports per 100 lines and central office entities of 1,000 working lines need not be included in reports even though records will be maintained for these offices.

General points out that the Computer II decision established AT&T and each of its operating companies, including Pacific, as dominant carriers directed to divest themselves of all terminal equipment. Similar provisions are not applicable to all other (non-Bell) companies with the result that trouble reports regarding terminal equipment will be included for the terminal equipment owned by the non-Bell companies but not for the terminal equipment owned by a Bell Company subsidiary. Under these circumstances it is General's position that if meaningful comparisons between telephone companies are to be made and a standardization of data collection and reporting is to result, either the exclusion of all terminal equipment must be added to the order or two separate measurements must be established to reflect performance of all utilities on a comparable basis.

This point is well taken and the order that follows will provide for a reporting level of eight reports per 100 working lines excluding terminal equipment reports, or 10 reports per 100 working lines including trouble reports relating to utility-owned terminal equipment for reporting units with more than 3,000 working lines; and 11 reports per 100 lines excluding terminal equipment trouble reports and 13 reports per 100 lines including trouble reports relating to utility-owned terminal equipment by reporting units of 3,000 lines or less. Reports of failure of equipment used for special service and failures of customer-provided equipment should obviously be excluded in computing the indexes, as the functioning of such equipment is outside the purview of the utility.

GO 133 presently provides for the reporting unit to be the plant maintenance center. Staff proposes the reporting unit be the central office entity, which is concurred in by Continental. General advocates the retention of the plant maintenance center as the reporting unit and Pacific recommends that wire centers be used as the reporting units. The definitions of these various proposed reporting units are as follows:

a. Central Office Entity. A group of lines using common-originating equipment.

b. Central Office Wire Center. A building that houses the switching equipment necessary to provide dial tone and the facilities to process and/or receive telephone communications for a specific geographic area.

c. Maintenance Center. A location responsible for the testing, dispatching, and tracking of trouble indications generated by customer reports, abnormal conditions, and routine analysis. Administers maintenance field work, schedules, dispatches, and tracks the progress of field work.

According to the testimony of staff witness Strahl, he selected the central office entity as the appropriate reporting unit because it is the smallest unit that could generate the problem. He further testified that the objective of the measurement is to find out if customers are experiencing a problem and to have available means to locate what he would perceive to be improperly operating machines. According to the record, the use of too large a reporting unit could result in the average trouble reports per 100 lines being below the reporting level even though one of the central office entities operating within a larger reporting unit could be experiencing trouble reports per 100 lines well above the reporting level.

Pacific argues that according to the record less than 8% of all trouble reported is attributable to the utility's central office entity and that the use of such entity as a reporting unit is misleading as a measurement of customer trouble report areas. Pacific notes that residential customers within a specific geographic area share common outside plant facilities but may not share the same central office equipment and that if the trouble reported is determined to be either at the customer's premises or in the utility's outside plant facilities, the work forces responsible for taking the report of trouble, as well as the group responsible for clearing the trouble, would be common to the entire geographic area. Pacific further argues that reporting trouble reports is quite similar to reporting a utility's ability to meet its installation commitments in that obstacles to meeting objectives may be found inside the central office, in the station equipment, or in the outside plant. Under these circumstances Pacific believes the same reporting unit should be used for both indexes, i.e., the wire center.

Another argument proffered by Pacific in support of the wire center as a reporting unit for customer trouble reports is that it can be more readily accepted by the public who may not be able to differentiate between a "step" entity, a "crossbar" entity, or an "ESS" unit. Pacific also notes that central office equipment already has two separate reports (Dial Service and Dial Tone Speed) specifically designed to identify any problems in a specific switching machine.

It is General's position, as testified to by witness Shultz, that since accountable trouble reports, which include those involved with outside plant as well as central office equipment, are reported to a service office or centralized maintenance center for recording, the maintenance center should remain as the reporting unit.

At the present stage of the art, it is obvious that many central office wire centers contain more than one type of switch. It is clear from the record that some types of switches, whether because of overloading, age, or lack of maintenance, generate more trouble reports than other types. While it might be generally true, as indicated on the record, that only 7 or 8% of reported cases of trouble are attributable to switching machines, it could well be that such malfunctions are not widespread throughout the system but occur in a relatively small number of such machines. It is axiomatic that if these machines creating a relatively high percent of trouble reports are coupled with relatively trouble-free switches at the wire center, the overall average rate of trouble reports could remain below the reporting level and thereby mask the poor performance of the malfunctioning machine. Furthermore, while it is true that the indexes for dial tone speed and

dial services are designed to identify problems in switching machines, there is no basis for a presumption that all switching machines that are generating trouble reports at a rate above the reportable level will perform in such a manner that the dial tone speed and/or dial service indexes fall within the reportable level. For these reasons we will adopt the central office entity as the reporting unit for customer trouble reports as recommended by staff. Should future recorded data indicate that the use of the wire center as the reporting unit would yield essentially the same result as the use of the central office entity as the reporting unit, the Review Committee could use this data as a basis for recommending the reporting unit be changed.

Section 3.5 - Dial Tone Speed. Staff, Pacific, and General proposed essentially the same dial tone speed section. The only change between the present and proposed order is the elimination of electronic analog and digital central offices as reporting units, the exclusion of a Standard Service Range, and the use of 3,000 working lines instead of 3,000 stations for the determination of the minimum size reporting unit. The staff-proposed Section 3.5 will be adopted.

Section 3.6 - Dial Service. Immediately preceding the hearing which took place on November 30, 1982, the GO 133 Review Committee met and resolved several major issues, including the dial service index. It was agreed that Pacific would present and distribute a Dial Line Service Evaluation Practice by January 17, 1983. All parties were given until January 31 to request hearings to cross-examine witnesses regarding Pacific's proposed practice.

No such hearings were requested so the issues relating to the dial service index were considered resolved. Pacific's proposed Section 3.6 includes, under subsection "b", the following:

> "b. Methods and Procedures: Detailed methods for the evaluation of calls and the compilation of results are contained in the Service Evaluation Practice, Dial Line, a copy of which is on file with the California Public Utilities Commission."

Copies of the Service Evaluation Practice were served on all parties to the proceeding. We will adopt it as a part of the order without change. We will also adopt Pacific's proposed Section 3.6 - Dial Service.

Section 3.7 - Toll Operator Answering Time. The present reporting service level is 85% answered within 10 seconds. Both staff and Pacific propose that when a force administration data system (FADS) or equivalent is used as a measurement device, the reporting service level will be an average answering time of 7 seconds with a standard deviation of 2.9 seconds and when answering time recorders are used, the reporting service level will be the present 85% answered within 10 seconds. These proposed indexes appear reasonable and we will adopt Pacific's proposed Section 3.7 - Toll Operator Answering Time.

Section 3.8 - Directory Assistance Operator Answering Time. GO 133 presently prescribes a reporting service level of 78% within 10 seconds. Staff proposes that when an FADS or equivalent system of measurement is used, that an average answering time of 7 seconds with a standard deviation of 2.9 seconds be adopted and when answering time recorders are used, a reporting service level of 85% within 10 seconds be adopted both after full establishment of a charge plan. Pacific proposes a 9-second

average answering time with a standard deviation of 2.9 seconds when an FADS system of measurement is used and the retention of the present 78% within 10 seconds reporting service level when an answering time recorder is used. Continental concurs with Pacific and General proposes the retention of the present reporting level of 78% within 10 seconds.

Pacific argues there is absolutely no basis for raising the level of service for directory assistance once a charge plan is instituted. According to Pacific, the entire purpose of the directory assistance charge plan is to attempt to recoup from the heavy users some of the expense associated with the provision of directory assistance service. Pacific also notes that D.92108, dated August 19, 1980 in Pacific's A.58918 for authority to establish charges for directory assistance service, specifically found that the proposed directory assistance charge plan would improve the effectiveness of the expense dollars used to provide directory assistance service and would keep basic rates lower than they otherwise would be by reducing the directory assistance subsidy being paid by the general body of ratepayers. According to Pacific, it was obviously contemplated that the level of directory assistance would remain constant and not be raised.

The record does not support either an increase in the level of directory assistance service or the imposition of the increased costs associated with such an increase in the level of service. Consequently, we will accept Pacific's proposed Section 3.8 - Directory Assistance Operator Answering Time, for purposes of this proceeding.

Section 3.9 - Trouble Report Service Answering Time. According to the testimony of staff witness Strahl, the trouble report system's accuracy depends on the ability of the subscriber to access the 611 system. For this reason he recommended a new index be established to apprise the Commission as to the ability of the serving utility to provide its subscribers with ready access to the 611 system. According to the record, the members of the GO 133 Review Committee agreed to the use of a 15-second average speed of answer with a standard deviation of 3 seconds. This agreed upon requirement was incorporated in staff Exhibit 10. The reporting unit, as set forth in Exhibit 10, will be, as of January 1, 1984, all centralized service groups which are equipped with automatic call distributors and which support 50,000 or more lines and as of January 1, 1990, all centralized service groups which support 10,000 or more lines. These requirements appear to be both warranted and reasonable. Consequently, we will adopt Section 3.9 - Trouble Report Service Answering Time, as it appears in Exhibit 10.

Section 3.10 - Business Office Answering Time. According to staff testimony, a considerable amount of customers' interaction is done through the business office over the telephone. Consequently, staff recommends the establishment of an index for measuring the time for a business office representative to answer a business office-related call. The staff-recommended reporting level is an average of 7 seconds with a standard deviation of 2.9 seconds to be applied as of January 1, 1984 to all business offices equipped with automatic call distributors and which support 50,000 or more lines, and as of January 1, 1990 all business offices which support 10,000 or more lines. On November 30, 1982 staff revised its

proposal to 88.8% of all calls within 20 seconds, a discontinued Pacific standard. Continental believes that the implementation of such a standard is unjustified and discriminatory in that it would only be applicable to telephone utilities. General recommends a report level of 87% of calls within 20 seconds. Pacific takes the position that measuring the speed of answer for the business office is not appropriate. Pacific's witness King presented testimony that there was no indication that Pacific's customers are dissatisfied with the speed of answer they now receive in the business office, that staff had any indication of Pacific customer dissatisfaction, or that staff's proposed level was indicative of inadequate service for business office access. Pacific further argues that it is apparent that services offered in the business office are totally different from the type provided by the toll and directory assistance operator and that common sense dictates that customers would expect the speed of answer to be different. Pacific estimates that the cost of meeting the staff-proposed standard would be $26.9 million for the first year and $22.4 million a year thereafter. Pacific notes that witness Strahl admitted in his testimony that Pacific's customers are satisfied today with their ability to get through to Pacific's business offices and acknowledged that 92% of TELSAM-surveyed customers who have recently used Pacific's business offices had no difficulty getting through to the residence business office. Pacific further notes that in D.88232, dated December 13, 1977 in Pacific's A.55492 for a general increase, the Commission disallowed $7,000,000 of commercial expense requested to provide 93.6% of calls to business offices which would be answered within 20 seconds on the basis: "...Pacific's expenditure of this sum

to improve business office accessibility does not cure any actual service deficiency and is therefore unreasonable." (83 CPUC 149 at 254.) Pacific interprets the above quote as a disallowance of the specific staff proposal.

The record in this proceeding is devoid of any indication whatsoever that telephone utility customers are dissatisfied with business office accessibility. Under these circumstances we are reluctant to establish an index setting forth a reporting level for this item. Should instances of customer dissatisfaction of the business office accessibility come to staff's attention, staff can, of course, address the matter further in the GO 133 reviews.

Section 4 - Records and Reports

With the exception of changing the due dates of the quarterly records from within 45 days of the end of the quarter to within 30 days of the end of the quarter, Section 4.1 - Reporting Units, Section 4.2 - Reporting Levels, Section 4.3 - Reporting Requirements, and Section 4.4 - Retention of Records, proposed by staff, Pacific, and General are virtually unchanged from the present order. Consequently, we will adopt these four sections as proposed by staff.

Section 4.5 - Commission Staff Investigations. Both staff and Pacific proposed the addition of Section 4.5 which reads:

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

Such a requirement appears both warranted and reasonable and will, therefore, be adopted.

Section 4.6 - Commission Staff Reports. Both staff and Pacific recommend that staff shall submit quarterly summary reports to the Commission that address the adequacy of telephone service in California, point out areas where service problems surface repeatedly, and discuss utility and/or staff-proposed remedies. Pacific recommends staff suggest an appropriate course of action whereas staff would make such a suggestion only if the utility elects not to address the problems in a timely fashion. Section 4.3 - Reporting Requirements, requires a statement of action being taken by the utility to improve service. The staff report should comment on whether or not such action is appropriate. Consequently, we will adopt the following for Section 4.6c.: "Shall evaluate the utilities' proposed remedies to the problem and if believed to be inadequate, suggest appropriate courses of action." Pacific also suggests a sentence providing: "The utility shall retain the right to file comments on the staff's report." Such a sentence appears reasonable and will be adopted.

Both Pacific and staff recommend that the GO Review Committee meet at least once a year to examine the measurements set forth in this GO and to suggest revisions, additions, and deletions to these measurements. Minutes are to be taken and in the event that changes to the GO are recommended, an appropriate report shall be submitted to the Commission with a suggested course of action. The Commission is to be represented by at least one member of the staff, the telephone utilities are to be represented by individual or joint representatives, and the public may be represented by any knowledgeable individuals or interested parties.

Pacific suggests that one of the staff members chair the meeting. This suggestion is well taken and will be adopted. We will adopt the staff's proposed Section 5.1 and Section 5.2, with the addition of the phrase "who shall chair the proceedings" at the end of Section 5.2a.

Appendixes

The present order contains Appendix A - Standard Reporting Levels, Appendix B - Record Keeping and Reporting Requirements, Appendix C - Held Primary and Regrade Service Order Reports, and Appendix D - Reporting Level Performance Report. Appendix 2 to this decision, our adopted GO 133-A, will contain similar appendixes modified to conform to our adopted order.

IV. FINDINGS AND CONCLUSIONS

Findings of Fact

1. Additions, deletions, and/or modifications should be made in Section 1.3 - Definitions, for the following items: Billing Center, Business Office, Central Office Entity, Central Office Wire Center, Centrex, Customer-Provided Equipment, Customer Trouble Report, Demarcation, Electromechanical, Electronic, Employee Report, Equivalent Main Line, Installation, Installation Center, Line, Maintenance Center, No Access, Primary Service Order, Reporting Service Level, Service Observing-Manual, Service Observing-Mechanized, Special Services, Standard Service Range, Station, Subsequent Report, Traffic Office, Traffic Sector, and Trouble Report.

2. The above-listed additions, deletions, and/or modifications to the definitions, as set forth in Appendix 2 to this decision, are reasonable.

3. Copies of the GO 133 reports to the Commission should be made available to interested parties for a nominal fee to cover the cost of processing and reproduction.

4. The provision in the present order relating to "Standard Service Range" should be deleted.

5. The results of measurement of both Held Primary Service Orders and Held Regrade Service Orders should be separated into the following four categories: 31-60 days, 61-90 days, 91-180 days, and over 180 days.

6. Section 3.3 - Installation Commitments, should be changed to "Installation-Line Energizing Commitments" to reflect the deregulation of terminal equipment and technological advances.

7. Requests for the installation, change, or transfer of PBX, PABX, EPABX, or other multiline lines and special services should be excluded from the base for computing the percentage of installation commitments met.

8. The present reporting service level for Installation-Line Energizing Commitments met should be increased from 90% to 94%.

9. There is no basis for increasing the reporting service level for Installation-Line Energizing Commitments met above the 94% set forth in Finding 8 at this time, but this matter should be further considered in the next annual GO 133-A review.

10. The reporting unit for the Installation-Line Energizing Commitments should be the central office wire center which handles an average of at least 250 inward movements per month or the plant installation center for smaller central offices.

11. The reporting frequency for Section 3.3 - Installation-Line Energizing Commitments, Section 3.4 - Customer Trouble Reports, Section 3.5 - Dial Tone Speed, Section 3.6 - Dial Service, Section 3.7 - Toll Operator Answering Time, Section 3.8 - Directory Assistance Operator Answering Time, and Section 3.9 - Trouble Report Service Answering Time, should be compiled monthly and reported quarterly for those reporting units below the reporting service level for any month.

12. General's proposed CTR Practice should be reviewed and commented on by the various parties to the proceeding and its adoption, together with possible additional indexes reflecting time from receipt of trouble report to time employee commences review of the matter, total lapsed time from trouble report to completion of repairs, and time lapse for customer confirmation of repairs, should be considered at the next GO 133 Review Committee meeting.

13. Section 3.4 - Customer Trouble Reports, should be modified in the following four requirements:

a. The Standard Service Range requirement should be eliminated.

b. The reporting service level should be eight reports per 100 working lines excluding terminal equipment reports and 10 reports per 100 working lines including reports relating to utility-owned terminal equipment for units with more than 3,000 working lines, and 11 reports per 100 working lines excluding

terminal equipment reports and 13 reports per 100 working lines including reports relating to utility-owned terminal equipment for units with 3,000 or less working lines.

c. Customer trouble reports used in the computation of the service index should exclude reports not relating to the quality of telephone service, reports that cannot be completed because of a lack of access to customers' 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.

d. The reporting unit should be changed from the plant maintenance center to the central office entity.

14. The reporting unit for Section 3.5 - Dial Tone Speed, should be each electromechanical or hybrid central office entity over 3,000 working lines. Electronic analog and digital central offices should not be included as reporting units for this index.

15. Pacific-proposed Service Evaluation Practice, Dial Line, agreed to by all the parties to the proceeding should be adopted as detailing methods for the evaluation of calls and completion of results for Section 3.6 - Dial Service.

16. The reporting service level for the Section 3.7 - Toll Operator Answering Time, index should be an average of 7 seconds with a standard deviation of 2.9 seconds when an FADS or equivalent is used and 85% answered within 10 seconds when answering time recorders are used.

17. The reporting service level for the Section 3.8 - Directory Assistance Operator Answering Time, index should be an average of 9 seconds with a standard deviation of 2.9 seconds when an FADS or equivalent is used, and 78% answering within 10 seconds when an answering time recorder is used.

18. A reporting service level should be established for a new Section 3.9 - Trouble Report Service Answering Time, equal to an average of 15 seconds with a standard deviation of 3.0 seconds with an FADS or equivalent. This standard should be applied as of January 1, 1984 to all centralized service groups which are equipped with automatic call distributors and which support 50,000 or more lines, and as of January 1, 1990 all centralized service groups which support 10,000 or more lines.

19. The establishment of a service index relating to business office answering time is inappropriate at this time.

20. The due date of quarterly reports required by Section 4.3 - Reporting Requirements, should be reduced from the present within 45 days to within 30 days of the end of each quarter.

21. A new Section 4.5 - Commission Staff Investigations, as proposed by staff and Pacific, should be adopted.

22. A new Section 4.6 - Commission Staff Reports, as proposed by staff and modified as follows: "c. Shall evaluate the utilities' proposed remedies to the problem and if believed to be inaccurate, suggest appropriate courses of action" and to include: "The utility shall retain the right to file comments on staff's report" should be adopted.

23. The staff's proposed new Section 5 - General Order Review Committee, with the addition of the phrase "who shall chair the proceedings" at the end of Section 5.2a. should be adopted.

24. The Commission should adopt Appendixes A, B, C, and D as attached to Appendix 2 to this decision.

Conclusion of Law

GO 133-A, Rules Governing Telephone Service, as set forth in Appendix 2 to this order should be adopted.

O R D E R

IT IS ORDERED that:

1. General Order (GO) 133-A, Rules Governing Telephone Service, is adopted to read as set forth in Appendix 2.

2. A copy of this decision shall be mailed to each telephone utility under the jurisdiction of this Commission.

3. At the next annual meeting of the GO 133-A Review Committee, the committee shall include for consideration for possible modification the following:

a. Raising the reporting service level for Section 3.3 - Installation-Line Energizing Commitments, from 94% to 95%.

b. General Telephone Company of California's proposed Customer Trouble Report Measurement Plan, together with the additional indexes set forth in Finding 12.

This order becomes effective 30 days from today.

Dated NOV 22 1983, at San Francisco, California.

LEONARD M. GRIMES, JR.
President
VICTOR CALVO
PRISCILLA C. GREW
WILLIAM T. BAGLEY
Commissioners

Commissioner Donald Vial, being necessarily absent, did not participate.

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

Joseph E. Bodovitz, Executive Director

APPENDIX 1

LIST OF APPEARANCES

Respondents: A. M. Hart, H. Ralph Snyder, Jr., Dale W. Johnson, and Kathleen S. Blunt, Attorneys at Law, for General Telephone Company of California; James S. Hamasaki and Daniel J. McCarthy, Attorneys at Law, for The Pacific Telephone and Telegraph Company; Dale Roncey, for Citizens Utilities Company; Orrick, Herrington, & Sutcliffe, by Robert J. Gloistein, Attorney at Law, and J. Richard Jones, for Continental Telephone Company of California; and Pelavin, Norberg, Harlick & Beck, by Alvin H. Pelavin and William R. Haerle, Attorneys at Law, for Calaveras Telephone Company, Capay Valley Telephone System, Inc., Dorris Telephone Company, Ducor Telephone Company, Evans Telephone Company, Foresthill Telephone Company, Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Company, Livingston Telephone Company, Mariposa County Telephone Company, Pinnacles Telephone Company, The Ponderosa Telephone Co., Sierra Telephone Company, Siskiyou Telephone Company, and Volcano Telephone Company.

Interested Parties: George W. Tice, Director, Los Angeles County Department of Communications, by James M. Nelson III, for Los Angeles County; Stanley Sackin, for himself; Sarah Shirley, Attorney at Law (Texas), Consumer Affairs Specialist, Office of the City Attorney, for the City of Santa Monica; T. I. Toczauer, Attorney at Law, for National University; Sylvia Siegel and Mike Florio, Attorney at Law, for TURN, Consumer Federation of California, Gray Panthers, California Legislative Council of Older Americans, and Consumer Cooperative; Ira Reiner, City Attorney, by Ed Perez, Deputy City Attorney, for the City of Los Angeles; James C. Dycus, for himself; A. John Terrell, Carl Dewey, and Alan Donnell, for Regents of the University of California; Ruth Benson, Attorney at Law, for Communications Workers of America, Distrct 11; Morrison & Foerster, by James P. Bennett and Elwood R. Sturtevant, Attorneys at Law, and Scott W. Flournoy, for Telephone Answering Services of California, Inc.; and Marvin J. Kaitz, Brian Kiely, and Susan B. Jacoby, for CAUSE West.

Commission Staff: Rufus G. Thayer and Edward W. O'Neill, Attorneys at Law, Harry Strahl, and Robert L. Howard.

(END OF APPENDIX 1)

APPENDIX 2
Page 1

GENERAL ORDER NO. 133-A

Public Utilities Commission of the
State of California

RULES GOVERNING TELEPHONE SERVICE

Adopted November 22, 1983, Effective December 22, 1983
Decision 83-11-062, OII 88

Table of Contents

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.

CORRECTION

THIS DOCUMENT

HAS BEEN REPHOTOGRAPHED

TO ASSURE LEGIBILITY

APPENDIX 2
Page 1

GENERAL ORDER NO. 133-A

Public Utilities Commission of the
State of California

RULES GOVERNING TELEPHONE SERVICE

Adopted November 22, 1983, Effective December 22, 1983
Decision 83-11-062, OII 88

Table of Contents

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 - Location where customers' requests for new installation or change in existing service are received.

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.

APPENDIX 2
Page 3

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 below 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. 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.

z. Special Services - Special application telephone circuitry such as foreign exchange, wide-area telephone service (WATS, both In and Out), private line, data.

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 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.

1.8 Revision of Rules

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

2. STANDARDS OF SERVICE

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

Service Measure	Type of Service
Held Primary Service Orders	Installation
Held Regrade Service Orders	Installation
Installation-Line Energizing Commitments	Installation
Customer Trouble Reports	Maintenance
Dial Tone Speed	Dial Service
Dial Service	Dial Service
Toll Operator Answering Time	Operator Services
Directory Assistance Operator Answering Time	Operator Services
Repair Service Answering Time	Repair Service

2.2 Description of Reporting Levels.

These levels have been established so as to indicate units which are performing below 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 the 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 Held Regrade Service Orders.

a. Description. Requests for change in grade of an existing primary service delayed over 30 days because of lack of telephone utility plant. An order will count as held when service is not provided within 30 days after the commitment date. The date the order is taken from the customer shall be used in lieu of commitment date where the utility cannot establish commitment dates. Orders requiring the customer to meet specific prerequisites will be measured from the time the prerequisites have been met.

b. Measurement. Count once a month the total held regrade service orders held over 30 days for each reporting unit. 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. Termination date: January 1, 1987.

3.3 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. 94% commitments met.

d. Reporting Unit. Central office wire center which handles an average of at least 250 inward movements per month. In the event that the wire center does not meet the criteria, then the plant installation center shall be the reporting unit.

e. Reporting Frequency. Compiled monthly, reported quarterly for those reporting units below the reporting service level for any month.

3.4 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. Eight reports per 100 working lines excluding terminal equipment reports and 10 reports per 100 working lines including reports relating to utility-owned terminal equipment for units with more than 3,000 working lines, and 11 reports per 100 working lines excluding terminal equipment reports and 13 reports per 100 working lines including reports relating to utility-owned terminal equipment for units with 3,000 or less 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.

f. Exclusion. Central offices entities of 1,000 working lines or less need not be included in reports. However, records will be maintained on these offices.

3.5 Dial Tone Speed.

a. Description. A measure of the adequacy of electromechanical 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.

3.6 Dial Service.

a. Description. A measure of the ability of the equipment to complete a customer-dialed call over the local and toll message network without the call encountering an equipment malfunction and/or all-paths-busy condition.

b. Methods and Procedures. Detailed methods for the evaluation of calls and the compilation of results are contained in the Service Evaluation Practice, Dial Line, a copy of which is on file with the California Public Utilities Commission.

c. Reporting Service Level. 97.0% for the Home Number Plan Area (HNPA) measurement.

d. Reporting Unit. Each central office entity over 3,000 lines.

e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units below the reporting service level for any month.

3.7 Toll Operator Answering Time.

a. Description. A measure of time for the operator to answer on toll and assistance calls.

b. Measurement. When the force administration data system (FADS) or equivalent measuring device is used, the measurement will be computed in terms of average answer. When a sample of the answering interval is taken utilizing an answering time recorder, the measurement is expressed as a percentage answered within 10 seconds.

c. Reporting Service Level. Seven seconds average answer with a standard deviation of 2.9 seconds to assure 84% answered within 9.9 seconds and 95% within 12.8 seconds. For answering time recorder applications, the level is 85% 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 below the reporting service level for any month.

3.8 Directory Assistance Operator Answering Time.

a. Description. A measure of the time for the operator to answer on directory assistance calls.

b. Measurement. When the force administration data system (FADS) or equivalent measuring device is used, the measurement will be computed in terms of average answer. When a sample of the answering interval is taken utilizing an answering time recorder, the measurement is expressed as a percentage answered within 10 seconds.

c. Reporting Service Level. Nine seconds average answer with a standard deviation of 2.9 seconds to assure 84% answered within 11.9 seconds and 95% within 14.8 seconds. For answering time recorder applications, the level is 78% within 10 seconds.

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

3.9 Trouble Report Service Answering Time.

a. Description. A measure of the time for the trouble report service attendant to answer on trouble report calls. A sample of the answering interval is taken to determine if trouble report calls are answered with an average of 15 seconds.

b. Measurement. Sample of the answering interval on trouble report calls that is representative of the measurement period utilizing a forced administration data system (FADS) or equivalent.

c. Reporting Service Level. Average of 15 seconds and a standard deviation of 3.0 seconds.

d. Reporting Unit.

1. As of January 1, 1984, all centralized service groups which are equipped with automatic call distributors and which support 50,000 or more lines.

2. As of January 1, 1990, all centralized service groups which support 10,000 or more lines.

e. Reporting Frequency. Compiled monthly and reported quarterly for those reporting units below the reporting service level for any month.

4. RECORDS AND REPORTS

4.1 Reporting Units. Service measurements shall be maintained by reporting units. Reporting units will be exchange, plant installation center, 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 below the reporting level in any given month will be considered indications of possible inadequate service.

4.3 Reporting Requirements. Reports shall be made to the Commission quarterly of all reporting units providing service below the reporting service level on any measure in any month during the quarter. Summaries of held primary and regrade service orders by reporting unit shall be submitted quarterly for each month during the quarter. Small reporting units will be excepted from reporting on certain service measures as set forth in Section 3 and summarized in Appendix B. Reports shall be filed within 30 days of the end of each quarter. Reports to the Commission of performance below 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 form is included as Appendix D. A sample form for reporting held primary and regrade service orders is included as Appendix C.

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

4.5 Commission Staff Investigations. The staff shall investigate, time and resources permitting, every reporting 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 November 22, 1983, at San Francisco, California.

PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA

By _____
Executive Director

Appendix A

Standard Reporting Levels

Service Measure	Reporting Level
Held Primary Service Orders	N/A
Held Regrade Service Orders	
Installation-Line Energizing Commitments	94%
Customer Trouble Reports	
Over 3,000 Working Lines	
Excluding terminal equipment reports	8 per 100 lines
Including utility-owned terminal equip. reports	10 per 100 lines
Over 1,000 Working Lines	
Excluding terminal equipment reports	11 per 100 lines
Including utility-owned terminal equip. reports	13 per 100 lines
Dial Tone Speed	97.4%
Dial Service	97.0%
Toll-Operator Answering Time	Average 7 seconds
Directory Assistance Operator Time	Average 9 seconds
Trouble Report Service Answering Time	Average 15 seconds

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 smaller
Held Primary Service Orders) Installation-Line Energizing Commitments	Central Office Wire Center with 250 inward movements/month or Plant Installation Center
Customer Trouble Reports	Central Office Entity-Central Office Entity 1,000 lines or less need not be included in performance reports
Dial Tone Speed	Each electromechanical or hybrid Central Office Entity over 3,000 lines
Dial Service	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 50,000 or more lines - January 1, 1984 Centralized group supporting 10,000 or more lines - January 1, 1990
Compilation of Data - Monthly Frequency of Reporting - Quarterly Retention of Measurements - 2 Years	

Appendix C

Held Primary and Regrade Service Order Reports

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

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

(END OF APPENDIX 2)