

September 30, 1999

Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
P. O. Box 47250
Olympia, Washington 98504-7250

Re: U S WEST Service Quality Information UT-921192

Attention: Glenn Blackmon

Dear Ms. Washburn:

On August 31, 1999, the Commission requested additional information on delayed installation of basic telephone service and excessive levels of repair problems in five exchange areas. Following is U S WEST's response to the Commission's request.

Delayed Installation of Basic Telephone Service:

As confirmed in the Commission's letter, U S WEST is currently meeting the Commission's standard of completing 90% of its orders for new lines within five business days. Through August 1999, U S WEST has received over 491,156 orders for basic exchange lines; this is 11% greater than the number of orders received in 1998. Over 95% of the orders have been completed within five business days. Another 3% are completed within thirty calendar days and less than 1% are held over sixty days. U S WEST has continued to face steady growth in the number of orders that require new facility placement each year. In spite of this trend, the Company has continued to complete over 99% of its orders within 90 days in full accordance with the Commission's rules. The Company will continue to take whatever steps are necessary to ensure that the level of delayed orders beyond thirty days remains less than 2%.

The Company also recently did a study of orders placed over a three month period and found that 92% of the orders completed after five business days were at the customers request. In other words, the customer called well in advance of their required due date to place their order and the five business day interval measurement would not apply. However, U S WEST has no means to exclude these orders from the number reported to the Commission as not

completed within the five business day interval. The Company can only exclude orders "held" due to customer reasons, not orders with customer established due dates.

It has also recently come to my attention that a number of the monthly held order reports filed for 1999 reflect incorrect information on a statewide and exchange specific basis. The seven and 90 day held order reports result in a total percentage greater than 100% in a number of the exchanges. This result is erroneous and overstates the true number of orders not completed within five business days. We are currently in the process of correcting this problem.

Excessive Levels of Repair Problems in Five Areas:

The Commission's letter also raised a concern about the number of trouble reports in certain exchanges. Attachment A identifies the number and type of trouble reports received for each of the five exchanges identified by the Commission since September 1998. An analysis of the actual repair tickets indicates that there is typically no single problem so therefore there is no single solution. The trouble conditions are caused by a variety of circumstances such as cable cuts, damaged drops to individual premises and damaged cable. When trouble is isolated, the corrective action generally occurs at that time.

More significantly, because the offices questioned contain few access lines, it is easy for a few incidents such as those caused by a cable dig up or drastic weather conditions that easily create a report rate that exceeds 4.0. For example, Buckley and Ocean Shores have a trouble report rate that exceeds 4.0 for August 1999. Buckley has 3440 access lines and Ocean Shores has 4339. If over 174 trouble reports are filed in Buckley or 200 reports are filed in Ocean Shores, the Company will not meet the Commission's standard. For example, in May, 24 of the total 145 Buckley trouble reports were due to the cover having been removed from one of our field terminals. Had this single instance not occurred, the Company would have had a report ratio of 3.5. In June, 173 of the 507 total reports in Buckley were due to cable dig ups. 102 trouble reports were recorded due to cable cuts in Ocean Shores during May, June and July and 132 reports were recorded due to damaged drops that required repair or replacement. Damaged drops are typically caused by rodents, accidental cable cuts on the owner's property while working in the yard, drastic weather damage, etc.

Attachment A also highlights the fact that a number of reports result in a no trouble found disposition because the trouble was for a short duration and does not reoccur when the line is tested. The "found okay inside" indicates the line was tested prior to dispatch and no trouble was found. The "found okay outside" indicates a technician was dispatched to the premise and the trouble no longer existed. As part of our ongoing network rehabilitation program, U S WEST routinely analyzes the trouble reports received and their disposition for trends that might suggest a more concentrated effort around certain plant conditions. As trends are noted, the work is prioritized by the number of customers impacted. The Company then deploys our personnel to investigate and repair the network.

U S WEST has instituted the following maintenance plan in Buckley, Enumclaw and Black Diamond.

1. Proactive Loop Analysis studies will be conducted to ascertain the current transmission characteristics of the network routes where a high incident of trouble reports have been received.
2. Where conditions are found that might indicate potential trouble in specific cable routes, a special team of technicians will be deployed to troubleshoot and determine the appropriate network rehabilitation.
3. A high incident of trouble associated with the drop cable requires visual and test inspections of customers served along certain routes. Technicians will visit these routes over the next six to nine weeks and will ascertain whether the plant appears to be susceptible to potential erosion.

U S WEST will file a report with the Commission summarizing the results of this effort by year-end 1999.

Had the cable cuts in Ocean Shores not occurred, the Company would have met the Commission's trouble report standard. We are at the mercy of the contractors digging in the right-of-way and will re-emphasize the "call before you dig" procedures with contractors. Additionally, the Company does have a service improvement project currently in progress in the Ocean Shores area. Over the last few months, very short duration outages (typically less than one minute) have occurred, these outages have created trouble reports. U S WEST is currently installing a second radio system in Ocean Shores that will be operational by early October 1999. The current radio serving this area is six megahertz, the new radio will operate at ten gigahertz. U S WEST also plans to deploy a fiber route between Aberdeen and Ocean Shores that will ultimately replace the radio systems. The Company is currently exploring its options for this long time solution.

The Northport exchange has only 994 access lines. If more than forty trouble reports occur in a given month, the exchange surpasses the Commission's standard. In May, 73 trouble reports were received; 36 of which were due to a power failure at a single remote terminal. In June, the Company replaced 1100 feet of cable. Whenever the Company is working on its facilities it generates temporary and short duration trouble conditions. In July, six reports were due to a damaged cable. Had this condition not existed, the Company would have been in compliance. The Commission is currently reviewing the existing service quality rules, which include the trouble report rate standard. U S WEST respectfully suggests that the Commission consider new trouble report rate standards that differ based on the size of the office.

I hope the above information provides a better understanding of how U S WEST manages its network rehabilitation efforts. I would also like to take this opportunity to share with you that U S WEST's investment in Washington year-to-date continues to mirror the investment average over the last five years of over \$1 million per business day. Through July, 1999 U S WEST has \$262 million in Washington.

If you need further information, I can be reached at 345-4726.

Sincerely,