

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

QWEST COMMUNICATIONS
INTERNATIONAL INC. AND
CENTURYTEL, INC.

For Approval of Indirect Transfer of
Control of Qwest Corporation, Qwest
Communications Company LLC, and
Qwest LD Corp.

DOCKET NO. UT-100820

JOINT APPLICANTS' SUPPLEMENT
TO THE SEPTEMBER 28, 2011
SERVICE QUALITY PLAN

1 On September 28, 2011, Joint Applicants herein filed a Service Quality Plan with the Commission, pursuant to paragraph 263 of Order 14. Thereafter, Commission Staff asked several questions regarding that plan. Joint Applicants hereby provide the responses to those questions, and submit the information as a formal supplemental filing to the Plan, in order that this information may also become a part of the Plan if the Commission deems it necessary or relevant to the issues.

2 Regarding Paragraph 16 of the Service Quality Plan

1. Staff Question:

CenturyLink indicates the company has met the TRR Metrics for all four wire centers for the year 2010 and the first half of 2011.

- a. During the public hearing, a comment was made that the tribe experienced an outage for 72 hours. The Commission's service outage standard for repairs is the repair will be made within 48 hours. Could the tribe experience an outage for 72 hours and still meet the Commission's repair standard?

Response:

Yes, there are multiple circumstances in which the 48 hour repair standard can be exceeded and still meet the requirements of the Commission's rule, WAC 480-120-440.

b. If the answer is yes, please explain.

Response:

First, the 48 hour standard applies only to out-of-service ("OOS") conditions, not conditions such as static on the line. The non-OOS conditions must be repaired within 72 hours. Second, the intervals do not apply to OOS conditions that are part of a major outage, force majeure situations, or when the company cannot get physical access necessary to the repair. Third, the intervals do not apply when the trouble is found to be on the customer side of the network interface, or on non-regulated services such as voice mail. Fourth, the 48 hour interval does not apply to non-POTS lines such as T-1 service. Fifth, the intervals specifically exclude Sundays and legal holidays, so that the actual repair interval may exceed 48 or 72 hours but not violate the rule.

2. Staff Question:

How many times has the company's tribal liaison met with the tribe to discuss tribal service issues since January 1, 2011?

Response:

Between January and September of this year, on at least 6 occasions, the company has communicated with the Tribe via phone calls and emails to collect data relating to service issues with the Tribe. In July of this year, on one of the calls, Larry Hall,

interim IT director for the Tribe, indicated that the real “service issue” from the Tribe’s perspective was not quality of service related per se, but rather was the fact that for a large portion of the reservation, there was no broadband availability. The company has also met with the Tribe formally twice in the last year to discuss the Tribe’s concerns with service quality, service availability, and broadband deployment. These meetings occurred on June 9, 2011 and again on September 23, 2011.

- a. Can the company summarize any service issues that were discussed and any process improvements resulting from the discussion?

Response:

At the formal meetings with the Tribe, referenced above, a broad range of issues were discussed, but the Tribe’s primary interest was expansion of broadband deployment on the reservation. In regard to voice service availability, at the June 9th meeting the company requested that the tribe provide it with addresses or GIS maps that could be used to locate residences that did not have telephone service. The company did not receive this information until September 9th after several additional requests. After reviewing the information provided by the tribe, the company identified 22 residences that did not have telephone service. These residences were all in the same geographic area and the company determined that it had provided the Tribe with a line extension quote in 2006 to build to this area and they never exercised the line extension agreement. The company subsequently provided the Tribe with an updated line extension quote. This is the only area reported by the tribe as not having telephone service.

As noted above, in addition to the formal fact-to-face meetings the company periodically communicates with the Tribe regarding various service issues.

Following is a summary of these communications and the services issues that have occurred this year:

- i. 7/5/2011 – 4 wire fire circuit Nespelem to Omak – referred ticket to Qwest in Omak – trouble was found in the inside wire at the tribal shack in Omak
 1. Access Care #: 268629 CCT, 4//UCXX/120544//PN. Called in on 7/5/11 @ 18:53. Cleared on 7/6/11 at 17:53 Duration: 23:00
 2. TRACS # 0462287
- ii. 7/18/2011 – Keller School T1 down – replaced a bad repeater
 1. Access Care#: 275922, 4/UHDA/146126//PN. Called in on 7/18/11 @ 23:16. Cleared on 7/19/11 @ 13:39 Duration: 14:23
 2. TRACS # 1434195
- iii. 7/21/2011 – Nespelem School T1 errors – took 16 error seconds over a 45 minute period as reported by the SOW – did not find any trouble when we tested
 1. Access Care #:277445 CCT, 4/UHDA/143485//PN. Called in on 7/21/11 @ 12:14. Cleared 7/21//11 @15:01 Duration: 2:47
 2. TRACS # 3595128
- iv. 8/15/2011 – beeping noise on Tribes PBX system (self maintained) – turned out to be low voltage on a customer owned battery
 1. Access Care #: 291863 CCT, 85/UMMA/025064//CNTY. Called in on 8:15/11 @ 17:56. Cleared 8/17/11 @ 10:20 Duration: 40:16
 2. TRACS #5307158
- v. 9/28/2011 – Keller Police Chief’s phone line down – smashed pedestal by fallen tree – replaced the pedestal and fixed the cable.
 1. Reporting Number: 509-634-4527 Called in Out of Service on 9/28/11 @ 11:26, cleared on 9/29/11 @ 18:57 Duration: 31:31
 2. TRACS #1302835

3. Staff Question:

Does CenturyLink have a priority process for repairing telephony service not incurred during normal business hours?

Response:

Yes.

- a. For example, would the company give priority to health facilities, corrections centers, etc? Please explain your answer.

Response:

For service issues that are reported to our afterhours repair center involving medical emergencies or other critical facilities, the company attempts to repair them in the shortest time possible, including after business hours dispatches. For non-emergency/non-critical situations, the company would schedule repair dispatch during normal business hours.

- b. Would the company charge for an outage repair for these priority facilities if a technician were dispatched after normal working hours?

Response:

If a problem was found to be in the customer's CPE the company would charge the customer for the repair. However, if the problem was in the company's facilities, the customer would not be charged for the repair.

4. Staff Question:

Does CenturyLink offer customers a choice to have facilities repaired after normal working hours for a fee?

Response:

No. As described above, if the service problem involves a medical emergency or critical facility situation, the company will dispatch repair personnel as soon as possible, including after business hour dispatches. For non-emergency/non-critical situations, the company would schedule repair dispatch during normal business hours. In either situation, the customer will not be charged for repairs to company facilities.

The company does notify the customer prior to dispatch of charges that may apply if the company finds the problem in the customer CPE.

- a. If the answer is yes, please describe the types of after hour repair services available to the customer and their associated costs.

Response:

NA. See previous response.

3 Regarding Paragraph 19 of the Service Quality Plan

5. Staff Question:

Has CenturyLink experienced any conditions in the tribal wire centers that has led to a "root cause analysis"?

Response:

Yes

- a. If the answer is no, would the company explain, in general, what a root cause analysis steps would be taken to identify the problem?

Response:

NA

- b. If the answer is yes, please explain what the problem was and how it was solved.

Response:

The company recently had an incident where it had a service issue at one address in the Keller area on a particular cable route and through its investigation learned that it had others without service or degraded service. The analysis led the company to fully test the cable which resulted in the discovery that a tree had crushed and buried a

pedestal, causing problems across the cable. The crushed pedestal was fixed which restored service, however, further testing by the company led to a determination that the cable was deteriorating. Consequently, a work order is in process to replace 6,100 feet of buried cable.

4 Respectfully submitted this 18th day of November, 2011.

CENTURYLINK/QWEST



Lisa A. Anderl (WSBA # 13236)
1600 – 7th Ave., room 1506
Seattle, WA 98191
lisa.anderl@centurylink.com