

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of
Telecommunications Carrier-to-Carrier Service
Standards for the Interface of Interconnecting
Local Exchange Carriers

Docket No. UT-990261

**METRONET'S OPENING COMMENTS
ON CARRIER-TO-CARRIER SERVICE
STANDARDS**

INTRODUCTION

MetroNet Services Corporation ("MetroNet") appreciates that the Commission is examining carrier-to-carrier service quality issues. As a rebiller of U S West's Centrex service, MetroNet has similar concerns regarding quality of service as to resellers of U S West's services. At best, problems with the underlying services provided by U S West reflect negatively on the reseller or rebiller of the service, even if the customer understands that the problems are caused by the underlying provider. Worse, however, is that the likely customer reaction will be a strong reluctance to obtain service from any company other than the ILEC if changes in service providers are associated with service disruptions. Telecommunications service is simply too essential to most businesses to risk a disruption regardless of which company is at fault.

METRONET'S EXPERIENCE

MetroNet has been a rebiller of Centrex service for almost 15 years. The quality of U S West's services to MetroNet's customers has varied considerably over those 15 years. At the low point, about two years ago, U S West's service failures severely crippled MetroNet's ability to attract and add new customers. In late 1997 MetroNet's new customers experienced problems in 29 percent of the conversions or "cuts" from their U S West POTS service to MetroNet-rebilled/U S West-provided Centrex service. The most common problem was that customers would lose services and features on conversion, such as voice mail, vertical features, and long distance. A number of the customers lost hunting, which effectively limited them to one incoming call at a time—a situation very close to being out of service (incoming) for multi-line customers.

Service failures by the underlying providers hit resellers and rebillers doubly hard.

First, the rebiller has the customer service responsibility for the end user. Cuts with service failures consume many times the labor cost of error free cuts. MetroNet must spend hours determining the nature and scope of the problem from the end user, isolating the problem to the ILEC (as opposed to CPE), getting the ILEC to repair the problem, keeping the end user informed regarding the nature of the problem and the steps being taken to restore service, and confirming full restoration of service with the ILEC and the end user. In short, service problems significantly inflate the rebiller's cost.

Even after the service is restored, the rebiller suffers a second harm. Its reputation and good will are damaged. MetroNet has lost several customers as a consequence of the conversion problems they experience. Many prospective customers will ask MetroNet for references or testimonials before they will switch service. When MetroNet was experiencing a 29 percent failure rate, it was difficult for MetroNet to market its services and obtain positive references.

Another area that MetroNet has experienced problems is in obtaining accurate billing. First, it almost always takes two to three months for U S West to correctly post and render a bill to MetroNet for new customer. Inaccurate billing raises MetroNet's costs. MetroNet must audit the ILEC's bills and then straighten out the errors. For example, MetroNet spends an extra 15 to 90 minutes, depending on the nature of the error, to correct U S West's bills when a customer has lost services or features, because U S West generally does not give proper credit for the lack of service. Billing errors are also common when a MetroNet customer has moves, adds, and changes during the billing cycle. Sometimes the process of reconciling and correcting U S West's bills takes months.

NEED FOR RULES

Although MetroNet does not have any specific language to recommend at this time, MetroNet's experience makes it clear that service quality rules are needed. While U S West's service quality for MetroNet's customers has improved considerably since 1998 in the area of conversions, there is no rule to prevent the same kinds of problems that MetroNet experienced in 1997 to 1998 from recurring. A rule should establish the minimum standards against which service quality can be measured. Also, a rule should provide mechanisms to remedy service quality problems, including escalation procedures up to and including Commission involvement in serious cases or in the event of repeated service failures. Finally, a rule should provide for financial compensation or allocation of loss in appropriate circumstances.

Finally, MetroNet suggests a rule provision be developed that requires ILECs to be proactive and cooperative in addressing service quality issues, rather than simply meeting minimum standards. Reasonable cooperation to ensure quality of service to end users should be required. While such a standard may have to be broad and somewhat vague, it is necessary to give resellers and rebillers some leverage over ILECs that may place unreasonable barriers to the day-to-day business of ensuring quality of service to all end users. It is impossible for a rule to address specifically all the situations that may require cooperation and coordination from the ILEC. Again, MetroNet's experience provides examples of barriers that a rule likely will not address specifically, but which hinder provision of high quality service.

As the first example, when MetroNet prepares to convert a new customer's service to rebill Centrex, it gets a customer service record or "CSR" from U S West that shows all of the services and features the customer has. The CSR shows all of these services and features by U S West's "USOC" codes (e.g., 1FB for single line business, flat-rated). However, U S West has hundreds of USOCs and refuses to supply MetroNet with a list of codes and their associated services. This creates an unnecessary barrier to ensuring that the end user has, gets, and keeps the proper services and features.

A second example where greater cooperation is needed is when call blocking occurs. Most of MetroNet's customers get network access through Centrex NARs, which only allow a certain percent of users in a Centrex system to access the public switched telephone network at a time. Recently, MetroNet has received an increasing number of complaints from its customers about "fast busy" signals, which indicates some type of network blockage (rather than

the called number being busy). The blockage could be a result of insufficient Centrex NARs, serving off central office ("CO") blockage, terminating CO blockage, or interoffice CO trunk blockage. If the problem is caused by insufficient NARs, then MetroNet can solve it by ordering and paying for more NARs. All other problems require U S West or the terminating carrier to increase capacity or repair the facility causing the problem. Again, U S West makes it difficult or impossible for MetroNet to solve the problem or to address end user's questions. U S West provides MetroNet little or no information, or inaccurate information, about the cause of the blockages its customers are experiencing. U S West has told MetroNet to order more NARs, which costs extra, when MetroNet has later learned that the blockage was occurring in the CO, not the NARs. A free flow of information should make it easier for both MetroNet and U S West to take appropriate steps to solve the blocking problems. Moreover, MetroNet will have better relations with its customers when it provides them with accurate information about the cause of their blocking problems and what is being done to resolve the problems.

CONCLUSION

MetroNet supports the adoption of rules that will help rebillers, resellers, ILECs, and other carriers improve cooperation and coordination to deliver reliable and high-quality services to telecommunications consumers regardless of which competitive option they choose for their service.

Dated: June 11, 1999.

Respectfully submitted,

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METRONET SERVICES CORPORATION'S COMMENTS
ON THE
PREPROPOSAL STATEMENT OF INQUIRY ON
CARRIER-TO-CARRIER SERVICE STANDARDS

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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SYNOPSIS

MetroNet Services Corporation supports the Commission's examination of carrier-to-carrier service quality issues. As a rebiller of U S West's Centrex service, MetroNet has many concerns regarding ILEC service. MetroNet recommends adoption of rules that set minimum standards for measurement of service quality, establish mechanisms to remedy service quality problems, provide for financial compensation in appropriate circumstances, and require ILECs to be proactive in resolving service quality issues. Such rules are essential in order for MetroNet to guarantee a high quality of service to its customers.