

**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 SUPPLEMENTAL  
COMMENTS ON CARRIER-TO-**

**I.INTRODUCTION**

MetroNet Services Corporation ("MetroNet") is a rebiller of U S West's Centrex service. As a rebiller, MetroNet is very concerned about the quality of the underlying service. Because MetroNet provides customer service to its end users, problems with the underlying service, including errors on orders, repairs and billing, result in MetroNet incurring considerable costs to resolve these service problems. Problems with the underlying service also have an adverse effect on the relationship between MetroNet and its customers. The end result of these problems is that competition in the local market is undermined. Service quality rules will serve to level the playing field between the local exchange carrier ("ILEC") and its competitors.

In its previous comments, MetroNet identified several issues to be addressed by service quality rules. MetroNet also has additional concerns discussed below that it would like to see addressed in a rulemaking. Specifically, MetroNet believes that service quality rules must (i) provide for non-discriminatory treatment of competitive service providers by the ILEC's; (ii) include specific measurable performance standards that prevent gaming of the system; (iii) ensure prompt customer loss

notification, and (iv) provide for quality control measures to ensure timely, straightforward handling of repair orders and accuracy in data entry and billing.

## **II.DISCUSSION**

### **A. Non-Discriminatory Treatment**

MetroNet is very concerned about discriminatory treatment of competitors by an ILEC, particularly with respect to the fulfillment of customer orders. MetroNet can illustrate the problem with a documented incident. On September 10 of last year, MetroNet submitted a service order for one of its customers, requesting a due date of September 29. US West assigned a due date of October 21 instead of the requested date. On September 14, the same MetroNet customer requested the same service directly from U S West and was told that U S West could have the service installed in three days. MetroNet brought this incident to the attention of U S West and was subsequently told that there were indeed openings for installation of service in September and was given a September 29 due date as originally requested. If there is to be effective competition, the rules must prevent such discriminatory treatment.

## **B. Measurable Performance Standards**

In developing rules to prevent discriminatory practices, the Washington Utilities and Transportation Commission ("WUTC" or "Commission") should be mindful of the current gaming of the system by U S West and provide specific measurable performance standards that will prevent such gaming. For example, merely stating that an order must be filled within a specific number of days provides an opportunity to game the system. Currently, U S West is supposed to provide an order due date within three business days of accepting an order from MetroNet. To meet this standard, U S West simply delays accepting the order. While MetroNet faxes written orders to U S West, U S West does not enter the orders into its system until the date it is ready to install the service. Although it might appear on a statistical report that U S West is giving same day turnaround, MetroNet customers experience a significant delay in fulfillment of their orders. Thus, it is imperative that any standard for fulfillment of orders provides for prompt entry of service orders as well as prompt installation of service. For each type of service provided, the rules will need to be tailored to the specific service to prevent gaming.

### **C. Prompt Notification and Changes for Customer Losses**

There is a need for a standard for prompt notification and changes to the ILEC database for any customer changes not initiated by the current service provider. Currently, when a MetroNet customer switches its U S West service to that of a CLEC, U S West is notified but fails to notify MetroNet. U S West also fails to make timely changes to its database. Unaware of the customer loss, MetroNet may continue to receive bills for that customer from U S West for up to three months and continue to rebill the customer, who is now being billed twice for the same service.

When a MetroNet customer switches its service from MetroNet to another reseller of U S West service, U S West notification to MetroNet of the customer loss may take five weeks. Thus, MetroNet cannot promptly verify that the change was intended and remedy unauthorized changes. It also cannot promptly advise the customer of termination liabilities associated with the change of service. Resolution of such issues is much less complicated if MetroNet is informed promptly of the change. A rule requiring prompt notification of loss and timely changes to the database used for billing would help eliminate customer confusion and reduce transaction costs for the service provider.

### **D. Quality Controls to Assure Accuracy**

A major area of concern for MetroNet has been accuracy of information with respect to repairs, orders, and billing. Quality controls in these areas are needed because of the costs that errors by the underlying service provider impose on MetroNet. Ultimately, such costs make it more difficult for MetroNet to compete in the market for local services.

First, there is a need for quality controls for repairs that would require

U S West to provide accurate information on the status of repairs. In approximately 15% of all repairs requested from U S West, MetroNet incurs unnecessary costs because of inaccurate or misleading information on the status of repairs. To communicate repair orders to U S West, MetroNet informs U S West of a need for a repair and, where necessary, also informs U S West if access to the customer premises will be limited to business hours. Thereafter, U S West will inform MetroNet that a repair technician has been dispatched to the customer site. MetroNet promptly informs its customer that a technician is on the way and the customer expects to see the technician before the close of the business day. In several instances, however, the technician has not arrived until after normal business hours and has filed a report that the premises were visited but the repair could not be completed due to circumstances beyond his control, i.e. the lack of access to the premises. Limitations on customer premises access appear not to have been recorded or communicated or to have been ignored. Clearly, the credibility of MetroNet with its customers is damaged by these incidents. In addition, MetroNet must reopen the repair order the next day and continue to incur costs in resolving the problem.

Second, quality controls on accuracy are needed for customer orders. Five to ten percent of all MetroNet customer orders are entered incorrectly by U S West after MetroNet faxes written customer orders to U S West containing detailed information. In one recent case, where MetroNet informed US West of a move of five lines and disconnection of the remaining five lines, the order was entered by U S West as a move of ten lines. Not having facilities for ten lines, U S West informed MetroNet that the facilities to fulfill the orders were not available when in fact U S West did have facilities

to accommodate the five lines. In another instance, U S West failed to note that a jack was to be installed along with a line. Unnecessary delays and customer confusion created by such errors imposes costs on MetroNet.

Third, quality controls are needed in the area of customer billing. Invoices often contain charges that are not billed at the correct rates. Often, tariffs are incorrectly interpreted. In a particularly egregious example, U S West actually applied the tariff of another state instead of the WUTC tariff. Considering that MetroNet's service area is entirely within the Puget Sound region, the reason for this is difficult to fathom. In other instances, customers continue to be billed for services that they have discontinued. Costs associated with auditing and correcting the U S West bills increase MetroNet's cost of doing business and adversely affect MetroNet's competitive position.

MetroNet needs both reliable information and service from U S West if it is to maintain quality of service to its customers. Any inaccuracies by U S West have the potential to harm MetroNet's relationship with its customers and to hurt MetroNet's ability to compete. The Commission must ensure that any quality control standards are specific enough to eliminate these problems. A provision for financial compensation for service providers who are harmed by failure of the ILEC to meet quality control or any other performance standards is also important for ensuring compliance with such standards.

### **III.CONCLUSION**

The Commission should promulgate rules on service quality that ensure nondiscriminatory treatment of competitors by an ILEC, measurable performance standards that cannot be avoided through gaming of the system, prompt notification and database changes in the event of a customer loss, and accuracy in repair orders, customer orders, and billing. Also, the Commission should consider financial compensation to service providers who are harmed by failure of the ILEC to maintain quality controls on accuracy in repair orders, customer orders and billing or to meet other performance standards.

Dated: September 24, 1999.

Respectfully submitted,

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