

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

REQUEST FOR WAIVER AND
ALTERNATE METHOD OF
REPORTING OF INFORMATION AS
DETAILED IN WAC 480-120-439(4)
AND AS PROVIDED FOR IN WAC
480-120-439(12)

Docket No. UT-(new)

CENTURYLINK'S PETITION FOR
WAIVER AND ALTERNATE METHOD OF
REPORTING

I. INTRODUCTION

1 CenturyLink hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for a permanent waiver of certain provisions of WAC 480-120-439(4) for the Washington local exchange companies to which that rule applies.¹ In addition, under WAC 480-120-439(12), CenturyLink petitions for an alternate method of reporting of service quality performance measurements detailed in WAC 480-120-439(4). This waiver is requested in accordance with Condition 17 of the Settlement Agreement between CenturyLink, Commission Staff, and Public Counsel in Docket No. UT-100820.² Commission Staff supports this request.

II. THE RULES

2 WAC 480-120-439(4) reads as follows:

4) Installation or activation of basic service report. The report must state the total number of orders taken, by central office, in each month for all orders of up to the initial five access lines as required by WAC 480-120-105. The report must include orders with due dates later than five days as requested by a customer. The installation or activation of basic service report must state, by central office, of the total orders

¹ CenturyLink of Washington, CenturyLink of Inter Island, CenturyLink of Cowiche, and United Telephone Company of Washington.

² Condition 17 provides, in pertinent part, that: “CenturyLink will file, and Commission Staff will support, a petition for waiver of WAC 480-120-439(4) seeking permission to report on orders completed rather than on orders taken, which would constitute treatment similar to that granted Qwest in Docket No. UT-030704.”

taken for the month, the number of orders that the company was unable to complete within five business days after the order date or by a later date as requested by the customer.

(a) A separate report must be filed each calendar quarter that states the total number of orders taken, by central office, in that quarter for all orders of up to the initial five access lines as required by WAC 480-120-105. The installation or activation of basic service ninety-day report must state, of the total orders taken for the quarter, the number of orders that the company was unable to complete within ninety days after the order date.

(b) A separate report must be filed each six months that states the total number of orders taken, by central office, in the last six months for all orders of up to the initial five access lines as required by WAC 480-120-105. The installation or activation of basic service one hundred eighty day report must state, of the total orders taken for six months, the number of orders that the company was unable to complete within one hundred eighty days.

Orders for which customer-provided special equipment is necessary; when a later installation or activation is permitted under WAC 480-120-071; when a technician arrives at the customer's premises at the appointed time and prepared to install service and the customer is not available to provide access; or when the commission has granted an exemption under WAC 480-120-015 from the requirement for installation or activation of a particular order, may be excluded from the total number of orders taken and from the total number of uncompleted orders for the month.

For calculation of the report of orders installed or activated within five business days in a month, orders that could not be installed or activated within five days in that month due to force majeure may be excluded from the total number of orders taken and from the total number of uncompleted orders for the month if the company supplies documentation of the effect of force majeure upon the order.

3 WAC 480-120-439(12) reads as follows:

(12) If consistent with the purposes of this section, the commission may, by order, approve for a company an alternative measurement or reporting format for any of the reports required by this section, based on evidence that:

(a) The company cannot reasonably provide the measurement or reports as required;

(b) The alternative measurement or reporting format will provide a reasonably accurate measurement of the company's performance relative to the substantive performance standard; and

(c) The ability of the commission and other parties to enforce compliance with substantive performance standard will not be significantly impaired by the use of the alternative measurement or reporting format.

III. DISCUSSION

4 CenturyLink seeks a waiver of WAC 480-120-439(4) as it pertains to reporting by orders taken. CenturyLink is unable to provide accurate service quality performance measurements through this method. Pursuant to WAC 480-120-439(12), CenturyLink seeks an order from the Commission allowing CenturyLink to provide the information in an alternative format which provides a more accurate and reliable measurement of the company's performance that allows for compliance enforceability by the Commission and other parties. It should be noted that CenturyLink is currently reporting in the alternative format requested herein, due to the inability to report in strict accordance with the rule.

5 The rule for reporting of service quality performance with respect to installation and activation of basic service (WAC 480-120-439(4)) requires that a company provide a report based on orders taken. CenturyLink is unable to provide an accurate and reliable report in this format. As Qwest Corporation noted in written comments (Supplemental Comments filed on June 7, 2000, February 14, 2001, April 18, 2002 and June 27, 2002) and in workshop discussions (including the Service Quality Workshop held September 19, 2001) in Docket No. UT-990146, Qwest attempted to produce a report based on orders taken, but found that the reports were not accurate because the number of orders taken did not match the number of orders completed for a variety of reasons. Orders taken could be rejected if they were inaccurate or incomplete. Consequently, reports that track orders prior to completion run the risk of counting orders multiple times or counting orders that may be rejected because they are inaccurate or incomplete. If the reports are based on completed orders, however, CenturyLink can prepare accurate and reliable reports that count each order for services as a single completed order.

6 Even if there were no accuracy concerns associated with an orders taken report method, CenturyLink is unable to modify its installation reports to provide information based on

orders taken without incurring extraordinary expense to reprogram its mechanized systems and processes. CenturyLink therefore seeks a waiver of WAC 480-120-439(4).


7 CenturyLink also seeks an order from the Commission allowing CenturyLink to continue to provide the data to the Commission based on its current reporting format noted above. This report format provides the Commission with an accurate measurement of CenturyLink's performance for the installation or activation of basic service orders, based on the number of orders completed each month. Most important, this alternative report format does not impair the Commission's or other parties' ability to evaluate compliance with the performance standard.

IV. CONCLUSION

8 CenturyLink respectfully requests a permanent waiver of WAC 480-120-439(4) as it pertains to orders taken. In addition, CenturyLink requests a Commission order allowing CenturyLink to continue with the more accurate, reliable and enforceable reporting system it currently uses which is based on completion date.

9 RESPECTFULLY SUBMITTED this 31st day of May, 2011.

CENTURYLINK


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