

Installation and Repair Volumes and Dispatches

This discussion provides background for the question of whether it is reasonable to expect Qwest, or any utility, to meet the Out of Service Repair metric 100% of the time or face penalties of \$1,000,000 per year. Qwest believes it is not, and that its proposal to eliminate or modify the metric is reasonable.

Qwest's ability to provide good service quality is dependent on having adequate staffing levels for anticipated volumes. However, as will be seen, all the planning and staffing in the world cannot anticipate weather and other events that cause volumes to spike unexpectedly.

The following table is a summary of the POTs and Design Service installation and repair loads that Qwest has experienced between the years of 2001 and 2003.

POTs	2001 POTs	2002 POTs	2003 POTs
Orders Provisioned	3,266,509	2,839,147	2,262,193
Orders Dispatched	242,170	192,007	167,396
Repair	654,792	425,662	381,640
Repair Dispatched	402,801	308,913	302,453

In 2001, Qwest processed 3,266,509 orders for POTs type services. Of that amount 7.4% or 242,170 POTs orders required a field dispatch in order to connect the service to the end user's premise. While the total amount of POTs type orders have decreased by almost 31% between 2001 and 2003, (3,266,509 in 2001 to 2,262,193 in 2003) field dispatches remain fairly constant at the 7% of total load level. For the past 12 months, Qwest has met the provisioning interval of 5 business day in 9 of those 12 months.

POTs repair loads have seen the same types of reductions due, in large part, to the amount of capital investment and new facilities Qwest has placed in the state, along with the

continual decline of subscribers. However, even those customers seeking service from Competitive Local Exchange Carriers, in most instances, still require Qwest to dispatch a technician if the service they are providing to their end user customer is experiencing trouble. In all, 2001 yearly totals for repair tickets were at 654,792 reports while 2003 report totals were reduced by 273,152 to 381,640 trouble reports. This is a reduction of nearly 42%. However, dispatch percentages for the repair load has actually increased from 61.52% in 2001(654,792 troubles reported and 402,801 required a dispatch) to 79.25% in 2003 (381,640 troubles reported and 302,453 required a dispatch).

While the installation and repair functions are dispatched to many of the same personnel, the loads experienced can vary depending on random events – repair loads are even more susceptible to this than installation loads.

For the year 2003 Qwest cleared 99.26% of all out of service tickets in less than two (2) working days. The rate was over 99% for every month except November, which was 97.36%. The rate would have been closer to 99.5% if November was excluded. There were significant weather related events in November 2003 that impacted Qwest's ability to perform repairs within the two-day standard. That month, Seattle received above average rainfall – approximately 6.2 inches – with about half of that total falling on November 18 and 19. Winds were above average as well.¹ The average precipitation for the month of November in Seattle is usually about 5.7 inches, with that amount being spread across a number of days in the month, not just two.² Approximately 1.15 inches fell the three days preceding the 18th and 19th and subsequently, November 20th brought another .28 inches of precipitation. I have reviewed the daily tracking of out of service tickets and the out of service tickets missed, and it is plain to see that the

¹ This information was found at URL: <http://www.wunderground.com/history/airport/KBFI/2003/10/30/DailyHistory.html>

² Information on Seattle weather history was found at URL: <http://www.cityrating.com/cityweather.asp?city=Seattle>

combination of the wind and rain was a contributing factor to the 416 out of service tickets that were not cleared in less than 2 days. I will illustrate this on the following table:

	11/15	11/17	11/18	11/19	11/20	11/21	11/22	11/24	11/25	11/26	11/27	11/28	11/29
Precipitation	.25	.53	1.93	1.11	.28	.07	0	.01	.23	0	.01	.78	.10
Wind – Max MPH	12 MPH	22 MPH	23 MPH	15 MPH	9 MPH	8 MPH	9 MPH	14 MPH	17 MPH	12 MPH	9 MPH	12 MPH	7 MPH
Total Tickets *	435	864	655	1055	1654	1146	848	972	558	588	380	316	397
# Cldr w/in 2 bus days	433	863	652	1054	1648	1113	750	771	527	586	379	313	395
# Missed	2	1	3	1	6	33	98	201	31	2	1	3	2
% Met – 2 days	99.54	99.88	99.54	99.91	99.64	97.12	88.44	79.32	94.44	99.66	99.74	99.05	99.50
# Cldr w/in 7 bus days	435	864	655	1055	1654	1146	848	972	557	588	380	316	397
% Met – 7 days	100	100	100	100	100	100	100	100	99.8	100	100	100	100
Excluded for CC 400 or 500	0	1	0	0	0	7	22	4	0	0	0	0	0

* Volumes indicate tickets cleared on this date not tickets submitted

The misses that were incurred during the last two weeks in November were attributable to the amount of moisture received and the winds that caused damage to overhead telecommunications facilities and the effect that both had on facilities, over time, that were exposed to these forces of nature. Wet cable pairs which may not have resulted in an immediate trouble report from the customer went into hard trouble resulting in an out of service after a day or two due to corrosion of metallic pairs within the cable sheath. The wind from the storms also introduced trees to power lines which almost always has an adverse effect on aerial drops. As the rains subsided, more troubles were reported and as the load began to level back out to those volumes experienced before the rains came that Qwest was able to catch up on the back-logged tickets and clear 99.97% of the out of service tickets that were reported in less than 7 working days. All but 4 tickets were cleared within the 7 business day time frame.

During the month of November, Qwest attributed only 0.25% (39 tickets) of the 15,772 out of service tickets to the measures which supposedly exclude Qwest from having to perform a 100% performance level. This amount of rain did not qualify as an emergency situation nor an unavoidable catastrophes or a force majeure event. It was rain and when it rains things get wet and cable pairs corrode not immediately but over a short period of time – it has happened for years and while Qwest has taken steps to repair vulnerable sections of its outside plant, address drainage problems so utility holes no longer fill up with water, and invested millions of dollars to replace older facilities, outages of this nature and volume can occur on any given day. The unfortunate fact is that no one can predict or staff for these conditions.

Taking all of the load and resource issues and inclement weather conditions into consideration, the fact is that if Qwest fails to repair a *single* out of service trouble report within two business days, the month is scored as a “not met” and 100% has once again been missed. I will restate the obvious – it is unrealistic to expect any telecommunications provider to manage a network the size of Qwest’s especially in a state that is as well known for rain and not have an occasion where in a given month some small percentage of trouble reports are missed. At least a performance standard of 99.5% cleared in 48 hours would allow for an occasional exception.

There is no difference in the maintenance or repair of business and residential POTs type services. While reports from end users may be submitted to Qwest through two different 800 numbers, the actual work itself is handled, in most part, by the same pool of occupational employees. Once Out of Service reports have been submitted to Qwest, it is up to the Load and Resource Allocation Center (LRAC) to ensure that resources are available to handle the daily volumes. The LRAC has available to them these resources and manages the work load for each technician with some technicians working requests for new service or CLEC service orders and others working repair tickets. In the pool of work due to be completed or resolved on any given day, there is no differentiation between the “types” of POTs services. The LRAC treats work on a first in, first out basis, where possible, with out of service restoral having the highest priority.

Outages for both residential and business customers are dispatched to technicians in a non-discriminatory manner with more attention being paid to travel time than service type. From a technician's standpoint, it is simply the repair of wires in order to get dial tone back to the residential or business end user as quickly as possible.