

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE PETITION	)	DOCKET NO. UT-061617
OF SBC LONG DISTANCE, LLC,	)	
FOR APPROVAL OF AN	)	<b>SBC LONG DISTANCE'S AMENDED</b>
ALTERNATIVE MEASUREMENT OF	)	<b>PETITION FOR ALTERNATIVE</b>
<b>SERVICE QUALITY REPORTING</b>	)	<b>MEASUREMENT AND REPORTING</b>
PURSUANT TO WAC 480-120-439(12)	)	<b>UNDER WAC 480-120-439(12)</b>
_____	)	

Pursuant to WAC 480-120-439(12), SBC Long Distance, LLC (d/b/a "AT&T Long Distance" and "SBC Long Distance") ("SBC LD") hereby requests that the Washington Utilities and Transportation Commission ("WUTC" or "Commission") grant this Amended Petition for Alternative Measurement and Reporting under WAC 480-120-439.

All pleadings, correspondence, and other communications concerning this petition should be sent to SBC LD at the following addresses:

Gregory L. Castle  
Senior Counsel  
AT&T Services, Inc.  
525 Market Street, Room 2022  
San Francisco, CA 94105  
Telephone: (415) 778-1487  
Facsimile: (415) 974-1999  
Email: [gregory.castle@att.com](mailto:gregory.castle@att.com)

Dan Foley  
General Attorney & Asst. Gen. Counsel  
AT&T Services, Inc.  
P.O. Box 11010  
645 E. Plumb Lane, B132  
Reno, NV 89520  
Telephone: (775) 333-4321  
Facsimile: (775) 333-2175  
Email: [dan.foley@att.com](mailto:dan.foley@att.com)

**INTRODUCTION**

1. The petition seeks the relief granted by the Commission to SBC LD's affiliates in *In the Matter of the Petition of AT&T Communications of the Pacific Northwest, Inc., TCG Oregon, and TCG Seattle Seeking Approval of Alternative Form of Reporting as allowed by WAC 480-120-439(12)*, Order No. 01, Order Approving

Alternative Measurement or Reporting Format in Part, and Denying in Part, Docket No. UT-041588 (May 11, 2005) (“*AT&T Alternative Reporting Order*”). In addition, SBC LD is proposing to report WAC 480-120-439 (4) on a statewide basis as opposed to a central office basis because it does not have central offices. As grounds therefore, SBC LD states as follows:

### **BACKGROUND**

3 SBC LD is an authorized competitive local exchange carrier (“CLEC”) providing telecommunications service in the Seattle area to primarily business customers. Prior to the merger of AT&T Corp. and SBC Communications, Inc., SBC LD did not file service quality reports because it was not a Class A company (i.e., it did not exceed the 2% of access lines threshold that triggers the reporting requirement). After the merger, the Commission Staff advised SBC LD that it would need to start filing service quality reports because its lines would be aggregated with those of the legacy AT&T CLECs that provide service in Washington, which are AT&T Communications of the Pacific Northwest, Inc., TCG Oregon, and TCG Seattle. As a result, in January, SBC LD started filing and continues to file service quality reports in the same manner as its affiliates.

3. Recently, Commission Staff advised SBC LD that in order to continue to file reports as it had been doing, it would need to obtain the same Commission authorization to use the alternative reporting measurements as authorized by the Commission for AT&T, TCG Seattle, and TCG Oregon in the *AT&T Alternative Reporting Order*. Therefore, SBC LD is making this “me too” filing.

### **AT&T Alternative Reporting Order**

4. In Docket No. UT-041588, AT&T and the two TCG entities doing business in Washington petitioned the Commission for authorization to provide an alternative measurement or reporting format for its service quality reports as permitted in WAC 480-120-439(12). Specifically, AT&T and the TCG entities sought variances regarding the method of reporting missed appointments (subsection 3), timeliness of installations (subsection 4), trouble reports (subsection 6), switching problems regarding dial service and intra-switch blocking (subsection 7), interoffice and interexchange trunk blocking (subsection 8), out-of-service and service impairment repairs (subsection 9) and business office and repair center answering times (subsection 10).

5. In the *AT&T Alternative Reporting Order*, the Commission granted the petition as to subsections (3) and (6) through (9), but denied the petition as to subsections (4) and (10). *See Order* at p. 4.

### **SBC LD Request**

6. In this petition, SBC LD does not seek to relitigate the denial of the earlier petition as to subsection (10), but is requesting the same relief as to subsections (3) and (6) through (9) that was granted to its affiliates. Further, for the reasons stated herein, it is proposing an alternative measurement and reporting as to subsection (4).<sup>1</sup> Thus, SBC LD proposes the following alternative measurements and reporting formats:

---

<sup>1</sup> SBC LD had not originally sought relief as to subsection (4) in its original petition; however, after discussing the petition with staff, subsection (4) raises a similar issue as does subsection (6) because SBC LD does not track data based on central office basis because it does not have central offices. Instead, SBC LD can track the requested information on a state-wide basis. Also, SBC LD is not able to exclude "non-reportables" for such events as a force majeure event, denied access, necessary CPE not present, etc., because it relies upon the local exchange carrier to install loop facilities. Therefore, it will report the timeliness of all installations and activations on statewide basis.

- (a) **Missed Appointments Report (subsection 3):** SBC LD will report commitments missed and total commitments for both installation appointments and repair appointments;
- (b) **Timeliness of Installations or Activations of Basic Service (subsection 4):** SBC LD will report timeliness of installations and activations on a statewide basis;
- (c) **Trouble Reports (subsection 6):** SBC LD will report total troubles received on a statewide basis, troubles as a ratio per 100 lines services, and causes of trouble if the applicable standard is exceeded;
- (d) **Switching Report (subsection 7):** SBC LD will report the number of times when it misses the standards regarding the provision of dial tone and intra-switch blocking regarding its switch;
- (e) **Trunk Blocking Report (subsection 8):** SBC LD will report the number of times when it fails to satisfy the standards regarding interoffice trunk blocking and E911 interoffice trunk blocking to the extent that it has interoffice trunks; and,
- (f) **Repair Report (subsection 9):** SBC LD will report the total out-of-service repairs requested, the out-of-service repairs cleared in less than 48 hours, the total number of non out-of service repairs requested. and non out-of-service repairs that clear in less than 72 hours.

7. The same facts and reasons that persuaded the Commission to grant the petition of AT&T and the two TCG entities apply with equal force to SBC LD. WAC 480-120-439 service reporting requirements are based principally upon a facilities-based, legacy network architecture. However, SBC LD is largely dependant on either obtaining its local loops from the incumbent local exchange carriers (“ILECs”) as UNE-loops or the entire service based on a resale arrangement. Further, several of the standards are predicated on the carrier having multiple central offices, end offices and interoffice trunks going between those offices. SBC LD does not have central and end offices.

Further, SBC LD must largely depend on the ILECs to install and maintain the local line facilities and to address cases of trouble on those lines.

8. The proposed alternative measurements and alternative reporting format will provide the Commission on a monthly basis with relevant quality of service reporting of SBC LD's operations. The monthly reports will also permit the Commission to track the information over time and the reports will be consistent with format and information that SBC LD has been reporting. Finally, the proposed alternative measurements will be based on information readily available to SBC LD and verifiable.

## CONCLUSION

9. For the reasons stated herein, SBC LD requests that the Commission grant this "me too" petition by accepting the proposed alternative measurements outlined herein as adequate to meet the Commission's needs under WAC 480-120-439 and as approved by the Commission for SBC LD's affiliates in the *AT&T Alternative Reporting Order* issued in Docket No. UT-041588 on May 11, 2005. Further, SBC LD requests that it be permitted to measure and report the timeliness of service installations and activations, the subsection (4) measurement, on a statewide as opposed to a central office basis.

Respectfully submitted this 23rd day of April, 2007

**SBC Long Distance, LLC (d/b/a AT&T  
Long Distance and SBC Long Distance)**

By: 

Dan Foley  
General Attorney & Assistant General  
Counsel  
AT&T Services, Inc.  
645 E. Plumb Lane, B132  
P.O. Box 11010  
Reno, NV 89520  
Telephone (775) 333-4321  
Facsimile (775) 333-2175  
Email: [dan.fb\47att.com](mailto:dan.fb\47att.com)