

ORIGINAL



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December 6, 1999

Mr. Rick Moses  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RE: Service Rule Comments

Dear Mr. Moses:

Attached are the comments of Sprint – Florida regarding proposed service rule revisions. Sprint appreciates the opportunity to have input to this process.

If you have any questions, please give me a call.

Sincerely,

*Sandy A. Khayrallah*

*for*

Ben Poag

Attachment

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FPSC-REGULATORY/REPORTING

## SERVICE RULE COMMENTS

## INTRODUCTION

With the increasing level of competition, and the ultimate goal being to further increase competition and reduce regulation, service rules should be designed which will foster the objective to increase competition. Thus, the Commission should eliminate service rules which will negatively impact new entrants by increasing their costs of doing business and thus preventing or discouraging them from entering the market, serving certain market segments or the offering of certain services because of burdensome service rules. The resources, both personnel and support systems, required to establish and maintain data collection, data compilation, performance measurement, and reporting are disproportionately burdensome for smaller companies and new entrants, regardless of the levels of service required by such rules. Thus, CLECs should not be subjected to these disproportionately higher costs which ultimately must be paid by customers. For the above reasons, it is Sprint's position that the CLECs should not be subject to service rules unless they are designated as a carrier of last resort, providing basic telephone service as defined by Florida Statute 364.

To the extent that a CLEC provides business services, and for the most part the majority of CLECs are primarily targeting the business market, CLECs should not

be subject to service rules. In many cases contracts are the basis of the service commitment, and such contracts should not be confined by regulation. For example, a customer may be willing to accept a lower grade of service for a lower price. The market for CLECs is 100% competitive, that is, there is virtually no situation where the customer cannot get service from the ILEC if not satisfied with the CLEC's service.

Similarly, because the medium and large business markets, if not already competitive, have a reasonable opportunity to solicit alternative competitive suppliers, service rules for the ILEC should either not apply to these markets or apply only in areas where there is little or no opportunity for competition. Thus at a minimum, less regulation should be the objective. Answer time rules should not apply to these markets. These customers generally have complex orders and often have non-regulated services and equipment included which require more time than a residential or small business order to complete.

Sprint also believes answer time rules should not apply to Directory Assistance and Toll Operator Services because of the highly competitive nature of these services. However, service rules could continue to apply for ILEC local operator services and for timing and rating of toll calls. Additionally, price caps already in existence in Rules 25-24.516 and 25-24.630 would continue to be applicable.

While most of the above comments relate to business customers, Sprint recognizes that there may be situations in which a CLEC provides service to residential customers as a result of an exclusive agreement with the building owner in a multi-tenant environment. Sprint does not believe exclusive agreements with building owners should be allowed. Nevertheless, to the extent that service rules may be necessary to address these types of situations, rules should be developed which are applicable only to these specific situations; but blanket rules for all CLECs should not be imposed as means to target problems in select unique situations.

Regarding, the scorecard as it was discussed in the November 5, 1999 workshop, Sprint has concerns with the details of how such a scorecard would be developed. If the companies were required to self-report the information, then the administrative cost and burden would be an issue, particularly for CLECs if service rules are to be applicable to CLECs. And if companies differentiate themselves based on both price and service, then the scorecard would have to reflect the relationship between the two in order to present a complete picture.

Regardless of what final objectives are established in the rules, some consideration should be incorporated into the rules to address peak periods. During any given period, whether it be answer time or installations, there are significant fluctuations in customer demand. For example, customers move more frequently at the beginning and end of the month and customer call volumes

peak on Mondays and are particularly high on the first work day of the week following holiday weekends. Because of the complex nature of the business, it requires highly trained personnel which makes it extremely difficult to increase force levels for these peak periods. The alternative is to maintain staffing at peak or near peak levels all the time. To mitigate this situation, Sprint proposes that the Commission build into the rules some flexibility. There are specific suggestions in the individual rule discussions below regarding changes that would help with peak loads. One possible general solution to this problem might be that the Company is allowed to omit, for example, three days each month from the results. Under this scenario, the Company would still be incented to provide a high level of service, but would not be as severely penalized for misses during the peak periods.

The following comments focus on the changes Sprint recommends be made to the existing service rules within the context of the recommended limitations stated above.

#### **25-4.003 Definitions**

(38) Out of Service – Since long distance carriers can and do block a customer's ability to originate long distance calls, reports of an inability to place long distance calls should not be considered an out of service condition.

#### **25-4.0345 Demarcation Point**

The requirement should move to a single point of demarcation at the customer's premises.

#### **Service Rules:**

The following recommended rule modifications for both repair activity and primary service requests provide consideration for the severe negative impact on achieving the results objective when significant workload increases occur that are beyond the control of the Company, i.e., acts of God. Moreover, it is an unrealistic expectation to advocate that any business must be staffed sufficiently to satisfy its customers' demands and needs during exception situations/periods. Additionally, reporting results on a higher level than exchanges, such as on a district level, will provide a more factual picture of the Company's overall performance. Stringent performance expectations associated with small exchanges does not provide a valid picture of the overall level of service being provided because as few as one to four misses often prevents the objective from being attainable even though realistically, a fewer number of customers experienced a delay than a large exchange can miss and still meet the objective.

#### **25-4.066 Availability of Service**

- (1) Provision of facilities subject to the Company's ability to secure and provide, at reasonable expense, suitable facilities and rights for construction and maintenance of such facilities.
- (2) Where central office and outside plant facilities are readily available, at least 90 percent of all requests for primary service in any calendar month shall normally be satisfied within each district (data is to be maintained on an exchange level and included in the monthly periodic report) within an interval of three working days after receipt of application. Further, an application will not be considered complete until all tariff and Company requirements thereto have been complied with except those instances where a later installation due date is requested by the applicant or where special equipment or services are involved. On an exchange level, the same exchange may not miss the 90 percent objective more than twice in a six-month period. In the event a storm related incident occurs that causes the average volume of trouble reports occurring in the most recent Monday through Saturday work week (absent of storm activity) to increase by 25% or more, any resulting misses will be excluded when calculating compliance with the monthly performance objective.
- (3) This rule is acceptable as written with the exception that the same considerations recommended for (2) above be applicable.
- (4) No comments
- (5) No comments

**25-4.067 Extension of Facilities – Contribution in Aid of Construction**

No comments

#### **25-4.069 Maintenance of Plant and Equipment**

Delete. This is incorporated in the requirement to maintain various service standards and does therefore not need to be separately stated.

#### **25-4.070 Customer Trouble Reports**

(a) Delete the reference to the Companies making every reasonable effort to restore service on the same day that an interruption is reported to the serving repair center. The objective and guidelines associated with the reporting of compliance with the monthly out of service objective drives this performance. Additional tracking of results associated with such a measurement is an unnecessary administrative process that can be eliminated without impacting results. It is to the respective Company's advantage to clear as many trouble reports the same day as possible in support of their pursuit of achieving the established monthly out of service objective.

(3) Service Objectives:

(a) Service Interruption: Modify the rule for consideration of the exception situations previously stated herein for 25-4.066 pertaining to storm related conditions when calculating the monthly service results performance compliance. Additionally, the performance objective should be tracked and reported on a district level as proposed in 25-4.066. On an exchange level, the same exchange may not miss the 95% objective more than twice in a six month period.



(5) Repeat Trouble: Delete – Customer expectations and demands drive the level of performance in this area.

(6) Add the information contained in 25-4.066 pertaining to consideration of exception situations when calculating the monthly results performance compliance.

#### **25-4.71 Adequacy of Service**

(1) No comments.

(2) Delete – The measurement of these objectives is no longer reasonably necessary given the automation associated in today's digital switching environment.

(3) No comments

(4) See 25-4.074 for any comments

(5) No comments

#### **25-4.72 Transmission Requirements.**

(1) Modify to read – Telecommunications companies shall adhere to ANSI/IEEE standard 820 “Telephone Loop Performance Characteristics”. The maximum loss objective of inter-toll trunks shall be consistent with the requirements of the nationwide switching plan and overall transmission losses within each trunk group will not vary more than plus or minus two db.

(2) No comments

(3) No comments

#### **25-4.073 Answering Time.**

The current method of measuring answer time from the last digit dialed to the time the caller is able to speak with a representative incorporates technical limitations that prevent the respective Company from being able to mechanically track and report the exact data requested by the Commission. Therefore, inconsistencies in tracking and reporting the results are inherent. Additionally, full utilization of an Interactive Voice Response (IVR) system (self-provisioning concept) to better serve the diverse needs of callers i.e., payment arrangements, billing inquiries (amount-bill date, etc), business (simple/complex, special circuits, data, etc), residential, Spanish speaking, repair, etc, and ensure they are routed/connected to the most appropriate automated function or personal

representative as quickly and efficiently as possible can not be accomplished. Utilizing the current methodology in converting/calculating service level measurements that require x% answered within y seconds to an average speed of answer is dependant upon several variables; therefore, the relationship is not totally consistent. The variables include the number of calls in queue, the number of agents available to answer calls, the size of the queue and the distribution of the arrival of calls.

It is recommended that an answer time measurement utilizing a true measurement of the Average Speed of Answer (ASA) be adopted. ASA measurement is easier to track, manage and comprehend than the current method of measurement. This measurement is more representative of how the customer views the speed in which their call is answered. Time in the IVR is not calculated against ASA, which allows the customer to take advantage of various self-provisioning feature options offered by the Company. The state of the art self-provisioning feature built into today's sophisticated IVR systems offer speed, accuracy and customer convenience in satisfying their diverse needs.

Utilization of an industry standard ASA measurement removes the barrier to commingling call traffic. Commingling of call traffic is the practice of pooling calls from multiple sources, and distributing them to one answering queue. This practice results in increased efficiencies that are realized by employing a large queue. A large queue is more efficient than a small one due to the random

nature of call arrival; small queues often experience a mismatch between supply (agents) and demand (calls). The large queue is staffed to handle the normal level of calling activity from the multiple locations and therefore maximizes the available resources (agents) to more efficiently handle "spikes" in calling activity. Spikes are often the result of seasonal demand in the service order arena and unforeseeable events such as storms, fiber cuts, network outages, changes in dialing schemes linked to area code changes or the introduction of extended area calling routes, etc. within a particular geographic area. If the calling traffic, for example, were to be mixed with that of a call center located in the Pacific Time Zone the redundancy would provide a safeguard against both the known as well as unforeseeable events that create challenges in meeting customer demand. The difference in time zones also provides additional flexibility to meet peak customer demand. During 1999, Sprint has been transitioning to large queues in our Mid-Atlantic and North Central regions with the result being increased efficiency through maximum utilization of agent resources, and all eight states have been meeting service levels virtually every month since transition.

Sprint believes customer expectations will be satisfied with an ASA of 60 seconds for both the residential Business Office and Repair centers when an IVR is or is not utilized. Further, a 30-second ASA should be associated with (1) (a) below as related to "0" operator services along with a 20 second ASA (1) (b)

below. Additionally, due to the competitiveness of the 411 Directory Assistance Service, measurement of an answer time objective should be discontinued.

(1) Modify to read – Each telephone utility shall meet the following service criteria under normal operating conditions:

(a) Modify to provide for an ASA to not exceed 30 seconds after zero is dialed.

(b) Modify to provide for an ASA to not exceed 20 seconds after zero is dialed.

(c) Modify to provide for an ASA to not exceed 60 seconds for repair and the residential business office.

(d) Modify to provide for an ASA of 60 seconds after a caller elects to not interact with the IVR system or selects a menu option intended to connect the caller to an agent when calling the residential business office or repair center.

(e) Modify to read – The initial message shall not contain promotional or merchandising material.

(f) No comments

(2) Modify to delete any wording not consistent with utilizing the ASA method of measurement.

(3) No comments

#### **25-4.770 Customer Appointments.**

Delete – Due to the extremely low number of situations requiring an appointment to access a customer's premises or dwelling to perform regulated activity.

#### **25-4.080 Weighted Measurement of Quality of Service**

This method of measurement should be discontinued and replaced with a scoring method that simply acknowledges a company's compliance with the agreed upon areas of measurement. Additionally, service audits should focus on the accuracy of the compilation of the results reported in the periodic reports and areas of concern that are not demonstrated in the periodic reports.