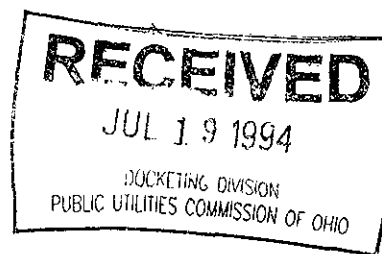


BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of  
The Ohio Bell Telephone Company  
for Approval of an Alternative  
Form of Regulation.

)  
) Case No. 93-487-TP-ALT  
)  
)



Prepared Testimony

of

Kenneth E. Rogiers

Staff Exhibit 7

1 1. Q. Please state your name and business address.

2  
3 A. My name is Kenneth E. Rogiers, and my business address is 180 E. Broad  
4 Street, Columbus, Ohio 43215

5  
6 2. Q. By whom are you employed?

7  
8 A. The Public Utilities Commission of Ohio (PUCO)

9  
10 3. Q. What is your position at the PUCO?

11  
12 A. I am Telephone Section Supervisor of the Compliance Division of the  
13 Consumer Services Department.

14  
15 4. Q. What previous positions have you held at the PUCO?

16  
17 A. I began my employment with the PUCO in 1979 as a Public Inquiry  
18 Assistant in the Public Interest Center (PIC). From 1984-1989 I worked as a  
19 Utility Rate Analyst in the Commission's Telecommunications Division.  
20 From 1989 to the present I have been employed in my current position.

21  
22 5. Q. What are your current duties and responsibilities?

23  
24 A. I am responsible for the supervision of telephone compliance  
25 investigations in the area of quality of service. These investigations focus  
26 on company compliance with the Minimum Telephone Service  
27 Standards(MTSS).

1 6. Q. What is the purpose of your testimony?

2  
3 A. I will respond to Ameritech's objections J2 ,3 and 5 to the Staff Report in  
4 the Quality of Service Section. Also I will address the subject matters  
5 raised in Julie A. West's supplemental testimony regarding Staff's  
6 endorsement of NRRI's recommendation 4.6, marketing practices,  
7 restructuring the business office, new service installation, on-premise  
8 service installation, and out of service clearance.

9  
10 7. Q. What is staff's position on Ameritech's response to the staff's  
11 endorsement of NRRI's recommendation that the Commission direct its  
12 staff to conduct an investigation on the ability of the existing quality of  
13 service standards to meet the needs of an information age economy?

14  
15 A. Contrary to Ameritech, Staff believes in an information age economy  
16 quality of service standards are important. Staff believes that during the  
17 transition to a fully competitive marketplace, minimum quality of service  
18 standards should exist to ensure fair and full competition. Staff has no  
19 way of foreseeing the level of competition that will take place in the  
20 future. Staff is also concerned that the absence of service standards may  
21 lead to potential degradation of service quality particularly in smaller rural  
22 exchanges.

23  
24 Staff however is in agreement with Ameritech that standards should be  
25 applied industry wide and equally to all providers of local exchange  
26 service. In addition, Staff believes that any future modifications of quality  
27 of service standards should apply to all providers of local exchange service.

1 8. Q. What is the Staff's position regarding Ameritech's objection #J2 in the  
2 Quality of Service Section stating that the Staff erred in concluding time  
3 spent on marketing optional services resulted in noncompliance with the  
4 minimum telephone services standards?  
5

6 A. As stated in the Staff Report, Staff visited Ameritech's business offices and  
7 noted that service representatives constantly spent significant amounts of  
8 time marketing optional services. Staff believes that this is one of the  
9 reasons for slow answer time in the business office and non compliance  
10 with the Ohio administrative code 4901:1-5-22(D)(1)(c) that requires that at  
11 least 90% of calls to the business office be answered within twenty seconds.  
12

13 9. Q. What is the Staff's position regarding Ameritech's objection #J3 in the  
14 quality of service section that the Staff erred by recommending that  
15 Ameritech restructure its business office operations?  
16

17 A. Staff believes that Ameritech should restructure its business office  
18 operations to reduce the level of marketing per call, thus allowing a  
19 quicker turn around time for service reps to answer customers incoming  
20 calls. Contrary to Ms. West's testimony which stated that Ameritech had  
21 only one reportable occurrence for business office answer time in 1993,  
22 Ameritech had two reportable occurrences. A reportable occurrence is  
23 when service levels are not met for two consecutive months within a  
24 twelve month reporting period. This means that for at least four months  
25 in 1993 that Ameritech failed to meet the answer time standard.  
26

1 Furthermore in each of the years 1991 through 1993 Ameritech has had  
2 two or more reportable occurrences in failure to comply with business  
3 office answer time standard. This indicates a problem of a continuing  
4 nature. Thus staff believes within 90 days of the approval of the plan  
5 Ameritech should submit in writing the steps taken to rectify this  
6 situation.

7  
8 10. Q. What is the Staff's position regarding Ameritech's objection #J5 in the  
9 Quality of Service Section that the Staff erred in its proposals concerning  
10 new service installation, on premises installations, and out of service  
11 clearance, including submission of a report within 90 days of the approval  
12 of the plan?

13  
14 A. Staff acknowledges that there were eight reportable instances of  
15 noncompliances with the new service installation standard in 1993. This  
16 represents a twofold increase over the previous year. These occurrences  
17 were exclusively in rural exchanges. (See Attachment A)

18  
19 Concerning the MTSS service standard for on-premises installation,  
20 Ameritech failed to meet this standard every month from 1991 through  
21 1993. While Ms. West's testimony attempts to show that there are 2244  
22 opportunities for reportable occurrences in a year, and that in 1993 there  
23 were 74 such reportable occurrences, Ms. West's testimony ignores the fact  
24 that the occurrences took place almost exclusively in rural exchanges with  
25 some exchanges reporting on multiple occasions failure to meet the  
26 standard. As a result, Staff is concerned that rural exchanges do not appear

1 to receive the same attention provided to urban and suburban exchanges.  
2 (See Attachment B)

3  
4 Concerning the MTSS service standard for the percentage of out of service  
5 trouble clearance within 24 hours, Staff pointed out that company has  
6 failed to decrease the number of reportable occurrences for the years 1991  
7 through 1993. Again, Staff is concerned that the effects of this non-  
8 compliance has been primarily in rural exchanges. (See Attachment C)

9  
10 In the above mentioned areas Ameritech should report in writing to the  
11 Commission within 90 days of the approval of the plan the measures  
12 taken to resolve these problems.

13  
14 11. Q. Does that conclude your testimony?

15  
16 A. Yes.

Attachment A

Ameritech M.T.S.S. Compliance Summary

Page 1 of 3

1991  
STANDARD  
MTSS Rule 22  
(C)(1a) 90% of  
New Service  
Installations  
5 days.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
JUN.	Belfast		
JUL.	Danville	Winchester	
SEP.	Sugar Tree Ridge		
OCT.	Graysville		
NOV.	Arabia		

Ameritech M.T.S.S. Compliance Summary

Page 2 of 3

1992

STANDARD

MTSS Rule 22

(C)(1a) 90% of

New Service

Installations

5 days.

MONTH

EXCHANGE

EXCHANGE

EXCHANGE

APR.

Arabia

Whitehouse

JUL.

New Riegel

AUG.

Leroy

OCT.

Walnut



1993  
STANDARD  
MTSS Rule 22  
(C)(1a) 90% of  
New Service  
Installations  
5 days.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
FEB.	Newport		
MAR.	Lewisville		
APR.	Beallsville		
MAY	Beallsville		
JUL.	Duffy		
SEP.	Newport		
OCT.	Clarington		
DEC.	Fultonham		

## Attachment B

## Ameritech M.T.S.S. Compliance Summary

Page 1 of 3

1991  
STANDARD  
 MTSS Rule 22  
 (C)(6) 90% of  
 Appts for  
 Installation  
 must be met.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
JAN.	Maumee Milledgeville Walnut	Harrisburg New Albany	Canal Winchester New Carlisle
FEB.	Berea Dresden New Albany	Arabia Milledgeville	Canal Winchester Rushville
MAR.	Rushville		
APR.	Magnolia		
MAY	Trenton	Winchester	Martins-Ferry
JUN.	New Riegel Arabia Somerset	Belfast New Matamoros Walnut	Winchester Newport
JUL.	Donnelsville Arabia	Marshall	Winchester
AUG.	South Charleston		Philo
SEP.	Dresden Newport	Philo Guyan	Lockbourne
OCT.	Graysville		
NOV.	Graysville Cheshire Urichsville	Fultonham Roseville West Lafayette	Milledgeville Sugar Grove Whitehouse
DEC.	Sugar Grove Guyan Greensburg	Dresden Nelsonville Roseville	Fultonham Graysville West Lafayette

1992  
 STANDARD  
 MTSS Rule 22  
 (C)(6) 90% of  
 Appts for  
 Installation  
 must be met.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
JAN.	Arabia Guyan	New Matamoros	Rio Grande
FEB.	Arabia		
MAR.	Arabia	Vinton	Rio Grande
APR.	Burton Duffy	Philo	Rio Grande
MAY		Philo	
JUN.	Lockbourne	Philo	
JUL.	Lowelville New Riegel Whitehouse	Philo Somerset	New Matamoros Sugar Grove
AUG.	Manchester	Somerset	Thornville
SEP.	Christianburg Greenburg	Somerset Sugar Tree Ridge	Manchester
OCT.	Manchester		
NOV.	Manchester South Vienna	Carroll Uniontown	Enon Walnut
DEC.	Manchester Newcomerstown	Uniontown	Walnut

## Ameritech M.T.S.S. Compliance Summary

Page 3 of 3

1993  
STANDARD  
 MTSS Rule 22  
 (C)(6) 90% of  
 Appts for  
 Installation  
 must be met.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
JAN.	Newcomerstown Leroy Bethesda Neweport	Manchester Beallsville Graysville Olmsted Falls	Walnut West Lafayette New Matamoras
FEB.	Leroy Newport	Canal Winchester Olmsted Falls	South Vienna
MAR.	Leroy	Lewisville	Thornville
APR.	Beallsville West Jefferson	Pitchin	Thornville
MAY	Beallsville Mantua	Fultonham Norwich	Thornville
JUN.	Maumee	Nelsonville	Trenton
JUL.	Belfast Mogadore Whitehouse	Franklin Nelsonville	Jamestown Vinton
AUG.	Franklin Medway Newcomerstown Roseville	Magnol-Waynbg New Carlisle Newport Somerset	Mantua New Matamoras Rogers Walnut
SEP.	Carroll Duffy Newport Perrysburg	Corning Marshall North Jackson	Walnut New Holland Norwich
OCT.	Beallsville Duffy Rainsboro	Chesterland Guyan Sugar Grove	Norwich Mogadore
NOV.	Cheshire Roseville Whitehouse	Sugar Grove Uhrichsville	Fultonham West Lafayette
DEC.	Roseville Greensburg	Graysville	West Lafayette

# Attachment C

## Ameritech M.T.S.S. Compliance Summary

Page 1 of 3

1991  
STANDARD  
 MTSS Rule 22  
 (H) Customer  
 reported Out of  
 Service Not  
 Cleared within  
 24 hours.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
JAN.	Castalia Sugar Grove	Jeffersonville	Marietta
MAR.	Rushville Milledgeville	Burton	Canal Winchester
MAY	Whitehouse		
JUN.	New Riegel Medway	Holland	Maumee
JUL.	New Riegel Franklin	Belfast Medway	Bowersville
SEP.	Whitehouse		

1992

STANDARD

MTSS Rule 22

(H) Customer  
reported Out of  
Service Not  
Cleared within  
24 hours.MONTHEXCHANGEEXCHANGEEXCHANGE

JAN.	Lindsey	Newport	
AUG.	Bellaire Perrysburg	Manchester	Maumee
SEP.	Dayton	Roseville	Saint Clairsville
OCT.	Fairborn		
NOV.	Lewisville New Lexington	Mingo Junction Rushville	Nelsonville Shawnee
DEC.	Lewisville	Mingo Junction	

## Ameritech M.T.S.S. Compliance Summary


Page 3 of 3

1993  
STANDARD  
MTSS Rule 22  
(H) Customer  
reported Out of  
Service Not  
Cleared within  
24 hours.

<u>MONTH</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>	<u>EXCHANGE</u>
JAN.	Conesville West Lafayette	Donnelsville	Gnaddenhutten
JUL.	Belpre Medway Thornville Whitehouse	Corning Perrysburg Toledo	Maumee Somerset Vandalia
AUG.	Bellaire Lewisville New Matamoros Philo Thornville	Belpre Marietta Newport Reynoldsburg Whitehouse	Corning New Lexington Painesville Saint Clairsville Willoughby
SEP.	Bellaire Hubbard New Holland Thornville Saint Clairsville	Corning Lewisville New Lexington Whitehouse	Conesville Marietta New Matamoros Woodsfield
OCT.	Graysville Marlboro Somerset	Corning Nelsonville Woodsfield	Lewisville New Lexington
NOV.	Lewisville New Lexington	Mingo Junction Rushville	Nelsonville Shawnee
DEC.	Gnadenhutten West Lafayette	Nelsonville	Shawnee

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Prepared Testimony of Kenneth E. Rogiers, submitted on behalf of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, or hand delivered to the parties of record on this 19th day of July, 1994.



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