



Agenda Date: 12/18/18  
Agenda Item: 4B

**STATE OF NEW JERSEY**  
**Board of Public Utilities**  
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CABLE TELEVISION AND  
TELECOMMUNICATIONS

IN THE MATTER OF THE BOARD'S INVESTIGATION ) ORDER  
OF THE SERVICE QUALITY STANDARDS AND )  
REPORTING BY INCUMBENT LOCAL EXCHANGE )  
CARRIERS-SERVICE QUALITY PROCEEDING ) DOCKET NO. TX18121301

**Parties of Record:**

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**Colleen A. Foley, Esq., Saul Ewing LLP, on behalf of United Telephone Company of New Jersey, Inc. d/b/a CenturyLink**  
**Richard Fipphen, Esq., Associate General Counsel, Verizon New Jersey Inc.**  
**Bradford M. Stern, Esq., Rothfelder Stern, LLC, on behalf of Alteva of Warwick, LLC**

**BY THE BOARD:**

In this Order, the New Jersey Board of Public Utilities ("Board") on its own motion seeks to initiate a comprehensive service quality proceeding to review and modernize how it evaluates, measures and assesses services provided by Incumbent Local Exchange Carriers ("ILECs") operating in the State of New Jersey. As part of this review, Board Staff intends to examine existing standards, governing statutes and rules, and carrier performance reports. In addition, Board Staff will review the relationship between network reliability and infrastructure throughout the State to determine if there is a correlation between existing infrastructure and network reliability and whether problems or disparities exist that could impact the delivery of safe, adequate and proper service throughout New Jersey.

The Board, through enabling legislation, is empowered to ensure that regulated public utilities provide safe, adequate and proper service to the citizens of New Jersey, as per N.J.S.A. 48:2-23. In addition, pursuant to N.J.S.A. 48:2-19, the Board is vested with the authority to investigate, upon its own initiative, any matter concerning any public utility, and to issue orders requiring public utilities to furnish safe, adequate and proper service. N.J.S.A. 48:2-23. The Board also possesses the statutory authority to require public utilities to furnish detailed reports of finances and operations in such form and containing such matters as the Board may from time to time prescribe, after proper notice and by order in writing. N.J.S.A. 48:2-40.

Specifically, the Board is vested with general supervision and regulation of and jurisdiction and control over all public utilities, including individuals, co-partnerships, associations and corporations, that own, manage or control telecommunications facilities that operate in New Jersey as well as their property, property rights, equipment, facilities and franchises, pursuant to N.J.S.A. 48:2-13 and N.J.S.A. 48:2-1 et seq., and has adopted rules and regulations concerning such activities.

## **BACKGROUND**

Three ILECs - Verizon New Jersey (Verizon), Alteva of Warwick (Alteva) and CenturyLink - have been granted franchises to provide telecommunications services in the New Jersey. Each occupies a unique service territory with defined boundaries throughout the State. They provide retail and wholesale voice communications and other regulated and unregulated services over their facilities to residential and business customers. While the carriers' primary focus is on voice communications, the delivery systems they utilize often provide the backbone for other services such as Internet and cable television services.

The market for telecommunications services has continued to evolve since the implementation of the State Telecommunications Act of 1992<sup>1</sup> and the Federal Telecommunications Act of 1996<sup>2</sup> dramatically altered the competitive landscape. Carriers once subject to rate base rate of return regulation have given way to alternative forms of regulation<sup>3</sup> designed to stimulate competition and allow for market incentives to provide for innovation and infrastructure investment in order to propel New Jersey into the forefront of the Information Age.

While the three ILECs all operate under alternative forms of regulation,<sup>4</sup> they are not subject to uniform service quality standards. Verizon follows a set of 21 metrics (See Attachment A) that are memorialized in the Order approving its Plan for Alternative Regulation (PAR). The 21 metrics measure carrier provisioning of service and performance, including out of service repair data, customer trouble reports per 100 lines, repair commitments negotiated with customers, installation intervals and customer interaction and other key performance statistics necessary to assess service quality.

Compliance with the metrics form an essential part of Verizon's PAR and provides the Board with a gauge upon which to measure Verizon's performance. On May 19, 2015, the Board approved a Stipulation of Settlement between Verizon and Board Staff resolving Verizon's

<sup>1</sup> L. 1991, c. 428 codified at N.J.S.A. 48:2-21.16 to 21.21.

<sup>2</sup> Pub. LA. No. 104-104, 110 Stat. 56 (1996), codified throughout Title 47 of the United States Code.

<sup>3</sup> See N.J.S.A. 48:2-21.16 (a)(5), the Board has the authority to approve alternative forms of regulation to address changes in technology and the structure of the telecommunications industry and to modify the regulation of competitive services and to promote economic development.

<sup>4</sup> See In the Matter of the Application of Verizon New Jersey Inc. for Approval (i) of a New Plan for an Alternative Form of Regulation and (ii) to Reclassify Multi-Line Rate Regulated Business Services as Competitive Services, and Compliance Filing, BPU Docket No. TO01020095 (August 19, 2003) ("PAR-2").

See In the Matter of the Board Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services As Competitive, BPU Docket No. TX07110873; and I/M/O the Application of United Telephone Company of New Jersey Inc. b/b/a Embarq for Approval of a Plan for Alternative Regulation, BPU Docket No. TO08060451 ("2008 ILEC Proceeding" or "ILEC Phase I") (August 20, 2008) ("2008 Order" or "Phase I Order").

See In the Matter of the Application of Warwick Valley Telephone Company d/b/a/ WVT Communications for Approval of a Plan for an Alternative Form of Regulation, Docket No. TO09010084 (June 7, 2010).

Petition seeking the reclassification of certain services as competitive.<sup>5</sup> As part of the Stipulation, the service quality standards set forth by prior decisions of the Board for residential basic local service and single line business service remained unchanged. As outlined in the Stipulation, at the end of year three, the Board would determine whether the existing service quality standards (metrics) should apply for the duration of the Stipulation and thereafter. On May 22, 2018, the Board determined that the existing standards would remain in effect until such time as the Board engages in a review of the standards. In addition, it directed Verizon to report on two metrics which it unilaterally decided to eliminate from its quarterly reports.<sup>6</sup>

An integral part of Verizon's PAR-2 and the establishment of the service quality standards is the provision requiring Verizon to file a Remediation Report in the event a metric is not achieved for three consecutive months. The Remediation Report requires a special filing with the Board that includes, at a minimum, a non-technical and technical explanation of the violations, root cause analysis for the failures, a corrective plan of action, a completion schedule and a commitment from Verizon "that the remediation plan will be vigorously pursued to the best ability of the Company." PAR-2 at 81. Over the past several years Verizon has consistently been deficient in 5 of the 21 service quality metrics. The five failing metrics generally involve service repair issues. Many of these standards and metrics have been missed and Verizon has only filed three remediation reports with the Board. These remediation reports are required to be filed by the 15<sup>th</sup> business day after Verizon fails to achieve a metric for three consecutive months respectively.

Whereas Verizon's service quality standards are derived from its PAR-2, CenturyLink and Alteva are governed by the service quality standards set forth in N.J.A.C. 14:10-1A.8 and Service Quality Reporting in N.J.A.C. 14:10-1A.9 (See Attachment B). Service quality standards memorialized in N.J.A.C. 14:10-1A.8 contain minimum standards of service installation, operator handled calls, direct dialed calls, customer trouble reports and technical resistance design standards. In addition, N.J.A.C. 14:10-1A-9 requires that CenturyLink and Alteva take measurements of their performance in relation to the standards found in N.J.A.C. 14:10-1A.8 and provide the measurements and summaries in reports to Staff: 1) upon request of Staff, or 2) if the company fails to meet a service standard for three consecutive months.

Although we have not observed any significant aberrations in CenturyLink's reported service quality data, several communities over the past two years in CenturyLink's service territory have reported repeated and potentially chronic issues with both service and infrastructure which may not comport with the standards in place, and Staff believes these potential problems may necessitate a closer review of the effectiveness of the current rules through this proceeding.

While the ILECs' plans for alternative regulation and existing statutes and rules govern, the provisioning and delivery of many of the services offered by the ILECs, along with reclassification, has resulted in a perception by some in the industry that overall jurisdiction is relaxed or eliminated when rate regulation ceases. This, however, is inaccurate. Regardless of the classification, the Board retains jurisdiction and oversight over the provisioning of telecommunications services throughout the state and all ILECs are legally obligated to provide safe, adequate and proper service as detailed and under the legal authority cited above.

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<sup>5</sup> See I/M/O the Board Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services as Competitive – Phase II, Docket No. TX11090570 (May 19, 2015).

<sup>6</sup> See Order, I/M/O the Board Investigation Regarding the Reclassification of Incumbent Local Exchange Carrier (ILEC) Services as competitive – Phase II, BPU Docket No. TX11090570 (May, 28, 2018).

Competitive services remain subject to the reporting requirements set forth in the PAR. Regulatory relief from rate regulation does not eliminate service quality requirements imposed by the Board. Furthermore, technological changes have dramatically altered how consumers place and receive telephone calls. Many customers have disconnected traditional voice services altogether, while others still rely on traditional landline service. Moreover, companies are continuing to modernize their networks with upgraded facilities. Copper wires are increasingly being replaced with fiber optic cables and modern switching facilities which have the ability to provide many advanced services.

Notwithstanding these upgrades, some parts of the State have reported service problems with legacy network facilities which were not captured by the existing metrics or standards. Advancements in technology are one of the prompts for a review of the appropriateness of the existing metrics and standards in light of the broad steps in technical capabilities of telecommunications providers.

Going forward, the existing measures and data must be carefully reviewed to assess whether the information contained in the current service quality reports as prescribed by rule are adequate to reliably investigate and determine if problems are being appropriately addressed. There remains concern that the current data being provided fails to present an accurate assessment of the level of service rendered by telecommunications providers in today's market. It is likely that a more targeted granular approach may be necessary to assure the provisioning of appropriate service. Under the current construct much of the existing data that is collected and reported is in the aggregate. When determining the significance of service issues in a particular area within the State, aggregate information may be insufficient.

It is instructive to note that the Board has been receiving service quality data since the introduction of Verizon's, (formerly New Jersey Bell's), Rate Stability Plan (RSP) in 1987.<sup>7</sup> In the RSP, the Board acknowledged that the rate capping aspects of the RSP could lead to cost cutting in an effort to maximize the Verizon's financial performance. To guard against it, the Board put in place automatic reporting if the existing standards exceeded what was known at the time as an "exception" level surveillance. Similar concerns were raised in the PAR-1 proceeding and it was decided that the RSP reporting would remain in place for the PAR-1.

When it was time to revisit Verizon's PAR-1, the Board undertook a review of the reported service quality data. During the PAR-2 proceeding, the Board's investigation determined that from 1998 through the first quarter of 2002, service quality had declined significantly. That analysis resulted in the Board adding 9 additional metrics to the previous plan increasing the reporting requirements to a total of 21.

In recognition of the changing competitive environment as indicated above, and the concerns regarding service quality that the Board has observed in reviewing the reports filed by ILECs the Board, by this Order launches an investigation to review ILECs' service quality to determine how to better evaluate, measure and assess the services provided by ILECs operating in the State of New Jersey.

Based upon the foregoing, the Board **DIRECTS** Staff to undertake a review of the existing ILEC service quality standards, including but not limited to the governing statutes and rules, and

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<sup>7</sup> In the Matter of the Petition of New Jersey Bell Telephone Company for Approval of a Proposal for a Rate Stability Plan and Relaxed Earnings Surveillance for Certain Competitive Services, Docket No. TO87050398 (June 22, 1987).

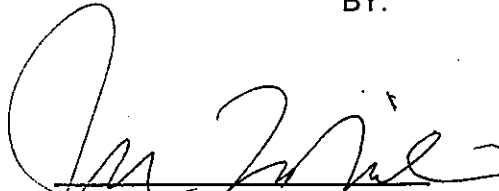
carrier performance reports to determine their efficacy in their present form and recommend, where warranted, amendments to the standards to ensure the Board is able to carry out its statutory obligation to ensure safe, adequate and proper service.

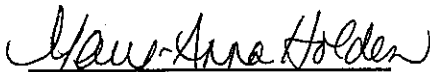
Therefore, the Board on its own Motion shall commence a proceeding to investigate the quality of service provided by ILECs. Such investigation at a minimum will include public hearings to allow comment on the existing service quality standards and recommendations for revisions.

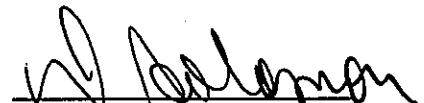
This Order shall be effective on December 28, 2018.

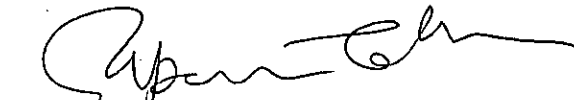
DATED: 12/18/18

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BY:

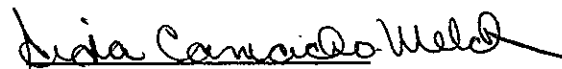
  
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AIDA CAMACHO-WELCH  
SECRETARY

I HEREBY CERTIFY that the within  
document is a true copy of the original  
in the files of the Board of Public Utilities.

IN THE MATTER OF THE BOARDS INVESTIGATION OF THE SERVICE QUALITY  
STANDARDS AND REPORTING BY INCUMBENT LOCAL EXCHANGE CARRIERS-SERVICE  
QUALITY PROCEEDING

DOCKET NO. TX11090570

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**ATTACHMENT A**  
**Verizon PAR Service Metrics**

Verizon New Jersey Retail Service Quality Standards

1. Customer Trouble Report Rate Per 100 Access Lines
2. Out of Service Troubles cleared within 24 Hours
3. Percent of Commitments Met As Negotiated with Customer
4. Repeat out Service trouble reports as a percentage of initial out of Service Reports  
Residential
5. Repeat out of Service Trouble Reports as a percentage of Initial out of Service Reports-  
Business
6. Average Local Residential Repair interval in Hours
7. Average Business Local Repair Service Interval Hours
8. Percent Service Order Provisioning Completed within 5 Working Days
9. Percent of Service Ordering Provisioning Appointments met
10. Installation Interval for Local Service in Days for Residential
11. Installation Interval for Local Service in Days for Business
12. Percentage Installation Commitments Met for Local Service Residential
13. Percent of Installation Commitments Met for Local Service Business
14. Percent of Calls Completed in the Toll/Access Network
15. Percent of Offices Above Dial Tone Speed Objective
16. Percent of Switching Offices Performing at or Above Call Completion Objective
17. Percent of Directory Assistance Calls Answered within 10 Seconds
18. Percent of Toll and Local Assistance Calls Answered within 10 Seconds
19. Percent of Customers Reaching Business Office within 20 Seconds for Business &  
Residential
20. Percent of Customers Reaching Repair within 20 Seconds for Both Residence and  
Business
21. Verizon Monthly Complaints Per 10,000 Lines

**ATTACHMENT B**  
**Service Quality Rules**  
**N.J.A.C. 14:10-1A-8**  
**N.J.A.C. 14:10-1A-9**

**N.J.A.C. 14:10-1A.8 Service Quality Standards**

- (a) This section establishes service quality standards that a telephone utility shall meet. These standards apply without exception, regardless of seasonality, weather, work stoppage, accident sabotage, acts of God or nature, or any other reason. The Board may, however, after investigation, suspend application of any provision of this chapter for periods of emergency catastrophe, natural disaster, severe storm or other extraordinary events beyond the control of a utility.
- (b) A telephone utility shall meet the following minimum service quality standards regarding installations of service:
1. Seventy-five percent of regular service installations shall be completed within five working days after the utility receives the request for service, unless a later date is requested by the applicant;
  2. Eighty-eight percent of the commitments made to customers, as to the date of installation of regular service, shall be met, unless the customer causes a delay, and
- (c) A telephone utility shall meet the following requirements regarding operator handled calls:
1. Eighty-five percent of repair service calls shall be answered within 20 seconds;
  2. Eighty-five percent of toll assistance operator calls (that is, toll calls assisted by an operator) shall be answered within 10 seconds; and
  3. Seventy-eight percent of directory assistance calls shall be answered with 10 seconds.

- (d) An "answer" under (c) above shall mean that the operator or representative is ready to render assistance and/or ready to accept the information necessary to process the call. An acknowledgment that the customer is waiting on the line shall not constitute an "answer."
- (e) A telephone utility shall meet the following requirements regarding dial service, measured as Statewide monthly averages:
  - 1. Ninety-five percent of dialed local calls shall be completed without encountering an all trunk busy or equipment irregularity; and
  - 2. Ninety-five percent of originating direct-dialed toll calls shall reach the toll network without experiencing blockage or failure.
- (f) Each telephone utility shall ensure that its Statewide average rate of customer trouble reports to the utility shall not exceed eight per 100 lines per month.
- (g) All customer loops shall meet the resistance design standards and trunk facilities shall conform to the transmission design factors required for meeting the objectives of direct distance dialing.

**N.J.A.C. 14:10-1A.9 Service Quality Reporting**

- (a) Each telephone utility shall take measurements of its performance in relation to the standards in N.J.A.C. 14:10-1A.8, and shall compile summaries of the measurements.
- (b) Each telephone utility shall retain records of the measurements and summaries required under this section for 18 months, and shall provide the measurements and summaries in a report to Board staff as follows:
  - 1. Upon request of Board staff; or
  - 2. If a telephone utility fails to meet a service standard in this chapter for three consecutive months.
- (c) Each telephone utility shall report its performance in relation to these standards on a monthly average (arithmetic mean) basis.
- (d) For the purpose of reports submitted under this section, each telephone utility shall provide Statewide totals of its performance measurements relating to all quality service standards set forth at N.J.A.C. 14:10-1A.8.
- (e) In addition to the Statewide totals required under (d) above, each telephone utility shall sort and/or aggregate its performance measurements regarding the following service quality standards by the applicable reporting unit described below:
  - 1. The additional reporting unit for measurements relating to the standards for installation of service under N.J.A.C. 14:10-1A.8(b), and for trouble reports under N.J.A.C. 14:10-1A.8(e), shall be the geographic area for which a second level manager in charge of installation and maintenance is responsible. For the purpose of this section, a second level manager is a person supervising one or more first level managers, where first level managers are supervisors of crews actually performing work on a telephone plant;
  - 2. The additional reporting unit for measurements relating to the standards for operator handled calls at N.J.A.C. 14:10-1A.8(c)1 through 3 shall be the call center;
  - 3. The additional reporting unit for measurements relating to the standards for dial service at N.J.A.C. 14:10-1A.8(d) shall be the geographic area for which a second level manager in charge of switching is responsible; and
  - 4. The number of reporting units described in (e)1, 2, and 3 above shall be no less than three.
- (f) All reports submitted under this section shall set forth the following:
  - 1. Service quality standard being measured;
  - 2. Results of measurements, and summaries of the results; and

3. Months being reported on.

(g) If any service quality standard set forth in this subchapter has not been met, the report shall include, in addition to the information required in (f) above, the following information:

1. The cause of performance at the reported level;
2. If the standard not met involved an installation commitment or customer trouble report, the specific reporting units affected;
3. Corrective action taken by the utility; and
4. Completion date, or expected completion date, of the corrective action.

(h) Reports shall be submitted no later than 30 calendar days after the end of the third consecutive month of noncompliance, or 30 days after requested by Board staff, whichever comes first.