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MEMORANDUM RECEIVED

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FROM: Ernest G. Johnson
Director
Utilities Division

EA for EGT

2004 OCT 19 P 12:43

Arizona Corporation Commission

DOCKETED

OCT 19 2004

AZ CORP COMMISSION
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DATE: October 19, 2004

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RE: IN THE MATTER OF THE APPLICATION OF OCMC, INC. TO OBTAIN A CERTIFICATE OF CONVENIENCE AND NECESSITY FROM ONE CALL COMMUNICATIONS, INC. DBA OPTICOM TO PROVIDE TELECOMMUNICATIONS SERVICES AS A PROVIDER OF RESOLD INTEREXCHANGE SERVICES AND ALTERNATIVE OPERATOR SERVICES WITHIN THE STATE OF ARIZONA (DOCKET NOS. T-04103A-02-0274 AND T-02565A-02-0274)

INTRODUCTION

A Procedural Order issued on September 20, 2004, ordered OCMC, Inc. ("OCMC") to file written responses to certain Staff data requests and provide any statistical data relating to OCMC's zero-minus call processing times which could provide a basis for comparison to the statistical information provided by Qwest Corporation ("Qwest"). OCMC filed its response on October 4, 2004 (Attachment A). Staff was ordered to file a responsive memorandum by October 19, 2004, comparing the data provided by OCMC with the data previously provided by Qwest and Staff's recommendation with regards to OCMC's zero-minus waiver request.

On September 22, 2004, Staff sent its second set of data requests to Qwest in the above referenced matter. On October 7, 2004, Staff received Qwest's responses (Attachment B). Staff asked several follow-up questions to clarify the statistical data included in Qwest's responses to Staff's first set of data requests.

COMPARATIVE ANALYSIS

The following table compares the call data OCMC's reported in Attachment A with the data previously provided by Qwest. The notes below the table include clarifying information provided by Qwest in Attachment B.

Call Processing Times (in seconds)	OCMC	Qwest
After being connected to the automated operator the average/typical time reported for the caller to be connected with a live operator (see note #1)	10	7.9 - 9.6
After being connected with the live operator the average/typical time reported for the caller to be connected with an emergency service provider (see note #2)	44.6	25
The total average call processing time reported (see note #3)	54.6	32.9 - 34.6

Notes:

- 1) OCMC reported that its average time is approximately 10 seconds. OCMC reported that it does not maintain an exact average for this segment of the call. Qwest reported that its monthly call processing times above include alternatively billed calls requiring operator assistance (calling card, collect, bill to a third number) and general assistance calls such as emergency assistance, dialing instructions, time of day, etc.
- 2) OCMC and Qwest both reported statistics for this segment of the call that included other call types. OCMC reported data for August 2003 through August 2004 that included zero-minus calls plus zero-plus calls, such as collect, billed to third party, calling card and travel card calls. OCMC reported an average operator work time of 44.6 seconds for all these call types. Qwest reported that its average operator work time of 25 seconds included not only zero-minus emergency calls but also included alternatively billed calls¹ requiring operator assistance such as dialing instructions, time of day, etc.
- 3) Staff's calculated total average call processing time for call types included in the data reported.

TEST CALLS REPORTED BY OCMC

OCMC reported that it had conducted a limited number of zero-minus test calls of its operators and those of Qwest. These tests were apparently aimed at measuring the operator work times for OCMC and Qwest so that a comparison could be made. Test call results reported for the OCMC operators ranged from approximately 24 seconds to approximately 55 seconds. The test call results reported for Qwest were longer, ranging from 51 to 63 seconds.² OCMC indicated that it would "assist Staff in making a full and accurate comparison" if Staff wanted to conduct its own test calls. Staff does not have the resources that would be needed to conduct the extensive number of test calls needed for a fair and accurate comparison. While Staff is not opposed to OCMC conducting additional test calls, at this point, it is not clear to Staff these test call results would necessary be more conclusive or reliable than the results reported in the table above.

CONCLUSIONS AND RECOMMENDATION

In the Procedural Order issued on September 20, 2004, OCMC was ordered to provide statistical data which could provide a basis for comparison to the statistical information provided by Qwest. OCMC indicated that it does not maintain statistical data for the call segment prior to being connected with a live operator. However, OCMC did report an average operator work time of 44.6 seconds that included not only zero-minus calls but also included zero-plus calls, such as collect, billed to third party, calling card and travel card calls. Qwest clarified that its average operator work time of 25 seconds included not only zero-minus emergency calls but also included alternatively billed calls requiring operator assistance such as dialing instructions, time of day, etc. Staff concludes that the call processing times presented above for OCMC and Qwest

¹ Staff believes that Qwest's reference to alternatively billed calls includes zero-plus calls that require live operator intervention.

² OCMC did not submit any data in support of its test call results, such as how the tests were conducted and timed, when the test calls were made, how many test calls were made, what specific types of zero-minus test calls were made, etc. Staff would need to know this information to determine if the results presented were reliable, accurate and fair.

represent a reasonable comparison and represent on average the time it takes each company to handle calls that reach a live operator. Staff recognizes that a more conclusive comparison could be made if separate statistical data for the processing of zero-minus emergency calls were available, unfortunately neither OCMC nor Qwest track this data.

As depicted in the table above, the call processing times reported by Qwest are shorter than the times reported by OCMC. Therefore, Staff cannot conclude that the requirement of AAC R14-2-1006B has been met. Staff recommends that the waiver requested by OCMC be denied.

Originator: Del Smith

Attachments: Original and thirteen copies

SERVICE LIST FOR: OCMC, INC. AND ONE CALL COMMUNICATIONS, INC. DBA
OPTICOM
DOCKET NOS. T-04103A-02-0274 AND T-02565A-02-0274

Mr. Thomas Campbell, Esq.
Mr. Michael Hallam, Esq.
40 North Central Avenue
Phoenix, Arizona 85004
Attorney for OCMC, Inc.

Ms. Anne C. Bernard
General Counsel
One Call Communications, Inc. d/b/a Opticom
801 Congressional Boulevard
Carmel, Indiana 46032

Ms. Laura Clore
Regulatory Manager
One Call Communications, Inc. d/b/a Opticom
801 Congressional Boulevard
Carmel, Indiana 46032

Mr. Ernest G. Johnson, Esq.
Arizona Corporation Commission
Director, Utilities Division
1200 West Washington
Phoenix, Arizona 85007

Mr. Christopher C. Kempley, Esq.
Arizona Corporation Commission
Chief Counsel, Legal Division
1200 West Washington
Phoenix, Arizona 85007

Ms. Lyn Farmer, Esq.
Arizona Corporation Commission
Chief Administrative Law Judge, Hearing Division
1200 West Washington
Phoenix, Arizona 85007