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MEMORANDUM

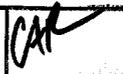
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TO: Docket Control
FROM: Ernest G. Johnson
Director
Utilities Division
DATE: October 20, 2004

EA for EGT

Arizona Corporation Commission
DOCKETED

OCT 20 2004

DOCKETED BY 

RE: **AMENDMENT TO 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)**

Staff inadvertently omitted the intended attachments to the memo previously filed on Tuesday, October 19, 2004, in this case. Please affix the Attachments "A" and "B" from this filing to the back of the original October 19, 2004 filing.

Originator: Del Smith

Attachments: Original and thirteen copies

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DOCUMENT CONTROL

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SERVICE LIST FOR: OCMC, INC. AND ONE CALL COMMUNICATIONS, INC. DBA
OPTICOM

DOCKET NOS. T-04103A-02-0274 AND T-02565A-02-0274

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Mr. Michael Hallo, Esq.
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Phoenix, Arizona 85004
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Our File Number 39888-00001

October 4, 2004

VIA HAND DELIVERY

Timothy J. Sabo
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Del Smith ✓
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

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OCT 04 2004

AZ Corporation Commission
Director Of Utilities

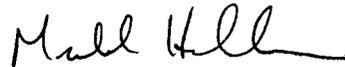
Re: In the Matter of the Application of OCMC, Inc.
Docket Nos. T-04103A-02-0274; T-02565A-02-0274

Dear Tim and Del:

Enclosed are OCMC's supplemental responses to Data Requests 2-3, 2-4, and 2-5 in response to the Procedural Order dated September 20, 2004.

If you have any questions or require additional information, please contact me at (602) 262-5340.

Very truly yours,



Michael T. Hallam

MTH/jw
Enclosures

cc: Ann Bernard (with enclosures)

SPECIFIC RESPONSES TO DATA REQUESTS

DWS 2-3 Describe the call processing sequence that occurs from the time the caller has dialed zero to the time the caller is connected with a live operator. What is the average/typical call processing time (in seconds) for this segment of a zero-minus call?

Response: As provided in the original response, within one (1) second of reaching the switch, the caller reaches the automated operator. A menu of services is played including pressing 0 for the live operator. If, at anytime, the caller presses 0, they are connected with a live operator. The average time is approximately 10 seconds (if the caller takes no action, the caller will be prompted to press zero at approximately 20 seconds), and most calls are less than ten seconds. OCMC does not maintain an exact average for this segment of the call, but given the times stated above, submits that its call processing times for this segment of the call meet or exceed Qwest's processing times.

DWS 2-4 Describe the call processing sequence that occurs from the time the live operator has been connected with the caller to the time the caller is connected with the emergency service provider. What is the average/typical call processing time (in seconds) for this segment of a zero-minus emergency call (including operator average work time)?

Response: Attached as Exhibit 1 is a bar chart showing data from August 2003 through August 2004. Based on data from this time period, the average total processing time for OCMC's operators is 44.6 seconds. By way of explanation, this data is based on statistical data that OCMC receives from its switches each day, which is then compiled into a monthly report. This data, however, is not limited to zero minus calls. Rather, it includes 0+ calls, such as collect, billed to third party, calling card and travel card calls. It also includes 0- and emergency calls. Additionally, it includes requests for rates, 211 requests for refunds, and directory assistance. As with most providers, all operators handle all call types.

It is important to note that rate requests, 211 and director assistance take longer to complete because of the data requested (such as name, address, where are you calling). This average also includes collect calls, which includes the time that the operator dials out to the called party and receives acceptance or denial of the call. Further, it is OCMC's policy to allow three attempts at trying to complete a call, which it does as a courtesy to its customers. This additional time can be significant if a credit card or calling call is blocked, at which time the OCMC operator would allow the caller to try to call collect or would let the caller make another call to another party. Because all of these items are included in the average stated above, the average time for zero minus emergency calls is necessarily less.

OCMC also tracks average times for individual operators (which are compiled to make the statistics provided in Exhibit 1). OCMC is concerned when an operator's time for all call types is below 40 seconds. This is because it might be caused by an operator

speaking too fast or not providing additional billing options. Accordingly, because speed is not paramount in non-emergency situations, the times for those calls are necessarily longer, making the average stated above higher.

As part of this process, OCMC conducted a limited number of zero minus test calls of its operators. These tests calls showed call processing times for this segment of the call ranging from approximately 24 seconds to approximately 55 seconds. OCMC believes that these call processing times are within industry standards based on its experience of completing zero minus calls for more than ten years in approximately 30 states.

OCMC has conferred with Qwest on how it arrived at its times and Qwest has indicated that its times were derived from switch data. If this data is raw switch data, it would necessarily include auto and incomplete calls which would reduce the times. As stated above, OCMC's data is based upon live calls only.

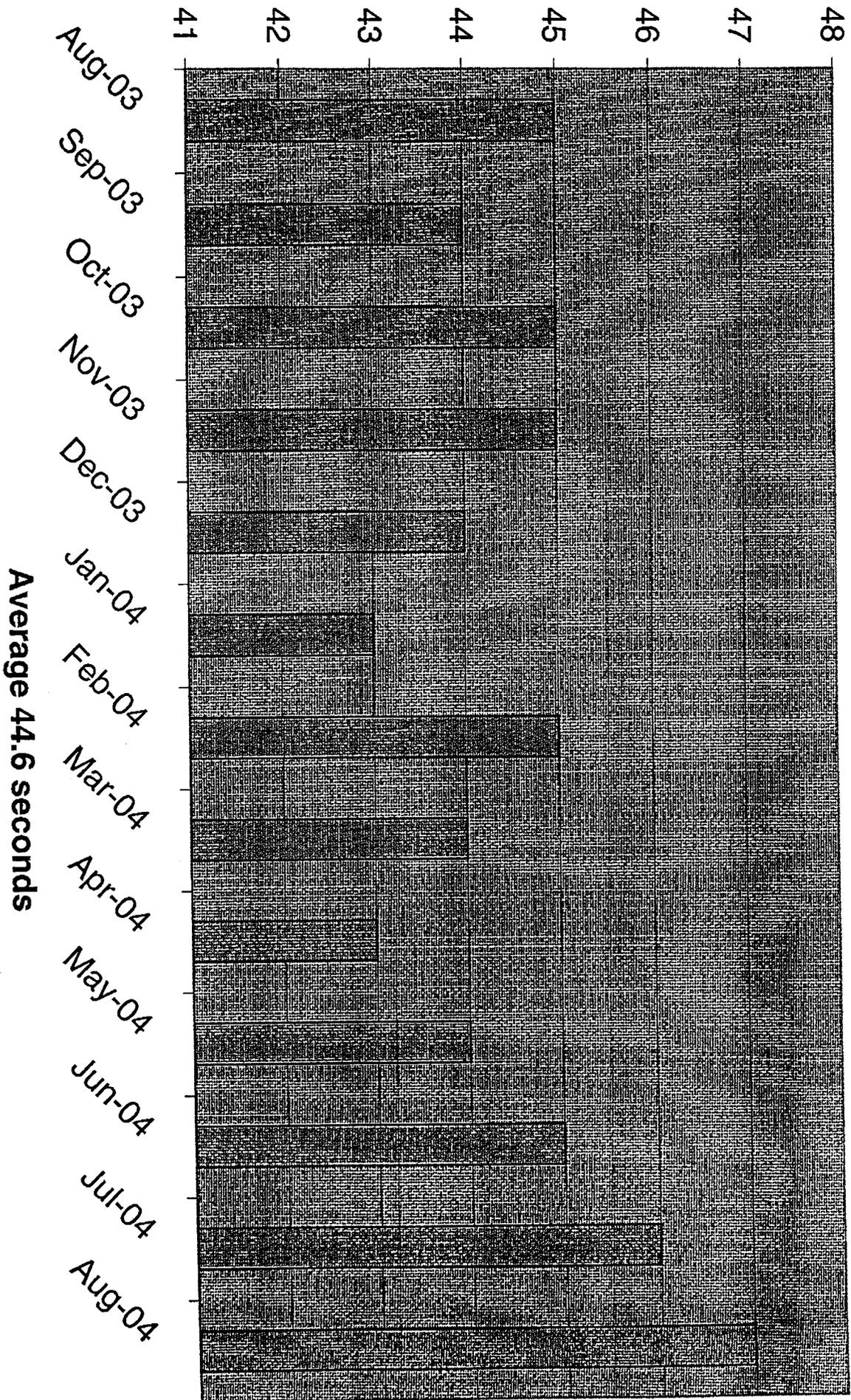
OCMC also conducted a limited number of test calls of Qwest's zero minus call processing. These test calls showed processing time for this segment of the call ranging from 51 seconds to 63 seconds. OCMC would welcome the opportunity to allow Staff to conduct test calls of OCMC's zero minus call completion capabilities and to facilitate test calls of Qwest's zero minus call completion system to assist Staff in making a full and accurate comparison.

DWS 2-5 What is the operator average work time (in seconds) for a zero-minus emergency call?

Response: The times set forth above in Exhibit 1 include operator average work time. As stated in its previous answer, OCMC does not maintain average work times specific to zero-minus emergency calls.

EXHIBIT 1

Operator Average Work Time (sec)



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OCT 07 2004



AZ Corporation Commission
Director Of Utilities

Qwest Corporation
Law Department
1801 California Street
49th Floor
Denver, CO 80202

Kathy Rowley
Interrogatory Manager

October 6, 2004

VIA OVERNIGHT DELIVERY

Timothy J. Sabo
Attorney, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

RE: Staff's **Second** Set of Data Requests to Qwest Corporation
Application to transfer the existing CC&N of One Call Communications, Inc.
d/b/a Opticom to OCMC, Inc.
Docket No. T-04103A-02-0274 and T-02565A-02-0274

Dear Mr. Sabo:

Enclosed please find Qwest Corporation's Responses to the following, in the above-referenced matter:

Staff Set 2 (Nos. 001-005)

Should you have any questions, you may contact me at (303) 383-6679.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Rowley". The signature is written in a cursive, flowing style.

Kathy Rowley

Enclosures

cc: Norm Curtright, Esq.
Tim Berg, Esq.
Monica Luckritz
Del W. Smith

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 02-001

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 001

With regard to your response to DWS 1-2: List the types of calls included in the actual monthly call processing time of 7.92 to 9.64 seconds (i.e., zero-minus, zero-minus emergency, other)?

RESPONSE:

The type of calls included in the actual monthly call processing time of 7.92 and 9.64 seconds are alternately billed calls requiring operator assistance (calling card, collect, bill to a third number) and general assistance such as emergency assistance, dialing instructions, time of day, etc.

Respondent: Judy Lee

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 02-002

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 002

With regard to your response to DWS 1-3: List the types of calls included in the average work time of 25 seconds (i.e., zero-minus, zero-minus emergency, all live operator assist calls)?

RESPONSE:

The types of calls included in the average work time of 25 seconds are alternately billed calls requiring operator assistance such as emergency assistance, dialing instructions, time of day, etc.

Respondent: Judy Lee

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 02-003

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 003

With regard to your response to DWS 1-3: Is the 25 seconds based on actual operator average work time results for the 2003 through June 2004 time period? If the answer is no, please explain.

RESPONSE:

Yes

Respondent: Judy Lee

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 02-004

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 004

With regard to your response to DWS 1-3: Does the Qwest operator instruct or suggest that the caller dial 911 once it is determined that an emergency exists? If so, please provide the script the operator uses and explain how the caller ultimately gets connected to the appropriate PSAP.

RESPONSE:

The Qwest operator **does not** instruct or suggest that the caller dial 911 once it is determined that an emergency exists if it is a landline customer. The Qwest operator may suggest to a customer calling from a cellular phone to hang up and dial 911 to ensure that they are connected to the closest emergency center based on the caller's present locality.

Respondent: Judy Lee

Arizona
T-04103A-02-0274 and T-02565A-02-0274
STF 02-005

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 005

With regard to your response to DWS 1-5: Does the number of emergency calls processed (1,828 in 2003 and 1,259 YTD 2004) include calls where the caller hangs up after being instructed by the operator to dial 911? If so, how many of these redirected 911 calls were included in the 2003/2004 call data reported above?

RESPONSE:

No

Respondent: Judy Lee