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BEFORE THE ARIZONA CORPORATION COMMISSION

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3 JEFF HATCH-MILLER
4 Chairman
5 WILLIAM A. MUNDELL
6 Commissioner
7 MARC SPITZER
8 Commissioner
9 MIKE GLEASON
10 Commissioner
11 KRISTIN K. MAYES
12 Commissioner

AZ CORP COMMISSION
DOCUMENT CONTROL

9 In the Matter of the Application of OCMC,)
10 Inc. to Obtain a Certificate of Convenience) Docket No. T-04103A-02-0274
11 and Necessity From One Call)
12 Communications, Inc. d/b/a Opticom to) Docket No. T-02565A-02-0274
13 Provide Telecommunications Services as a)
14 Provider of Resold Interexchange Services)
15 and Alternative Operator Services Within)
16 the State of Arizona)
17)

16 **NOTICE OF FILING DIRECT TESTIMONY**
17 **OF DAVID HILL ON BEHALF OF**
18 **OCMC, INC.**

18 Notice is given that OCMC, Inc. is filing the direct testimony of David Hill in the
19 above-captioned docket.

20 DATED this 27th day of July, 2005.

21 LEWIS AND ROCA LLP

22

23 Thomas H. Campbell
24 Michael T. Hallam
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26 Phoenix, Arizona 85004
Attorneys for OCMC, Inc.

1 ORIGINAL and fifteen (15) copies
2 of the foregoing filed this 27th day of
3 July, 2005, with:

4 The Arizona Corporation Commission
5 Utilities Division – Docket Control
6 1200 W. Washington Street
7 Phoenix, Arizona 85007

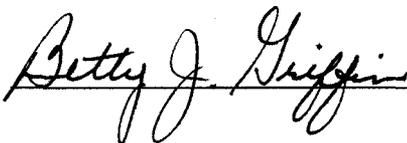
8 COPIES of the foregoing
9 hand-delivered this 27th day of
10 July, 2005, to:

11 Dwight Nodes, Assistant Chief Administrative Law Judge
12 Hearing Division
13 Arizona Corporation Commission
14 1200 W. Washington Street
15 Phoenix, Arizona 85007

16 Tim Sabo, Legal Division
17 Arizona Corporation Commission
18 1200 W. Washington Street
19 Phoenix, Arizona 85007

20 Del Smith,
21 Utilities Division
22 Arizona Corporation Commission
23 1200 W. Washington Street
24 Phoenix, Arizona 85007

25 Ernest G. Johnson, Director
26 Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007



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BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MARC SPITZER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner

In the Matter of the Application of OCMC,)
Inc. to Obtain a Certificate of Convenience) Docket No. T-04103A-02-0274
and Necessity From One Call)
Communications, Inc. d/b/a Opticom to) Docket No. T-02565A-02-0274
Provide Telecommunications Services as a)
Provider of Resold Interexchange Services)
and Alternative Operator Services Within)
the State of Arizona)

DIRECT TESTIMONY OF DAVID HILL
ON BEHALF OF OCMC, INC.

Dated: July 27, 2005

Direct Testimony of David Hill
OCMC, Inc.

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Q. Please state you name and business address for the record.

A. My name is David Hill. My business address is 801 Congressional Boulevard, Carmel, Indiana 46032.

Q. What is your job title and job description with OCMC? For how long have you been in that position?

A. I am the Director of Technical Operations for OCMC. My job responsibilities include overseeing operator services for OCMC's three call centers, providing dialogue for OCMC's operators, developing scripts for zero-minus emergency calls and operator assisted calls, addressing technical-related issues for OCMC's system, performing network troubleshooting and assisting payphone owners with technical programming of their payphones. Additionally, I assist with phone system dialers (i.e., the programming of hotel/motel telephone systems) and procedures. I have held this position with OCMC (formerly One Call Communications) for 13 years.

Q. What are your qualifications?

A. I have a bachelor's degree in business administration and four years of telecommunications experience with the United States Navy. I also have 16 years of experience with OCMC (formerly One Call Communications). This experience includes direct involvement with OCMC's call center operations for more than 15 years, as well as direct involvement with networking, switching, and the programming of payphone software, hardware and other aspects of the telecommunications systems used by OCMC.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to support OCMC's request for a permanent waiver of AAC R14-2-1006.A. so that OCMC may continue to process zero minus traffic in Arizona.

Q. Please describe what is meant by a zero minus call.

A. A zero minus call occurs when a caller dials zero and reaches an operator for completion of the call. Not all zero minus calls are emergency calls. In fact, most zero minus calls are not emergency calls. Other types of zero

Direct Testimony of David Hill
OCMC, Inc.

1 minus calls include collect calls, calling card calls, credit card calls, travel
2 cards, and third-party billing calls.

3 **Q. In how many states does OCMC complete zero minus emergency calls?**

4 A. OCMC currently completes zero minus emergency calls in thirty states.

5 **Q. For how many years has OCMC completed zero minus emergency**
6 **calls?**

7 A. Approximately 14 years--OCMC (formerly One Call Communications)
8 began completing zero minus calls in 1991.

9 **Q. What type of customers use OCMC's zero minus service in Arizona?**

10 A. A large majority of customers of zero minus service are payphone users.
11 Most other customers of zero minus service are guests of hotels and motels
12 (i.e., hospitality).

13 **Q. Please describe the facilities that OCMC uses for zero minus call**
14 **completion.**

15 A. OCMC uses three operator call centers—two in the Dominican Republic
16 (Santa Domingo and Hainamosa) and one in Carmel, Indiana. OCMC has
17 approximately 140 total operators that staff these call centers. OCMC uses
18 state-of-the-art switching and networking equipment, which it continues to
19 update so that it meets or exceeds industry standards.

20 **Q. Please describe the process that occurs for a zero minus emergency call?**

21 A. The following is a description of OCMC's processing of zero minus
22 emergency calls. First, the caller would dial zero. Upon dialing zero, the
23 caller reaches the OCMC automated operator. The automated operator gives
24 instructions to the caller to dial zero for operator assistance. At that point,
25 the call will roll over to a live operator.

26 Upon hearing that the caller has an emergency, the operator will
immediately instruct the caller to hang up and dial 911. If the caller
indicates that 911 was not available or dialing 911 did not work for any
reason, the operator will listen to the caller's request, and will connect the
caller to the emergency agency requested. Operators are trained not to

Direct Testimony of David Hill
OCMC, Inc.

1 question the sincerity of an emergency and to connect the caller immediately
2 to the appropriate emergency agency.

3 **Q. What type of training is provided to call center operators?**

4 A. All operators received one week of introductory training, which includes
5 detailed information and step-by-step instructions regarding the handling of
6 zero-minus emergency calls and other zero minus calls. At the end of the
7 training, operators must complete and pass a written test. In addition, once
8 an operator is employed, OCMC continues to monitor the operator's
9 performance. When we find an operator that is not processing calls as fast
as expected, these individuals are pulled off-line, and we conduct special
training until they are able to meet our expectations.

10 **Q. Are you familiar with the Staff Report dated August 23, 2004 in this
11 matter?**

12 A. Yes.

13 **Q. On Page 3 of that Staff Report, do you concur with Staff's conclusion
14 that "OCMC has the capability to process zero minus calls at a level of
accuracy and reliability that is equal to that provided by Qwest"?**

15 A. Yes. I agree with that conclusion.

16 **Q. Please explain the processes that OCMC uses to ensure that zero minus
17 calls are processed accurately.**

18 A. As stated previously, upon dialing zero, a caller reaches the OCMC
19 automated operator. The automated operator gives instructions to the caller
20 to dial zero for operator assistance. At that point, the call will roll over to a
21 live operator. Upon hearing that the caller has an emergency, the operator
22 will immediately instruct the caller to hang up and dial 911. If the caller
23 indicates that 911 was not available or dialing 911 did not work for any
24 reason, the operator will listen to the caller's request, and will connect the
25 caller to the emergency agency requested. Operators are trained not to
26 question the sincerity of an emergency and to connect the caller immediately
to the appropriate emergency agency. The operator remains on the line until
the call is completed, making sure that he or she is available for any other
questions with regard to the caller's origination or the caller's address or
phone number.

Direct Testimony of David Hill
OCMC, Inc.

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Q. Please describe the databases that operators use to identify the appropriate agency to which a caller should be connected and to identify the location of the caller. How are these updated?

A. First, the payphone owner who submits the payphone for service must include all emergency telephone numbers. Also, by contract, the payphone owner who is local and who pays the location or site a commission, is obligated to provide correct information. Additionally, OCMC has a database which it checks for correct information. OCMC also calls the emergency numbers and verifies the information in the database. With nationwide 911 coverage, however, emergency numbers do not change very often. At most, new lines or rollover lines are added.

Q. Have you also reviewed the chart on page 7 of Decision No. 67444 that compares OCMC's and Qwest's call processing times?

A. Yes, I have.

Q. Does OCMC maintain records that track specific times for zero minus emergency calls?

A. No.

Q. Why is that?

A. OCMC does not separate the zero-minus emergency calls from our regular operator assisted calls. We measure and track the speed for all calls as a whole. The times reported to Staff includes zero minus calls and zero plus calls, such as collect, billed to third party, calling card, and travel card calls. The times reported also include requests for rates, 211 requests for refunds, and directory assistance.

OCMC fully recognizes that timing and speed is very important for our zero-minus emergency calls, as well as for all operator assisted calls. As discussed previously, OCMC keeps averages as a whole for our operators. When we discover that an operator is not processing calls as fast as expected, these individuals are taken off-line and receive special training until they are able to meet our expectations.

1 **Q. Are you familiar with Qwest's processing of zero minus calls? How**
2 **have you gained this familiarity?**

3 A. Yes, I am familiar with Qwest's processing of zero minus calls. Over the
4 years, I have periodically called most carriers to see how each handles its
5 call flow and operator scripts. In the case of Qwest, at the time of the
6 hearing held in September 2004, I made more than thirty calls over a four
7 day period. I timed all calls in the same manner and made notes regarding
8 call scripts and options offered.

9 **Q. Is it common for providers to conduct test calls? Why is that?**

10 A. Absolutely, it is common. OCMC conducts test calls for a number of reasons.
11 We use test calls to evaluate and measure the quality of our operators. We
12 want to make sure that our operators are completing calls in a professional
13 and timely manner. More importantly, we use test calls to ensure calls are
14 being completed within industry standards.

15 We also make test calls to see what our competition is doing. Our customers
16 often tell us that another carrier is offering something different, so we make
17 test calls to confirm. We also make test calls to check rates and to check the
18 rates of our competitors. Finally, our customers make regular test calls of
19 OCMC to make sure that we perform as contracted.

20 **Q. Please again describe what occurs from the time an OCMC customer**
21 **has dialed zero until connected to a live operator?**

22 A. Upon dialing zero, a caller reaches the OCMC automated operator. The
23 automated operator gives instructions to the caller to dial zero for operator
24 assistance. At that point, the call will roll over to a live operator.

25 **Q. In Decision No. 67444, do you see the time stated by Qwest for this**
26 **segment of the call? What is that time? How does OCMC compare to**
this average time?

A. Qwest indicates that its time for this segment is between 7.9-9.6 seconds.
OCMC's average time is approximately 10 seconds.

In test calls that I have conducted for Qwest, Qwest regularly exceeded 9.6
seconds for this segment of the call. My experience with Qwest's system is
that after dialing zero, the Qwest automated operator asks that you select 1

Direct Testimony of David Hill
OCMC, Inc.

1 for English or 2 for Spanish. After you select 1 for English (or 2 for
2 Spanish), the automated operator gives you a prompt to enter the destination
3 number. After you enter the destination number, followed by a pound sign,
4 it will list other call options. At the end of that prompt, the caller has the
5 option to dial zero for a live operator. Given that OCMC's automated
6 operator script instructs the caller to dial zero within seconds of starting and
7 given that OCMC uses state-of-the-art systems, OCMC compares favorably
8 to Qwest for this segment of the call.

9 **Q. Please again describe what occurs from the time the caller has reached**
10 **the live operator to the time the caller is connected to the emergency**
11 **service provider?**

12 A. When the call reaches the live operator, OCMC operators ask: "How may I
13 assist you?" Upon hearing that the caller has an emergency, the operator
14 will immediately instruct the caller to hang up and dial 911. If the caller
15 indicates that 911 was not available or dialing 911 did not work for any
16 reason, the operator will listen to the caller's request, and will connect the
17 caller to the emergency agency requested. Operators are trained not to
18 question the sincerity of an emergency and to connect the caller immediately
19 to the appropriate emergency agency. The operator remains on the line until
20 the call is completed, making sure that he or she is available for any other
21 questions with regard to the caller's origination or the caller's address or
22 phone number.

23 **Q. In Decision No. 67444, do you see the time stated by Qwest for this**
24 **segment of the call? What is that time?**

25 A. Yes. Qwest's time is 25 seconds and OCMC's time is 44.6 seconds.

26 **Q. Based on test calls of Qwest that you have conducted, what is your**
understanding of how Qwest's operators process this segment of the
call?

A. Based on test calls I have conducted, my experience with Qwest's processing
of zero minus calls is as follows. First, the operator questions the caller as to
whether the call is an emergency. If it is, the operator asks the nature of the
emergency. The operator then indicates that the caller may want to use 911.
If the caller does not wish to use 911 (or cannot use it), the operator will then
process the call.

Direct Testimony of David Hill
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1 **Q. Please describe the time provided by OCMC for this segment of the call.**

2 A. As discussed above, the times provided by OCMC include zero minus calls
3 and zero plus calls, such as collect, billed to third party, calling card and
4 travel card calls. Additionally, this time also includes requests for rates, 211
5 requests for refunds, and directory assistance. It is very important to note
6 that rate requests, 211 and director assistance calls take longer to complete
7 because of the amount of data requested. The average also includes collect
8 calls, which includes the time that the operator dials out to the called party
9 and receives acceptance or denial of the call. Further, it is OCMC's policy
10 to allow, as a courtesy, three attempts to complete a call. This additional
11 time can be significant if a credit card or calling call is blocked, at which
12 time the OCMC operator would allow the caller to try to call collect or
13 would let the caller make another call to another party. Because all of these
14 call types are included in the average stated above, the average time for zero
15 minus emergency calls is necessarily less.

16 It is important to note that OCMC becomes concerned when an operator's
17 time for all call types is less than 40 seconds. This is because it might be
18 caused by an operator speaking too fast or not providing additional billing
19 options. Accordingly, because speed is not paramount in non-emergency
20 situations, the times for those calls are necessarily longer, making the
21 average stated above higher.

22 For zero minus emergency calls, this segment of the call can vary based on
23 the time it takes the caller to explain the nature of the emergency and the
24 time it takes the emergency agency to answer. There is an appropriate
25 balancing that must take place between speed and accuracy.

26 Based on OCMC's experience in this industry for more than 10 years, it is
our belief that our call processing for zero minus emergency calls is as quick
as is prudent to maintain accuracy for those calls.

Q. Does OCMC complete zero minus calls in Arizona outside of Qwest's service territory?

A. Yes. Attached as Exhibit DH-1 is a list of other LEC territories in which OCMC completes zero minus calls and the number of payphone or hospitality customers in the territory.

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OCMC, Inc.

1 **Q. Why did OCMC not provide comparisons to other LECs?**

2 A. Qwest is the largest and predominant service provider in the state and the
3 great majority of OCMC's zero minus service is within Qwest's service
4 territory. OCMC believes that a comparison with Qwest also provides a fair
5 comparison to other LECs in the state.

6 **Q. Are you aware of any complaints being filed in relation to OCMC's zero
7 minus service in Arizona?**

8 A. No.

9 **Q. Given the type of customer that uses the zero minus service above,
10 would you expect complaints to be filed if there were an issue relating to
11 OCMC's zero minus service?**

12 A. Yes. If a customer had an issue with an emergency call, I would expect the
13 customer to complain to the Arizona Corporation Commission.

14 **Q. Does this conclude your testimony?**

15 A. Yes, it does.
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Direct Testimony of David Hill
OCMC, Inc.

Exhibit DLH-1

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1. SAN CARLOS APACHE (1)
2. ARIZONA TELEPHONE COMPANY (4)
3. FRONTIER UTILITIES RURAL (14)
4. SOUTHWESTERN TELEPHONE COMPANY (2)
5. CENTURYTEL OF SW AZ (3)
6. VALLEY TELEPHONE COOPERATIVE (4)
7. SOUTH CENTRAL UTAH TELEPHONE ASSN (1)
8. COPPER VALLEY TELEPHONE (2)
9. TABLE TOP TELEPHONE (2)
10. VERIZON CALIFORNIA-AZ (3)
11. FRONTIER WHITE MTNS (10)
12. FRONTIER NAVAJO COMM (23)