

March 31, 1992

ADJUSTMENTS TO PRICE CAP CARRIERS' SERVICE QUALITY AND
INFRASTRUCTURE REPORTS IN ARMIS

On May 17, 1991, the Common Carrier Bureau released its Memorandum Opinion and Order in CC Docket No. 87-313 establishing specific service quality and infrastructure reporting requirements for local exchange carriers (LECs) subject to price cap regulation. 6 FCC Rcd 2974 (Com.Car.Bur. 1991) (Service Quality Order). In that Order, we stated that it was our intent that consideration of reporting requirements would continue.

Having carefully reviewed the initial submissions of data and information in response to our reporting requirements, we have determined that some modifications to the Reports are needed. These modifications, described below, are to be effective beginning with the June 30, 1992, filing.

1. Installation Intervals

Attachment B of the Service Quality Order directed LECs to file their installation intervals with the Tariff Division. To centralize reporting and analysis functions, we have now determined that the installation interval file will be maintained in the Accounting and Audits Division, where hard and diskette copies of the reports are filed. Accordingly, carriers proposing installation interval changes should file these changes with the Accounting and Audits Division, not the Tariff Division, effective immediately.¹

Attachment B also imposed a 30-day waiting period on installation interval changes, when it stated: Should a LEC change any [installation] intervals, that LEC will file the new intervals, with an explanatory cover letter, no less than 30 days before the effectiveness of the change. 6 FCC Rcd at 3000. We have determined that, effective immediately, filings that decrease installation intervals should be allowed to be effective when filed, without a 30-day waiting period.

2. Roll-ups of reports

We have discussed informally with the carriers their filing all reports in a more aggregated, "rolled up" form, in addition to on a study area level. They have agreed to do so, and some carriers filed their December 31 reports with

¹ There has apparently been some confusion as to the frequency with which installation intervals must be filed. Interval reports must be filed only if intervals are changing; they need not be included, for example, with quarterly report filings.

roll-ups. Beginning with the June 30, 1992 filings, all three ARMIS reports in this program should include roll-ups. We believe this approach creates minimal burden for the carriers, and will reduce Commission staff burden and allow more ready access to these publicly available filings. OMB approval of this modification is being requested.

3. Multiple reports per diskette

The Service Quality Order required that carriers file all reports on a study area basis, in both hard copy and diskette. Most carriers have taken this to mean that each study area report must be filed on a separate diskette, but we find this practice unnecessary and wasteful. Accordingly, we notify the carriers that they may file the reports of multiple study areas on a single diskette if they so desire. The three reports -- 43.05, 43.06, and 43.07 -- should not, however, be combined.

4. Switch Downtime Reports

LECs currently file reports on switch downtime in Table IV and Table IVa of Report 43.05, identifying downtime as "scheduled" or "unscheduled." Lack of typographic uniformity in these two classifications has caused difficulty in using the database. Further, we have concluded it will be helpful and not burdensome to expand the usefulness of these reports by further characterizing each unscheduled downtime exceeding 2 minutes' duration. The following categories have been developed by Commission staff through discussions with industry and review of technical publications. LECs should use the two-digit code for each downtime cause to populate column t.

Classifications of Switch Downtime

- 01 -- scheduled - includes outages, restarts, phases, etc. resulting from scheduled or planned maintenance, installation, or manual initializations. This includes such activities as parameter loads, software/firmware changes, and other OA&M activities.
- 02 -- procedural errors - telco - installation or maintenance related
- 03 -- procedural errors - telco - non installation or maintenance related (deviation from established procedures, or human error within established procedures; includes failure to respond)
- 04 -- procedural errors - system vendors
includes errors in documentation/instruction
- 05 -- procedural errors - other vendors
e.g., contractor, independent installation vendor
- 06 -- software design
faulty or ineffective design, including faulty patches or software overrides provided by vendor
- 07 -- hardware design

design deficiency or error. Does not include Product Change Notice (PCN) inappropriately delayed by vendor (= procedural error vendor) or telco (= procedural error telco), or PCN waived by telco (= procedural error telco)

08 -- hardware failure
random hardware failure not related to design but due to inherent unreliability of system components

09 -- acts of God
weather, natural disaster (including lightning, but not if lightning's effect due to bonding or grounding violations; then = procedural error vendor or telco)

10 -- traffic overload
traffic load exceeds engineered capacity of system due to unforeseen external condition; not if due to system trouble, inadequate engineering, inadequate network management, system design deficiency

11 -- environmental
contamination, leaks, temperature, etc.

12 -- external power failure
use of this classification is rare because of existence of battery and other backup systems; does not include failures of converters, inverters internal to telco

13 -- massive line outage
cable cut, other

14 -- remote
loss of facilities between host and remote (if due to activities internal to host or remote; if external, assign other cause as appropriate -- e.g., cable dig-up = procedural telco or procedural other vendor)

15 -- other/unknown
must be footnoted; if unknown, so state

Thus, a carrier noting an unscheduled outage due to an external power failure would report simply "12." Footnotes may be used, as before, to give further details.

5. Data corrections

Commission staff and various users of the monitoring program data have experienced uncertainty regarding the reliability of some data, in view of multiple corrective filings by some carriers. We have accordingly determined to establish some guidelines for such filings, effective immediately, as follows:

a. Each corrective filing must be clearly labeled as to its place in the series. In the upper right corner is a submission number, and this number must

be filled in, with successive submissions numbered serially. All corrective filings must be filed, as initial filings are, in both paper and diskette, with the Accounting and Audits Division, the Industry Analysis Division, and Downtown Copy Center.

b. Carriers filing reports in ARMIS are under a legal obligation to assure that the reports are accurate and complete; we therefore do not discourage LECs from correcting these filings. We do, however, encourage them to finalize each report as rapidly as possible.

c. In every case, filing carriers should make every effort to assure that the report is complete before the filing of the next report in that series. The next-filed report must note the final submission number of the previous report. For example, Report 43.05 3Q 1991 might note: Report 43.05 2Q 1991 Final Submission was Number 4.

6. Definition of remote switch

Report 43-07 collects information on remote switches in both "total switching entities" (row 110) and "remotes" (row 114). These numbers are different, because row 114 lists only those remotes capable of stand-alone service. Remotes to be included in row 110 are those described in the general definition of remote:

A remote switching entity can generally be described as a switching entity that has no connection to the facilities network except through one other (host) switching entity, that shares the processing capabilities of another switching system for certain control functions under the direction of the host central processor, and that can be controlled remotely by the host over a pair of dedicated data links.

Service Quality Order, 6 FCC Rcd 2974 (Com.Car.Bur. 1991) at 3081. This definition applies to all remotes; it is used to include remotes in line 110 of Report 43-07, and it is used in Report 43-08. The narrower definition of stand-alone remotes used in row 114 is explained as follows:

However, row 0114 excludes separate reporting of remotes that are incapable of providing stand alone operation when the host switch fails. Only those remote switching entities that are equipped to operate in a stand alone fashion (i.e., able to operate when the host fails, or the data links to the host fail) to be able to provide more limited service, are to be reported on row 0114.

Id. These definitions are deliberately different, as the data are collected for different purposes.

These modifications of reporting requirements are effective as noted herein. Questions or comments should be directed to Jacqueline Spindler, Accounting and Audits Division, 2000 L St., Suite 812, Washington, DC 20554, telephone 202 634-1861.

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