



Public Service Commission of Wisconsin

Joseph P. Mettner, Chairman
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Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Re: 1998 Biennial Regulatory Review-
Review of ARMIS Reporting Requirements

File CC Docket No. 98-117

Dear Ms. Salas:

Enclosed are an original and six copies of the reply comments by the Public Service Commission of Wisconsin regarding the Federal Communications Commission's proposed modifications to Automated Reporting and Management Information System (ARMIS) reporting requirements.

Dated at Madison, Wisconsin SEPTEMBER 3, 1998

By the Commission:

 FOR LLD

Lynda L. Dorr
Secretary to the Commission

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Enclosures

cc: Anthony Dale, FCC
International Transcription Services

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Washington, D.C. 20554

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1998 Biennial Regulatory Review --) **CC Docket No. 98-117**
Review of ARMIS Reporting Requirements)

REPLY COMMENTS
OF THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

The Public Service Commission of Wisconsin (PSCW) supports the Federal Communication Commission's (FCC) initially proposed modifications to ARMIS reporting requirements. In initial comments, several parties proposed the elimination of much of the information currently reported in ARMIS. The PSCW opposes some of those proposals as discussed further below.

The PSCW opposes the elimination of the ARMIS 43-05 service quality and 43-07 infrastructure reports, as proposed by various commenters. In comments filed earlier this year in pending AAD file numbers 98-22 and 98-23, the PSCW supported most of the modifications to these reports as proposed by the FCC, and suggested several enhancements. These comments are attached for your convenience. The PSCW makes use of the data in these ARMIS reports to develop and monitor alternative forms of regulation for Wisconsin telecommunications utilities. Although Wisconsin is considering switching to standards based on Wisconsin-specific data, there is much added value in having standardized, national data, to reference incentive and penalty benchmarks for alternative regulation. Comparability between companies is restricted if such comparisons are limited to a single state.

ARMIS 43-05 Service Quality

Companies operating without restrictions on their earnings or fully effective competition may have an incentive to cut back on expenses, which in turn may impact service quality. The Commission has addressed several instances of service quality deterioration involving price regulated companies since 1995 when price regulation became an option for telecommunications utilities in Wisconsin. Close monitoring of service quality in the interest of consumer protection should remain one of the key duties of the FCC and state commissions. As such, sufficient reporting requirements need to be maintained.

Some may argue that Table II of the ARMIS 43-05 report should be eliminated because local service is outside of FCC jurisdiction and this report duplicates states' reporting requirements for service quality. The PSCW has developed four measurements for determining incentives and penalties for price regulated companies based on data from this table for all companies nationwide. The PSCW has avoided creating additional reporting requirements because of the existence of the ARMIS data.

If the FCC determines that the information in the ARMIS 43-05 report should be reduced, the PSCW recommends that, at a minimum, Table II of the ARMIS 43-05 report be retained.

ARMIS 43-07 Infrastructure Report

While the ARMIS 43-07 report may need updating, it still serves a valuable purpose to the PSCW. The PSCW develops price regulation incentive and penalty benchmarks for various technologies based on comparisons between Wisconsin companies and similar companies

nationwide. Especially useful to the PSCW are Tables I and II dealing with switching and transmission facilities.

As many commenters point out, much of the technology reported is reaching full deployment. As the PSCW pointed out in the attached comments submitted earlier this year, however, there are several emerging technologies, such as interoffice fiber, xDSL, and number portability, which could replace or supplement the older ones.

Summary

While there may be reason to streamline the ARMIS reports, the PSCW respectfully requests that, at a minimum, Table II of the 43-05 report and Tables I and II of the 43-07 report should be maintained at this time.

Dated at Madison, Wisconsin, SEPTEMBER 5, 1998

By the Commission:

 *LLD*

Lynda L. Dorr
Secretary to the Commission

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Attachments

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Proposed Modifications to ARMIS Service Quality)	AAD File No. 98-22
and Infrastructure Reporting Requirements)	AAD File No. 98-23

**COMMENTS OF THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

The Public Service Commission of Wisconsin (PSCW) supports the Federal Communication Commission's (FCC) proposed modifications to ARMIS service quality and infrastructure reporting requirements, with the exception of the proposal to eliminate call set-up time from the ARMIS 43-07 report. The PSCW makes much use of the ARMIS data to develop and monitor alternative forms of regulation for telecommunications utilities.

Facility Outage Reporting

One of the FCC's proposals is to add a table to report facility outages resulting in a threshold number of customers out of service for longer than 12 hours. The PSCW supports this proposal, and recommends that the threshold be set so that all outages which affect more than 5 percent of the subscribers served in a wire center be reported.

Call Set-up Time Reporting

With the advent of local competition, the rise of competitive local exchange carriers (CLEC), and local number portability, the PSCW believes that data on call set-up time should continue to be collected by the FCC. The PSCW recommends that Table III of the ARMIS 43-07 report be retained.

Additional Enhancements

In addition to the FCC's proposals, the PSCW suggests the following additional modifications to enhance the usefulness of these reports:

1. On line 134 of the ARMIS 43-05 service quality report, carriers report average installation interval. It is our understanding that this line represents the average interval for all orders, including "automatic" orders relating to primary interexchange carrier (PIC) changes, custom calling, and record-only orders. These types of orders require little effort to fulfill and dilute the overall average interval statistic. We suggest disaggregating the reported data to reflect two separate lines: one for access line orders, and one for PIC changes, custom calling, and record only orders. This would provide regulatory agencies with a more useful measure of responsiveness to service orders for those companies who are able to report this level of detail.
2. Add a statistic to measure average employee answer time for repair calls. This is an important quality statistic which measures how much time customers have to spend on hold, waiting for a company representative to address their concerns.
3. Add additional codes to Table IV-A of the ARMIS 43-05 report that designates the cause of switch downtime for signal system failure and local number portability failure.
4. Add statistics to the ARMIS 43-07 report to measure deployment of:
 - a. interoffice fiber
 - b. xDSL technology
 - c. number portability
 - d. total switches and percent of switches equipped with caller identification
 - e. total switches and percent of switches equipped with ISUP trunking

5. The PSCW encourages the FCC to develop a more user-friendly method of sharing the information over the internet. Presently, PSCW staff accesses the ARMIS data from an electronic bulletin board. Downloading all files for one year is now a time consuming process which involves searching lists of files, waiting for each of the condensed (zipped) files to download, unzipping the holding company condensed files into study area files, then devising a macro to extract the desired information from dozens of separate files. Enhancing the accessibility of this data will make it even more useful.

The Public Service Commission respectfully requests the FCC to consider these changes to improve the ARMIS reports.

Dated at Madison, Wisconsin, April 23, 1998

By the Commission:


Lynda L. Dorr
Secretary to the Commission