



CenturyLink™

RON L. TRULLINGER

February 10, 2012

Oregon Public Utility Commission  
Attn: Filing Center  
550 Capitol Street NE, Suite 215  
Salem, OR 97301-2551

RE: UM 1484 – Fourth Quarter 2011 Service Quality Report

Dear Commission:

Pursuant to Docket UM 1484, Order No. 11-095 (“Order”), CenturyLink provides the enclosed information in compliance with Condition No. 35 of the Order.

The first two quarterly reports submitted to the Oregon Public Utility Commission, on August 15, 2011 and November 8, 2011, showed a pre-merger vs. post-merger performance difference in the Average Provisioning Delay Days - UNE Loop POTS measurement for two consecutive quarters. CenturyLink performed a root cause analysis on the measurement and determined that the reason for the difference was that unbundled distribution sub-loops were erroneously counted with unbundled analog loops. Accordingly, CenturyLink corrected this problem and revised the pre-merger and post-merger comparisons in the 2Q11 and the 3Q11 reports. Therefore, accompanying this filing of the 4Q11 report, CenturyLink is also providing the corrected versions of the two prior quarterly reports.

In addition, in response to a Commission Staff request made during the January 10, 2012 workshop (UM 1542), CenturyLink added a new column titled,

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"2010 Average," to the current 4Q11 report and also to the corrected 2Q11 and 3Q11 reports. This new column displays for each measurement the annual average result for the pre-merger year. The "2010 Average" represents the calculation basis for the numbers in the "Comparison Threshold" column (which continues to be the next-to-last column on each report). Specifically, the "Comparison Threshold" is calculated by adding one standard deviation to the "2010 Average," consistent with in the FCC's Memorandum Opinion and Order 11-47, Section IV.B, Adopted March 18, 2011.

If you have any questions regarding this filing, please contact me.



Ron Trullinger  
State Regulatory Affairs Director

Enclosures

**FCC Docket No. 10-110 Order 11-47**  
**Section IV.B - Commitments Regarding Wholesale Operations**

**REVISED**

**Oregon Docket No. UM 1484 Condition 35 - Legacy Qwest**

FCC Merger Commitment Merger Measure	Description	PID	*	Product Category (see Notes for products, lines & intervals as applicable)	2010 Average	Comparison Threshold	2Q2011
Average response time to pre-order queries (in seconds)	The number of seconds from receipt of CLEC query to return of requested data.	PO-1A	↓	All	3	5	3
		PO-1X	↓	All	5	8	5
Percentage of electronically submitted resale and UNE orders	Percentage of electronically submitted resale and UNE orders confirmed within specified timeframes	PO-5B	↑	Resale	100%	100%	100%
				UNE Specials	98%	97%	98%
Missed appointments / Appointments met	Percent of orders completed in the reporting period on or before the application due date.	OP-3	↑	Resale	99%	87%	100%
				UNE Loop POTS	96%	93%	97%
Average provisioning delay days (in days)	Average number of business days service is delayed beyond Applicable Due Date for facility reasons.	OP-6B	↓	Resale		na	
				UNE Loop POTS	5	8	3
Provisioning - Percentage of installation troubles reported within 30 days	Percentage of inward line / circuit / trunk service orders that are free of repair trouble reports within 30 calendar days of installation completion.	OP-5A	↑	Resale	91%	67%	98%
				UNE Loop POTS	97%	95%	98%
				UNE Specials	96%	89%	96%
Repair/Maintenance - Network Trouble Report Rate (number per 100 lines or circuits in service)	Percentage of trouble reports to the total installed base of services or elements within a calendar month.	MR-8	↓	Resale	0.5	5.1	0.4
				UNE Loop POTS	0.3	0.7	0.3
Repair/Maintenance - Mean Time to Repair (in hours and minutes)	Time from receipt of trouble to time trouble report is cleared divided by total number of trouble reports closed in reporting period.	MR-6	↓	Resale	15:44	29:13	17:56
				UNE Loop POTS	8:46	12:59	8:36
Repair/Maintenance - Percentage of Repeat Reports within 30 Days	Percentage of repeated trouble reports received in 30 days of the initial report to the total number of trouble reports received in the period.	MR-7	↓	Resale	13%	35%	3%
				UNE Loop POTS	5%	16%	3%
				UNE Specials	13%	30%	11%
Carrier Service Center - Average Speed of Answer - Ordering	Timeliness of CLEC access to the Company's intercon-nection provisioning centers	OP-2	↑	All	87%	82%	96%
Carrier Service Center - Average Speed of Answer - Repair	Timeliness of CLEC access to the Company's intercon-nection repair centers.	MR-2	↑	All	82%	78%	89%

\* Comparison Threshold applies the provision of paragraph (or condition) number IV.B in the above-referenced FCC Order, which calls for the "benchmark value to be set at one standard deviation below the 12-month average..." Thus, the threshold consists of the 12-month average pre-merger 2010 performance level plus the one standard deviation.

\* ↑ = Higher is good ↓ = Lower is good *Blank cells indicate little or no activity*

Measures missing Comparison Threshold	1
Percent not missing Comparison Threshold	95%

**FCC Docket No. 10-110 Order 11-47**  
**Section IV.B - Commitments Regarding Wholesale Operations**

**REVISED**

**Oregon Docket No. UM 1484 Condition 35 - Legacy Qwest**

FCC Merger Commitment Merger Measure	Description	PID	*	Product Category (see Notes for products, lines & intervals as applicable)	2010 Average	Comparison Threshold	3Q2011
Average response time to pre-order queries (in seconds)	The number of seconds from receipt of CLEC query to return of requested data.	PO-1A	↓	All	3	5	2
		PO-1X	↓	All	5	8	4
Percentage of electronically submitted resale and UNE orders	Percentage of electronically submitted resale and UNE orders confirmed within specified timeframes	PO-5B	↑	Resale	100%	100%	100%
				UNE Specials	98%	97%	96%
Missed appointments / Appointments met	Percent of orders completed in the reporting period on or before the application due date.	OP-3	↑	Resale	99%	87%	100%
				UNE Loop POTS	96%	93%	96%
Average provisioning delay days (in days)	Average number of business days service is delayed beyond Applicable Due Date for facility reasons.	OP-6B	↓	Resale		na	
				UNE Loop POTS	5	8	7
Provisioning - Percentage of installation troubles reported within 30 days	Percentage of inward line / circuit / trunk service orders that are free of repair trouble reports within 30 calendar days of installation completion.	OP-5A	↑	Resale	91%	67%	94%
				UNE Loop POTS	97%	95%	96%
				UNE Specials	96%	89%	95%
Repair/Maintenance - Network Trouble Report Rate (number per 100 lines or circuits in service)	Percentage of trouble reports to the total installed base of services or elements within a calendar month.	MR-8	↓	Resale	0.5	5.1	0.4
				UNE Loop POTS	0.3	0.7	0.3
Repair/Maintenance - Mean Time to Repair (in hours and minutes)	Time from receipt of trouble to time trouble report is cleared divided by total number of trouble reports closed in reporting period.	MR-6	↓	Resale	15:44	29:13	20:04
				UNE Loop POTS	8:46	12:59	9:13
Repair/Maintenance - Percentage of Repeat Reports within 30 Days	Percentage of repeated trouble reports received in 30 days of the initial report to the total number of trouble reports received in the period.	MR-7	↓	Resale	13%	35%	3%
				UNE Loop POTS	5%	16%	3%
				UNE Specials	13%	30%	11%
Carrier Service Center - Average Speed of Answer - Ordering	Timeliness of CLEC access to the Company's intercon-nection provisioning centers	OP-2	↑	All	87%	82%	96%
Carrier Service Center - Average Speed of Answer - Repair	Timeliness of CLEC access to the Company's intercon-nection repair centers.	MR-2	↑	All	82%	78%	87%

\* ↑ = Higher is good ↓ = Lower is good *Blank cells indicate little or no activity*

<sup>1</sup>Comparison Threshold applies the provision of paragraph (or condition) number IV.B in the above-referenced FCC Order, which calls for the "benchmark value to be set at one standard deviation below the 12-month average..." Thus, the threshold consists of the 12-month average pre-merger 2010 performance level plus the one standard deviation.

Measures missing Comparison Threshold	1
Percent not missing Comparison Threshold	95%

**Oregon Docket No. UM 1484  
Condition 35 - Legacy Embarq**

		Category	Comparison Threshold	4Q2011
<b>OR</b>	<b>Average Response Time to Pre-Order Queries</b> (Reported in Seconds)		10.27	9.09
	<b>Average Completed Interval</b> (Reported in Days)	Resale	2.97	2.72
		UNE	7.96	3.14
		Other	6.54	-
	<b>Customer Trouble Report Rate</b> (Reported as a Percentage)	Resale	0.46%	0.00%
		UNE	2.10%	1.00%
		Other	0.00%	0.00%
	<b>Average Time to Restore</b> (Reported in Hours)	Resale	21.19	9.15
		UNE	16.99	13.33
		Other	-	-
	<b>Center Responsiveness</b> (Percentage)		91.44%	96.00%

Measures Missing Comparison Threshold      0  
Percent Not Missing Comparison Threshold      100%

**FCC Docket No. 10-110 Order 11-47**  
**Section IV.B - Commitments Regarding Wholesale Operations**

**Oregon Docket No. UM 1484 Condition 35 - Legacy Qwest**

FCC Merger Commitment Merger Measure	Description	PID	*	Product Category (see Notes for products, lines & intervals as applicable)	2010 Average	Comparison Threshold	4Q2011
Average response time to pre-order queries (in seconds)	The number of seconds from receipt of CLEC query to return of requested data.	PO-1A	↓	All	3	5	3
		PO-1X	↓	All	5	8	2
Percentage of electronically submitted resale and UNE orders	Percentage of electronically submitted resale and UNE orders confirmed within specified timeframes	PO-5B	↑	Resale	100%	100%	100%
				UNE Specials	98%	97%	98%
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				UNE Loop POTS	96%	93%	98%
Average provisioning delay days (in days)	Average number of business days service is delayed beyond Applicable Due Date for facility reasons.	OP-6B	↓	Resale		na	
				UNE Loop POTS	5	8	8
Provisioning - Percentage of installation troubles reported within 30 days	Percentage of inward line / circuit / trunk service orders that are free of repair trouble reports within 30 calendar days of installation completion.	OP-5A	↑	Resale	91%	67%	95%
				UNE Loop POTS	97%	95%	97%
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				UNE Loop POTS	0.3	0.7	0.3
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				UNE Loop POTS	5%	16%	5%
				UNE Specials	13%	30%	15%
Carrier Service Center - Average Speed of Answer - Ordering	Timeliness of CLEC access to the Company's intercon-nection provisioning centers	OP-2	↑	All	87%	82%	95%
Carrier Service Center - Average Speed of Answer - Repair	Timeliness of CLEC access to the Company's intercon-nection repair centers.	MR-2	↑	All	82%	78%	85%

\* ↑ = Higher is good ↓ = Lower is good *Blank cells indicate little or no activity*

<sup>1</sup> Comparison Threshold applies the provision of paragraph (or condition) number IV.B in the above-referenced FCC Order, which calls for the "benchmark value to be set at one standard deviation below the 12-month average..." Thus, the threshold consists of the 12-month average pre-merger 2010 performance level plus the one standard deviation.

Measures missing Comparison Threshold	1
Percent not missing Comparison Threshold	95%

**NOTES:**

Percentage of electronically submitted resale and UNE orders (PO-5B)	POTS/Pre-Qualified Complex		Special Services	
	The following products are reported above under these categories:		The following products are reported above under these categories:	
	Resale	UNE	Resale	UNE
1-10 lines	ISDN BRI <sup>Note A</sup>	24 Hours	24 hours	
1-19 lines	Centrex (non-Special) <sup>Note B</sup>			
1-24 loops	Res/Bus POTS	UBL - Analog		Sub-loops, DS3 Capable
1-39 lines	Centrex line feature changes			
All		48 hours	48 hours	
1-3 ckts	UBL DS3		ISDN PRI	
1-10 lines	ISDN BRI <sup>Note C</sup>		DS0 or Voice Grade Equivalent	
1-24 trunks	PBX		DS1 Facility, DS3 Facility	EEL-DS1 <sup>Note D</sup>
1-24 ckts				

Note D Included in Product Reporting Group (b)

Note A	ISDN BRI - Conversion as is - Adding/Changing features - Add primary directory listing - Add call appearance
Note B	No Common Block configuration
Note C	ISDN BRI - New installs - Address changes - Change to add Loop

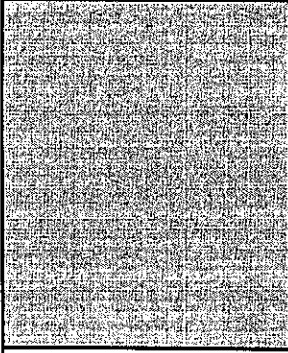
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NOTES:

PID <sup>1</sup>	FCC Measure	Resale	UNE Loop POTS	UNE Specials
OP-3	Missed appointments / Appointments met	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog Loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	
OP-6B	Average provisioning delay days	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	
OP-5A	Provisioning - Percentage of installation troubles reported within 30 days	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	ADSL capable loop DS1-capable loop DS3 and higher loops EEL-DS0 EEL-DS1 EEL-Above DS1 ISDN-capable loop UDIT-DS1 UDIT-Above DS1 xDSL-I capable loop
MR-8	Repair/Maintenance - Network Trouble Report Rate	Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI	Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop	



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<p><b>MR-6</b></p>	<p><b>Repair/Maintenance - Mean Time to Repair</b></p>	<p>Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX</p>	<p>Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop</p>	
<p><b>MR-7</b></p>	<p><b>Repair/Maintenance - Percentage of Repeat Reports within 30 Days</b></p>	<p>Residential single line Business single line Centrex / Centrex 21 DSO DS1 DS3 Frame Relay ISDN-BRI ISDN-PRI PBX</p>	<p>Analog loop Non-loaded 2-Wire loop Non-loaded-4 Wire loop</p>	<p>ADSL capable loop DS1-capable loop DS3 and higher loops EEL-DSO EEL-DS1 EEL-Above DS1 ISDN-capable loop UDIT-DS1 UDIT-Above DS1 xDSL-I capable loop</p>

<sup>1</sup> "Performance Indicator Definition"

## CERTIFICATE OF SERVICE

UM 1484

I hereby certify that on the 10<sup>th</sup> day of February, 2012, I served the foregoing CENTURYLINK'S COMPLIANCE WITH CONDITION NO. 35 OF ORDER NO. 11-095, in the above entitled docket on the following persons via e-mail, and via U.S. Mail by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. Post Office at Portland, Oregon.

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DATED this 10<sup>th</sup> day of February, 2012.

CENTURYLINK



By: \_\_\_\_\_

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(w) denotes waiver of paper service

\* denotes signed Protective Order No. 10-192

\*\* denotes signed Protective Order Nos. 10-192 and 10-291

**CERTIFICATE OF SERVICE**

**UM 1542**

I hereby certify that on the 10<sup>th</sup> day of February, 2012, I served the foregoing **CENTURYLINK'S COMPLIANCE WITH CONDITION NO. 35 OF ORDER NO. 11-095 IN DOCKET UM 1484** in the above entitled docket on the following persons via e-mail transmission as the parties have waived paper service in this docket.

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