

**BEFORE THE CANADIAN RADIO-TELEVISION AND
TELECOMMUNICATIONS COMMISSION**

MTS Allstream Inc.

5 October 2005

**EXCLUSION APPLICATION
QUALITY OF SERVICE RATE ADJUSTMENT PLAN
AND RELATED ISSUES**

**TELECOM DECISION CRTC 2005-17
and
TELECOM DECISION CRTC 2005-20**

Introduction

1. In Telecom Decision CRTC 2005-20, *Finalization of quality of service rate plan for competitors*, and Telecom Decision CRTC 2005-17, *Retail quality of service rate adjustment plan and related issues* the Commission put in place a mechanism for assessing possible exclusions from Quality of Service (QoS) results where circumstances beyond the control of an incumbent local exchange carrier (ILEC) may have caused the ILEC to fail to meet a performance standard.¹ The Commission stated that each adverse event is to be considered in light of the surrounding circumstances, and modifications to the results for the purposes of the rate adjustment plan are to be determined on a case-by-case basis².
2. The Commission determined that an exclusion application should include the following elements:
 - identification of the adverse event for which an exclusion is sought;
 - identification of the effects of the adverse events on specific QoS indicators; and,
 - the proposed adjustment for those QoS results.³
3. MTS Allstream is hereby requesting an exclusion of retail QoS Indicator 2.1A, *Out-of-Service Trouble Reports Cleared within 24 Hours – Urban*, for the period of 27 June 2005 to 10 August 2005.

Identification of the adverse event for which an exclusion is sought

4. During the months of June and July southern Manitoba experienced precipitation far above seasonal averages that led to significant flooding and water related service outages. These very heavy rainfalls resulted in significant runoff and saturated soils. Provincial flood forecaster Alf Warkentin characterized the rainfall as being "... unprecedented in Manitoba."⁴ While the resultant flooding did not cause as much damage as the flooding in

¹ Decision 2005-20, paragraph 115 and Decision 2005-17, paragraph 56.

² Decision 2005-20, paragraph 117 and Decision 2005-17, paragraph 63.

³ Ibid.

⁴ For examples for news clippings see: <http://www.cbc.ca/story/canada/national/2005/07/04/manitoba-flood-monday050704.html>; and <http://www.cbc.ca/story/canada/national/2005/07/17/winnipeg-storms-050717.html>.

1997, it affected more communities. By the the end of June, four days of back-to-back storms dumped as much as 90 millimeters of rain on some parts of Winnipeg and by the end of July cumulative rainfall of 313 millimeters had fallen in Winnipeg. The cumulative precipitation damaged cable plant and equipment, generating a significant volume of trouble calls which in turn resulted in a large backlog of repair activities during these months.

5. MTS Allstream reacted to the repair backlog condition⁵ by instituting mandatory overtime for field service personnel, redeploying service installation resources to the field, maximizing the use of contractors, and redeploying qualified personnel from other departments and from locations that were not as severely affected by the rainfall. As a result of these actions MTS Allstream substantially improved its repair backlog clearing capability.
6. While the abnormally heavy rainfall conditions ended by 30 July 2005, the repair backlog was not cleared until 10 August 2005. The situation was monitored closely throughout the remainder of August and into September to ensure that additional rainfall would not trigger another repair backlog.

Effect of the adverse event and the Proposed adjustment to QoS results

7. The repair backlog condition caused by the heavy rainfall had the most significant impact on Indicator 2.1A (urban), *out-of-service trouble reports cleared within 24 hours*. Specifically, MTS Allstream attained a QoS result of 76.4%, 54.3% and 74.2% in June, July and August respectively, compared to the target of 80%.

⁵ A repair backlog condition exists when more trouble reports are received than can be cleared in the daily normal course of operations for a period of at least three consecutive days.

8. MTS Allstream proposes to exclude the QoS results for Indicator 2.1A (urban) for the period of 27 June 2005 to 10 August 2005 inclusive as this is the period that was most affected by the heavy rainfall and consequent higher than normal volume of service outages. In order for this to be meaningful the exclusion must encompass the entire QoS result for Indicator 2.1A (urban) because all repair requests, whether caused by heavy rainfall or not were subject to the delay arising out of the adverse event. Out-of-service repair requests for primary exchange service are cleared on a first-in/first-out basis, regardless of the cause or nature of the problem. Therefore, in MTS Allstream proposes all the QoS results for Indicator 2.1A (urban) for the time period in question should be excluded.
9. Based on the above proposed methodology MTS Allstream has recalculated the QoS result for Indicator 2.1A (urban) for June by including only the results the period from 1 to 26 June 2005, those days prior to the rain-induced backlog. Similarly, the August indicator only includes the period of 11 to 31 August 2005. This re-calculation produces a 79.0% QoS in June and 82.4% in August. The details of these calculations are provided in Attachment 1.
10. For the month of July MTS Allstream proposes that Indicator 2.1A (urban) be entirely omitted from the 2005 results since the repair backlog persisted throughout the entire month. Therefore, at step 3 of the retail QoS rate adjustment plan calculation, MTS Allstream proposes to use a denominator of 11 months rather than 12 months to calculate the Annual Average Performance (AAP) for this indicator. The remaining steps for the rate adjustment plan calculation would be unchanged. At paragraph 130 of Decision 2005-17 the Commission determined that it would be appropriate to require a rate adjustment of 15% of the maximum adjustment value (MAV) for an indicator if the annual average performance of an ILEC were above standard, but below standard results were reported for five or more months during the year. Under MTS Allstream's proposal July would be excluded from this calculation for Indicator 2.1A (urban).

11. These results for Indicator 2.1A (urban) and proposed recalculation year to date is provided in the table below:

Table 1
Retail Indicator 2.1A
Out-of-Service Trouble Reports Cleared within 24 Hours
Urban for 2005 Year to August

Month	Result	Proposed
January	89.8%	No Change
February	92.9%	No Change
March	93.7%	No Change
April	90.9%	No Change
May	95.3%	No Change
June	76.4%	79.0%
July	54.3%	Exclude
August	74.2%	82.3%

Conclusion

12. MTS Allstream submits that the efforts taken to clear the backlog expeditiously were effective and led to an elimination of the backlog and restoration of acceptable service quality earlier than otherwise. These efforts came at significant cost as additional resources had to be deployed to deal with this adverse event. Consequently, MTS Allstream's submits that its proposal represents a reasonable and appropriate exclusion mechanism.

Attachment 1

**Retail Indicator 2.1A Out-of-Service Trouble Reports Cleared within 24 Hours
– Urban for June to August 2005 with daily precipitation**

Retail Indicator 2.1A Out-of-Service Trouble Reports Cleared within 24 Hours – Urban for June to August 2005								
D	% OF		D	% OF		D	% OF	
A	TOTAL	PROPOSED	A	TOTAL	PROPOSED	A	TOTAL	PROPOSED
T	UNDER		T	UNDER		T	UNDER	
E	24 HRS		E	24 HRS		E	24 HRS	
1-Jun	96.92%	96.92%	1-Jul	41.67%	EXCLUDE	1-Aug	26.67%	EXCLUDE
2-Jun	98.55%	98.55%	2-Jul	49.15%	EXCLUDE	2-Aug	48.28%	EXCLUDE
3-Jun	100.00%	100.00%	3-Jul	34.78%	EXCLUDE	3-Aug	81.05%	EXCLUDE
4-Jun	84.44%	84.44%	4-Jul	72.94%	EXCLUDE	4-Aug	66.09%	EXCLUDE
5-Jun	67.86%	67.86%	5-Jul	100.00%	EXCLUDE	5-Aug	50.51%	EXCLUDE
6-Jun	90.67%	90.67%	6-Jul	48.60%	EXCLUDE	6-Aug	53.77%	EXCLUDE
7-Jun	85.53%	85.53%	7-Jul	55.88%	EXCLUDE	7-Aug	37.50%	EXCLUDE
8-Jun	88.75%	88.75%	8-Jul	59.34%	EXCLUDE	8-Aug	66.94%	EXCLUDE
9-Jun	87.30%	87.30%	9-Jul	41.30%	EXCLUDE	9-Aug	81.08%	EXCLUDE
10-Jun	85.48%	85.48%	10-Jul	35.48%	EXCLUDE	10-Aug	87.50%	EXCLUDE
11-Jun	90.91%	90.91%	11-Jul	57.69%	EXCLUDE	11-Aug	93.02%	93.02%
12-Jun	58.62%	58.62%	12-Jul	55.45%	EXCLUDE	12-Aug	98.53%	98.53%
13-Jun	88.24%	88.24%	13-Jul	54.46%	EXCLUDE	13-Aug	97.30%	97.30%
14-Jun	81.54%	81.54%	14-Jul	61.22%	EXCLUDE	14-Aug	85.19%	85.19%
15-Jun	83.13%	83.13%	15-Jul	68.00%	EXCLUDE	15-Aug	94.34%	94.34%
16-Jun	72.00%	72.00%	16-Jul	44.64%	EXCLUDE	16-Aug	89.23%	89.23%
17-Jun	70.41%	70.41%	17-Jul	59.38%	EXCLUDE	17-Aug	81.43%	81.43%
18-Jun	50.79%	50.79%	18-Jul	77.18%	EXCLUDE	18-Aug	77.50%	77.50%
19-Jun	37.04%	37.04%	19-Jul	42.14%	EXCLUDE	19-Aug	83.33%	83.33%
20-Jun	65.85%	65.85%	20-Jul	42.31%	EXCLUDE	20-Aug	73.33%	73.33%
21-Jun	76.81%	76.81%	21-Jul	35.65%	EXCLUDE	21-Aug	96.00%	96.00%
22-Jun	82.98%	82.98%	22-Jul	47.42%	EXCLUDE	22-Aug	93.44%	93.44%
23-Jun	70.77%	70.77%	23-Jul	12.50%	EXCLUDE	23-Aug	91.53%	91.53%
24-Jun	63.16%	63.16%	24-Jul	20.83%	EXCLUDE	24-Aug	85.00%	85.00%
25-Jun	62.22%	62.22%	25-Jul	50.56%	EXCLUDE	25-Aug	73.44%	73.44%
26-Jun	25.00%	25.00%	26-Jul	59.00%	EXCLUDE	26-Aug	60.87%	60.87%
27-Jun	53.57%	EXCLUDE	27-Jul	35.11%	EXCLUDE	27-Aug	53.85%	53.85%
28-Jun	51.32%	EXCLUDE	28-Jul	50.56%	EXCLUDE	28-Aug	64.10%	64.10%
29-Jun	68.83%	EXCLUDE	29-Jul	41.67%	EXCLUDE	29-Aug	84.00%	84.00%
30-Jun	72.92%	EXCLUDE	30-Jul	100.00%	EXCLUDE	30-Aug	78.82%	78.82%
			31-Jul	51.28%	EXCLUDE	31-Aug	79.81%	79.81%
Monthly	76.44%	79.05%		54.27%	EXCLUDE		74.18%	82.38%
Backlog Condition existed								

* * * End of Document * * *