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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of | ) | |
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| 2000 Biennial Regulatory Review - | ) | CC Docket 00-229 |
| Telecommunications Service Quality | ) | |
| Reporting Requirements | ) | |

**COMMENTS OF SIEMENS MEDICAL SOLUTIONS HEALTH SERVICES CORPORATION**

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January 11, 2001

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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**COMMENTS OF SIEMENS MEDICAL SOLUTIONS HEALTH SERVICES CORPORATION**

Siemens Medical Solutions Health Services Corporation ("SMSHS") hereby submits its comments in response to the Notice of Proposed Rulemaking (NPRM) issued in the above-captioned proceeding, in which the Commission seeks comment on Telecommunications Service Quality Reporting Requirements.

SMSHS, the global leader in healthcare information technology, uses the wide area network services that are provided by telecommunications carriers to deliver many of it integrated products, applications, and services to health organizations throughout North America. On-time implementation and prompt repair timeframes are critical to our ability to service our customers. SMSHS tracks this service quality data to find the most reliable and responsive carriers.

SMSHS urges the Commission not to eliminate the bulk of the existing service quality reporting requirements and not to apply the simplified service quality reporting

requirements without also taking additional actions that will safeguard consumer interests.

## SUMMARY

SMSHS supports the Commission's high level goals of ensuring that consumers receive information that they need to make informed decisions. Public disclosure of historical service quality information will accomplish two goals. Consumers will be able to distinguish among service providers and choose a vendor based on service and value. In addition, public disclosure of this type of information will place a spotlight on those carriers that continue to ignore customer service metrics and internal quality assurance processes.

However, it is not enough to simply provide a framework for service quality reporting. The Commission will not achieve its intended goals without also defining service quality standards and associated financial penalties for providers that consistently miss these quality standards.

The categories of performance data should be expanded to include such metrics as the length of time a customer has to wait on hold before speaking to a customer service representative, and the percentage of callers who hang up while waiting on hold before speaking to a customer service representative. Another performance metric that needs to be addressed relates to how carriers deal with troubles that are reported after "normal business hours". While telecommunications services require twenty-four hour a day, seven-day a week (24 x 7) maintenance and support, many carriers routinely attempt to defer repair services until the next business day.

The Commission needs to broaden the service quality standards past basic voice telephony to also include data and other advanced services. Installation and repair information should continue to be reported separately for business and residential customers.

Consumer ease of access to this service quality information is key to the success of this initiative. Lack of access to this information is a contributing factor in poor service levels from the telecommunications industry.

SMSHS feels marketplace forces will provide the required incentives for competitors to incumbent LECs to provide service quality information. While service quality data might be more meaningful for all interested parties if all LECs, including CLECs, reported such data, only incumbent LECs should be required to report**.**

## I. SERVICE QUALITY STANDARDS AND FINANCIAL PENALTIES

While service quality reporting is an important part of a quality improvement effort, service quality standards and financial penalties are even more important to long term quality improvement and consumer awareness. The existing structure of service quality reporting needs to be expanded to include defined service quality standards and associated financial penalties for providers that consistently miss these quality standards.

## II. SERVICE QUALITY CATEGORIES

The categories of performance data that are already identified should be considered to be a minimum requirement. This performance data needs to be expanded to include such metrics as the length of time a customer has to wait on hold before

speaking to a customer service representative, and the percentage of callers that hang up while waiting on hold before speaking to a customer service representative. These quality standards are readily measured by available call center technologies.

Another set of performance metrics that needs to be addressed relates to how carriers deal with troubles that are reported after "normal business hours". While telecommunications services require 24 x 7 maintenance and support, many carriers routinely attempt to defer repair services that require a dispatch to a central office or customer location until the next business day. This issue of continuous coverage is a sensitive issue for any business that requires service after "normal business hours", such as the healthcare business. Many carriers have elected to reduce staff and rely on call out lists for those trouble reports that are escalated to a point where a call out is authorized.

Because business and residential service needs are very different, SMSHS recommends that carriers file separate reports for business and residential customers.

Network reliability data, currently reported by the carriers in ARMIS 3-05, Table IV, represents outages that cause a serious impact either regionally or nationally. Some carriers use this data to differentiate themselves from their competition in the marketplace. For this reason and because of the severity of impact these outages cause to customers, this data should continue to be reported.

## III. SERVICE QUALITY INFORMATION FOR DATA AND ADVANCED SERVICES

The Commission needs to broaden the service quality standards past basic voice telephony to also include data and other advanced services. Data can be defined as any

dedicated private line, frame relay, and ATM service. Advanced services to be considered include ISDN and xDSL services and should be expanded, as additional services are generally available to business or residential customers.

The press[1] is littered with horror stories about long installation and outage times for services such as xDSL. It is very important for the carriers to recognize that business users rely on these telecommunications services for access to critical services.

## IV. CONSUMER ACCESS TO SERVICE QUALITY INFORMATION

A good example of a consumer friendly service quality reporting program is the DOT airline reporting program. The commission should use this model as a starting point for our industry. Consumer ease of access to this service quality information is key to the success of this initiative. Lack of access to this information is a contributing factor in poor service levels from the telecommunications industry. Readily accessed service quality information will put a spotlight on poor performers, embarrass executive management into action, and punish chronic poor performers in the marketplace.

Easy, consumer friendly access should be defined as access to the existing website where all information can be viewed in a common format, along with the associated norm, standard, goal, or objective.

[1] The New York Times, Phone Companies Face Critical Months for DSL, January 3, 2001

## V. SERVICE QUALITY REPORTING REQUIREMENTS

SMSHS feels marketplace forces will provide the required incentives for competitors to incumbent LECs to provide service quality information. While service quality data might be more meaningful for all interested parties if all LECs, including CLECs, reported such data, only incumbent LECs should be required to report**.** Management will quickly realize that a failure to report and share data is a tacit indication that quality and service are not company focal points. Companies can not operate efficiently today without basic internal metrics. Sharing information that exists internally should not be a burden to any reporting entity.

SMSHS does not feel that a carrier should be relieved of mandatory reporting under certain circumstances, such as few or no service quality complaints. Service complaints are a lagging indicator of service quality and put the burden of reporting on the consumer. The Commission should require regular and rigorous reporting. The fact that the performance data is historically complete, with no gaps due to reporting relief, will make the quality reporting reports more meaningful to consumers.

## CONCLUSION

For the forgoing reasons, the Commission should move forward with plans to make service quality information more consumer available. SMSHS supports the Commission's underlying goal of ensuring that consumers receive information that they need to make informed decisions. In addition, the Commission should define methodologies for collecting service quality information. Service quality standards and associated financial penalties for providers that consistently miss these quality standards must also be included to ensure a successful outcome for consumers.

Respectfully submitted,

_____

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January 11, 2001

## CERTIFICATE OF SERVICE

I, R. Russell Miller, hereby certify that on this 11th day of January 2001, I caused a copy of the "Comments of Siemens Medical Solutions Health Services Corporation" to be sent to the Commission using the Electronic Comment Filing System (ECFS).