

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of the Vermont Department of Public	)	
Service for an investigation into the service	)	
quality provided by Telephone Operating	)	Case No. 18-3231-PET
Company of Vermont, Inc., d/b/a Consolidated	)	
Communications, Inc.	)	

**DIRECT TESTIMONY OF
GABE WAGGONER
ON BEHALF OF CONSOLIDATED COMMUNICATIONS**

June 12, 2019

SUMMARY OF TESTIMONY

Mr. Waggoner provides detail on the service delivery challenges Consolidated experienced in Vermont in the summer and fall of 2018, describes key Operations responses to those challenges, and details the long-term important operational changes the Company has implemented and will implement.

**DIRECT TESTIMONY OF
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ON BEHALF OF CONSOLIDATED COMMUNICATIONS**

1 **1. Q. Please state your name, position, and business address.**

2 **A.** My name is Gabe Waggoner, and I am Executive Vice President of Operations,
3 Consolidated Communications, Inc. (“Consolidated” or “CCI”), 350 South Loop 336 West,
4 Conroe, Texas 77304. I have corporate-wide responsibilities for all Customer Service,
5 Wholesale, Repair, and Technical Support call center functions; billing remittance functions;
6 Central Office Network Technician functions; and Field Technician functions in all 23 states in
7 which Consolidated operates, including Vermont.

8

9 **2. Q. On whose behalf are you testifying?**

10 **A.** I provide testimony on behalf of Consolidated Communications of Vermont
11 Company, LLC (formerly Telephone Operating Company of Vermont, LLC) d/b/a Consolidated
12 Communications (“Consolidated Vermont”).

13

14 **3. Q. Please describe your professional and educational background.**

15 **A.** I have over 20 years of telecommunications experience, having served in diverse
16 functions, including leadership roles in Customer Service, Engineering, Network, and Field
17 Operations with Consolidated Communications. I have also had primary responsibilities for
18 integration strategy and implementation for key operational functions in CCI’s four previous
19 acquisitions. I hold a B.Sc. in Business and a MBA from Eastern Illinois University, in addition
20 to continuing education programs with the University of Wisconsin and Georgetown University.

1 **4. Q. Have you previously testified before the Vermont Public Utility Commission**
2 **(the “Commission” or “PUC”)?**

3 **A. Yes, I provided testimony in PUC Docket No. 8881.**
4

5 **5. Q. What is the purpose of your testimony?**

6 **A. Ryan Whitlock and I provide detail on the service delivery challenges**
7 Consolidated experienced in Vermont in the summer and fall of 2018, explain key changes the
8 Company has implemented to address those challenges, and describe service improvement plans
9 the Company is in the process of implementing to ensure timely repair and installation of
10 services in Vermont. Specifically, I provide testimony on the following: 1) Consolidated’s
11 assessment of the main reasons for the service quality issues in 2018, 2) describe how
12 Consolidated Operations responded to and addressed these identified reasons, and 3) detail long-
13 term operation changes the Company has begun to implement. Mr. Whitlock further discusses in
14 detail how Consolidated responded to and addressed the other identified reasons for the 2018
15 service issues, details other important changes the Company has implemented, and describes
16 service improvement plans the Company is in the process of implementing in Vermont.
17

18 **6. Q. Please explain in detail what Consolidated has determined caused the**
19 **Vermont service levels to decline beginning in mid-2018.**

20 **A. Based on our review and assessment, we have determined that service levels in**
21 Vermont, specifically as to the Cleared in 24 metric, declined in mid-2018 due to four primary
22 factors:

- 1 1. Technician retirements in the Splice Service Technician (SST) and Outside Plant
2 Technician (OPT) classifications in late 2017 and during the first half of 2018
3 reduced the number of technicians available in Vermont to complete repairs and
4 installations. Backfilling these positions took significantly longer than anticipated.
- 5 2. Increased marketing activity, rebranding, and large scale network investment and
6 upgrades that increased available internet speeds, resulted in higher order volume.
7 Many of the orders included internet service using bonded technology, which
8 increased the installation timeframe, because the bonding work can be more time
9 consuming than other installations.
- 10 3. Consolidated had the inability to quickly scale the workforce due to restrictive
11 language contained within the prior collective bargaining agreement, which, for
12 example a) prohibited the Company from effectively sourcing flexible resources to
13 meet workload demands, b) had certain restrictions that prevented the workforce from
14 being available on short notice to meet our customer demands, and c) allowed for
15 only 37.5 hour work weeks in supporting groups, which caused delays in order
16 processing.
- 17 4. Weather was also a factor in several ways. First, in the 2018 time period at issue,
18 there were multiple significant weather events, which combined with an increase in
19 service order activity related to large scale network and broadband enhancements for
20 New England, resulted in less available technicians to assist in Vermont. Second,
21 once the collective bargaining agreement was renegotiated and ratified in August of
22 2018, bringing on contractor resources took longer due to hurricanes in North

1 Carolina and Florida. There are a limited number of highly qualified contractor
2 resources, and many national firms relocate resources to where there is the greatest
3 demand. Many contractor resources decided to go and work on the restoral of
4 services in North Carolina and Florida, making it harder to quickly put into effect our
5 plan to increase resources in Vermont.
6

7 **7. Q. What was one of the first steps Consolidated initiated to address the service**
8 **concerns in 2018?**

9 **A.** One of the first steps was to add additional technician resources. We started
10 supplementing the Vermont area with technicians from other Northern New England (“NNE”)
11 locations in July 2018. This equaled up to 15 technicians from other NNE states on a rotating
12 basis and we utilized technicians from other Consolidated markets and sent 29 technicians
13 beginning in October to support efforts in Vermont at any time. These 29 technicians from other
14 Consolidated Communications markets including TX, IL, CA, MN, ND, and OK.
15

16 **8. Q. What other steps were taken by Consolidated Operations to correct and**
17 **address the service decline in 2018 and return the service levels to normal and when were**
18 **these steps taken?**

19 **A.** In addition to the added staffing and collective bargaining changes Mr. Whitlock
20 describes, operational steps have also been taken to improve service delivery and repair since the
21 summer of 2018. Below is a summary of operational steps that have been implemented by

1 Consolidated to improve service delivery and repair since the summer of 2018. These steps were
2 implemented specifically to assist technicians in performing their work:

- 3 1. Continued refinement of the centralized Dispatch Resource Center to provide
4 coordination, oversight and prioritization of work. The Dispatch Resource Center was
5 reinstated in the spring of 2018.
- 6 2. New dispatch leadership was introduced in January 2019. Consolidated reorganized its
7 dispatch center by appointing a 35+ year Consolidated veteran with extensive dispatch
8 experience to lead the group.
- 9 3. New test equipment was deployed to field technicians in Q4 2018 and Q1 2019.
10 Specifically, we purchased additional cable troubleshooting units. The purpose of this
11 equipment is to enhance the testing and conditioning of Consolidated's facilities
12 providing internet services to our customers. We also use this new tool to pre-qualify
13 customers' cable pair for internet services, thus helping us to meet due dates on a more
14 consistent basis.
- 15 4. The Company redesigned the broadband installation process in January 2019 to include
16 the following:
 - 17 ○ Technician is sent a "Prequalification" 2 days prior to the customer's
18 appointment;
 - 19 ○ Technician prepares the cable pairs by testing, repairing and otherwise performing
20 diagnostics to ensure the cable has met a standard;
 - 21 ○ Technician runs additional test to ensure the customer is capable of achieving the
22 speeds purchased; and

- Technician then completes the installation at a later date according to the customer appointment.

5. Three additional resources were hired and trained during Q4 2018 and Q1 2019 in the Facilities Management Group, Internet Activation Center and Voice Activation Center to increase technician efficiencies if they need to interact with these groups during the installation and/or repair process.

6. During Q1 2019, additional resources in the Texas dispatch center were trained to assist in the coordination, oversight and dispatch of technician work. These resources are focused on our prequalification efforts which help enhance the timeliness and quality of our install orders. This process also cuts down on troubles after installation which improves the overall customer experience and improves technician efficiencies.

7. During Q4 2018, additional resources in the Texas and California Provisioning centers were trained to assist VT technicians calling in for support when repairing and installing service.

The net result of these process changes I describe above has included a better quality product, less missed customer appointments, and less time the technician must interface with the customer, thus reducing the time the customer is required to be home during this process.

Although it is too early to measure the results, these changes are expected to reduce broadband trouble tickets, thus freeing more technicians up to focus on other service delivery needs. What we do know for certain is that we have seen significant improvements in Out Of Service (OOS) trouble tickets completed within 24 hours as compared to summer-fall of 2018. In April 2019, our results showed we achieved a cleared in 24 performance of 67.24% for

1 residential customers and a 69% cleared in 24 for combined residential and business basic
2 telephone out of service repairs. Complaints to the Vermont Department of Public Service have
3 also decreased significantly.

4
5 **9. Q. What other actions has Consolidated Operations implemented to oversee the**
6 **Company's response to trouble tickets?**

7 **A.** Before I discuss those actions, I think it would be helpful to provide a brief
8 overview of the Operations structure in Vermont.

9 Consolidated Communications uses a functional hierarchy structure for its technician
10 workforce in Vermont and other New England states. This structure allows us to group
11 technicians around their area of specialization, thus allowing for us to be more responsive to the
12 customer's needs. Each classification of technician, such as Central Office Technician, Splice
13 Service Technician (SST), and Outside Plant Technician (OPT), has a dedicated "first level"
14 manager for their respective function (installation, repair, maintenance, construction, and central
15 office). First level managers thus manage the technicians for their respective function. First level
16 managers report to Area Operations Managers who oversee multiple functions in their designated
17 service territory.

18 Vermont is managed by nine first level managers and two Area Operations Managers,
19 one Senior Director of Operations.

20 Consolidated has taken several steps in recent months to ensure that managers are more
21 aware of and involved with addressing timely trouble ticket repair. First, beginning in December
22 2018, daily workload reports are sent to the Executive and Senior Vice Presidents of Operations

1 and Senior Director of Operations, who interact with the operations and dispatch teams to
2 strategize, plan, and execute on timely service delivery.

3 Second, beginning in Q1 2019, a greater focus throughout the organization has been
4 brought to monitoring trouble tickets prior to the 24 hour deadline. The Senior Director of
5 Operations, the Director of Dispatch Resource Center, and the Dispatch Resource Center
6 Manager communicate daily regarding the oversight of the workload and service restoral.

7
8 **10. Q. What did Consolidated do in terms of its marketing activities to address the**
9 **2018 service quality concerns?**

10 **A.** Consolidated chose to temporarily suspend all marketing activities and
11 promotions for consumer and commercial products in Vermont. This decision, although not
12 taken lightly, was made to avoid continuing to increase the workload until such a time the
13 workload could be reasonably caught up.

14
15 **11. Q. Does this conclude your testimony?**

16 **A.** Yes, this concludes my testimony.