

UCLL Performance Report

Consolidated Report

July 2019

Introduction

Unbundled Copper Local Loop (UCLL) Performance Reports are prepared each month to provide a comprehensive view of our performance over the preceding month. These reports measure our performance against service levels defined in the UCLL Standard Term Determinations.

Executive Summary

Service Level Defaults this month: SL 4 (Order is completed right first time). Service Level Default Report can be found in the appendix of this report.

Points to note

Orders may have been excluded from Service Level calculations where the default was the direct result of an action that is the Access Seeker's responsibility under the UCLL Standard Terms Determinations

Defaults that occur at the Access Seeker level but not at the consolidated level are reported to the relevant Access Seeker, in their individual performance report.

Further Information

If you have queries, please email your Chorus Account Manager.

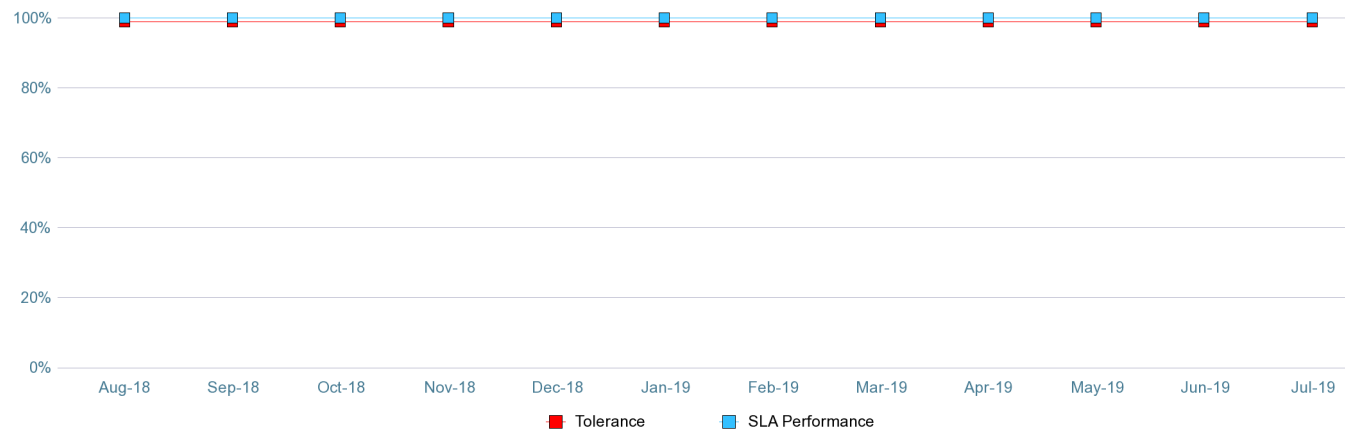


Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 1. Orders Acknowledged Within 4 Consecutive Business Hours of Receipt



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	100.0%	100.0%	100.0%	100.0%	n/a	n/a	100.0%	n/a	n/a	n/a	n/a	n/a
New Connection	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Other Service to Transfer	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Transfer	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Relinquishment	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

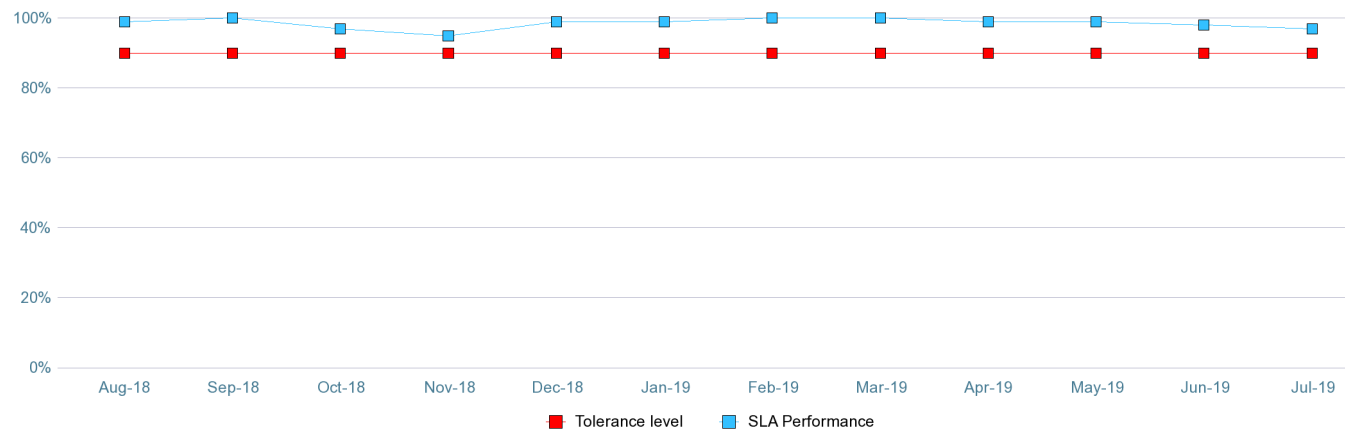
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Tolerance Level	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 2. Invalid order rejection notifications sent Within four consecutive business hours of receipt



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
New Connection	96.0%	100.0%	96.0%	97.0%	97.0%	98.0%	100.0%	94.0%	100.0%	100.0%	100.0%	100.0%
Other Service to Transfer	100.0%	100.0%	75.0%	75.0%	100.0%	100.0%	100.0%	100.0%	100.0%	67.0%	100.0%	100.0%
Transfer	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	n/a	100.0%	100.0%	n/a	n/a
Relinquishment	100.0%	100.0%	98.0%	96.0%	100.0%	100.0%	100.0%	100.0%	99.0%	99.0%	96.0%	95.0%

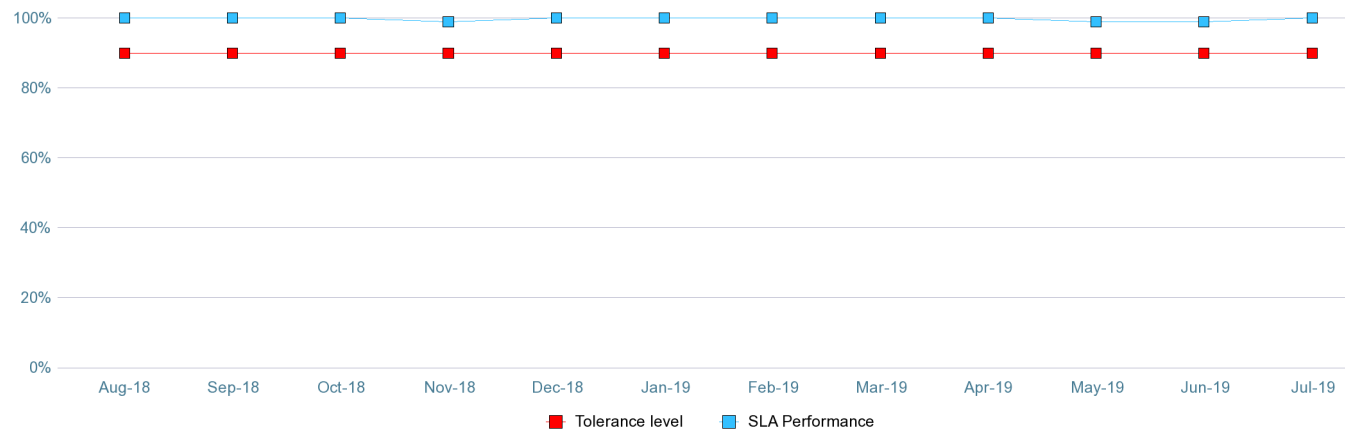
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	99.0%	100.0%	97.0%	95.0%	99.0%	99.0%	100.0%	100.0%	99.0%	99.0%	98.0%	97.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 3. Notification Of Expected Completion Dates Sentm Within 6 Consecutive Business Hrs Of The Deemed Acceptance Time



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	80.0%	100.0%	n/a	100.0%	n/a	n/a	100.0%	n/a	n/a	n/a	n/a	n/a
New Connection	99.0%	100.0%	100.0%	98.0%	99.0%	99.0%	100.0%	100.0%	99.0%	96.0%	96.0%	99.0%
Other Service to Transfer	100.0%	100.0%	95.0%	93.0%	100.0%	100.0%	100.0%	100.0%	100.0%	91.0%	100.0%	100.0%
Transfer	100.0%	100.0%	97.0%	93.0%	95.0%	98.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Relinquishment	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

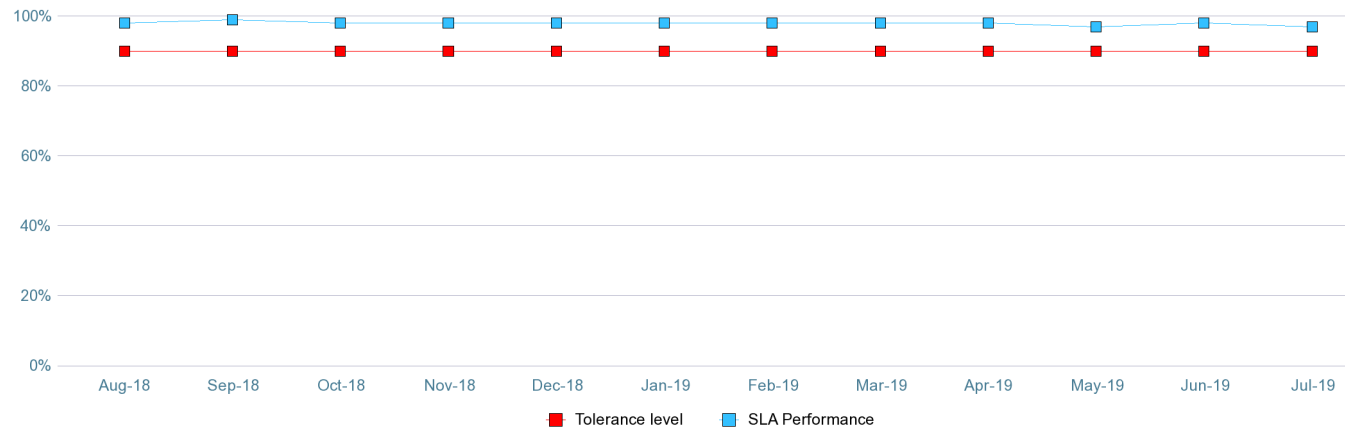
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	99.0%	100.0%	100.0%	100.0%	100.0%	100.0%	99.0%	99.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 4. UCLL orders experiencing no fault following Chorus confirmation of order completion within 5 working days (level A)



Commentary

Performance has not met the required tolerance level for New Connection orders. See the SL4 Default Report for more information.

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	100.0%	100.0%	50.0%	n/a	n/a	n/a	100.0%	n/a	n/a	n/a	n/a	n/a
New Connection	88.0%	87.0%	86.0%	89.0%	89.0%	88.0%	88.0%	87.0%	81.0%	88.0%	88.0%	85.0%
Other Service to Transfer	95.0%	100.0%	87.0%	100.0%	95.0%	92.0%	94.0%	100.0%	100.0%	80.0%	93.0%	100.0%
Transfer	97.0%	100.0%	98.0%	94.0%	96.0%	97.0%	87.0%	97.0%	91.0%	92.0%	84.0%	94.0%
Relinquishment	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

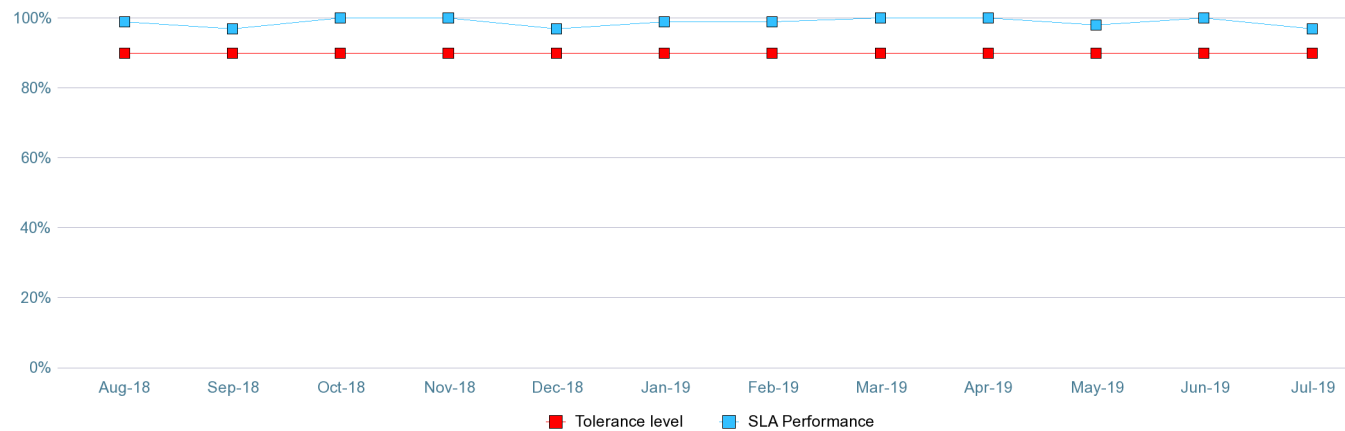
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	98.0%	99.0%	98.0%	98.0%	98.0%	98.0%	98.0%	98.0%	98.0%	97.0%	98.0%	97.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 5. Orders Completed By The Notified Expected RFS Date (Level A)



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	100.0%	100.0%	n/a	100.0%	n/a	n/a	100.0%	n/a	n/a	n/a	n/a	n/a
New Connection	99.0%	97.0%	100.0%	100.0%	97.0%	99.0%	99.0%	100.0%	100.0%	98.0%	99.0%	97.0%
Other Service to Transfer	100.0%	100.0%	100.0%	94.0%	100.0%	95.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Transfer	97.0%	96.0%	98.0%	100.0%	96.0%	100.0%	100.0%	100.0%	100.0%	96.0%	100.0%	100.0%
Relinquishment	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

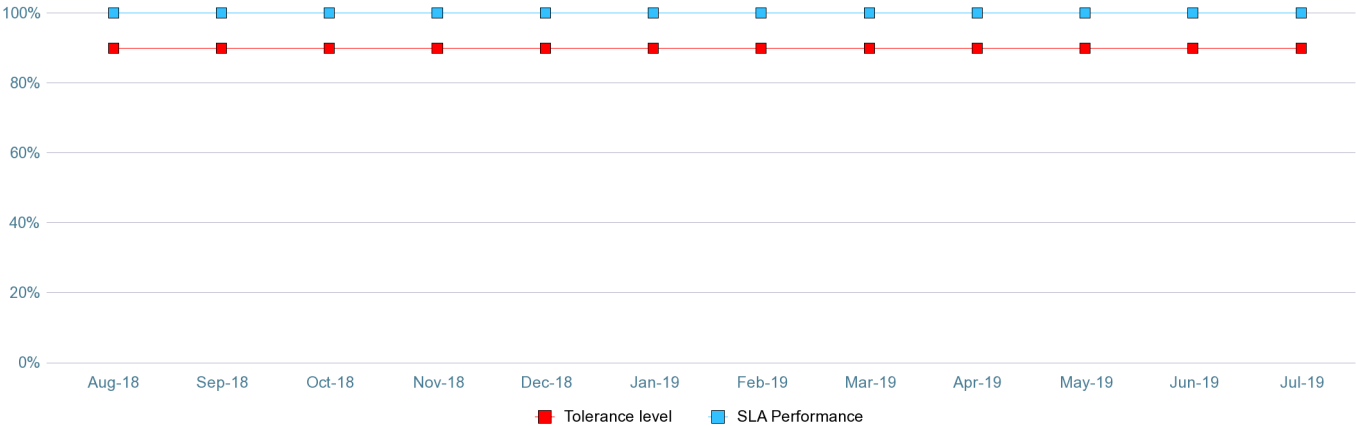
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	99.0%	97.0%	100.0%	100.0%	97.0%	99.0%	99.0%	100.0%	100.0%	98.0%	100.0%	97.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 6. MPF Relinquishment Orders Completed By The Notified Expected RFS Date



Commentary
Performance has exceeded the required tolerance level

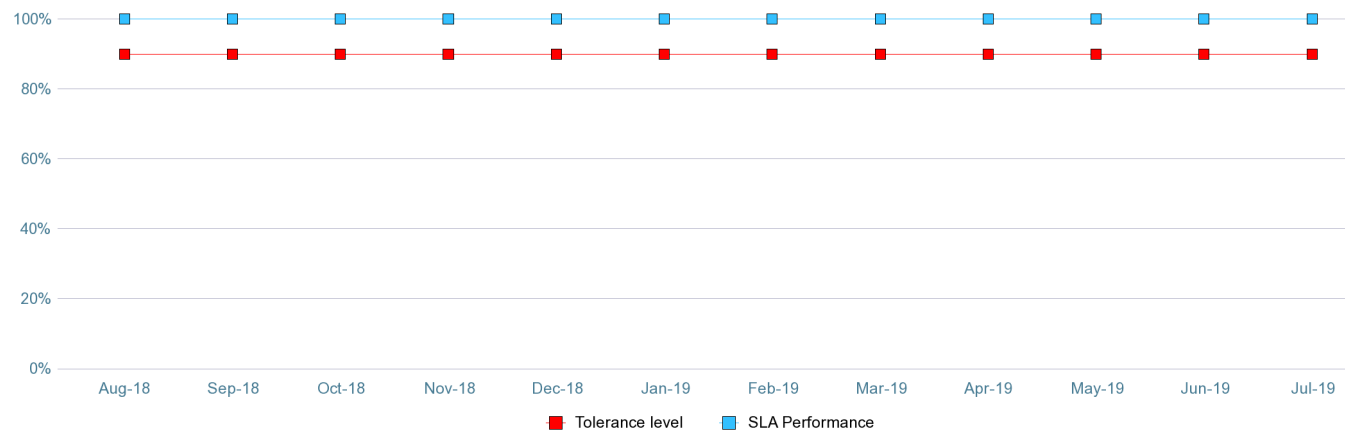
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 7. Pre-Qualification Orders Acknowledged Within 4 Consecutive Business Hours Following Receipt Of Order



Commentary

Performance has exceeded the required tolerance level

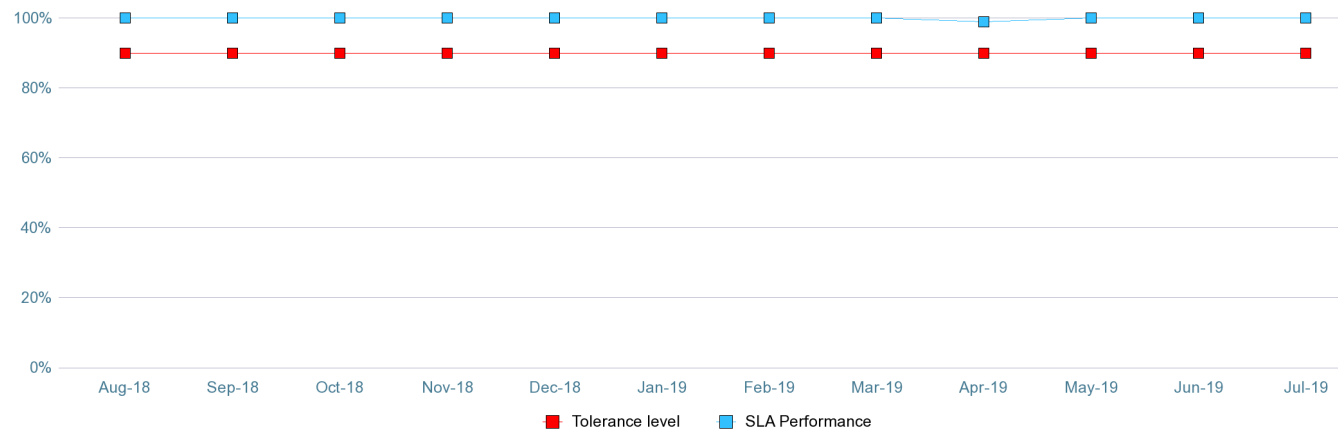
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 8. Authorised & unauthorised automatic pre-qualification order completion acknowledgements made within four consecutive Business Hours following order receipt and special manual pre-qualification investigation/manual line test within 6 Working Days following order receipt



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Automatic Prequal	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	99.0%	100.0%	100.0%	100.0%
Manual Prequal			100.0%	100.0%	100.0%	100.0%	100.0%		100.0%	100.0%	100.0%	100.0%

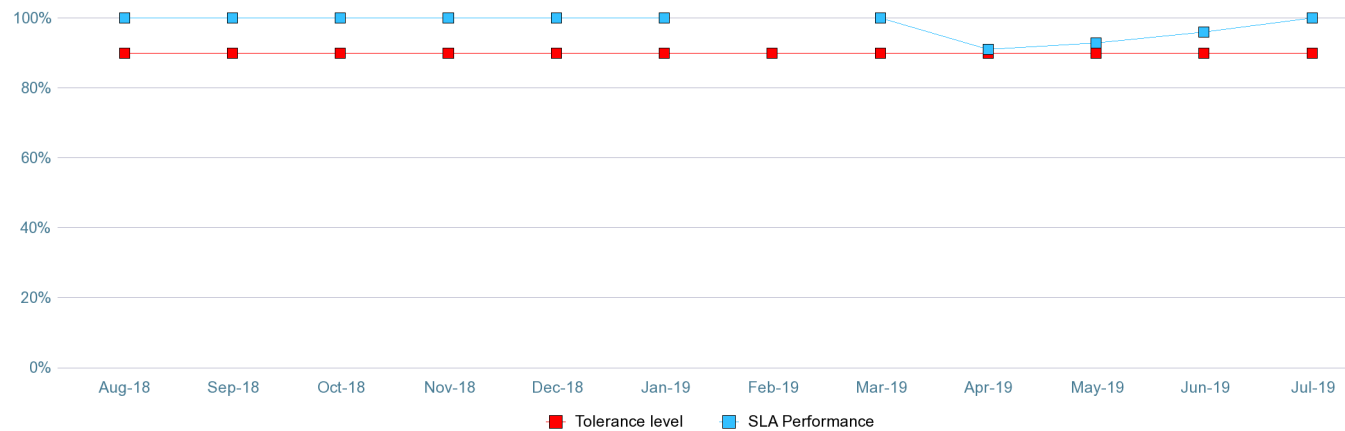
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	99.0%	100.0%	100.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 9. Notification Of RFS Date Changes Received Within 6 Consecutive Business Hours Following Receipt Of The Requests To Change An Existing Order



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	100.0%	100.0%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
New Connection	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	n/a	100.0%	90.0%	96.0%	95.0%	100.0%
Other Service to Transfer	100.0%	100.0%	n/a	n/a	100.0%	n/a	n/a	n/a	n/a	100.0%	100.0%	100.0%
Transfer	100.0%	100.0%	n/a	n/a	100.0%	n/a	n/a	100.0%	100.0%	n/a	100.0%	100.0%
Relinquishment	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a

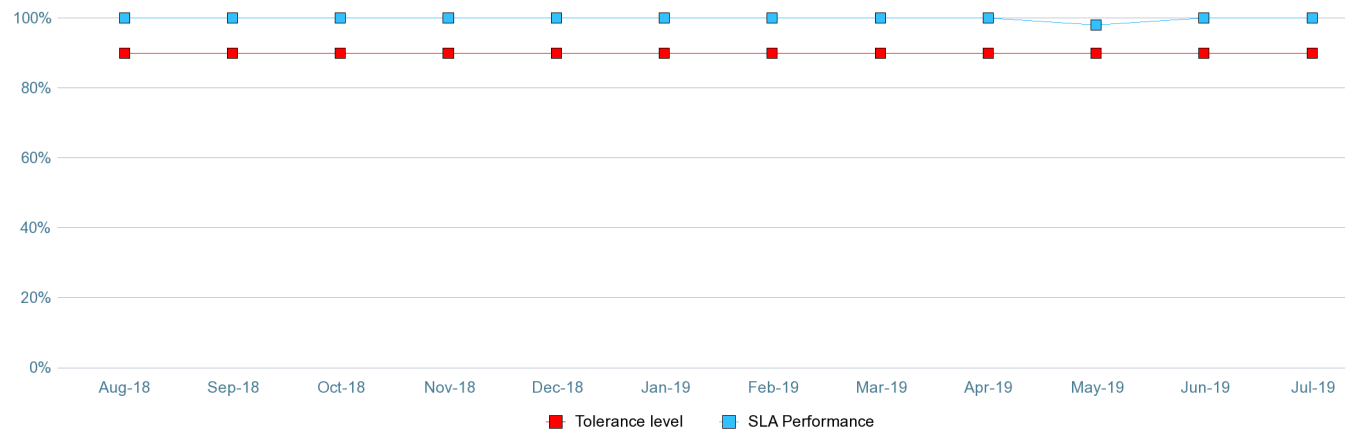
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	n/a	100.0%	91.0%	93.0%	96.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 10. Confirmation Of Completions Sent To The As Within 4 Consecutive Business Hours After The UCLL Order Has Been Completed



Commentary

Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
Move Address	100.0%	100.0%	n/a	100.0%	n/a	n/a	100.0%	n/a	n/a	n/a	n/a	n/a
New Connection	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Other Service to Transfer	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Transfer	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Relinquishment	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	98.0%	100.0%	100.0%

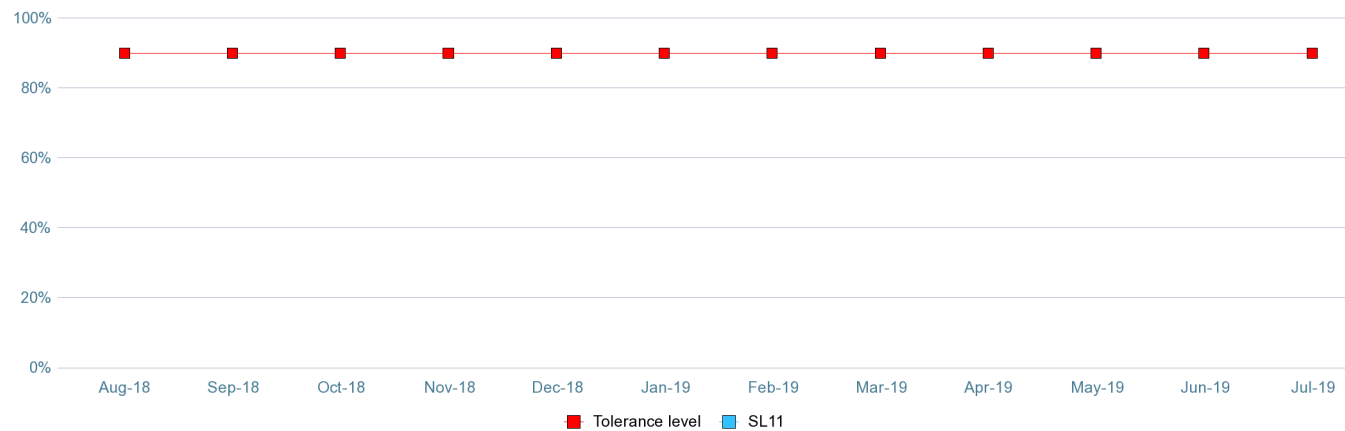
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	98.0%	100.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

This section covers UCLL provisioning service, including ordering, notifications, and outages.

SL 11. Planned Outage Notifications Advised To The Access Seeker At Least 5 Working Days Prior To The Planned Outage Taking Place



Commentary

No Planned Outages this month

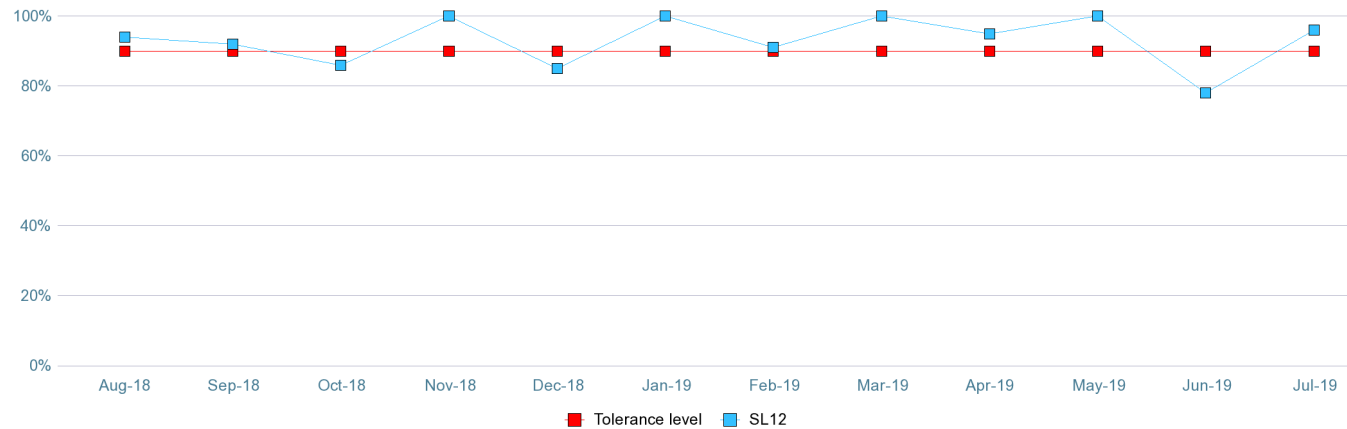
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Provisioning UCLL services

July 2019

"This section covers UCLL provisioning service, including ordering, notifications, and outages."

SL 12 - Unplanned outage notifications advised within two hours of Chorus discovering or receiving outage notice (24x7 basis)



Commentary

Performance has exceeded the required tolerance level

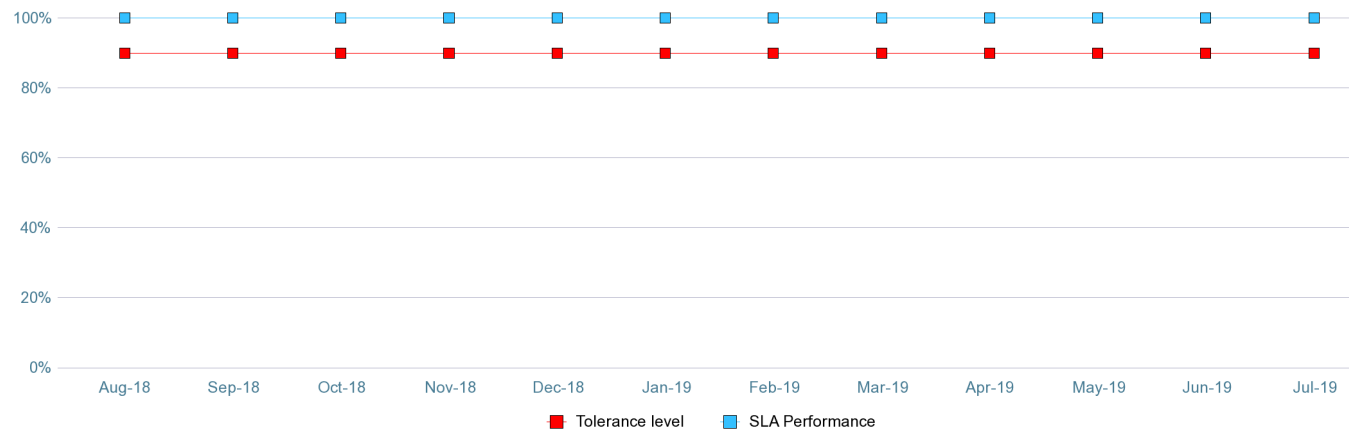
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	94.0%	92.0%	86.0%	100.0%	85.0%	100.0%	91.0%	100.0%	95.0%	100.0%	78.0%	96.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Fault Management

July 2019

This section covers fault receipt acknowledgement, notification, restoration

SL 13 - Fault report receipt acknowledgements provided within half a fault restoration hour of fault report



Commentary

Performance has exceeded the required tolerance level

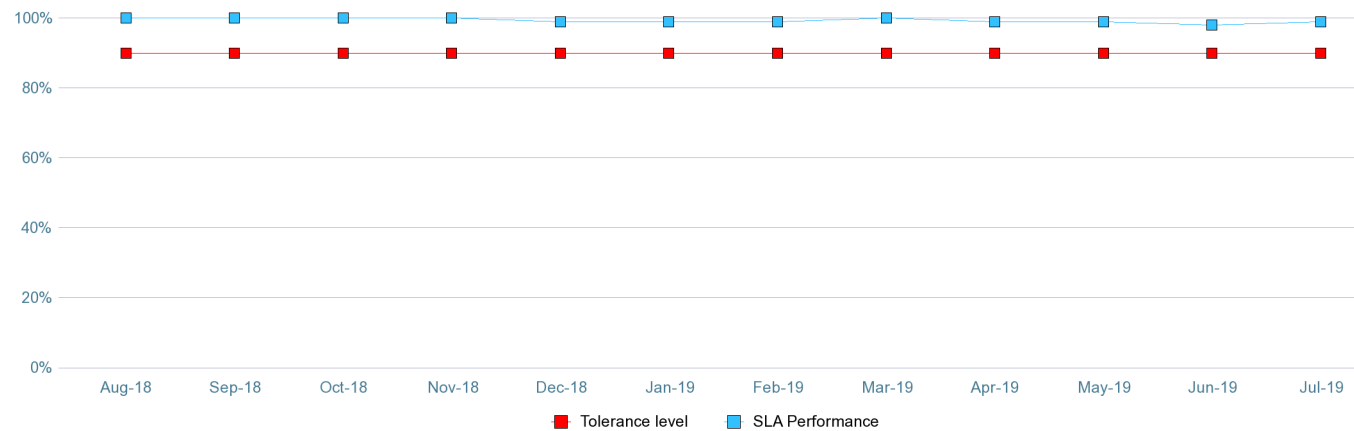
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Fault Management

July 2019

This section covers fault receipt acknowledgement, notification, restoration

SL 14 - Expected fault restoration time notifications sent within eight fault restoration hours of fault report



Commentary

Performance has exceeded the required tolerance level

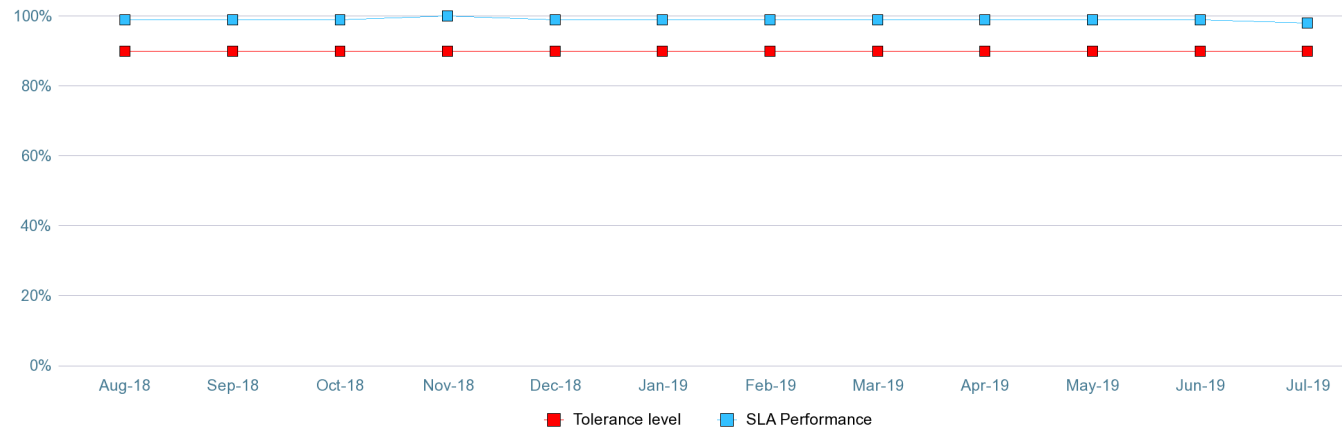
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	99.0%	99.0%	99.0%	100.0%	99.0%	99.0%	98.0%	99.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Fault Management

July 2019

This section covers fault receipt acknowledgement, notification, restoration

SL 15 - Faults restored within notified expected restoration time (level A)



Commentary

Performance has exceeded the required tolerance level

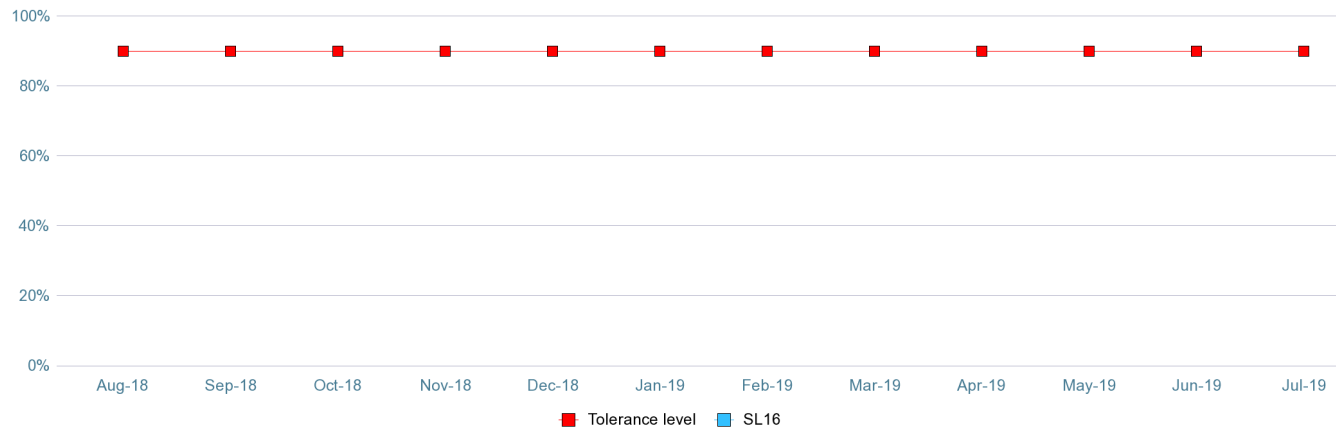
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	99.0%	99.0%	99.0%	100.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	99.0%	98.0%
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

UCLL forecasting

This section covers UCLL forecasting

July 2019

SL 16 - Cabinet forecasts provided within 10 working days of 6 month anniversaries from 7 November 2007



Commentary

No Cabinetisation Forecast this month

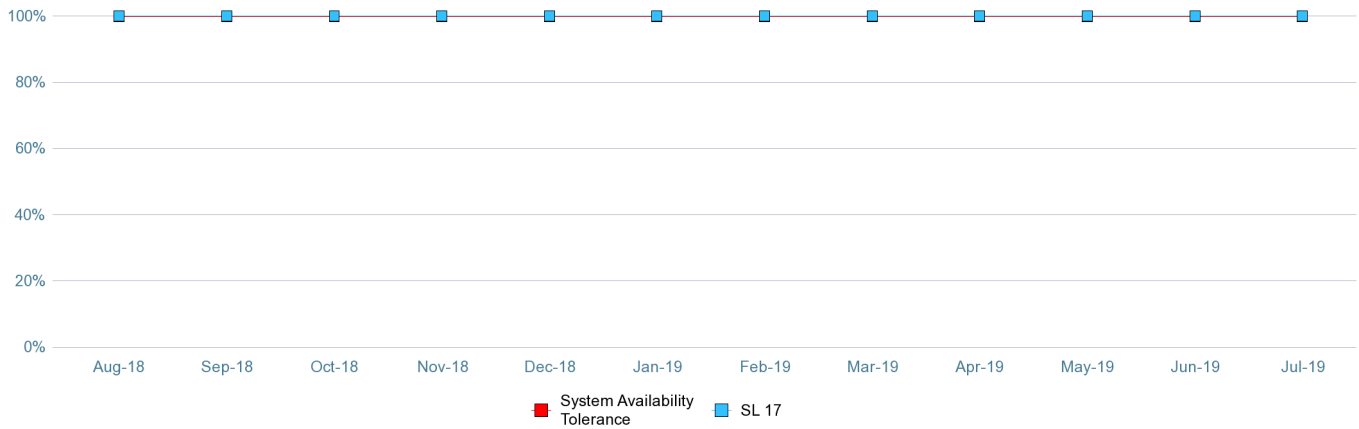
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Tolerance Level	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%	90.0%

Operational support systems

July 2019

This section covers operational support systems for access seekers

SL 17 - Online Ordering & Tracking availability (24/7)



Commentary
Performance has exceeded the required tolerance level

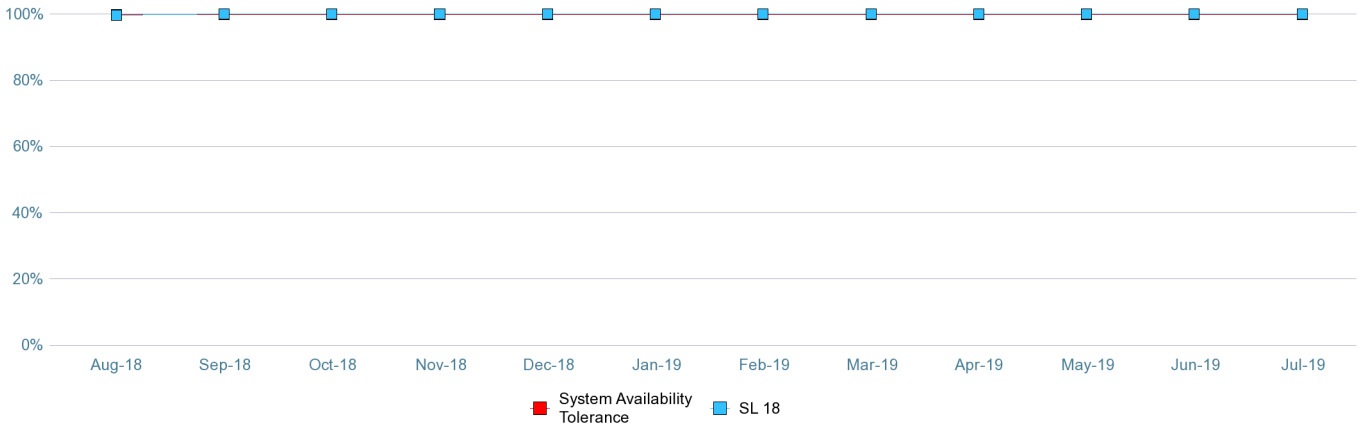
	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Tolerance Level	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%

Operational support systems

July 2019

This section covers operational support systems for access seekers

SL 18 - Online Fault Management availability (24/7)



Commentary
Performance has exceeded the required tolerance level

	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19
SLA Performance	99.8%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Tolerance Level	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%	99.8%

Full explanation of terms used in this report

July 2019

Note: Chorus has summarised the relevant Service Levels for the purpose of this report. For the full description of each relevant Service Level refer to Appendices 1 and 2 of the UCLL Service Level Terms (UCLL Standard Terms Determination Schedule 3) which is available on the Commerce Commission's website at www.comcom.govt.nz.

- SL1 Percentage of UCLL orders acknowledged within 4 consecutive business hours following receipt of the order
- SL2 Percentage of rejection notifications for invalid UCLL orders sent to the access seeker within 4 consecutive business hours following receipt time
- SL3 Percentage of notification of expected RFS dates sent to the access seeker within 6 consecutive business hours of the deemed acceptance time
- SL4 Percentage of UCLL orders that experienced no faults in work carried out to provision an order within 5 working days following confirmation by Chorus of completion of the order (Level A)
- SL5 Percentage of UCLL orders completed by the notified expected RFS date (Level A)
- SL6 Percentage of MPF relinquishment orders completed by the notified expected RFS date

- SL7 Percentage of pre-qualification orders acknowledged within 4 consecutive business hours following receipt of order
- SL8 Percentage of pre-qualification order completion acknowledgements made within 4 consecutive business hours following receipt of an authorised or unauthorised automatic pre-qualification order and percentage of pre-qualification order completion acknowledgements made within 6 working days following receipt of an order for a special manual pre-qualification investigation or manual line test
- SL9 Percentage of notification of RFS date changes provided to access seeker within 6 consecutive business hours following receipt of the requests to change an existing order

- SL10 Percentage of confirmation of completions of order provided to the access seeker within 4 consecutive business hours after the order has been completed
- SL11 Percentage of planned outage notifications advised to the access seeker at least 5 working days before the planned outage occurs
- SL12 Percentage of unplanned outage notifications advised to the access seeker within 2 hours on a 24x7 basis of Chorus discovering or receiving notification of the unplanned outage
- SL13 Percentage of fault report receipt acknowledgements provided to the access seeker within half a fault restoration hour of the fault being reported

- SL14 Percentage of notifications advising the expected restoration time sent to the access seeker within 8 fault restoration hours of the fault being reported
- SL15 Percentage of faults restored within the notified expected restoration time (Level A)
- SL16 Percentage of written rolling 3-year cabinet forecast reports provided to the access seeker within 10 working days of the 6 month anniversary of the 07 November 2007
- SL17 Percentage of OO&T availability to the access seeker
- SL18 Percentage of OFM availability to the access seeker

UCLL Service Level Default

July 2019

Item No.	4	Item No.	90%
Service Attribute	Order is completed right first time		
Cause of default	Investigations reveal that failed installs are more likely to occur where the connection is completed with an intact line but without a supporting Truck Roll to test and initially confirm the service related to the order.		
Procedure for correcting default	A fault ticket has been raised in each circumstance and service has been restored for the customer.		
Steps taken to remedy default	Chorus is continuing to assess and investigate causes of these faults to ensure they are minimised and Service Levels are achieved.		
Effectiveness of steps taken	Effective.		
Date of previous default	April 2019, May 2019, June 2019, July 2019		