

**Le-Ru Telephone Company's
Responses to
MoPSC Questions re Quality of Service
Case No. TO-2011-0047**

A. Does your company own or maintain telecommunications facilities in Missouri? If yes, please answer all of the following questions. If no, then your survey is complete and should be submitted at this point.

RESPONSE: Yes.

B. Does your company track on a regular basis any of the following: If yes, explain how your company tracks it (include whether such information is tracked by exchange or some other area). If no, explain why not.

- i. Timeliness of installing service after a customer orders service.
- ii. Timeliness of repairing service after a customer reports trouble.
- iii. Amount of service trouble.

RESPONSE: Yes. Items i, ii and iii are tracked by the Company on a quarterly basis. The Company tracks this information for each of the exchanges it serves. Although the Company has elected to waive the Commission rules regarding quality of service objectives and surveillance levels, it nevertheless uses these service objective levels as a benchmark for measuring the timeliness of installing and repairing service and tracking the number of service troubles.

C. Please provide your most recent results for any of the information tracked above.

RESPONSE: See attached.

D. Explain your company's preventative maintenance procedures. Include in your explanation specific methods you utilize to be certain that telephone equipment and plant is kept in good working condition. State whether your preventative maintenance program is tracked by exchange, area, or state. Please provide results of this measurement for the past two years.

E. What percentage of your company's annual budget is spent on maintaining existing telephone plant?

F. What percentage of your company's annual budget is spent on training its technical staff?

RESPONSE TO QUESTIONS D, E AND F:

Le-Ru Telephone Company takes seriously its obligation to provide high quality telephone service. This commitment to service is regularly communicated to its employees. For example, the Company sends its technicians and outside plant personnel to at least one training program per year to keep up with changing technology and equipment. In addition, the Company holds monthly meetings with its employees to discuss safety and technical issues. The fact that the Company has not been the subject of a customer complaint or inquiry with the Commission regarding quality of service for the last four years is evidence of its commitment to service.

The Company's preventive maintenance activities for its central offices involve regular testing of the switching and related equipment using the software included with the switch for reporting of "out-of-bounds" conditions. The Company checks the status of the batteries and the voltage output levels on the rectifiers on a regular basis. Each quarter the Company performs remote testing and backup and portable power generators are exercised. The Company's outside plant facilities are also reviewed and tested on a regular basis. Since 2004, the Company has been upgrading its outside plant facilities with fiber-fed digital loop concentrators. As a result, a significant portion of the outside plant has either been replaced or upgraded, thus eliminating potential maintenance issues. Another benefit to the upgrade is that the length of copper loops to the customer has been reduced to an average of 10,000 feet, thus further eliminating potential problems. If any problems are found in either the central office or outside plant, the Company takes the necessary steps to immediately correct the problems. The Company performs preventive maintenance on its entire system and therefore its preventive maintenance efforts are not "tracked by exchange, area or state." The Company does not keep a record or report of its preventive maintenance activities. If the Company is performing work in response to a specific trouble report, a record is created and maintained by the Company. Engineering records and up-to-date maps of the network are maintained by the Company and its outside engineering firm, Finley Engineering.

The Company maintains its books and records in accordance with the FCC's Uniform System of Accounts (Part 32 of the FCC Rules). Part 32 does not provide for the separate accounting of preventive maintenance or training expense. Maintenance expenses, both preventive and normal, are recorded in the Plant Specific Expenses accounts along with other operating expenses associated with specific types of plant. As a result, the Company is not able to identify what amount or percentage of its annual budget is spent on preventive maintenance of existing telephone plant or on training of its technical staff. As a

general matter, however, the Company believes that a significant portion of its Plant Specific Expenses is spent maintaining its telephone plant.