MoPSC Questions re Quality of Service

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 TDS on a quarterly basis. TDS tracks this information for each of its three Missouri companies. Although TDS 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.

RESPONSE:

TDS' preventive maintenance activities for its central offices involve regular testing of the switching and related equipment using the software included with the switch with reporting of "out-of-bounds" conditions. All of our Central Offices are connected and tested by our Network Operation Center (NOC) located in Madison, Wisconsin, where all alarms are tracked, reported and dispatched back to our field techs to resolve. The NOC is manned 24x7x365 days/year. TDS'outside plant facilities are also reviewed and tested on a regular basis. For switch testing we do not maintain records. We do have a bi-annual maintenance

ticket for the DC power plant and batteries. In addition, TDS does a weekly maintenance ticket for all the standby generators at each location. If any problems are found in either the central office or outside plant, TDS takes the necessary steps to immediately correct the problems. TDS performs preventive maintenance on its entire network and therefore its preventive maintenance efforts are not "tracked by exchange, area or state." TDS does not keep a record or report of its preventive maintenance activities. TDS is performing work in response to a specific trouble report, a record is created and maintained by the Company.

The TDS Missouri companies of Orchard Farms, Stoutland and New London Telephone Company takes seriously its obligation to provide high quality telephone service. This commitment to service is regularly communicated to its employees. **All three companies** were selected in the Missouri PSC's 2010 USF Field and Management audits, including review of the Quality of Services practices and indexes. Per Myron Couch's, MoPSC staff, letter of June 9, 2010 to Mr. Paul Pederson, TDS:

"I looked at those indexes and found the company is accurately tracking and tabulating the quality of its service and those indexes are within the Commission's Quality of Service Objectives. ... I have no recommendation for the companies I have audited."

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

RESPONSE:

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 and adequate portion of its Plant Specific Expenses is spent maintaining its telephone plant.

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

RESPONSE:

See answer provided for Question E.