



November 10, 2010

**Filing via EFIS**

**RE: File No. TO-2011-0047  
Order Opening an Investigation into the Quality of Wireline  
Telecommunications Services in Missouri  
Global Crossing Local Services, Inc**

Good Day,

Enclosed please find the response for Global Crossing Local Services, Inc to File No. TO-2011-0047 - Order Opening an Investigation into the Quality of Wireline Telecommunications Services in Missouri.

If you have any questions pertaining to this filing, please contact me directly at 585.255.1206 or by email at [lynne.powers@globalcrossing.com](mailto:lynne.powers@globalcrossing.com)

Sincerely,

A handwritten signature in cursive script that reads "Lynne Powers".

Lynne Powers  
Sr. Mgr. Regulatory Affairs

ORDER OPENING AN INVESTIGATION INTO  
THE QUALITY OF WIRELINE TELECOMMUNICATIONS SERVICES IN MISSOURI  
File No. TO-2011-0047

Response of  
Global Crossing Local Services, Inc.  
November 10, 2010

- A. Does your company own or maintain telecommunications facilities in Missouri?

Response:

Global Crossing Local Services, Inc. does not own nor maintain telecommunications facilities in Missouri. Global Crossing Local Services, Inc. provides services via a Global Crossing owned switch located in Kansas City, KS and leased special access loops from the ILEC.

- 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.

Response: Not applicable. Global Crossing Local Services, Inc. provides services via special access loop from the ILEC.

- ii. Timeliness of repairing service after a customer reports trouble.

Response: Global Crossing Local Services, Inc. tracks the time it takes to service customer troubles monthly by exchange.

- iii. Amount of service trouble.

Response: Global Crossing Local Services, Inc. tracks the amount of customer service troubles monthly by exchange.

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

Response:

Trouble reports for time period January 2010 to October 2010

Jan 2010	2 outages; both repaired within 24 hrs. 1) O'Fallon exchange - Internal network issue, 2) Kansas City exchange - LEC cable repair.
Feb 2010	1 outage, repaired within 24 hrs. Kansas City exchange - LEC cable repair.
Mar 2010	no issues
Apr 2010	no issues
May 2010	no issues
Jun 2010	no issues
Jul 2010	no issues
Aug 2010	1 service issue; repaired within 24 hrs. Berger exchange - LEC cable repair
Sep 2010	1 outage, repaired with 24 hrs. St. Louis exchange - Internal routing issue.
Oct 2010	no issues

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- 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:

Global Crossing conducts daily, weekly, monthly, quarterly, semi-annual and annual routines at each switch site to include testing on HVAC systems, generators and batteries, DC plant readings, alarm testing, fire suppression systems, Alber testing, air filter maintenance and UPS systems. All testing is tracked by state and is documented on internal reporting systems within Operations systems. Global Crossing monitors call completion traffic in our switches on a daily basis to ensure network reliability. As evidence that telephone equipment and plant is in good working condition, data for the Kansas City switch reflect 100% availability from fourth quarter 2008 to present.

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

Response:

Information is not available.

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

Response:

Annual budget information is not available. Training courses have been developed and placed on an internal Global Crossing website. All Operations employees are encouraged to take the online training modules (called eLearning) and review the PowerPoint individual training sessions.