Pamela H. Sherwood
Vice President of Regulatory

November 1, 2010

Via EFIS

Steven C. Reed
Secretary of Missouri Public Service Commission
Missouri Public Service Commission
200 Madison Street, PO Box 360
Jefferson City, MO 65102-0360

   RE: Answers to data request in File No. TO-2011-0047

Dear Mr. Reed:

In accordance with the September 2, 2010 docket entry in the above referenced case, **tw telecom of kansas city llc** provides the following information:

> 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.*

Answer: 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.*

> B.i.   *Timeliness of installing service after a customer orders service.*

Answer: **tw telecom** consistently measures performance to customer installation commitments met. This measures the extent to which **tw telecom** installs services for customers by the Customer Committed Due Date (CCDD). Customer canceled orders are excluded from the metric. The CCDD is defined as the latest negotiated due date that was driven by a customer-initiated due date change or delay. **tw telecom** initiated due date changes and/or delays do not change the CCDD. An installation commitment "met" is defined as when all services were turned up and implemented on or before midnight of the CCDC. Turn-ups delayed by the customer, where there were not **tw telecom** issues or delays, are included as a "met" in this metric. This measurement is aggregated for the requested date range and reported by market (in this case, our market is the entire Kansas City area, including both Missouri and Kansas) and can be rolled up to a regional and/or company-wide (all 75 **tw telecom** markets) level as needed.

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

Answer: **tw telecom** consistently measures performance to Mean Time to Restore (TTR). This measures the timeliness of repair actions, focusing on how long it takes to restore service to the customer. Timing (in clock hours) starts with the time the trouble is reported to **tw telecom** and ends when service has been restored to the customer. Time delays due to "no access" to the customer premises are excluded from the repair time.   In addition to TTR, **tw telecom** measures the percent of time service is restored within 24 hours of the initial time the trouble was reported to **tw telecom**.   These measurements are aggregated for the requested date range and reported by market and can be rolled up to a region and/or company level as needed.

B.iii.   Amount of service trouble.

Answer: **tw telecom** consistently measures trouble ticket reports per 100 access lines. All trouble tickets reported to **tw telecom** by the customer are measured with the exception of tickets closed to customer premise equipment (CPE) or disaster situations. These measurements are aggregated for the requested date range and reported by market and can be rolled up to a region and/or company level as needed.

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

Answer: For each of the metrics described in B above, tw telecom's results, for the entire Kansas City market, which includes Kansas City, Missouri and Kansas City, Kansas, are as follows:

B.i Timeliness of installing service after a customer orders service:

3rd Quarter 2010   93.8% of orders completed on or before the CCDD

B.ii Timeliness of repairing service after a customer reports trouble:

3rd Quarter 2010   97.6% of trouble tickets cleared within 24 hours
Average TTR of 5 hours and 12 minutes

B.iii Amount of service trouble:

3rd Quarter 2010   0.93 trouble reports per 100 access lines

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.

Answer: PMI (Preventative Maintenance and Inspection) is the tool and process used to manage the routine work required to maintain the integrity of the **tw telecom** network. This includes the maintenance of Common Systems, Transport, Switch and Data infrastructure in the Central Offices and HUBs as well as **tw telecom** equipment installed at customer locations.   Proactive maintenance on the network is intended to reduce the number and/or duration of network outages thus creating a more stable and reliable network for **tw telecom** customers.

The PMI tool measures the percent of time that critical network activities are completed on time in a proactive manner. In December of 2009 an enhancement was made to the PMI system to better track the performance of tasks that were not completed. Prior to this time metrics had the potential to have false positives. As such, we are providing metrics beginning in January 2010 (post system enhancement).

January 2010	96.0%
February 2010	94.0%
March 2010	97.0%
April 2010	94.0%
May 2010	95.0%
June 2010	94.0%
July 2010	94.0%
August 2010	94.0%
September 2010	94.0%

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

Answer: The following information is generated using financials for the 12 month period ended 9/30/2010 for **tw telecom**'s Kansas City market, which includes both Missouri and Kansas. Of the total annual budget, 5.6% is spent on maintaining the Kansas City plant. This number represents the amount of cost recorded to Repair & Maintenance (R&M) expense for Kansas City plus the allocable share of operations employee costs for estimated time spent on R&M activities.

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

Answer: Of the total annual budget for our entire 75 markets, **tw telecom** estimates that it spends 0.02% on training technical staff. Training costs are not recorded to the individual state/markets. Thus this represents an estimate based on an allocable share (based on Kansas City operations headcount) of company-wide costs recorded to internal and external technical training.

If you have any questions regarding the above answers, or seek additional information, please contact me at the email or phone number listed above.

Sincerely,

Pamela H. Sherwood
Vice President of Regulatory