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November 12, 2010

VIA ELECTRONIC FILING

Ms. Colleen Dale
Secretary of the Commission
Missouri Public Service Commission
Governor Office Building
P.O. Box 360
Jefferson City, Missouri 65102

Re: Investigation into the Quality of Wireline Telecommunications Services in the State
of Missouri; File No. TO-2011-0047

Dear Ms. Dale:

On September 1, 2010, the Missouri Public Service Commission (the “Commission”) issued an Order requesting that all “local exchange telecommunications service providers certificated to provide service in Missouri” provide responses to several data requests in furtherance of the Commission’s investigation of the quality of wireline telecommunications services in the State of Missouri. On October 29, 2010, Charter Fiberlink - Missouri, LLC (“Charter Fiberlink”) filed its initial Response, along with a Motion for Protective Order and Motion for Expedited Treatment. Charter Fiberlink hereby provides the following additional information in response to the Commission’s September 1, 2010, Order and November 9, 2010, Order Establishing Protective Order. Pursuant to the Order Establishing Protective Order, the information indicated as “highly confidential” has been submitted directly to the Commission Staff and the Office of the Public Counsel.

I. Description of Charter Fiberlink

On April 15, 2001, the Commission granted Charter Fiberlink a certificate of service authority authorizing Charter Fiberlink to provide basic local telecommunications services and intrastate interexchange telecommunications services in Missouri.¹

¹ *Application of Charter Fiberlink - Missouri, LLC for a Certificate of Service Authority to Provide Basic Local Telecommunications Service and Intrastate Interexchange Services in Portions of the State of Missouri and to Classify Said Services and the Company as Competitive*, Order Granting Certificate to Provide Basic Local and Interexchange Telecommunications Services, Case No. TA-2001-346 (Mo. PSC April 16, 2001).

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Charter Fiberlink's principal service offering in Missouri is its all distance voice communications service permitting unlimited calling throughout the United States, Canada and Puerto Rico, combined with eleven (11) features and the lease of a multimedia terminal adaptor, which connects the customer's home wiring to the cable television facilities of Charter Fiberlink's affiliate. Charter Fiberlink provides its principal voice communication service over a broadband connection provided by its cable television affiliate using the same cable that is used to provide cable television service. As such, Charter Fiberlink has no separate, standalone local or long distance telecommunications network in Missouri. Although Charter Fiberlink also offers point-to-point private line services in certain portions of Missouri, Charter Fiberlink does not offer a primary line service that does not include the use of a multimedia terminal adaptor.²

Charter Fiberlink's principal voice communications service satisfies the Federal Communications Commission's ("FCC") definition of an interconnected VoIP service.³ With respect to such service, Charter Fiberlink complies with all current FCC requirements applicable to interconnected VoIP service, including requirements related to 911, federal universal service, CALEA, CPNI, number portability and accessibility.⁴ Charter Fiberlink also exercises reasonable efforts to act consistently with the Commission's traditional telephone regulatory requirements in connection with Charter Fiberlink's provision of voice communications service in Missouri. Such efforts have included, among other things, filing and maintaining tariffs that describe Charter Fiberlink's voice communications service, as well as Charter Fiberlink's submission of responses to Commission data requests and other periodic reports.

² In 2002, Charter Fiberlink acquired certain assets and customers as a result of a transaction with AT&T Communications of the Southwest, Inc. See *Joint Application of AT&T Communications of the Southwest, Inc. to Transfer Assets to Charter Fiberlink - Missouri, LLC*, Order Approving Transfer of Assets and Granting Waiver of Commission Rule 4 CSR 240-33.150, Case No. TM-2002-71 (Mo. PSC Dec. 9, 2001). Many, but not all, of those customers have been transitioned to Charter's voice communications service from the traditional circuit switched telephone service offerings that were provided at the time of the transaction. However, all such customers utilize a multimedia terminal adapter in connection with their use of Charter Fiberlink's service.

³ The FCC defines "interconnected VoIP service" as "a service that: (1) Enables real-time, two-way voice communications; (2) Requires a broadband connection from the user's location; (3) Requires Internet protocol-compatible customer premises equipment (CPE); and (4) Permits users generally to receive calls that originate on the public switched telephone network and to terminate calls to the public switched telephone network." 47 C.F.R. § 9.3.

⁴ *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers*, WC Docket Nos. 04-36, 05-196, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (2005); *Communications Assistance for Law Enforcement Act and Broadband Access and Services*, ET Docket No. 04-295, First Report and Order and Further Notice of Proposed Rulemaking, 20 FCC Rcd 14989 (2005); *Universal Service Contribution Methodology*, WC Docket No. 06-122, Report and Order and Notice of Proposed Rulemaking, 21 FCC Rcd 7518 (2006); *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information*, CC Docket No. 96-115, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007); *IP-Enabled Services; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, WC Docket No. 04-36, CG Docket No. 03-123, Report and Order, 22 FCC Rcd 11275 (2007); *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531 (2007).

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II. Responses to the Commission's Data Requests

Charter Fiberlink hereby provides the following responses to the Commission's data requests in furtherance of the Commission's investigation of the quality of wireline telecommunications services in the State of Missouri.

- 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: ****HIGHLY CONFIDENTIAL INFORMATION REMOVED****

- 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: ****HIGHLY CONFIDENTIAL INFORMATION REMOVED****

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

Response: ****HIGHLY CONFIDENTIAL INFORMATION REMOVED****

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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: ****HIGHLY CONFIDENTIAL INFORMATION REMOVED****

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

Response: ****HIGHLY CONFIDENTIAL INFORMATION REMOVED****

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

Response: ****HIGHLY CONFIDENTIAL INFORMATION REMOVED****

If any further information is required by the Commission, please contact the undersigned.

Very truly yours,

/s/ Kennard B. Woods
Counsel for Charter Fiberlink - Missouri, LLC

cc: Missouri Public Service Commission Staff
Office of the Public Counsel
Mark E. Brown, Esq.
Michael R. Moore, Esq.
Charter Fiberlink - Missouri, LLC