

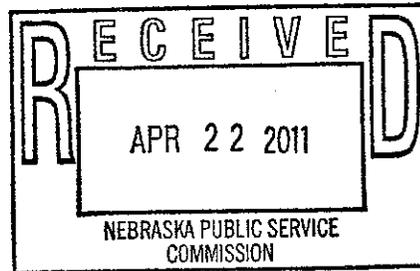
**BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Nebraska Public Service ) Application No. C-4272/PI-169  
commission, on its own motion, to investigate )  
practices related to network reliability and )  
requirements governing notification for )  
service interruptions. )

**RURAL INDEPENDENT COMPANIES' COMMENTS IN RESPONSE TO  
MARCH 15, 2011 ORDER SEEKING FURTHER COMMENT**

The Rural Independent Companies ("RIC")<sup>1</sup> submit these Comments in response to the Commission's Order Seeking Further Comments entered in this proceeding on March 15, 2011.<sup>2</sup> RIC appreciates the opportunity to provide the following Comments to the Commission.

On May 12, 2010, the Commission opened Application No. C-4272/PI-169 to investigate practices related to network reliability and standards governing telephone service interruptions. The docket was opened in response to a substantial service outage which interrupted telephone service and affected the ability of many consumers to reach emergency responders for an extended period of time. The Commission found that a statewide investigation would assist it in considering policies or rules aimed at reducing the likelihood that a substantial service outage will occur in the state.



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<sup>1</sup>Arlington Telephone Company, Blair Telephone Company, Cambridge Telephone Co., Clarks Telecommunications Co., Consolidated Telephone Company, Consolidated Telco, Inc., Consolidated Telecom, Inc., The Curtis Telephone Company, Eastern Nebraska Telephone Company, Great Plains Communications, Inc., Hartington Telecommunications Co., Inc., Hershey Cooperative Telephone Company, Inc., K & M Telephone Company, Inc., The Nebraska Central Telephone Company, Northeast Nebraska Telephone Company, Rock County Telephone Company, Stanton Telephone Co., Inc. and Three River Telco.

<sup>2</sup> *In the Matter of the Nebraska Public Service commission, on its own motion, to investigate practices related to network reliability and requirements governing notification for service interruptions.C-4272/PI-169 Order Seeking Further Comments dated March 15, 2011 ("March 15, 2011 Order").*

In this docket, the Commission stated its main focus will be the impact of communications disruptions on public safety. The Commission stated that it would look at ways communication providers could minimize disruptions to 911 access through network design.

The Commission also sought comment on ways to improve the responsiveness of carriers to state and local authorities and to other carriers when a service outage occurs. The Commission also sought comment on ways to improve service outage reporting to ensure that companies convey this information to the Commission and other entities, in a concise, uniform and timely manner. The Commission held a technical workshop on July 13, 2010 to focus on these issues.

On March 15, 2011, the Commission entered a subsequent Order in this Docket in which it sought further comment. In the Order, the Commission's stated purposes were to first seek assurance from the industry that sufficient reliability and diversity exists to prevent or minimize service disruptions. Second, in the event of a service disruption, to provide the Commission with accurate and timely information regarding the status of communications service in the affected area so that the Commission and providers can properly inform the public.

In the March 15, 2011 Order, the Commission asks a series of questions regarding network reliability and reporting and requests those providing comments to file them with the Commission on or before April 22, 2011. The RIC believes that this Commission investigation is important and will assist the Commission in its investigation. If the Commission ascertains it is in need of additional information, the RIC recommends for the Commission to seek additional information in the form of a data request.

## Network Reliability – Paths and Equipment – Redundancy and Diversity

The Commission seeks further comment on whether companies have sufficient paths and equipment for redundancy and diversity. The RIC submits that the initial focus of the Commission's inquiry should be regarding 911 service.

For 911 service the most critical path that would affect the most subscribers in reaching 911 service is the path between the location which houses the selective router(s) and the PSAP. The selective router and the path between the location which houses the selective router and the PSAP are outside the direct control of the RIC. RIC believes that the information could be provided by CenturyLink and Windstream and this information would assist the Commission in determining whether there are sufficient paths for redundancy and diversity in this link.

There are various degrees of redundancy and diversity throughout the RIC networks between end office locations and the tandem locations (where the selective routers are located) and between remote locations and host-office locations. In some instances, there is diversity between end office locations and the tandem, and between remotes and their host office. The level of diversity between these locations are based upon balancing the specific factual situation for that exchange, cost considerations and the subscriber benefit that would result from additional route diversity.

Although route diversity can help to minimize the potential of some service outages, route diversity does not guarantee against service outages. For example, last year's flooding on the Elkhorn river washed-out diverse fiber routes across the river.

The Commission seeks comment on infrastructure improvement projects that are currently being planned or implemented in the state. From an overall perspective, some of the

RIC are planning to connect to a second carrier that over time will allow for additional redundancy in both trunks and signaling links.

The Commission also seeks comment on whether carriers that have experienced any weakness in reliability or redundancy through the use of another provider's network reported the weakness to the underlying carrier. The RIC members did not report the breach of fiber routes that occurred during the Elkhorn flood as Qwest was well aware of the problem.

Some of the RIC have experienced weaknesses in reliability in terminating long distance calls. This issue has been reported to the Commission for further action.

### Reporting

In order to strengthen and clarify the Commission's network outage reporting requirements, the Commission seeks comment on definitional and reporting standards. In so doing, the Commission seeks comment on how to define a network "service outage." The RIC recommends that providing companies with a quantifiable definition of a "service outage" is necessary to assure consistent reporting of "service outages" among all carriers in the state.

RIC believes the Commission's current definition of "service interruption" as defined in its Service Outage Reporting Requirements is sufficient to be used as the definition of "service outage." In its Service Outage Reporting Requirement "service interruption" has been defined by the Commission as:

- (a) Any service outage of a company's (LEC's) intraLATA long distance facilities for more than thirty (30) minutes.
- (b) A service outage for thirty (30) minutes or longer affecting an exchange or five hundred (500) working lines in any NXX per central office excluding planned and scheduled outages under thirty (30) minutes.
- (c) Complete loss of EAS or toll trunk groups in a central office for thirty (30) minutes or longer.

- (d) Loss of local distribution facilities affecting service to one hundred (100) or more of the working lines in an exchange for thirty (30) minutes or longer.
- (e) Any service outage of company operated 911 equipment or facilities which causes isolation of working lines in any exchange from 911 access for thirty (30) minutes or longer.
- (f) The loss of service to airports, military facilities, or hospital facilities affecting public safety.

RIC believes the Commission should continue to focus its definition of service outage on the ability of end users to complete calls--particularly emergency calls to PSAPs. It should not be necessary, for example, to report when a redundant element of a carrier's network is disrupted, but services to subscribers have not been disrupted and subscribers are able to complete calls.

The Commission also seeks comment on how to obtain a more accurate report of the number of lines affected by an outage which could impact service provided by other providers. RIC does not believe the focus of reporting should be based upon service outages which may affect other carriers. RIC does not believe carriers would have sufficient information to determine if another carrier's subscribers are affected or the number of subscribers affected. For example, it is unlikely that the RIC would know how many subscribers are served or could be served by a cell site should there be a cable cut to the cell site location.

#### Notification of First Responders and Public Safety Answering Points

The Commission seeks comment on the process used by the industry to notify first responders and Public Safety Answering Points of outages which may disrupt or impair access to 911 Service. The RIC believes that the Commission should adopt notification requirements for carriers to notify first responders and public safety answering points ("PSAPs") upon the occurrence of a significant outage. This notification should be provided, if possible, through multiple communication methods (voice, email, etc.) for all outages of a large scope.

The Commission also seeks comment on whether it should require carriers to inform the Commission about their steps to notify PSAPS, media outlets and the public. RIC believes it is appropriate to inform the Commission when it has notified the appropriate PSAPs and to include further information in the carrier's final report to the Commission.

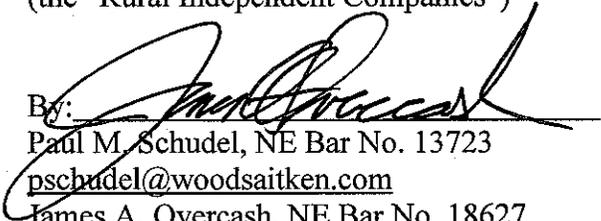
The Commission also seeks comment on whether it should require carriers to provide information on remedial actions taken to prevent or minimize disruptions going forward. The RIC believes such information is already required as part of the Commission's Service Outage Reporting Requirements and this requirement should continue.

#### Carrier-to-Carrier Notification

The RIC believes that the current level of intercarrier communication is sufficient to notify and cooperate on outage issues. Consequently, the RIC does not believe that the adoption of additional requirements is necessary.

Dated: April 22, 2011

Arlington Telephone Company,  
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Cambridge Telephone Co.,  
Clarks Telecommunications Co.,  
Consolidated Telephone Company,  
Consolidated Telco, Inc.,  
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Great Plains Communications, Inc.,  
Hartington Telecommunications Co., Inc.,  
Hershey Cooperative Telephone Company, Inc.,  
K & M Telephone Company, Inc.,  
The Nebraska Central Telephone Company,  
Northeast Nebraska Telephone Company,  
Rock County Telephone Company,  
Stanton Telephone Co., Inc., and  
Three River Telco  
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