

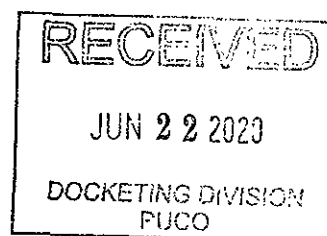
Confidential Release

Case number: 13-1115-TP-COI

Date of Confidential Document: 11/18/2013

Release Date: 6/18/20

Page Count: 3



Document Description: Line 510 and Line 610

"Consent to Release to the PUCO DIS Website"

Name Jay S. Agranoff

Reviewing Attorney Examiner's Signature

Date Reviewed 6/22/20

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician ADZ Date Processed 6/23/20

CONFIDENTIAL

Confidential treatment has been requested for the following document:

Case # 13-1115-TP-COI

Page Count: 3

Date Filed: Monday, November 18, 2013

Filed by: Norman J. Kennard

Behalf of: Vanlue Telephone Company

Summary of document: Line 510 and Line 610

PUCO

RECEIVED-DOCKETING DIV
2013 NOV 18 PM 2:13



THOMAS, LONG,
NIESEN & KENNARD

Attorneys and Counsellors at Law

NORMAN J. KENNARD
OHIO ID No. 0090006
Direct Dial: 717.255.7627
nkennard@thomaslonglaw.com

November 15, 2013

Via Electronic and First Class Mail

Barcy F. McNeal, Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215

Re: *In the Matter of the Annual Filing Requirements for 2013 Pertaining to the Provisioning of High Cost Universal Service*, Case No. 13-1115-TP-COI; **2013 FCC 481**

Dear Secretary McNeal:

Enclosed for filing in the above-captioned docket on behalf of Vanlue Telephone Company ("Vanlue") please find an original and three (3) copies of Line 510 (Description of Compliance with Service Quality Standards and Consumer Protection) and Line 610 (Description of Functionality in Emergency Situations) which were omitted from Vanlue's original filing made October 15, 2013 with respect to company financial results required in "Rate of Return Carrier Additional Information" section contained within the Federal Communications Commission's Form 481.

Redacted public versions of Vanlue's Form 481 will be or have been electronically filed with the Commission.

Vanlue requests that you certify to the FCC, as required by 47 C.F.R. § 54.314, by the deadline of December 16, 2013 that Vanlue should continue receiving Federal high cost support.

Should you or any member of the Commission Staff have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Sincerely,

THOMAS, LONG, NIESEN & KENNARD

Norman J. Kennard

By

Norman J. Kennard

NJK:tl
Enclosure

RECEIVED-DOCKETING DIV
2013 NOV 18 PM 2:13
PUCO

Vanlue Telephone Company

Line 510 – Description of Compliance with Service Quality Standards and Consumer Protection

Rule 54.313(a)(5)

TDS Telecommunications Corporation's ILEC companies follow applicable federal and state service quality and consumer protection rules. They comply with quality of service requirements including monitoring and reporting service quality metrics where required. TDS Telecom has implemented numerous consumer protection measures to protect customer information. For example, TDS implemented Customer Proprietary Network Information (CPNI) policies and procedures that are consistent with the FCC's regulations. Employees are required to complete CPNI training and in addition, employees who have access to CPNI data receive additional guidance through written procedures regarding customer authentication. Annually, all employees are required to review TDS' Business Code of Conduct which includes information and requirements on protecting sensitive customer information from improper use and disclosure. TDS data privacy and security policies are reinforced through periodic training required of all employees. Additional consumer protection measures include TDS' use of a third-party verifier to prevent unauthorized presubscribed interexchange carrier (PIC) changes ("Slamming") and the elimination of billing and collection arrangements that could have potentially allowed unauthorized third party charges to be added to customer's bills ("Cramming").

CONFIDENTIAL -
NOT FOR PUBLIC DISSEMINATION

Vanlue Telephone Company

Line 610 – Description of Functionality in Emergency Situations

Rule 54.313(a)(6)

Company is able to remain functional in an emergency situation through the use of back-up power to ensure functionality without an external power source. The Company's standard for battery backup is 8 hours in offices with no generator and 4 hours in offices with a generator. This is ensured during semi-annual routine maintenance which includes battery inspection, cleaning, documentation of float voltage and cell temperature, as well as equalization or replacement if necessary. In addition, permanent generators are present at significant wire centers to maintain power in the event a commercial power failure extends beyond battery backup capabilities. Also, portable generators are available for deployment to remote wire centers without permanent generators. The Company's network is engineered to provide maximum capacity in order to handle excess traffic in the event of traffic spikes resulting from emergency situations. Company facilities are remotely monitored and managed by a centralized Network Operations Center which is staffed 24 x 7, 365 days a year. Technicians are able to remotely access and respond to alarm conditions. By design, transport redundancy is built into the telephony and data network on many levels and in the event of a hardware or circuit failure or traffic spike, the networks are able to self-correct in many cases or, at many locations, technicians are able to manually switch network elements to standby facilities both locally and remotely.