



UT-143013

Steven King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
Olympia WA 98504-7250

July 15<sup>th</sup>, 2014

RE: Eligible Telecommunications Carrier's annual filing to the Federal Communications Commission pursuant to 47 C.F.R. § 54.313. and 47 C.F.R. 54.422 (Form 481)  
Docket UT-143013

STATE OF WASHINGTON  
UTIL. AND TRANSPORTATION COMMISSION  
2014 JUL 17 AM 8:08  
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REGULATORY MANAGEMENT

Dear Mr. King;

Enclosed please find additional Form 481 support as requested by staff.

Should you have any questions or require additional information please contact me directly.

Best regards,

A handwritten signature in black ink, appearing to read "Dale Merten", written in a cursive style.

Dale Merten  
C.O.O.  
ToledoTel  
306-864-2044  
[dale@toledotel.com](mailto:dale@toledotel.com)

Enclosures

**5-Year Plan for Network Improvements and Upgrades**  
Pursuant to 47 C.F.R. § 54.202(a)(1)(ii)

Company Name: The Toledo Telephone Co., Inc.  
Study Area Code: 522447

Attached Map of 5 Year Plan: Yes

**Project Information:**

Wire Center/Exchange Project	Projected Start Year	Projected Completion Year	Estimated Population Served	Estimated Area	Description of Proposed Improvement or Upgrade
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1) Entire Service Area FTTP Upgrade	1/2/19	1/1/24	2000	386 sq miles	Complete fiber upgrade to existing old copper network began in 2012. 100% of households and business will receive fiber optic cable to the premise providing voice and broadband capability of up to 1 gigabit before the end of the five year plan time frame.
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- a)
- b)
- c)
- 2)
  - a)
  - b)
- 3)
  - a)
  - b)
- 4)
  - a)

**Estimated Investment and Operating Expenses per Year:**

Year	Network Investment	Operating Expenses
2015	\$ 8,000,000	\$ 3,500,000
2016	\$ 7,000,000	\$ 3,000,000
2017	\$ 1,000,000	\$ 2,500,000
2018	\$ 500,000	\$ 2,000,000
2019	\$ 500,000	\$ 1,500,000
<b>Total</b>	<b>\$ 17,000,000</b>	



## STATEMENT DEMONSTRATING FUNCTIONALITY IN EMERGENCY SITUATIONS.

At line 600 of FCC Form 481, The Toledo Telephone Co., Inc. (ToledoTel) certified that it is able to function in emergency situations as set forth in 47 C.F.R § 54.202(a)(2). This means that ToledoTel has reasonable amount of back-up power to ensure functionality without an external source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. This statement will detail how ToledoTel is prepared to ensure continued service in an emergency situation.

ToledoTel has back-up batteries that provide service for the central office during a power outage with the capacity to function for at least twenty-four hours. In addition, there is a natural gas powered generator available which can operate as long as the natural gas supply is not interrupted that automatically starts during any power outage or spike in power which powers the central office and business office. Further, the Company has portable generators available for remote sites.

ToledoTel has route redundancy for long distance service, E-911 trunking and SS7 signaling trunking. ToledoTel also maintains IP connections as triple protection for call processing, SS7 and 911. In fact, when the entire state was unable to place 911 calls earlier this year, ToledoTel customers still had access to 911 services.

ToledoTel's outside plant is primarily fiber that is buried and, thus, protected from most weather events. Because of the fiber, ToledoTel has the capacity to manage traffic spikes without extraordinary additional effort.

In the case of isolated groups of customers that may suffer damage due to a cable cut, ToledoTel maintains sufficient staff and other resources to be able to put customers back in service in a very short amount of time. ToledoTel's emergency service equipment is located within its exchange and requires very little time to dispatch.

**Line 510**  
**Processes and Procedures to Ensure Compliance with Service Quality Standards**  
**and Consumer Protection Rules**  
**Per FCC Form 481 Instructions**

This document details the processes and procedures that The Toledo Telephone Company, Inc. (“Company”) follows to ensure compliance with service quality standards and consumer protection rules as laid out in FCC Form 481 Instructions.

For service quality standards that are affected by plant issues, the Company engineers and installs its plant and other facilities in such a way as to ensure, to the greatest extent possible, compliance with service quality standards that exist at the time that the plant and facilities are constructed.

In addition, employees are periodically briefed on service quality standards and consumer protection issues. In particular, if any set of issues appear to be prevalent, employees are given briefings on how to handle such issues. A recent example is the call completion problems that have arisen and the customer calls that are generated as a result. Although this is not a service quality problem caused by the Company, it does affect customers of the Company and, therefore, deserves the attention of the Company employees.

The Company also periodically reviews its operating procedures to be sure that those operating procedures are in compliance with service quality standards and that the operating procedures are not in violation of consumer protection rules. If questions arise, legal counsel is sought as needed.

If complaints are filed with the Company related to service quality standards or consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made. It should be noted that the Company has received only customer complaints regarding service quality standards that are related to call completion issues and no complaints regarding consumer protection rules as they relate to the service offered by the Company other than call completion issues.

New service requests are generally completed within one business day unless additional construction is required. Service outages are addressed by qualified technical staff within 2 hours, 24x7. Very few service issues are directly related to the Company’s network, the vast majority are caused by customers equipment or inside wiring.