

Vista-United Telecommunications

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March 17, 1999

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Mr. Blanca S. Bayo
Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Review of Regulated Utilities' Year
2000 Preparations and Readiness
(Telecommunications)

Dear Mr. Bayo:

Pursuant to the March 5, 1999 Notice of Staff Workshop in the above referenced undocketed matter, please find enclosed Vista-United Telecommunications' responses to the list of questions attached thereto.

Should you have any questions regarding this matter, please contact me at (407) 827-2210.

Sincerely,

Lynn B. Hall
Contracts and Tariffs Manager

- ACK Enclosures
- AFA ~~cc:~~ Rick Astleford
- APP _____ Jerry Hooks
- CAF _____ Michael J. Martin
- CMU Turbell Jim Schumacher
- CTR _____ Jim Stewart
- EAG _____
- LEG 1 C/Keaty
- LIN _____
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH 2 Melinda Butler

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**REVIEW OF REGULATED UTILITIES'
YEAR 2000 PREPARATION AND READINESS
(TELECOMMUNICATIONS)**

QUESTIONS

1. What is the status of your company's Year 2000 plans and preparations? Please report your company's overall percentage of completion toward being fully Year 2000 compliant.

With the exception of contingency planning, Vista-United Telecommunications is 100% complete with all phases of our Year 2000 plans and preparations which include Inventory, Assessment, Remediation, Unit Testing, Integration and System Testing, and Rollout for our Network Elements and Auxiliary Systems. For our Support Systems, we are 100% complete with the Inventory and Assessment phases, and 60% complete with the Unit Testing, Integration and System Testing, and Rollout phase, all of which we expect to have completed by August 1999.

2. What specific timetables and milestones have you identified to prepare for Year 2000? For each timetable and milestone please report the following: (1) the percentage completed and expected full-completion date; (2) the specific tasks remaining to be completed; and (3) any specific problems anticipated.

For purposes of making plans and preparations for Year 2000, Vista-United partitioned its Communications Systems into three major subsets, defined as follows:

Network Elements which are those systems, components, or software that directly affect telecommunications transmission and/or reception (e.g., computer switches, routers, and amplifiers).

Support Systems which are operations support and administrative maintenance systems such as maintenance, billing, parts, ordering, etc.

Auxiliary Systems which are systems or components such as payroll, human resources, security and alarm control systems, environmental control systems, etc.

In assessing and remedying the Year 2000 problem, five basic phases were identified, which are Inventory, Assessment, Remediation, Unit Testing, Integration and System Testing Phase, and Rollout. The phases are fluid. Having completed one phase, you may go back and repeat earlier phases. For instance, every action taken should, to the extent possible, be followed by testing. Testing may reveal unforeseen circumstances that may require a return to Assessment and Remediation.

- (1) **The following represents our overall report on the progress of Year 2000 preparations:**

PROGRESS OF YEAR 2000 PREPARATIONS

	INVENTORY		ASSESSMENT		REMEDIATION		UNIT TESTING	
	% Complete	Estimated Completion Date	% Complete	Estimated Completion Date	% Complete	Estimated Completion Date	% Complete	Estimated Completion Date
Network Elements	100	11/97	100	3/98	100	12/98	100	3/99
Support Systems	100	11/97	100	5/98	75	7/99	60	8/99
Auxiliary Systems	100	11/97	100	5/98	100	12/98	100	12/98

	INTEGRATION AND SYSTEM TESTING		ROLLOUT	
	% Complete	Estimated Complete Date	% Complete	Estimated Complete Date
Network Elements	100	3/99	100	3/99
Support Systems	60	8/99	60	9/99
Auxiliary Systems	100	1/99	100	2/99



- (2) **For Network Elements and Auxiliary Systems, our contingency plan is basically all that remains to be completed and that is on schedule to be completed by July 1, 1999. For Support Systems, some remaining testing is currently being done in a test environment with final testing scheduled for spring of 1999 with all implementation to be completed by the end of September 1999.**
 - (3) **The problems we have encountered as well as continue to anticipate are basically the result of software vendors lacking knowledgeable personnel.**
3. What is the status of the **inventory** phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.
 - (1) **The Inventory phase for all Vista-United's systems is complete.**
 - (2) **None as we have completed the Inventory phase of our Year 2000 plans and preparations.**
 - (3) **The problems we encountered were basically the result of software vendors lacking knowledgeable personnel.**
 - (4) **N/A.**
4. What is the status of the **assessment** phase of your company's year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.
 - (1) **The Assessment phase for all of Vista-United's systems are complete.**
 - (2) **None as we have completed the Assessment phase of our Year 2000 plans and preparations.**
 - (3) **The problems we encountered were basically the result of software vendors lacking knowledgeable personnel.**
 - (4) **N/A.**



5. Which of your company's hardware and software systems, such as billing, administrative, customer service, infrastructure, and operational support systems, do you consider critical? For each such system, what functions (in whole or part) are done via mainframe computers and which functions electronically interface with PC-based computers? How are these systems being remediated and tested? What problems have been identified that require additional work to make them Year 2000 compliant? Please report estimated completion dates for each problem identified.

For our Network Elements and Auxiliary Systems, Vista-United has identified as critical systems the following:

- **Voice Mail**
- **Central Office Switch**
- **Carrier Equipment**
- **Cross Connect System**

For our Support Systems we have identified as critical systems the following:

- **Billing and Accounting and Inventory System**
- **UNIX Operating Systems and associated Customer Interface Systems**
- **Call Center Application Systems**

6. What is the status of the **remediation**, or renovation, phase of your company's Year 2000 preparations. Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

- (1) **For Vista-United's Network Elements and Auxiliary Systems, we are 100% complete with the Remediation phase of our Year 2000 plans and preparations. For our Support Systems, we are 75% complete with the Remediation phase.**
- (2) **None for Vista-United's Network Elements and Auxiliary Systems as we have completed the Remediation phase of our Year 2000 plans and preparations. For our Support Systems, software releases have been loaded in a test environment and all that remains is completion of that testing, subsequent user testing, and ultimate implementation.**
- (3) **The problems we have encountered are basically the result of software vendors lacking knowledgeable personnel.**
- (4) **For Vista-United's Support Systems, remaining Remediation consists of software releases having been loaded in a test environment and testing being underway. Subsequent user testing is scheduled for April 1999 with ultimate implementation scheduled for no later than the end of July 1999.**



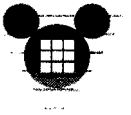
7. What is the status of the **testing (both unit and system)** phase of your company's Year 2000 preparations? Please report the following: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified. What tests are being done or will be done on network elements and customer-affecting systems? Please describe your company's testing process, including its approach and steps.

- (1) **For Vista-United's Network Elements and Auxiliary Systems, we are 100% complete with the Unit Testing and Integration and System Testing phase of our Year 2000 plans and preparations. For our Support Systems, we are 60% complete with the Unit Testing and Integration and System Testing phase and are on schedule to have this phase completed by the end of August 1, 1999.**
- (2) **None for Vista-United's Network Elements and Auxiliary Systems as we have completed this phase of our Year 2000 plans and preparations. For our Support Systems, all that remains is completion of testing in a test environment and subsequent user testing.**
- (3) **The problems that we have encountered as basically the result of software vendors lacking knowledgeable personnel.**
- (4) **For our Support Systems, software releases have been loaded in a test environment and testing is underway. Subsequent user testing is scheduled to begin in April and be completed by the end of July 1999.**

Any testing that has occurred or will occur is being performed in a lab captive or test environment with subsequent user testing where technically feasible. We do not anticipate performing any testing in a live environment due to the risk of jeopardizing the provision of service to our customers.

8. Please describe your company's plans to address interoperability issues with other domestic carriers, such as LECs, IXC's, ALECs, CAPs, and wireless providers, and with interconnected networks and outside systems. Please describe the status of such plans and related discussions, including percentage of completion.

Vista-United has met with numerous companies with whom we interconnect in the provision of services to discuss contingency planning. We have additional meetings with major carriers with whom we interconnect regarding Year 2000 scheduled for March 17, 18 and April 22, 1999. To our knowledge, all carriers with whom we are involved are, in our opinion, adequately addressing Y2K.



9. What network inter-operability testing has your company conducted or will your company conduct? Is your company working with ATIS and NRIC to perform network inter-operability tests? Please report the following concerning such testing: (1) the percentage of this phase completed and expected full-completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action(s) is being taken; and (4) the expected completion date for each problem identified.

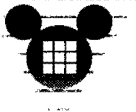
Vista-United does not currently have any plans to conduct network inter-operability testing in a live environment due to the risk of jeopardizing provision of service to our customers. We currently download information from ATIC and NRIC and consult with them from time to time as necessary. We also receive NRIC information directly from an affiliated company employee who participates in NRIC Year 2000 activities.

10. What is your company doing to avoid network failures that could arise due to non-compliant network providers? What safeguards are being taken? What communications channels have been opened with other network providers?

As noted in 8. above, Vista-United has met, continues to meet, and has regular dialogue with companies with whom we interconnect in the provision of service to our customers to discuss contingency planning. We are also in the process of developing a stand alone Y2K Crisis Management/Contingency Plan. While the Plan is a stand alone plan, certain modules of it are tied into our overall Business Resumption and Emergency Preparedness Plans.

11. Please describe your company's efforts to work with suppliers of your company's critical hardware and software systems to ensure that each supplier's equipment is Year 2000 compliant. Have you inventoried supplier and third-party products? Have you established compliance standards? What tests (unit and system) remain to be completed to verify that supplier's products are Year 2000 compliant, and when will they be completed? Please describe any contingency plans your company has developed to address the situation where a supplier's product is found to be non-compliant?

During the Inventory phase of our Year 2000 plans and preparations, we sent compliancy letters to all of our suppliers and vendors for all of our respective Network Elements, Support, and Auxiliary Systems. For our Network Elements and Auxiliary Systems, we received responses and with the exception of contingency planning, our Year 2000 plans and preparations are complete. For our Support Systems, out of 172 vendors of Vista-United systems who were contacted, only 33 have not given us any Y2K information regarding their product, none of which represent critical systems. The search for alternative vendors for these products and systems has been in process and continues. We have also attended and continue to attend numerous presentations by our suppliers. We have visited some vendor labs and participated in joint testing with them. Some systems have already been updated to Y2K compliancy.



As for contingency plans, Vista-United is in the process of developing a stand alone Y2K Crisis Management/Contingency Plan. While the Plan is a stand alone plan, certain modules of it are tied into our overall Business Resumption and Emergency Preparedness Plans.

12. What efforts is your company making to contact and educate critical customers to ensure that their telecommunications services and customer premises equipment (CPE) are Year 2000 compliant? What tests are being conducted or can be conducted by a customer to test its equipment?

Vista-United's current plans are to send out three (3) bill inserts to all of our customers regarding Year 2000 in the latter half of this year. As for customer testing, we do not anticipate performing any testing with any customers in a live environment due to the risk of jeopardizing the provision of service to them.

13. What communications channels has your company established with the Department of Emergency Services' Emergency Operations Center? With other industries/companies that depend on your company's services?

To date, Vista-United has only had contact with the Department of Emergency Services' in regard to a meeting announcement sent out in early January for a meeting that was held on January 14, 1999, which we were unable to attend. As already mentioned, we continue to have constant dialogue with carriers with whom we interconnect in the provision of services, as well as our vendors, regarding Year 2000.

14. Please describe your company's contingency or disaster recovery plans for Year 2000 related network problems and the status of such plans. If such plans are still being developed, please report the expected completion date. If such plans are complete, please bring a copy to the workshop. If such plans are not yet complete, please submit a copy to this Commission's Division of Communications prior to July 1, 1999.

Vista-United is in the process of developing a stand alone Y2K Crisis Management/Contingency Plan. While the Plan is a stand alone plan, certain modules of it are tied to our overall Business Resumption and Emergency Preparedness Plans. Assessment of the probability of failure and the associated risk is 100% complete for Network Systems, Support Systems, Auxiliary Systems, electric power, and suppliers. Preparation of contingency plans for Network Systems are 75% complete and are scheduled to be complete by July 1, 1999. Preparation of contingency plans for Support Systems are 20% complete and are scheduled to be complete by July 1, 1999. Preparation of contingency plans for Auxiliary Systems are 75% complete and are scheduled to be complete by April 1, 1999. Preparation of contingency plans related to electric power were completed in December 1998. Preparation of contingency plans related to suppliers are 75% complete and scheduled to be complete by October 1, 1999. There are different criteria for invoking the multiple and various phases of our Plan. Some very early phases of our Plan have already been invoked, such as planning analysis and



development freeze, resource availability planning, establishment of crisis management teams and determination of appropriate staffing, etc.