

State of Florida



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: November 25, 2013
TO: Dorothy E. Menasco, Commission Deputy Clerk II, Office of Commission Clerk
FROM: James S. Polk, Public Utility Analyst II, Office of Telecommunications
RE: Please file the attached documents in Docket 130158-TP

Please file the attached documents with corresponding email for the following telecoms in Docket 130158-TP entitled, **“2014 State certification Section 54.313 and Section 54.314, annual reporting requirements for high-cost recipients, and certification of support for eligible telecommunications carriers”** :

1. ITS Telecom
2. Verizon
3. CenturyLink

If you have any questions, please feel free to give me a call. Thank you for your assistance.

Enclosure

Service Quality Standards and Consumer Protection Rules Compliance

ITS Telecommunications Systems certifies that our company complies with the applicable state and FCC Service Quality Standards and the Consumer Protection Rules.

With regards to the FCC 47 C.F.R. §64.2001-64.2011 rules for CPNI (Customer Proprietary Network Information), ITS has a policy manual that details and enforces the requirements of the federal rules. Our managers review the policies of CPNI on a yearly basis or as needed when a new hire is involved with our customer information. The company certifies it's compliance annually with the FCC.

ITS also trains their employees on the Red Flag regulations to help identify Identity theft and through our NOC, we have procedures to mitigate the potential damage of identity theft. Our NOC has numerous measures in which to insure the integrity of our network and customer data.

ITS Telecommunications discloses their rates to our customers on our website, provide protection to our customers with Anti-Slamming Procedures as adopted with the Florida Administrative Code and the Florida Statutes and follow all other applicable federal and state requirements governing the protection of our customers' privacy.

Functionality in Emergency Situations

ITS Telecommunications Systems, Inc. certifies that our company is compliant in emergency situations as set forth in the Code of Federal Regulations. We have had a Disaster and Hurricane Preparedness Plan in place for many years and currently are revising our plan to incorporate use of the new technology that came about with the opening of our NOC (Network Operations Center) . We have established a Steering Committee that meets quarterly to review our Emergency Preparedness Policies.

ITS Telecommunications central office is designed to withstand power failures through the use of batteries and backup generators. We also have backup generators for our remotes which will keep running until power is restored as long as fuel is available. The NOC and OSP perform scheduled routine maintenance of our batteries and generators. Our NOC monitors our network 24/7 which ensures timely responses when a problem arises. Our serving area has network redundancy that provides an alternate route when needed.

DOCKET NO. 130158-TP
VERIZON'S RESPONSE TO STAFF'S REQUEST FOR ADDITIONAL INFORMATION
CONCERNING FEDERAL HIGH-COST SUPPORT CERTIFICATION
November 25, 2013

Information Concerning Service Quality Standard and Consumer Protection

Verizon Florida LLC (Verizon Florida) complies with the company's privacy policy, *available at* <http://www.verizon.com/about/privacy/> and, among other things, has implemented procedures designed to comply with the FCC's Customer Proprietary Network Information and Truth-in-Billing requirements. Verizon Florida makes available the rates, terms and conditions of its offerings through its product guide, and, where applicable, tariffs. Consumers can access this information through Verizon Florida's website (*available at* <http://www.verizon.com/tariffs/GridMain.aspx?optState=FL>). Consumers are able to contact Verizon Florida with questions or concerns through a toll-free number or online. Verizon Florida advertises its services using media of general distribution and these advertisements are clear and contain appropriate disclosures.

Information Concerning Functionality in Emergency Situations

Verizon and its affiliates (Verizon) have emergency response and recovery plans in place to address business continuity.

Verizon's overall emergency response and recovery efforts are managed at emergency operations "hubs" – the Verizon Emergency Operations Center (EOC), which can be activated at multiple locations, including Texas, New Jersey, or via a Mobile Command Center, and the Verizon Wireless EOCs located in New Jersey and Texas. When activated, the EOCs are staffed by members of Verizon's Business Continuity and Emergency Management teams, the Verizon Wireless Crisis Management Teams, and representatives from several Verizon departments.

Verizon's business units have divided the country into regions based on their respective business needs and established specific continuity programs and plans that are appropriate. For example, one of Verizon's business units has a Regional Preparedness Plan for the Southeast Region that provides for appropriate equipment to be pre-positioned within a certain number of hours before estimated landfall of a hurricane. There is another Plan for the West Coast Region that includes procedures for, among other things, the aftermath of an earthquake. Similarly, there is a Plan for the New England Region that addresses contingencies for severe winter storms, including ice storms, which can lead to widespread power outages.

Verizon sets an internal goal for the availability of its wireline voice networks of far greater than 99%. To achieve this goal, Verizon focuses on service protection and restoration strategies for its networks. Verizon's legacy voice networks are comprised of numerous components that are connected using diverse (*i.e.*, redundant) transmission systems, circuits, and network technologies. Verizon has the ability to re-route traffic dynamically over its networks to

address outages at a specific location. This capability makes Verizon's networks more resistant to the impact of a local weather emergency or disaster.

Verizon also maintains Network Operations Centers (NOCs) that monitor critical network facilities, including transmission facilities, switches, and cell sites across Verizon's networks. The NOCs are staffed 24 hours a day, seven days a week with experienced personnel who work closely with regional and local field operations teams and with vendors to coordinate and expedite the restoration of service in the event of outages. The NOC technicians work with the field operation managers, and personnel are dispatched to an affected site as needed. An inventory of standard spare parts and repair equipment is available to technicians in centralized network locations. Verizon also has standing agreements with critical vendors to get support 24 hours a day, seven days a week from their engineering personnel and to obtain replacement equipment if required.

Verizon typically employs automatic power backup systems for its key network equipment. Verizon's central offices have been engineered to have both battery reserves and generators with 72-hour fuel reserves. Verizon's remote switches and DLCs have batteries designed to an eight hour engineering standard and/or on-site generators capable of providing at least eight hours of power. Verizon also has arrangements with fuel suppliers to refill fuel tanks as needed, thus allowing Verizon's critical network components to operate until commercial power is restored.

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

Embarq Florida, Inc. d/b/a CenturyLink ('CenturyLink') has established methods and procedures that are designed to facilitate compliance with applicable service quality standards and consumer protection rules. In the event that a service quality or consumer protection issue arises, CenturyLink works with appropriate government entities and/or customers to resolve the issue consistent with CenturyLink's obligations.

CenturyLink has implemented Customer Proprietary Network Information and Truth-in-Billing procedures in accordance with Federal requirements. CenturyLink also makes available the rates, terms and conditions of their offerings through service guides and where applicable, tariffs, which consumers can access through CenturyLink's website (available at http://www.centurylink.com/tariffs/fl_eqfl_loc_terms.pdf). Among other things, these documents explain the terms of service, including billing and payment requirements. Consumers are able to contact CenturyLink with questions or concerns through a toll-free number or online. Also, CenturyLink advertises their services using media of general distribution and these advertisements are clear and contain appropriate disclosures.

**Embarq Florida, Inc. d/b/a CenturyLink
Preparedness Statement**

Section 54.313(a)(6) of the Commission's rules requires an ETC to certify an ability to function in emergency situations as set forth in section 54.202(a)(2) of the Commission's rules. The standards set forth in section 54.202(a)(2) include a reasonable amount of back-up power to ensure functionality without an external power source, an ability to reroute traffic around damaged facilities, and a capability to manage traffic spikes resulting from emergency situations.

All Embarq Florida, Inc. d/b/a CenturyLink ('CenturyLink') central offices are equipped with battery backup equipment. Offices are equipped with sufficient battery capacity or generators to run for a minimum of four hours without power.

CenturyLink's network technologies are managed by centralized network reliability centers that manage and control the network's operation. Network reliability centers are located throughout the United States. Overseeing the network reliability centers and the hub of CenturyLink, Inc. overall network operations is the National Event Management Center, located in Littleton, CO.

We have extensive experience in planning for and responding to a wide variety of situations including hurricanes, floods, power outages, and man-made disasters. We have a team of experienced responders that work to restore the CenturyLink network as quickly and safely as possible.

- Our Disaster Preparedness Team has extensive experience in planning for and responding to a wide variety of situations that can affect the CenturyLink network. Our plans are designed to get the network back to business as usual as quickly and safely as possible. The planning process includes incorporating improvement opportunities from previous events into future response activities.
- Mitigation plans are developed to reduce the customer service disruption and to minimize network service affecting incidents with the activation of a managed restoration plan.
- In addition to ensuring a response plan for any adverse events, we also review and address issues such as capacity, infrastructure, and physical reliability.
- CenturyLink's Information Technology department is committed to identifying and managing IT-related service continuity risks across the enterprise. Safeguards have been established to minimize the risk, cost, and duration of disruption to essential business processes in the event of a major crisis or disaster.

Based on the above information, the reporting carrier certifies it is able to function in emergency situations as set forth in section 54.202(a)(2).