

# REPORT ON TELECOMMUNICATIONS SERVICE QUALITY

For

## TDS TELECOM/QUINCY TELEPHONE

Greensboro, Gretna, and Quincy Exchanges

March 2 – March 20, 2009

Division of Service, Safety & Consumer Assistance September 1, 2009

# TDS Telecom/Quincy Telephone Telecommunications Service Quality Report

## **Summary**

Staff performed a service evaluation on TDS Telecom/Quincy Telephone (TDS), during the period of March 2 – March 20, 2009. The exchanges reviewed were Greensboro, Gretna, and Quincy. A broad range of tests were conducted that included measurements of the subscriber's line and it included a series of automated test calls. Several other categories were evaluated and they are as follows:

- Periodic Report Review
- Answer Time, which includes Voice and TDD calls to both the Business and Repair Service Offices
- Adequacy of Directory Services, which includes a Directory Review and New Numbers in Directory Assistance
- Availability of Service (Installation)
- Subscriber Loops, Transmission
- Repair Service, which includes Out-of-Service (OOS) Restored within 24 Hours, Service Affecting (SA) Restored within 72 Hours, Rebates, and TDS tariff credits
- Safety, which includes Ground Deficiencies
- Timing and Billing Accuracy, which includes Intra-LATA 1+, and Directory Assistance Billing
- 9-1-1 Emergency Service, which includes Voice and TDD call completions

The service evaluation objectives are (1) to evaluate a company's performance based on service quality rules and standards; (2) to verify the service results the company reported to the Commission on a periodic basis; and (3) to determine if the company has corrected, or is in the process of correcting, all deficiencies found in previous evaluations. Staff reviewed the Quality of Service Complaints reported to the Commission during 2008 and found only one complaint had been filed for the entire year.

## **Findings**

In the periodic report review, staff examined the period from January 1, 2008 through December 31, 2008 for the three exchanges being evaluated, and found that the reports required by rule were in not in agreement with the records that were examined by staff. The records used by staff were for residential lines only; however, TDS used both residential and business lines for the preparation of the periodic reports. In addition to TDS using residential and business lines for the report, TDS only reflects "I" (Installation) orders, whereas, staff uses both "I" (Installation) and "T" (Transfer) orders for the review, as required by rule.

#### Corrective Action:

TDS refers to the August 18, 2009, Agenda Conference, where the Commission adopted changes to Rule 25-4.0185, Periodic Report, that they will evaluate the changes to the rule and make the necessary changes in future periodic reports.

#### **Answer Time:**

TDS Telecom's answer time, which included voice and TDD calls to its business office and repair service offices, did not meet the rule requirements.

#### Corrective Action:

TDS stated that during the audit time period, in which staff was making answer time calls to the local business office and repair service office, they were undergoing a major upgrade to their customer E-mail, impacting the majority of TDS Telecom customers system wide. This caused unusually high call volumes in all TDS contact center departments, and at times, resulted in customer call attempts being blocked in the contact centers. TDS has undertaken an extensive reorganization of their customer service representatives (CSR) in order to improve efficiency and to improve the customer's experience. TDS stated that they have restructured in order to create areas of expertise for customer service representatives such as finance, broadband, repair, and sales, to provide greater certainty that the CSR will be able to address the customer's needs with They created this extensive reorganization of their CSR in order to improve one phone call. efficiency and the customer's experience. TDS states that they are exploring one option to implement a Consumer Sales Contact Center, to handle residential sales and customer service calls (non-repair), which will add intelligent call routing to properly identify customers calling their toll free number by the customer's calling line ID (ANI). They feel the repair center can also utilize this intelligent routing to answer calls more quickly. Another option being evaluated is for any customer identified as being from Florida, in the Consumer Sales call routing system, will overflow to a secondary team of agents for Florida customers, when all agents on the Consumer Sales team are busy.

## **Adequacy of Directory Services:**

#### **Directory Review:**

Staff reviewed TDS' telephone directory labeled Quincy, Florida – Attapulgus, Georgia dated February 2009. The telephone directory listed the prices for Line Verification and Emergency Line Interrupt services as \$0.40 and \$0.35, respectively; however, the TDS tariff listed the prices as \$0.35 and \$0.40. This is the reverse order as shown in the directory. The price for local directory assistance was not listed in the telephone directory, but there was reference for the customer to call TDS information for any pricing information which might apply. In addition, the telephone directory did not have an explanation for the discontinuance of service procedures.

#### Corrective Action:

TDS responded by stating that with the next directory publication (February 2010), these two items will be corrected.

#### **New Numbers in Directory Assistance:**

Out of the 110 requests for numbers to local Directory Assistance (DA), the DA operators found 71 of the numbers correctly. There appears to be a problem with the local DA (411) database being updated in a timely manner. Staff took 20 of the voice DA requests and called through Florida Relay System (FRS) to the national database directory assistance asking for the same information. The national DA operator was able to find the number for the same request that

the local DA (411) was unable to locate. Staff made 70 requests through FRS to national directory assistance and the national DA operators found 59 of the numbers correctly.

#### Corrective Action:

TDS states that the process used to provide directory listings has been the same for years, which involves auto faxing the new listings to Independent Company Number Services (ICONS), on a daily basis. In order to better meet the needs of their customers, TDS decided to expand its offering of directory assistance to include national directory assistance (NDA) which affected their ability to ensure new listings were entered into local DA within 48 hours. Previously, TDS utilized a local exchange company for local DA service who utilized the ICONS data base, which given that the new listings were faxed on a daily basis, there was no issue meeting the 48 hour requirement. However, the change to a NDA provider added an additional step for a new listing which added a minimum of another 24 hours to get the new listings into the national DA databases. After investigating alternatives to working directly with any of the national databases, TDS was not able to work out any arrangements due to formatting issues with the records from their billing system. TDS states that it would require extensive cost to get the system corrected to the point where extracting the data into a legible format would work. TDS also stated that the cost to implement the required changes would exceed one year of annual directory assistance revenue. TDS said they would, if necessary, file a request for a rule waiver in the case for this commitment. TDS stated that, as for the staff finding concerning the Florida Relay System (FRS) being able to find the number, when local DA's could not, that FRS uses a different national DA database then the NDA provider used by TDS Telecom.

#### **Timing and Billing Accuracy:**

#### **Directory Assistance Billing:**

Staff made 110 calls to the local direct dialed DA and no calls to the national direct dialed DA. TDS billed for 113 calls to the local direct dialed DA, and 5 calls to the national direct dialed DA. Therefore, TDS billed for 118 total calls, and only 110 calls were made by staff. According to TDS' tariff, the rates for local direct dialed calls are \$0.50 each call and the rates for national direct dialed calls are \$0.95 for each call. Staff reviewed the TDS bills during that period and found the calls were billed according to tariff, except for 3 calls to local DA, and 5 calls to national direct dialed DA, which were billed, but not made.

#### Corrective Action:

TDS Telecom requested a log of directory assistance records from the DA vendor and the log showed a total of 118 calls made. TDS is attempting to reconcile and work with their DA provider regarding the differences. TDS Telecom's approved tariff states that a caller must dial 411, 1-411, or 555-1212 to reach their local or National Directory Assistance service, and that a local DA listing request is any listing request which is in the same NPA as the caller's "Home" NPA. Upon review, TDS has been able to determine that there was an error in the logic when customers dialed 555-1212 (411 calls are not effected). This error is qualifying the home NPA listing at the national rate. TDS will update the logic to correctly bill 555-1212 DA calls made for listings within the home NPA, and will work with their vendor to ensure that records are being sent to TDS in the proper format. TDS is in the process of identifying the customers affected and will be making the appropriate adjustments where possible.

#### **Subscriber Loops:**

#### **Transmission:**

For the exchanges that were reviewed, 257 loops were tested for transmission requirements. Twenty-nine loops were deemed unsatisfactory. The problems observed were high power influence, high noise, low balance readings, and one loop had a loop current reading that was below the circuit minimum. The readings caused the loops to be classified as unsatisfactory.

#### Corrective Action:

TDS has reviewed the twenty-nine loops deemed unsatisfactory by staff and follow-up to correct unsatisfactory measurements has been conducted or is in progress. Eleven of the unsatisfactory loop locations were served by a common cable in Quincy, and six loops in Gretna were found in a common cable. TDS currently has network projects either completed or in progress to address these situations. TDS states that company practice dictates "Every premise visit involving a trouble or installation (to include second and additional lines) must have loop readings taken and properly entered into MARTENS [TDS Plant Records System] for accuracy of records and to help isolate future troubles. Taking and entering loop readings is considered vital to the entire trouble or installation process in order for the job to be 100% complete." This practice has been reviewed with the technicians based at the Quincy office.

#### **Availability of Service (Installation):**

Staff reviewed a total of 1,125 service orders for the year of 2008 for the Greensboro and Gretna exchanges, and the fourth quarter of 2008 for the Quincy exchange. There were 224 missed appointments beyond the 3-day rule for the period under review. The Gretna exchange met the standard for two quarters of 2008. The Greensboro and Quincy exchanges did not meet the standard for any portion of the period under review.

#### Corrective Actions:

TDS acknowledges that the Greensboro and Quincy exchanges did not meet the standards for any portion of the review period; however, as a practice, for orders involving voice services only, TDS Telecom's internal processes are designed to meet the maximum 3-day installation interval. For installations which include DSL, the target installation interval is 5 days, which is necessary to allow for the shipment of customer equipment, i.e. DSL Gateway, from a central distribution center. TDS states that the use of a 5-day window allows time for the equipment to arrive and prevent billing from starting prior to the arrival of the equipment. TDS believes that with the recent changes to Rule 25-4.066 and the new definition of basic, they will meet the standards in all future reviews and reporting requirements.

#### **Repair Service:**

#### **Out-of-Service Reports restored within 24 Hours:**

Staff reviewed 1,360 OOS reports for the year of 2008 for the Greensboro and Gretna exchanges, and the fourth quarter of 2008 for the Quincy exchange. These three exchanges did not meet the standard.

#### Corrective Action:

TDS responded that of the tickets that failed to meet the standard, most were reported Sunday through Thursday, and did not meet the standard line appointment. TDS states that 60% were cleared the next day; however, later than the 24 hours target, some missed by only a few minutes. TDS feels that their clearing process method used in 2008 may have contributed to some of the tickets not meeting the standard, whereas, the technicians called results in to a centralized group to provide information for input into the ticketing system. While technicians were encouraged to make the calls as soon as a ticket was cleared, that was not always practical or possible. The real time recording capability of the ticketing system was not always used and entries were keyed from information provided after the fact. In these cases, the automatic time stamp in the system would have had to be adjusted, which was not always done. In 2009, TDS deployed laptop computers to all technicians with a new work management system that gathers their work progress in a real time manner, thus, immediately updating the ticketing system. TDS feels this system will be more accurate in recording ticket clear times, thereby meeting the commitment standard. There were some clearing issues which may have been compounded by the fact that the clearing data would be left in a voice message for entry on the following Monday. In situations of late-day Friday reports, TDS trouble advisors assess the situation with each customer to determine if a Monday repair time is acceptable. If no emergency situation exists, and the customer is agreeable, the troubles are scheduled for the next business day.

In 2009, TDS Telecom modified its call-out procedures for calls before 4:00 P.M., advisors let customers know that a technician will be dispatched the same day, and if access is needed, a four hour window is set as late as 4:00 P.M.-8:00 P.M. For calls after 4:00 P.M., repair appointments are set for the next business day. TDS believes that based on the new definition of basic service, they will be able to meet the rules for repair service going forward.

#### **Service Affecting Reports restored within 72 Hours:**

In the Service Affecting reports restored within 72 hours, staff reviewed 336 reports in 2008 for the Greensboro and Gretna exchanges, and the fourth quarter of 2008 for the Quincy exchange. All three exchanges met the standard in this category.

#### **Rebates Required by Rule:**

During the repair ticket review, staff found 219 rebates were due to customers being out of service greater than 24 hours. TDS provided 22 rebates as required by rule during the period under review.

#### Corrective Action:

TDS is in agreement with the findings on rebates required by rule and concede that the lack of rebates can be attributed to human error and system processes. TDS is working to correct this problem and ensure that future rebates are made in a timely basis. TDS will provide the proper rebates not made, and report back to the Commission staff when all rebates required by rule have been completed.

#### **TDS Tariff Local Service Guarantee Credit:**

#### **Service Installation Commitment Credits:**

In reviewing the service orders, staff found 224 instances where a service installation credit was due to the customer per TDS' tariff. TDS only provided 34 automatic credits to its customers. TDS tariff, Section A2, E. 1b, 1, states "The customer will be given a one (1) month local service credit if the Company fails to meet a commitment and has not notified the customer 24 hours prior to the agree[d upon] time and date. This would apply to such services as installations, changes to custom features, provision of optional calling plans and other similar requests." There was one instance for a Service Guarantee Program credit on a customer's bill which was charged, not credited, to the customer's account, resulting in overbilling in addition to loss of the rebate and credit due.

#### Corrective Action:

TDS is in agreement with the staff findings on the credits required under Service Guarantee tariffs, and attributes those problems to human error and system processes as well. TDS Telecom will report back to the Commission staff when the Installation Credits and rebates have been made.

#### **Service Outages of More Than 24 Hours (OOS) Credits:**

During the repair ticket review, staff found 219 credits should have been credited to customers for being out of service greater than 24 hours. TDS provided 41 of those credits to the customers. TDS tariff, Section A2, E., 1b, 2, states "A one (1) month local service credit will be applied to the customer's telephone bill if the Company fails to restore basic exchange telephone service within 24 hours after the interruption was reported to or discovered by the Company." TDS furnished staff with a copy of all customer bills where credits were actually given to customers for the period under review. TDS only provided 18.9% of the credits due to customers.

#### Corrective Action:

TDS, again, is in agreement with staff findings of the credits required under their tariff and attribute all of the problems to human error and system processes. TDS is working to correct this problem and ensure that future rebates and credits are made in a timely basis. TDS Telecom is in the process of addressing customer OOS credits, and will report back to the Commission staff when those credits have been completed.

#### Safety:

#### **Ground Deficiencies:**

For the exchanges that were reviewed, 257 loops were tested for grounding deficiencies. Ninety-three loops were new installs and 164 loops were randomly tested. Five (5) loops were deemed to have improper grounds for the loops that were recently installed. One (1) randomly tested loop also was improperly grounded. The problems observed included loops that were missing a ground or the ground wire was broken or loose. These deficiencies were below the acceptable levels for adequate grounding in accordance with the Florida Administrative Code, Rule 24-4.038 F.A.C.

#### Corrective Action:

There were five loops tested that had improper grounds, all five have been repaired. TDS Telecom's practice requires subscriber loop readings be taken on every visit to a customers premises and these practices have been reviewed with the technicians based at the Quincy office.

#### **Timing and Billing Accuracy:**

#### Intra-LATA 1+:

Staff made 142 calls to test TDS' Intra-LATA 1+ service. TDS overbilled on one of these calls.

#### Corrective Action:

The call in question, which was made 3/11/09 at 4:02.26, per staff log from the ARONTS system, was timed at 58 seconds; therefore, the call should have been billed at one minute. TDS reviewed their switch records which showed the duration of the call at 1 minute, 15.5 seconds. Based on TDS Telecom's response concerning the single call, staff believes either the Automated Remote Origination Network Test System (ARONTS) or the Remote Test Set (RTS-1) may have improperly disconnected causing the call duration to exceed 58 seconds. No corrective action is necessary.

Immediately following this summary and findings is a series of charts depicting the results of the categories that were evaluated. In the instances where TDS failed to meet the established standard, the results are highlighted in yellow.

# TDS Telecom/Quincy Telephone Telecommunications Service Quality Report

## **Charts**

|       | Answer Time - Business Office * |                 |                          |                   |                           |                        |  |  |  |  |
|-------|---------------------------------|-----------------|--------------------------|-------------------|---------------------------|------------------------|--|--|--|--|
|       | Total<br>Calls                  | Calls<br>Failed | % of<br>Calls<br>Offered | Calls<br>Answered | Calls Answered in 55 sec. | % Answered w/i<br>Std. |  |  |  |  |
| Voice | 150                             | 7               | 95.3%                    | 143               | 86                        | 60.1%                  |  |  |  |  |
| TDD   | 50                              | 4               | 92.0%                    | 46                | 10                        | 21.7%                  |  |  |  |  |

Standard: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant. Rule 24-4.073 (b) and (c) F.A.C., Answering Time applies.

\*One failed call and six busy signals after the IVRU for the Business Office Voice calls. Four busy signals to the Business Office TDD, business office hung up or disconnected by live operator.

| Answer Time - Repair Service * |                |                 |                          |                   |                           |                        |  |  |  |
|--------------------------------|----------------|-----------------|--------------------------|-------------------|---------------------------|------------------------|--|--|--|
|                                | Total<br>Calls | Calls<br>Failed | % of<br>Calls<br>Offered | Calls<br>Answered | Calls Answered in 55 sec. | % Answered w/i<br>Std. |  |  |  |
| Voice                          | 150            | 1               | 99.3%                    | 149               | 115                       | 77.2%                  |  |  |  |
| TDD                            | 50             | 5               | 90.0%                    | 45                | 9                         | 20.0%                  |  |  |  |

Standard: 95% of the calls shall be offered within 15 seconds after the last digit is dialed when the company uses an IVRU.

90% of the calls shall be answered within 55 seconds after being transferred to a live attendant. Rule 24-4.073 (b) and (c) F.A.C., Answering Time applies.

\*One busy signal after the IVRU for the Repair Service Voice calls. One busy signal to the Repair Service TDD, four calls operator hung up after answering call, without conversing with the FRS operator.

| Directory Reviewed  |                            |                                      |                                    |  |  |  |  |
|---|----------------------------|--------------------------------------|------------------------------------|--|--|--|--|
| Name / Date of Directory                                  | Total<br>Items<br>Reviewed | *Items in<br>Compliance<br>with Std. | % of Items in Compliance with Std. |  |  |  |  |
| Quincy, Florida -<br>Attapulgus, Georgia<br>February 2009 | 21                         | 19                                   | 90.5%                              |  |  |  |  |
| "No Sales" annual bill insert                             | 1                          | 1                                    | 100.0%                             |  |  |  |  |
| Total   | 22                         | 20                                   | 90.9%                              |  |  |  |  |

<sup>\*</sup>Directory listed price for Line Verification and Emergency Line Interrupt Service was reverse of TDS Tariff, and no explanation for discontinuance of service procedures.

| New Numbers in Directory Assistance (411) |                            |                   |               |  |  |  |
|---|----------------------------|-------------------|---------------|--|--|--|
| Calls Made to DA                          | Requests<br>for<br>Numbers | Total found in DA | % Found in DA |  |  |  |
| 110                                       | 110                        | 71                | 64.5%         |  |  |  |

| New Numbers in Directory Assistance (TDD) |                            |                   |               |  |  |  |  |
|---|----------------------------|-------------------|---------------|--|--|--|--|
| Calls Made by FRS                         | Requests<br>for<br>Numbers | Total found in DA | % Found in DA |  |  |  |  |
| 70  | 70*                        | 59                | 84.3%         |  |  |  |  |

| New Numbers in Directory Assistance (Total) |                            |                   |               |  |  |  |  |
|---|----------------------------|-------------------|---------------|--|--|--|--|
| Total Calls Made to DA                      | Requests<br>for<br>Numbers | Total found in DA | % Found in DA |  |  |  |  |
| 180   | 180                        | 130               | 72.2%         |  |  |  |  |

Standard: 100% of the items reviewed for the directory shall comply with Rule 25-4.040 F.A.C., Telephone Directories; Directory Assistance and Rule 25-4.079, F.A.C., Hearing/Speech Impaired Persons.

Standard: 99% of new service orders shall be listed in Directory Assistance (DA) within 48 hours of completion of the order. Rule 25-4.040 (5) F.A.C., Telephone Directories; Directory Assistance applies.

<sup>\* 20</sup> requests for numbers were duplicate calls made by voice to 411 and the number was not found by local DA, but when called to FRS, using national database, the DA found the numbers.

| Availability of Service (Installation) - 1st Qtr. 2008 |                             |                    |                           |               |                                 |                                |  |  |
|--|-----------------------------|--------------------|---------------------------|---------------|---------------------------------|--------------------------------|--|--|
| Exchange   | Total<br>Orders<br>Reviewed | Orders<br>Excluded | Orders Delayed for Const. | Net<br>Orders | Orders<br>Completed<br>w/i Std. | % Orders Completed w/i<br>Std. |  |  |
| Greensboro   | 95                          | 0                  | 0                         | 95            | 82                              | 86.3%                          |  |  |
| Gretna   | 79                          | 0                  | 0                         | 79            | 62                              | 78.5%                          |  |  |

|            | Availability of Service (Installation) - 2nd Qtr. 2008 |                    |                           |               |                                 |                                |  |  |  |
|------------|--|--------------------|---------------------------|---------------|---------------------------------|--------------------------------|--|--|--|
| Exchange   | Total<br>Orders<br>Reviewed                            | Orders<br>Excluded | Orders Delayed for Const. | Net<br>Orders | Orders<br>Completed<br>w/i Std. | % Orders Completed w/i<br>Std. |  |  |  |
| Greensboro | 75   | 0                  | 0                         | 75            | 66                              | 88.0%                          |  |  |  |
| Gretna     | 77   | 0                  | 0                         | 77            | 70                              | 90.9%                          |  |  |  |

|            | Availability of Service (Installation) - 3rd Qtr. 2008 |                    |                           |               |                                 |                                |  |  |  |
|------------|--|--------------------|---------------------------|---------------|---------------------------------|--------------------------------|--|--|--|
| Exchange   | Total<br>Orders<br>Reviewed                            | Orders<br>Excluded | Orders Delayed for Const. | Net<br>Orders | Orders<br>Completed<br>w/i Std. | % Orders Completed w/i<br>Std. |  |  |  |
| Greensboro | 83   | 0                  | 0                         | 83            | 61                              | 73.5%                          |  |  |  |
| Gretna     | 90   | 0                  | 0                         | 90            | 81                              | 90.0%                          |  |  |  |

|            | Availability of Service (Installation) - 4th Qtr., 2008 |                    |                           |               |                                 |                                |  |  |  |
|------------|---|--------------------|---------------------------|---------------|---------------------------------|--------------------------------|--|--|--|
| Exchange   | Total<br>Orders<br>Reviewed                             | Orders<br>Excluded | Orders Delayed for Const. | Net<br>Orders | Orders<br>Completed<br>w/i Std. | % Orders Completed w/i<br>Std. |  |  |  |
| Greensboro | 63  | 0                  | 0                         | 63            | 52                              | 82.5%                          |  |  |  |
| Gretna     | 64  | 0                  | 0                         | 64            | 49                              | 76.6%                          |  |  |  |
| Quincy     | 499   | 0                  | 0                         | 499           | 378                             | 75.8%                          |  |  |  |
|            |   |                    |                           |               |                                 |                                |  |  |  |
| TOTAL      | 1125  | 0                  | 0                         | 1125          | 901                             | 80.1%                          |  |  |  |

Standard: 90% of Services Orders shall be completed within 3 days, on the appointment day, or on the date of customer request, if greater than 3 days. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.066 F.A.C., Availability of Service applies.

| Ins            | Installation Credits Per TDS Tariff |               |                    |  |  |  |  |  |  |
|----------------|-------------------------------------|---------------|--------------------|--|--|--|--|--|--|
| Month          | Credits Due                         | Credits Given | % of Credits Given |  |  |  |  |  |  |
| January-2008   | 11                                  | 2             | 18.2%              |  |  |  |  |  |  |
| February-2008  | 8                                   | 2             | 25.0%              |  |  |  |  |  |  |
| March-2008     | 11                                  | 3             | 27.3%              |  |  |  |  |  |  |
| April-2008     | 5                                   | 1             | 20.0%              |  |  |  |  |  |  |
| May-2008       | 3                                   | 2             | 66.7%              |  |  |  |  |  |  |
| June-2008      | 8                                   | 1             | 12.5%              |  |  |  |  |  |  |
| July-2008      | 7                                   | 3             | 42.9%              |  |  |  |  |  |  |
| August-2008    | 10                                  | 5             | 50.0%              |  |  |  |  |  |  |
| September-2008 | 14                                  | 1             | 7.1%               |  |  |  |  |  |  |
| October-2008   | 63                                  | 2             | 3.2%               |  |  |  |  |  |  |
| November-2008  | 40                                  | 5             | 12.5%              |  |  |  |  |  |  |
| December-2008  | 44                                  | 7             | 15.9%              |  |  |  |  |  |  |
| TOTAL          | 224                                 | 34            | 15.2%              |  |  |  |  |  |  |

TDS tariff, Section A2, E. 1b, 1, states "The customer will be given a one (1) month local service credit if the Company fails to meet a commitment and has not notified the customer 24 hours prior to the agree[d upon] time and date. This would apply to such services as installations, changes to custom features, provision of optional calling plans and other similar requests."

| Out-of-Service Reports Restored Within 24 Hours -2008 |                     |                     |                     |   |                                      |  |  |  |  |
|---|---------------------|---------------------|---------------------|---|--------------------------------------|--|--|--|--|
| Exchange  | Reports<br>Reviewed | Excluded<br>Reports | # of OOS<br>Reports | # of OOS<br>Reports<br>Cleared w/i<br>24 Hrs. | % of OOS reports<br>Cleared w/i Std. |  |  |  |  |
| Greensboro  | 374                 | 35                  | 261                 | 217   | 83.1%                                |  |  |  |  |
| Gretna  | 480                 | 35                  | 361                 | 330   | 91.4%                                |  |  |  |  |

| Out-of-Service Reports Restored Within 24 Hours - 4th Qtr 2008 |                     |                     |                     |   |                                      |  |  |
|--|---------------------|---------------------|---------------------|---|--------------------------------------|--|--|
| Exchange   | Reports<br>Reviewed | Excluded<br>Reports | # of OOS<br>Reports | # of OOS<br>Reports<br>Cleared w/i<br>24 Hrs. | % of OOS reports<br>Cleared w/i Std. |  |  |
| Quincy   | 506                 | 61                  | 287                 | 234   | 81.5%                                |  |  |

Standard: 95% of Out-of-Service Repair Tickets shall be cleared within 24 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

| OOS Repair Rebate Required by Rule |             |               |                    |  |  |  |  |
|------------------------------------|-------------|---------------|--------------------|--|--|--|--|
| Exchange                           | Rebates Due | Rebates Given | % of Rebates Given |  |  |  |  |
| Greensboro                         | 52          | 2             | 3.8%               |  |  |  |  |
| Gretna                             | 46          | 6             | 13.0%              |  |  |  |  |
| Quincy                             | 121         | 14            | 11.6%              |  |  |  |  |
| TOTAL                              | 219         | 22            | 10.0%              |  |  |  |  |

Rule 25-4.110 (6) F.A.C., "The refund to the subscriber shall be the pro rata part of the month's charge for the period of days and that portion of the service and facilities rendered useless or inoperative; ..."

| OOS Repair Local Service Credit as Required by TDS Tariff |             |               |                    |  |  |  |  |  |
|---|-------------|---------------|--------------------|--|--|--|--|--|
| Exchange  | Rebates Due | Rebates Given | % of Rebates Given |  |  |  |  |  |
| Greensboro  | 52          | 1             | 1.9%               |  |  |  |  |  |
| Gretna  | 46          | 1             | 2.2%               |  |  |  |  |  |
| Quincy  | 121         | 39            | 32.2%              |  |  |  |  |  |
| TOTAL   | 219         | 41            | 18.9%              |  |  |  |  |  |

TDS Tariff: Section A2, E. 1b, 1, states "The customer will be given a one (1) month local service credit if the Company fails to meet a commitment and has not notified the customer 24 hours prior to the agree[d upon] time and date. This would apply to such services as installations, changes to custom features, provision of optional calling plans and other similar requests."

| Service Affecting Reports Restored Within 72 Hours - 2008 |                 |  |                                     |  |  |  |  |  |
|---|-----------------|--|-------------------------------------|--|--|--|--|--|
| Exchange  | # of SA Reports | # of SA Reports Cleared<br>w/i 72 Hrs. | % of SA Reports Cleared w/i<br>Std. |  |  |  |  |  |
| Greensboro  | 88              | 84                                     | 95.5%                               |  |  |  |  |  |
| Gretna  | 84              | 81                                     | 96.4%                               |  |  |  |  |  |

| Service Affecting Reports Restored Within 72 Hours - 4th Qtr 2008 |                 |  |                                     |  |  |  |  |  |
|---|-----------------|--|-------------------------------------|--|--|--|--|--|
| Exchange  | # of SA Reports | # of SA Reports Cleared<br>w/i 72 Hrs. | % of SA Reports Cleared w/i<br>Std. |  |  |  |  |  |
| Quincy  | 164             | 156                                    | 95.1%                               |  |  |  |  |  |

Standard: 95% of Service Affecting Repair Tickets shall be cleared within 72 hours or on the appointment day. Exchanges with less than 50,000 access lines shall be aggregated and reported quarterly; exchanges with at least 50,000 access lines shall be reported monthly. Rule 25-4.070 F.A.C., Customer Trouble Reports applies.

| Subscriber Loops - Transmission |                            |    |     |       |  |  |  |  |
|---------------------------------|----------------------------|----|-----|-------|--|--|--|--|
| Exchange                        | % of Satisfactory<br>Loops |    |     |       |  |  |  |  |
| Greensboro                      | 56                         | 5  | 51  | 91.2% |  |  |  |  |
| Gretna                          | 100                        | 8  | 92  | 92.0% |  |  |  |  |
| Quincy                          | 101                        | 16 | 85  | 84.2% |  |  |  |  |
| Company Total                   | 257                        | 29 | 228 | 88.7% |  |  |  |  |

Standard: Rule 25-4.072 F.A.C., Transmission Requirements applies. An unsatisfactory loop describes a condition where the parameter (loss, noise, balance, loop current) being measured is not within the recommended or acceptable limits as defined within the ANSI/IEEE std. 820-1984.

| Safety - Ground Deficiencies |              |              |                          |  |  |  |  |
|------------------------------|--------------|--------------|--------------------------|--|--|--|--|
| Exchange                     | Loops Tested | Poor Grounds | % of Adequate<br>Grounds |  |  |  |  |
|                              | New Installs | 5            |                          |  |  |  |  |
| Greensboro                   | 25           | 1            | 96.0%                    |  |  |  |  |
| Gretna                       | 44           | 2            | 95.6%                    |  |  |  |  |
| Quincy                       | 24           | 2            | 91.7%                    |  |  |  |  |
| Company Total                | 93           | 5            | 94.6%                    |  |  |  |  |
|                              | Random Loo   | ps           |                          |  |  |  |  |
| Greensboro                   | 31           | 0            | 100.0%                   |  |  |  |  |
| Gretna                       | 56           | 0            | 100.0%                   |  |  |  |  |
| Quincy                       | 77           | 1            | 98.7%                    |  |  |  |  |
| <b>Company Total</b>         | 164          | 1            | 99.4%                    |  |  |  |  |

Standard: Rule 25-4.038, F.A.C. Safety applies. New Installs are 100%. Random Loops are 92%.

| Timing and Billing - Intra-LATA |                 |             |            |             |  |  |  |  |
|---------------------------------|-----------------|-------------|------------|-------------|--|--|--|--|
|                                 | Number of Calls | Calls Under | Calls Over | % Correctly |  |  |  |  |
|                                 | Number of Cans  | timed       | timed      | Timed       |  |  |  |  |
| Timing Accuracy                 |                 |             |            |             |  |  |  |  |
| 1+                              | 142             | 0           | 1          | 99.3%       |  |  |  |  |
| Billing Accuracy                |                 |             |            |             |  |  |  |  |
| 1+                              | 142             | 0           | 1          | 99.3%       |  |  |  |  |
| Billing Per Tariff              |                 |             |            | Yes or No   |  |  |  |  |
| 1+                              |                 |             |            | Yes         |  |  |  |  |

Standard: Timing and billing accuracy for intra-LATA calls shall not be les than 97%. Rule 25-4.077 Metering and Recording Equipment applies. The test was conducted prior to the repeal of the rule.

|                   | Timing and Billing - Directory Assistance |               |           |                   |                 |          |                       |                         |
|-------------------|---|---------------|-----------|-------------------|-----------------|----------|-----------------------|-------------------------|
| Central<br>Office | Telephone<br>Number                       | Calls<br>Made | Allowance | Billable<br>Calls | Calls<br>Billed | Variance | % Correctly<br>Billed | Billed<br>per<br>Tariff |
| Quincy            | 850-875-<br>6160                          | 110           | 0         | 110               | 118             | -8       | 92.7%                 | N                       |
| Quincy<br>DD Line | 850-875-<br>6165                          | 70            | 70        | 0                 | 0               | 0        | 100.0%                | Y                       |

Standard: 97% of calls to DA shall be billed correctly and in accordance with the company's tariff on file with the Commission. Rule 25-4.077 Metering and Recording Equipment, and Rule 25-4.115, F.A.C., Directory Assistance applies. The test was conducted prior to the repeal of Rule 25-4.077. TDS billed for eight (8) calls that were not made by staff.

DID NOT MEET STANDARD

14

|           | 9-1-1 Emergency Service |               |               |                 |                    |                         |  |  |
|-----------|-------------------------|---------------|---------------|-----------------|--------------------|-------------------------|--|--|
| Area      | NXX                     | Calls<br>Made | Busy<br>Calls | Failed<br>Calls | Calls<br>Completed | % of Calls<br>Completed |  |  |
|           | Voice Calls             |               |               |                 |                    |                         |  |  |
| Quincy    | 875                     | 142           | 0             | 1               | 141                | 99.3%                   |  |  |
|           |                         |               |               |                 |                    |                         |  |  |
| TDD Calls |                         |               |               |                 |                    |                         |  |  |
| Quincy    | 875                     | 50            | 0             | 11              | 39                 | 78.0%                   |  |  |

Standard: 100% of calls to 911 Emergency Service shall be completed by the company. Rule 25-4.081, F.A.C., Emergency 911 Access applies.