

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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OCT 25 2013

**PUBLIC SERVICE
COMMISSION**

TATYANA AND DONNA AUSTIN,

COMPLAINANTS

v.

WINDSTREAM KENTUCKY EAST, LLC,

DEFENDANT.

CASE NO. 2012-00424

**WINDSTREAM KENTUCKY EAST, LLC'S RESPONSES TO
COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION**

1. Identify the date that Tatyana and Donna Austin (collectively “Austins”) began receiving broadband service at their residence.

a. If the Austins began receiving broadband service prior to April 10, 2012, indicate if any complaints related to the speed of their broadband service were received prior to that date.

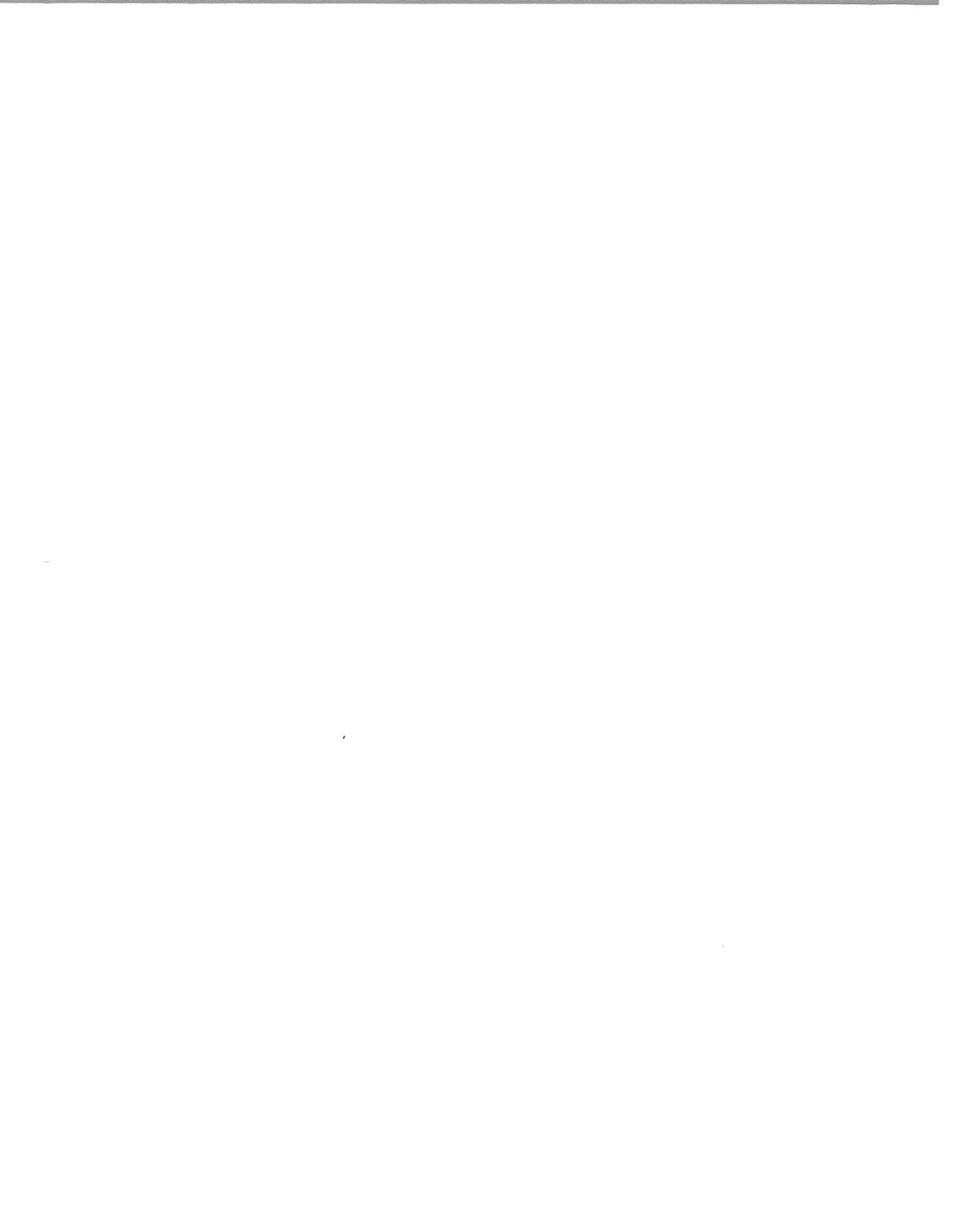
Response:

The Austins began receiving broadband service on March 7, 2012.

a. Prior to April 10, 2012, the Austins made no complaints related to the speed of their broadband service.

Witness:

Tim Williamson



2. Identify the date that the Austins began receiving voice service at their residence.

a. If the Austins began receiving voice service prior to April 10, 2012,

indicate if any complaints related to dropped calls or line noise were received prior to that date.

Response:

The Austins began receiving voice service at their residence on May 24, 2010.

a. Prior to April 10, 2012, the Austins reported line noise on the following dates: October 28, 2010, October 30, 2010, December 5, 2011, and February 27, 2012.

Witness:

Tim Williamson

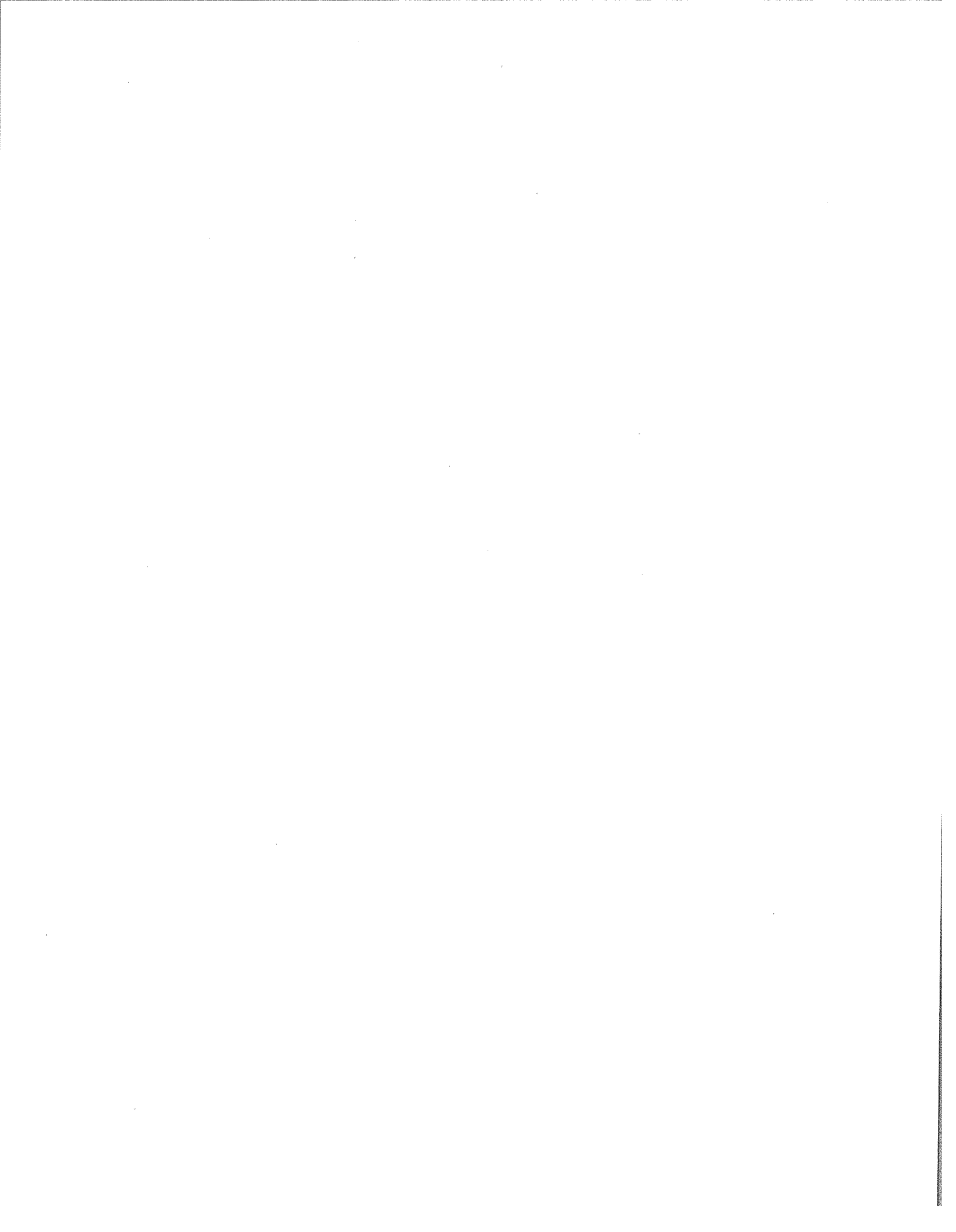
3. Provide the approximate distance from the Austins' home to the central office from which the Austins receive service.

Response:

The Austins' service are being provisioned by a local loop that runs from their home to the Gilpin Remote. The Gilpin Remote is fed from the Liberty Central Office. The approximate distance from the Gilpin Remote to the Liberty Central office is 12.5 miles.

Witness:

Tim Williamson



4. Provide the following information with respect to the local loop which serves the Austins' home, including the following:

- a. Total length of the loop.
- b. Number of customers currently served by the loop.
- c. Type of facilities used.

Response:

- a. The length of the loop that runs from the Austins' home to the Gilpin Remote is approximately 12,400 feet.
- b. The Austins are the only customers being serviced by the loop.
- c. The facility used from the Austins' home to the Gilpin Remote is a copper line. The facility used from the Gilpin Remote to the Liberty Central Office is a copper T1.

Witness:

Tim Williamson

5. State whether Windstream has received complaints related to slower than expected or dropped internet service from other customers served by the same loop and central office which serves the Austins. If so, provide the number of complaints received since April 10, 2012.

Response:

Since April 10, 2012, Windstream has received two complaints pertaining to alleged slower than expected or dropped internet service from customers other than the Austins who were either served directly by the Liberty Central Office or from a remote that was fed by the Liberty Central Office. Windstream's response to this request is limited to complaints made to the Commission or to Windstream's Executive Relations Department. Windstream does not maintain searchable records of all customer calls and correspondence and a complete response will require a review of all customer accounts to identify whether service complaints have been made and whether any such complaints were related to slower than expected or dropped internet service.

Witness:

Tim Williamson

6. State whether Windstream has received complaints related to dropped calls or line noise from other customers served by the same loop and central office which serves the Austins. If so, provide the number of complaints received since April 10, 2012.

Response:

Since April 10, 2012, Windstream has received five complaints related to dropped calls or line noise from customers other than the Austins who were served by remotes fed from the Liberty Central Office. Two of those complaints were made by the same customer. Again, Windstream's response to this request is limited to complaints made to the Commission or to Windstream's Executive Relations Department. Windstream does not maintain searchable records of all customer calls and correspondence and a complete response will require a review of all customer accounts to identify whether service complaints have been made and whether any such complaints were related to dropped calls or line noise.

Witness:

Tim Williamson

7. In comments filed with the Commission on March 12, 2013, Donna R. Austin makes the claim that Windstream indicated to her that the problem with service at the Austins' residence "might be fixed with the new lines in July or August." Can Windstream confirm that this claim was made to Ms. Austin, and, if so, indicate what was intended by the statement allegedly made by Windstream?

Response:

Yes, this claim was made to Ms. Austin. The Gilpin Remote has been identified by Windstream to receive an upgrade in connection with Federal Stimulus funds available to the Company. At one point in time, the estimated timeframe for the upgrade was July or August of 2013. The project has been unavoidably delayed and the current estimate is that it will be completed by the end of 2013.

The planned upgrade will result in the replacement of the existing copper T1 line that runs from the Gilpin Remote to the Central Office with a fiber optic cable.

Witness:

Tim Williamson

8. Refer to Windstream's: (1) status report dated July 12, 2013 ("July Status Report"), in which Windstream indicates that prior to the initial status report filed in this case on November 26, 2012 ("Initial Status Report"), a new modem had been installed at the Austins' home; and (2) status report dated March 15, 2013, in which Windstream indicated that a technician installed another new modem at the Austins' home on March 14, 2013.

a. Provide the product information related to the modems installed on each of the identified dates in Windstream's status reports.

b. State whether Windstream performed any additional tests on the modems that were removed from service to determine if there were issues with the equipment.

c. If so, provide any test results or documentation that may be available indicating any issues found with the removed modems.

d. State whether Windstream replaced similar modems to those removed from the Austins' residence for any other customers due to problems experienced with slower than expected or dropped internet service.

Response:

a. The modem that was installed at the Austins' home on March 14, 2013 was a Sagem 1704. Windstream does not have records identifying the brand or model of modem that was removed at that time.

b. Additional tests were not performed on the modems subsequent to their removal from the Austins' home.

c. N/A

d. Windstream is unaware of whether modems similar to that removed from the Austins' home were removed from other residences due to slower than expected or dropped service. When addressing possible problems, it is common for Windstream technicians to replace modems in the course of addressing service interruption issues.

Witness:

Tim Williamson

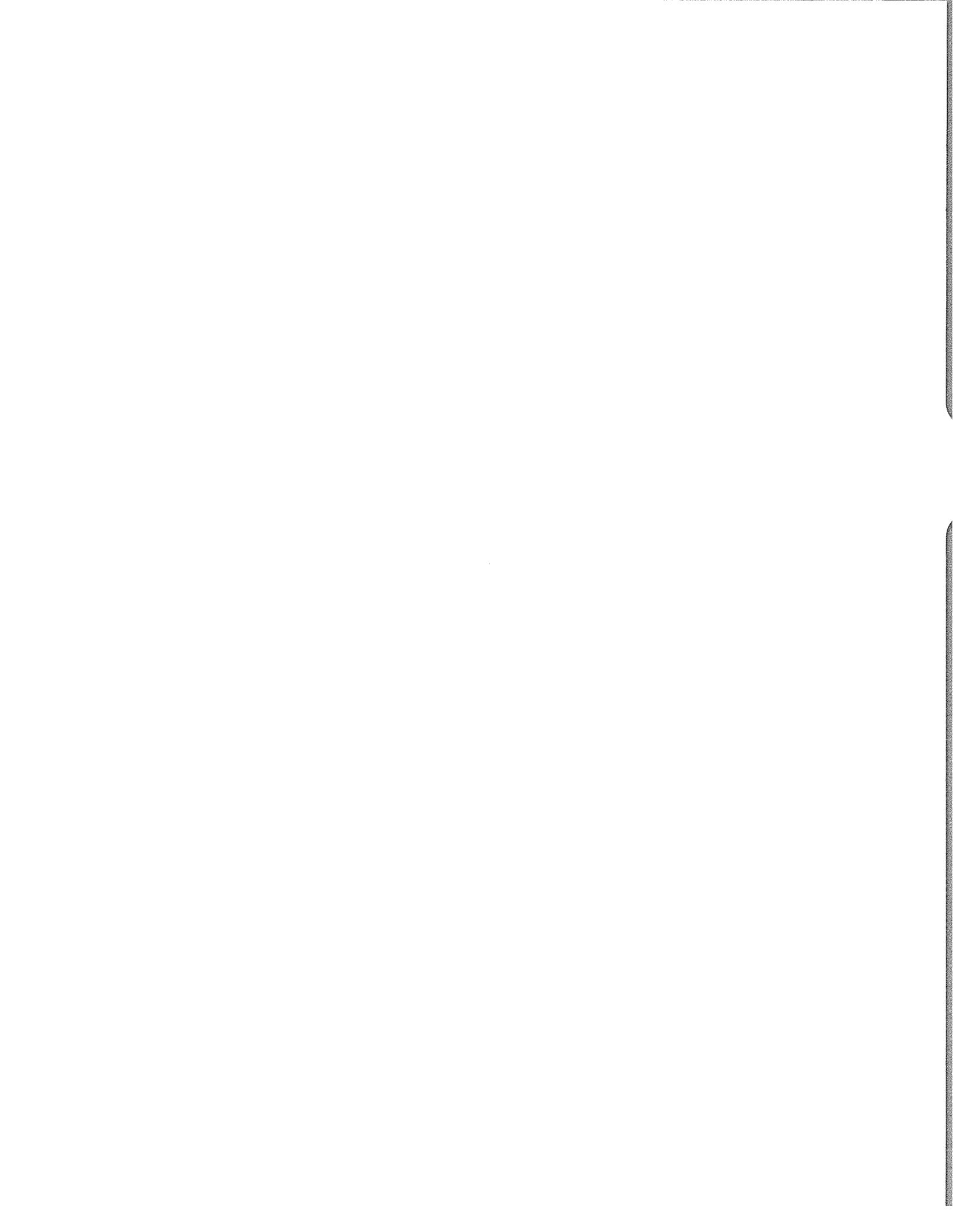
9. Refer to the July Status Report in which Windstream indicates that prior to the Initial Status Report, Windstream had “reconfigured the lines servicing the Austins’ home.” Provide specific details regarding all work done, to date, with respect to reconfiguring the lines servicing the Austins’ home, as indicated by Windstream.

Response:

Prior to the Initial Status Report, Windstream reconfigured the set-up of the modem at the Austins’ residence by taking them off a direct wireless modem and placing them on a Linksys router. This was completed in an attempt to stabilize their connectivity. It appeared that these actions resolved the Austins’ service issues for a period of time. However, the Austins began experiencing service issues again after this action was taken.

Witness:

Tim Williamson



10. Refer to the July Status Report in which Windstream states that “[c]ertain measures implemented by Windstream have been successful, but Windstream is working to arrive at a permanent solution.” Identify what measures implemented by Windstream, to date, it believes have been successful.

Response:

Windstream has replaced several sections of the cable feeding the Gilpin Remote and several sections of the loop feeding from the Gilpin Remote to the Austins’ residence. These actions have helped to stabilize the Austins’ service and have resulted in fewer service calls from the Austins.

Witness:

Tim Williamson

11. Refer to the July Status Report in which Windstream states that a technician replaced the Austins' line equipment at the remote location in response to the Austins' complaint that they were experiencing line noise and dropped calls. Identify what equipment was replaced at the remote to address this particular complaint.

Response:

The Windstream technician who responded to the June 24, 2013 service call transferred the Austins' service from one line card to another line card within the serving service. A number of problems can plague line cards, and it is common for a technician to transfer a customer's service from an apparently-defective portion of a line card onto a working portion of a line card to address issues with line noise or dropped calls.

Witness:

Tim Williamson

12. Refer to the July Status Report in which Windstream indicates that its employees routinely tested the Austins' line and equipment with the most recent test occurring on July 2, 2013. State whether Windstream has performed tests on the lines and equipment inside the Austins' residence, as well as outside the home.

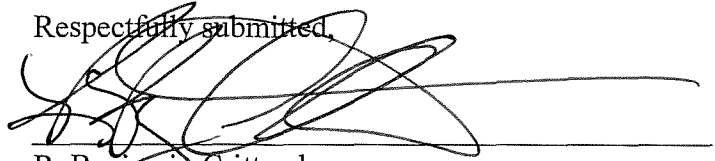
Response:

Windstream has not maintained a record of the specific tests performed on the facilities serving the Austins' residence and cannot confirm with certainty whether it has performed tests on lines and equipment located inside the Austins' residence.

Witness:

Tim Williamson

Respectfully submitted,

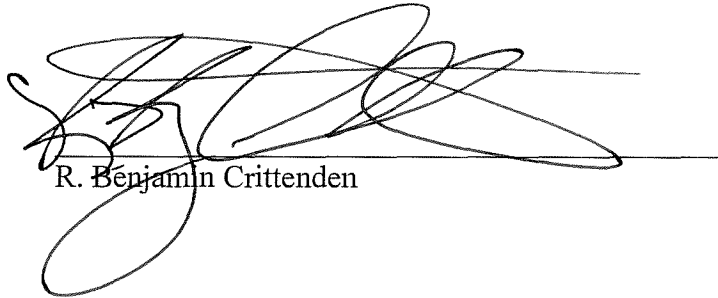


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KENTUCKY EAST, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by United States First Class Mail, postage prepaid, on this 25th day of October, 2013 upon:

Tatyana and Donna Austin
4734 S KY 501
Liberty, KY 42539



R. Benjamin Crittenden