

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

CARTER COUNTY ENHANCED 911)
)
COMPLAINANT)
)
v.)
)
SOUTHEAST TELEPHONE, INC.)
and)
KENTUCKY ALLTEL, INC.)
)
DEFENDANTS)

Docket No. 2006-00149

ANSWER BY KENTUCKY ALLTEL, INC.

Kentucky Alltel, Inc. ("Kentucky Alltel") files the following in response to the Commission's Order to Satisfy or Answer issued in this proceeding on April 10, 2006:

1. Kentucky Alltel is an incumbent local exchange carrier ("ILEC") serving all or part of 50 counties in the Commonwealth, including Carter County, Kentucky. In this capacity, Kentucky Alltel serves as an Enhanced 911 Database Administrator for Carter County. As the database administrator, Kentucky Alltel compiles customer 911 records for its own customers and collects 911 customer records from other telecommunications carriers which also provide local exchange service to citizens in Carter County. Kentucky Alltel then sends all of the customer 911 records (both its own and those of the other telecommunications carriers) to the custodial database and selective router updates (as applicable). In the case of Carter County, the selective router updates are not applicable. Kentucky Alltel does not maintain or manipulate 911 records submitted by other telecommunications carriers on behalf of their customers.

2. In submitting customer 911 customer records, each telecommunications carrier generally adheres to National Emergency Number Association (“NENA”) standards. Further, each carrier is responsible for placing its own customers’ records in a format that complies with a particular county emergency service provider’s requests. For example, some counties may require records to be formatted with a customer’s last name preceding the first name, while other counties may require the first name to appear before last name (*e.g.*, Doe, John v. John Doe). Each carrier is responsible for placing and maintaining its own customer records in the required format.

3. Kentucky Alltel’s role as the Database Administrator does not include performing customer record maintenance for or on behalf of other carriers. As the Database Administrator, Kentucky Alltel offers to any other ILEC or competitive local exchange carrier (“CLEC”) three options for that carrier to maintain and update its own customer records. First, the carrier may access Kentucky Alltel’s 911 system using secure identifications through which the carrier may create, delete, and modify its customers’ records. Second, the carrier may choose to send Kentucky Alltel a NENA-formatted file that Kentucky Alltel can process and then return to the carrier any errors and statistics necessary for the carrier to correct its records and resubmit them. Third, the carrier may combine the first and second options in order to minimize the amount of manual processing the carrier is required to perform; in such case, the carrier would perform error correction on missing records and manually input any records that the carrier cannot transmit. Kentucky Alltel employees do not perform, under any of the three options, input functions and do not maintain another carrier’s customer 911 records.

4. Kentucky Alltel collects and aggregates the various carriers’ customer records and forwards them to the various counties on a timely basis (*i.e.*, nightly) in order to regularly update

the Master Street Address Guide (“MSAG”). Carriers who submit to Kentucky Alltel correctly formatted records on behalf of their customers will achieve MSAG-valid address updates in the database. Carriers who do not format or transfer their customers’ records properly will cause their customers’ records to be MSAG invalid.

5. As a CLEC, SouthEast Telephone, Inc. (“SETel”) also serves customers in Carter County, provides 911 service to those customers, and is responsible for maintaining and updating its customers’ 911 records and providing the updated records to Kentucky Alltel. After initiating CLEC service in Kentucky Alltel’s territories in 2004, Kentucky Alltel provided SETel the necessary access identifications to access Kentucky Alltel’s 911 database and information with respect to submitting proper 911 data. (See email from Jimmy Dolan at Kentucky Alltel to Brad Hall at SETel on May 6, 2004 confirming SETel’s responsibility to migrate its own customer information and the accompanying confirmation receipt dated May 7, 2004 attached as Exhibit A.) Problems with SETel’s 911 customer records have persisted, and Kentucky Alltel has aided SETel in manually processing SETel customer records in an effort to assist SETel in achieving proper maintenance and updates of its customer records.

6. Kentucky Alltel was contacted by the Carter County Enhanced 911 Emergency Telephone Service on December 28, 2005 regarding an incomplete SETel customer record which resulted in problems with an ambulance timely reaching a SETel customer. Kentucky Alltel notified Oma Miller at SETel and requested a status from SETel with respect to SETel’s electronic processing of its customers’ 911 records. The parties met on January 10, 2006 to discuss the format of SETel’s customer records and SETel’s need to mechanize its customers 911 records. It appeared to Kentucky Alltel that because SETel had not instituted a mechanized process with respect to its 911 records, SETel’s records were not formatted consistently, thereby

resulting in recurring MSAG invalid records. Since January 2005, Kentucky Alltel has discussed with SETel the recurring inconsistencies in its record formatting, the need for SETel to include additional information on its records, and the need for electronic transmission of SETel records.

7. To the best of Kentucky Alltel's information, SETel began sending its Carter County customer records electronically on March 7, 2006. Thereafter, Kentucky Alltel sent an inquiry to SETel due to the fact that 90% of SETel's customer 911 records were MSAG invalid. SETel accesses its customer data through Kentucky Alltel's "Alltel Express" database, and SETel apparently assumed incorrectly that Kentucky Alltel was performing MSAG validation services with respect to SETel's customer data. As indicated previously, Kentucky Alltel only updates and formats its own customer data and does not perform this function with respect to customer records belonging to other telecommunications carriers.

8. Based on Kentucky Alltel's information, SETel reformatted its customer records for Carter County on March 23, 2006. In turn, Kentucky Alltel transmitted all SETel customer records to Carter County on April 10, 2006 and completed its processing of SETel's files on April 15, 2006 (including MSAG validation, return of statistics reports, creation of error files on MSAG invalid records, and creation of a file of completed MSAG valid records). However, SETel is not performing the necessary electronic loading of its customer data into the database and instead emails the records to Kentucky Alltel. This approach is problematic and delays transmittal of the records to Carter County as discussed in more detail below.

9. Kentucky Alltel's policy is not to transmit this type of proprietary customer data over the Internet and through emails, although Kentucky Alltel did so in this limited instance upon SETel's request. Kentucky Alltel continues to receive SETel's records via email at this time only because Kentucky Alltel is concerned about otherwise missing customer records from

SETel. However, Kentucky Alltel is concerned about SETel continuing to email its customer 911 records due to recurring problems such as the emails being delayed by Kentucky Alltel's spam filters. The timeliness of such emails also depends on Kentucky Alltel employees' receipt of and access to SETel's emails, which is particularly problematic in the event that a Kentucky Alltel employee is sick, on vacation, or traveling for business. Again, such functions are not the responsibility of Kentucky Alltel as the Database Administrator. The preferred approach followed by other carriers is to use their secure identifications to access the database directly in order to perform their own customer data uploads and downloads instead of extraneously emailing proprietary records to Kentucky Alltel. Most recently, Kentucky Alltel received 554 records from SETel via email on April 19, 2006; the email was delayed initially in Kentucky Alltel's spam filter and was further delayed by Kentucky Alltel being forced to manually verify each SETel record.

10. Kentucky Alltel has reviewed the April 7, 2006 letter from the Carter County Attorney to SETel expressing concern that SETel is not providing Carter County Enhanced 911 Emergency Telephone Service with correct or timely SETel customer data. The letter notes Carter County's "long history of successful operation" which Kentucky Alltel believes to be true based on its information and belief since Kentucky Alltel is not aware of prior 911 record problems in Carter County. Kentucky Alltel is aware of problems with SETel 911 records in the following counties: Carter, Rowan, Bath, Perry, Hardin, and Carlisle. Further, Kentucky Alltel cannot respond to the statement in Carter County's letter with respect to SETel failing to cooperate in Commission Staff's effort to assist Carter County in correcting the problem with SETel's 911 customer records. Kentucky Alltel agrees with the statements in the letter that

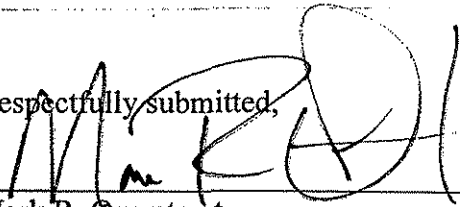
SETel's customer 911 records are a serious concern and in need of immediate resolution and the responsibility of SETel.

11. Kentucky Alltel states affirmatively that it remains willing to work with all parties in this proceeding to ensure that SETel properly formats, maintains, updates, and transmits its customers' 911 records as necessary to ensure MSAG valid records and to alleviate Carter County's concerns set forth in its April 7, 2006 communication.

12. Kentucky Alltel reserves the right to plead further in this matter as it deems necessary.

WHEREFORE, Kentucky Alltel requests that the Commission grant all necessary and proper relief to ensure the proper electronic submission and maintenance of SETel customer 911 records for Carter County and all other affected counties.

Respectfully submitted,



Mark R. Overstreet
STITES & HARBISON PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40601
Telephone: 502-223-3477

COUNSEL FOR: KENTUCKY ALLTEL, INC.

CERTIFICATE OF SERVICE

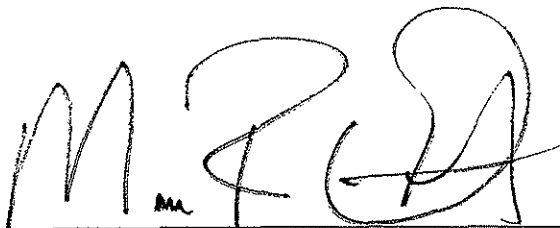
I hereby certify that a true and accurate copy of the Answer by Kentucky Alltel, Inc. was served via United States Postal Service, First Class Mail, postage prepaid, upon:

SouthEast Telephone, Inc.
Darrell Maynard
106 Power Drive
P.O. Box 1001
Pikeville, KY 41502-1001

Carter County E911
Tom Thompson
315 W. Second Street
Grayson, KY 41143

Office of the Carter County Attorney
Michael B. Fox
County Courthouse
Second Floor Room 218
Grayson, KY 41143

on this the 20th day of April, 2006

A handwritten signature in black ink, appearing to read 'M. R. Overstreet', written over a horizontal line.

Mark R. Overstreet

From: Dolan, Jimmy
Sent: Thursday, May 06, 2004 4:32 PM
To: 'brad.hall@setel.com'
Subject: e911

Brad,

I'm glad that we were able to get everything going on 911. Just to confirm our conversation with Enoch Morris, with ALLTEL 911. Enoch will provide you with the necessary paperwork to request secure IDs for access to ALLTELS 911 database. Enoch also provided you with the link to access information on how to submit proper 911 data and gave 330-995-1957 as the number to call if you have any questions or problems with submitting your customers 911 information. Also, it will be SE Tels responsibility to migrate customer information for customers converting service from the losing provider to SE Tel. SE Tel will have 30 days to migrate customer information to SE Tel. If you have any questions regarding the above please let me know and we'll set up another call.

Jimmy Dolan
Manager - ALLTEL Negotiations
(501)905-7873 Desk
(501)905-6299 Fax
jimmy.dolan@alltel.com

-----Original Message-----

From: Brad Hall [mailto:Brad.Hall@setel.com]
Sent: Friday, May 07, 2004 12:18 PM
To: Dolan, Jimmy
Subject: rcpt: e911
Importance: Low

(Receipt notification for message dated Thu, 6 May 2004 16:32:24 -0500)