

UNION TELEPHONE COMPANY
DT 11-024

Union's Responses to Data Requests from OCA – Set 1

Date Request Received: 3/18/11

Date of Response: 4/6/11

Request No. OCA 1-13

Respondent/Witness: Thomas E. Murray

Request:

The key to Highly Confidential Attachments D-1 through D-5 (to Exhibit 2 – Confidential Murray Testimony) equates a red dot with <<<BEGIN CONFIDENTIAL>>>

<<<END CONFIDENTIAL>>>. At the technical session on March 1, 2011, the Company described the red dots differently.

- a. Please define the meaning of a red dot as used on these maps.
- b. Please identify the source of the data from which the red dots were derived.
- c. Please identify the date upon which the red-dot data was collected from the source.
- d. Please identify the beginning and end dates of the source records from which the data was drawn. In other words, what is the time period for which data (used to create red dots) covers?
- e. Are there <<<BEGIN CONFIDENTIAL>>> <<<END CONFIDENTIAL>>> other than those reflected as red dots in the Union Maps (Highly Confidential Attachments D-1 through D-5 to Exhibit 2 – Confidential Murray Testimony) that exist within the Union service territory, which <<<BEGIN CONFIDENTIAL>>> <<<END CONFIDENTIAL>>>? Please provide the basis of knowledge for the response.

Response:

- a. The red dots represent locations, both residents and businesses, where Union Telephone Company has existing telephone cable facilities. The telephone cable drops from Union's poles to each location shown as a red dot are still in place, even for customers that have switched to a competitive provider. While it is possible that a customer, without notice to or permission from Union, may have severed the Union telephone cable drops, Union would still reflect such telephone cable drops in our system. Such an act by the customer would be a violation of law. The red dots therefore include residential and business locations currently and previously served by Union.

- b. The source for this information is Union's Plant Records system. This system is the comprehensive record of the telephone plant.
- c. The data was retrieved from Union's Plant Record system on July 2, 2010.
- d. In 2000, Union converted its paper plant records system to an electronic system. During that conversion, great care was taken to ensure that the electronic system accurately reflected the older paper records. In addition, following TDS's acquisition of Union, Union performed extensive verification of the data in this system to ensure the records were complete and accurate. The Plant Records system is routinely updated on a daily basis as Union deploys new services and upgrades facilities.
- e. The red dots shown on the Union maps represent locations with existing Union telephone service facilities. Union does not track locations where its facilities have never been installed.