107 W. Franklin Street P.O. Box 189 Quincy, FL 32351-0189



Retail Markets Group

March 16, 1999

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RECEIVED-FPSC

Blanca S. Bayo, Director Division of Records and Reporting 2540 Shumark Oak Boulevard Tallahassee, FL 32399-0850

### Re: UNDOCKETED - REVIEW OF REGULATED UTILITIES' YEAR 2000 PREPARATIONS AND READINESS

Dear Ms. Bayo:

Per your notice issued March 5, 1999, attached are the discussion question responses on behalf of Quincy Telephone Company (dba,., TDS TELECOM/Quincy Telephone).

If you have any questions, please feel free to contact Trina Kloehn at (608) 437-7368.

Sincerely,

I lomas M. Mille

ACK		Thomas M. McCabe Manger External Relations
AFA	-	
APP	-	Enclosure
CAF		_
CMU		-
CTR		
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LEG		•
LIN		
OPC		Year 2000 Readiness Disclosure
RCH		Tear 2000 Readiness Disclosure
SEC .		TDS TELECOM makes this Readiness Disclosure pursuant to the Year 2000 Information and Readiness Disclosure Act of 1998 with regard to the Year 2000 processing capabilities of TDS TELECOM, and with
WAS .		regard to any and all services and products offered by TDS TELECOM. Any claims made by parties other
OTH _		than TDS TELECOM which are referenced herein have not been tested or verified by TDS TELECOM and TDS TELECOM makes no claim as to the accuracy of any such third party claims

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1. What is the status of your company's Year 2000 plans and preparations? Please report your company's overall percentage of completion toward being fully Year 2000 compliant.

A company - wide Year 2000 program office with senior executive level sponsorship has been established to coordinate the Year 2000 efforts, as well as, monitor the efforts of the business units in an effort to promote uniformity of approach and completeness of testing and compliance efforts. In addition, each of the business units have appointed senior officers responsible for Year 2000 compliance, and in some cases, have formed steering committees to oversee the process. Each business unit also has assigned individuals to work in the various areas of Year 2000 compliance.

Please refer to Attachment 1 for specific details on the Y2K progress of TDS TELECOM. Given the information provided in this attachment, TDS TELECOM would estimate that its overall percentage of completion toward being Y2K compliant is approximately 75%.

2. What specific timetables and milestones have you identified to prepare for Year 2000? For each timetable and milestone, please report the following: (1) the percentage completed and expected full-completion date; (2) the specific tasks remaining to be completed; and (3) any specific problems anticipated.

TDS TELECOM uses the completion of individual Y2K phases (i.e., Inventory, Assessment, Remediation and Testing) to gauge its Y2K preparation. Please refer to Attachment 1 for a detailed analysis of specific timetables and completion percentages.

3. What is the status of the inventory phase of your company's Year 2000 preparations? Please report the following; (1) the percentage of this phase completed and expected full completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action is being taken; and (4) the expected completion date for each problem identified.

Please refer to Attachment 1 for a detailed analysis of the inventory phase of TDS TELECOM's Y2K preparation. This phase is nearly complete – requiring only some follow-up and verification work at this time. To date, TDS TELECOM does not believe it has encountered any <u>unique</u> problems or circumstances during the inventory phase of its Y2K efforts.

4. What is the status of the assessment phase of your company's Year 2000 preparations? Please report the following; (1) the percentage of this phase completed and expected full completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action is being taken; and (4) the expected completion date for each problem identified.

Please refer to Attachment 1 for a detailed analysis of the assessment phase of TDS TELECOM's Y2K preparation. This phase is nearly complete. TDS TELECOM is currently working with key vendors and suppliers to finish the assessment of various mission critical systems. To date, TDS TELECOM does not believe it has encountered any <u>unique</u> problems or circumstances during the assessment phase of its Y2K efforts.

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5. Which of your company's hardware and software systems, such as billing, administrative, customer service, infrastructure and operational support systems, do you consider critical? For each such system, what functions (in whole or part) are done via mainframe computers and which functions electronically interface with PC-based computers? How are these systems being remediated and tested? What problems have been identified that require additional work to make them Year 2000 compliant? Please report estimated completion dates for each problem identified?

TDS TELECOM has designated all systems affecting customer service as Mission Critical or Mission Important. Please refer to Attachment 1 for the Y2K status of such systems.

Support Systems are generally PC based with processing functions on the Mainframe. Auxiliary Systems and Network Systems are generally dependent on an embedded chip.

To date, TDS TELECOM does not believe it has encountered any <u>unique</u> problems or circumstances during its Y2K efforts.

6. What is the status of the remediation, or renovation, phase of your company's Year 2000 preparations? Please report the following; (1) the percentage of this phase completed and expected full completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action is being taken; and (4) the expected completion date for each problem identified.

Please refer to Attachment 1 for a detailed analysis of the remediation or renovation phase of TDS TELECOM's Y2K preparation. This phase is nearly complete. TDS TELECOM is currently working with key vendors and suppliers to finish the remediation of various mission critical systems. To date, TDS TELECOM does not believe it has encountered any <u>unique</u> problems or circumstances during this phase of its Y2K efforts.

7. What is the status of the testing (both unit and system) phase of your company's Year 2000 preparations? Please report the following; (1) the percentage of this phase completed and expected full completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action is being taken; and (4) the expected completion date for each problem identified. What tests are being done or will be done on network elements and customer-affecting systems? Please describe your company's testing process, including its approach and steps.

Please refer to Attachment 1 for a detailed analysis of the testing phase of TDS TELECOM's Y2K preparation. This phase is currently in the planning stages for many systems. TDS TELECOM has been working with key vendors and suppliers in an attempt to receive any testing information they may have available.

The nature of testing a switched network raises a number of serious difficulties which must be addressed prior to any actual tests to the switched network. TDS TELECOM is aware of industry groups currently working to develop protocols for such testing, and once industry protocols have been established, TDS TELECOM shall make good faith efforts to comply with testing requirements of the network, so long as such testing would not pose an undue risk to the company's customers

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8. Please describe your company's plans to address interoperability issues with other domestic carriers, such as LECs, IXCs, ALECs, CAPs, and wireless providers, and with interconnected networks and outside systems. Please describe the status of such plans and related discussions, including percentage of completion.

TDS TELECOM is aware of various groups working on obtaining interoperability information. TDS TELECOM will work closely with these groups to try to utilize and add to the information they are able to provide. TDS TELECOM feels strongly that interoperability issues must be addressed as a group rather than as an individual company undertaking.

9. What network inter operability testing has your company conducted or will your company conduct? Is your company working with ATIS or NRIC to perform network interoperatibility tests? Please report the following concerning such testing: (1) the percentage of this phase completed and expected full completion date; (2) the specific tasks remaining to be completed; (3) problems found where corrective action is being taken; and (4) the expected completion date for each problem identified.

TDS TELECOM has not done inter operability testing to date. TDS TELECOM plans to follow the activities of groups such as NRIC and lend assistance where necessary.

10. What is your company doing to avoid network failures that could arise due to non-compliant network providers? What safeguards are being taken? What communication channels have been opened with other network providers?

TDS TELECOM is currently in the process of developing contingency plans to address issues such as these. Because the TDS TELECOM contingency planning process is currently in its infancy, specific information on this issue is not currently available.

11. Please describe your company's efforts to work with suppliers of your company's critical hardware and software systems to ensure that each supplier's equipment is Year 2000 compliant. Have you inventoried supplier and third party products? Have you established compliance standards? What tests remain to be completed to verify that supplier's procedures are year 2000 compliant and when will they be completed? Please describe any contingency plans your company has developed to address the situation where a supplier's product is found to be non-compliant.

TDS TELECOM has been engaged in communications with suppliers regarding Y2K processing capability of products received from those suppliers. This process is on going. TDS TELECOM believes that all critical suppliers have been contacted. However, follow-up and continued monitoring of supplier Y2K efforts is necessary.

12. What efforts is your company making to contact and educate critical customers to ensure that their telecommunications services and customer premises equipment (CPE) are Year 2000 compliant? What tests are being conducted or can be conducted by a customer to test is equipment.

TDS TELECOM has responded to specific customer queries as necessary. In addition, TDS TELECOM has developed a companyY2K information site. This site can be accessed at www.tdstelecom.com.

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13. What communications channels has your company established with the Department of Emergency Services Emergency Operations Center? With other industries/companies that depend on your company's services?

Please refer to the answer given for item 12 above.

14. Please describe your company's contingency or disaster recovery plans for Year 2000 related network problems and the status of such plans. If such plans are still being developed, please report the expected compliant date. If such plans are complete, please bring a copy to the workshop.

At this time, TDS TELECOM has only just begun to develop additional contingency plans devoted exclusively to the Y2K issue. TDS TELECOM has been and continues to focus its efforts primarily on the successful resolution of the Y2K issues within the company to ensure that there is no need for additional contingency plans. As more of the immediate Y2K concerns are completely addressed, TDS TELECOM shall be able to allocate additional effort to the development of contingency plans specifically regarding the Y2K issue.

TDS TELECOM estimates that a contingency plan will be available by July 31, 1999.

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### **ATTACHMENT 1**

### Year 2000 Status

	Inventory		Assessment		Remediation		Unit Testing	
	% Complete	Est. Comp Date	% Complete	Est Comp Date	% Complete	Est Comp Date	% Complete	Est Comp Date
Network Elements	95%	03/31/99	80%	04/30/99	70%	09/30/99	50%	10/30/99
Support Systems	90%	03/31/99	80%	04/30/99	80%	06/30/99	90%	09/30/99
Auxiliary Systems	90%	03/31/99	80%	04/30/99	80%	06/30/99	50%	09/30/99

	-	and System est	Rollout		
	% Complete	Est. Comp Date	% Complete	Est Comp Date	
Network Elements	50%	10/30/99	50%	10/30/99	
Support Systems	80%	09/30/99	80%	09/30/99	
Auxiliary Systems	50%	09/30/99	50%	09/30/99	

#### **Definitions**:

**Network Elements:** 

Support Systems: Auxiliary Systems: those systems, components or software that directly affect telecommunications transmission and/or reception (e.g., computer switches, routers, and amplifiers)

operations support and administrative maintenance systems (such as maintenance, billing, parts ordering, etc.) systems or components such as payroll, human resources, security and alarm control systems, environmental control systems, etc.

Note:

The nature of the Y2K issue precludes a firm response as to completion in any one stage as all later stages could potentially affect the completion of earlier stages. For example, if in the testing phase a previously assessed system is found to have a problem, that system, and potentially any similar systems, would have to once again be assessed, and remediation for that system would have to occur again. In addition, the testing of a switched network presents some potential difficulties which are being addressed by the industry as a whole. Finally, all of these dates are estimates which are subject to change as new information arises and none of the estimated dates should be considered a guarantee of any kind whatsoever that any phase, or any portion of any phase, will be completed by the estimated date given.

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