



**NAVIGATOR TELECOMMUNICATIONS, LLC.**

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**ORIGINAL**

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March 11, 1999

Kay Flynn, Chief  
Bureau of Records  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

990000

Re: Response to Questions in Notice of Staff Workshop, Undocketed – Review of Regulated Utilities' Year 2000 Preparations and Readiness (Telecommunications)

Dear Ms. Flynn:

Thank you for inviting Navigator Telecommunications, LLC. to participate in your upcoming workshop on Year 2000 Readiness. Unfortunately, given a shortness of time and resources, Navigator will be unable to send a representative to participate in person. Also, if the agenda can be inferred from the nature of the questions and topics included in the Notice, it seems likely that a reseller of local service the size of Navigator would have little of substance to contribute to the greater discussions of network and interconnection issues. Nevertheless, such issues are a vital concern for all providers and customers who rely on the facilities of other entities. Navigator stands ready and willing to coordinate and cooperate with the incumbent local exchange carriers in every way to provide uninterrupted service to our customers.

Please find enclosed for filing Navigator's Response to the questions in the Notice. I hope these are responsive to the concerns you seek to address at the workshop. Please do not hesitate to contact me if you have more questions or require more information.

Sincerely,

Michael McAlister  
Director of Regulatory Affairs  
Navigator Telecommunications, LLC.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

NOTICE OF STAFF WORKSHOP  
UNDOCKETED  
REVIEW OF REGULATED UTILITIES' YEAR 2000 PREPARATIONS AND  
READINESS (TELECOMMUNICATIONS)

**RESPONSE OF NAVIGATOR TELECOMMUNICATIONS, LLC.**

Navigator Telecommunications, LLC. ("Navigator") is a newly licensed ALEC, Certificate No. 5777, the order granting its certificate having become final on March 2, 1999. Navigator is just beginning its initial operations in Florida.

Navigator will make every effort to provide telecommunications services to its customers that is uninterrupted by a Year 2000 condition or failure. Navigator has fully completed all of its Year 2000 plans and preparations, in a diligent and responsible manner, to assess and remedy potential problems in the systems and equipment within its control.

As a reseller of basic local exchange service, Navigator utilizes the networks and equipment of incumbent local exchange carriers (ILECs), specifically, BellSouth in Florida. Because those systems remain wholly within the control of the ILEC, Navigator must rely on the efforts and assurances of the ILEC regarding Y2K compliance. Navigator would refer to and rely upon any responses filed by BellSouth concerning Y2K readiness of all network equipment, network software, maintenance and repair systems, ordering and provisioning systems, testing and dispatch systems, engineering systems, and any other equipment or systems within the sole control of the ILEC.

Regarding Navigator's in-house computer systems and software, and the billing and collection systems, all have been personally examined and tested for Y2K compliance and have been certified as compliant by Navigator's Vice President of Operations. Navigator has not conducted an inventory of all equipment and systems that may be date sensitive or otherwise affected by the Y2K, and none is planned, because it does not seem warranted. Navigator's date sensitive equipment and systems is limited to four desktop PCs, a server, and a laptop, all purchased within the last 14 months and running Windows '98, all of which have been recently updated with the latest software fixes available from Microsoft. All equipment and software has been tested for Y2K compliance in the manner prescribed by the manufacturers and Microsoft, the supplier of the operating system used on all of Navigator's computers. Any patches or upgrades necessary and supplied by Microsoft have been installed, and results of the prescribed diagnostic tests indicate that Navigator's computer equipment and software systems are all Y2K ready.

Navigator does not utilize any network of vendors and suppliers of hardware, software, and other supplies used in the provision of telecommunications services other than the service providers that are the ILECs. Navigator has not assessed the risks associated with the company's customers and telecommunication equipment used by those customers since Navigator, as a reseller of telecommunications services, does not provide any equipment to the customer, and assumes no responsibility for the customers' equipment. Navigator is not interconnected with any other telecommunications providers. Beyond being ready and willing to cooperate and coordinate with the ILECs in every way to ensure the seamless continuation of the provision of telecommunications services to its customers, Navigator currently has no developed plan to address operational concerns associated with Y2K readiness, nor does it have a prepared operating contingency plan to address interconnection with telecommunications providers that are not Y2K compliant.

Respectfully submitted,



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