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March 18, 1999

Ms. Blanca Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Dear Ms. Bayo:

**Subject: Data Request Responses for Year 2000 Readiness Workshop  
Scheduled for March 19, 1999**

Attached are GTE Florida's responses to the questions regarding Year 2000 Readiness which will be discussed at the March 19, 1999 Staff Workshop. The Notice of the Staff Workshop requested each company to file written responses to these questions with the Division of Records and Reporting.

Should you require additional information, please contact Linda Rossy at (813) 483-2525.

Sincerely,

*Beverly Y. Menard*

Beverly Y. Menard

BYM:lh

c: Mr. Rick Moses - FPSC Communications Staff via fax on 3-18-99.

**NOTE: RESPONSE FAXED TO RECORDS AND REPORTING 3-18-99. ORIGINAL WILL  
BE AIRBORNE 3-18-99 FOR DELIVERY ON 3-19-99.**

DOCUMENT NUMBER-DATE

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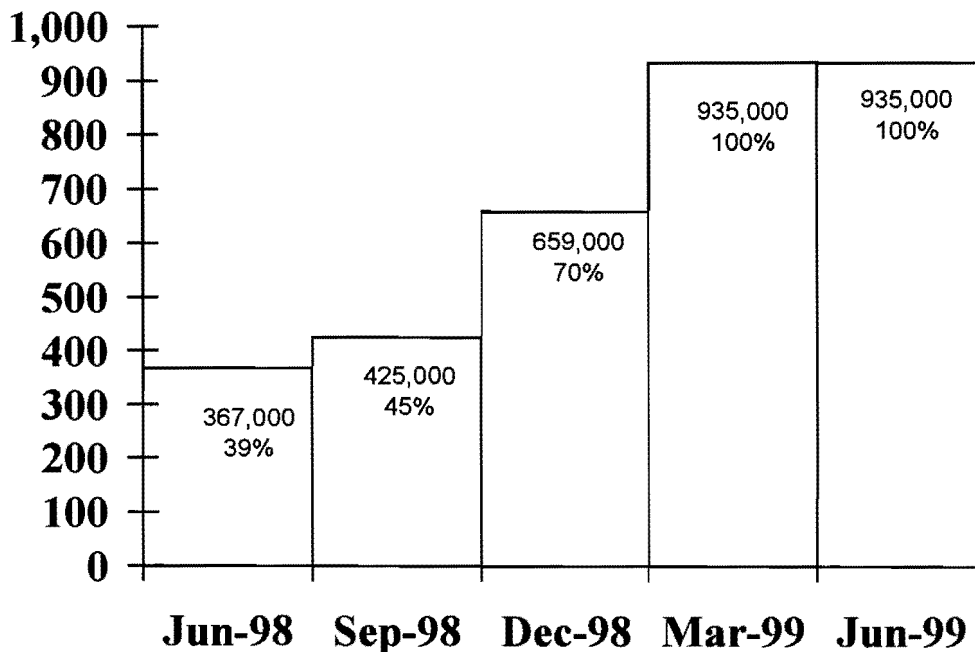
**GTE FLORIDA'S RESPONSES TO QUESTIONS FOR  
YEAR 2000 READINESS WORKSHOP  
TO BE HELD ON  
MARCH 19, 1999 - 9:30 A.M.**

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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.
  
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.

**Response: For Questions 1-2**

**Chart #1 Florida Switch Status**



**The GTE operated switches serving the public switched network in Florida are now 100% CENTURY COMPLIANT, as of March 15, 1999.**

<b>% of Access Lines within Florida</b>	<b>Scheduled Completion</b>
41% – AGCS GTD-5	Complete
17% – Lucent 5ESS	Complete
27% – Nortel DMS 100	Complete
11% – Nortel DMS 10	Complete
4% – DCO	Complete
Frame Relay Networks	Complete
Advanced Intelligent Network Products	2 <sup>nd</sup> Quarter 1999

Conversion of mission critical legacy systems was targeted for a December 31, 1998, completion date. As of that date, 95% of such systems were Year 2000 compliant and put back into production. All remaining systems are in the process of being converted and are scheduled to be put back into production and through testing by June 30, 1999. Otherwise, GTE's overall program schedule and status (as of January 31, 1999) may be summarized as follows:

- Year 2000 Program is overall 67% complete
  - US telephone operations is 76% complete
- 90% of critical legacy systems are converted and back into production
  - US telephone operations is more than 95% complete
- 100% of GTE's Wireline Data Network is Year 2000 compliant, and awaiting audit
- Enterprise testing is overall 30% complete
  - US telephone operations is 36% complete

GTE Florida's Responses to Questions for  
 Year 2000 Readiness Workshop  
 To be held on March 19, 1999 - 9:30 a.m.  
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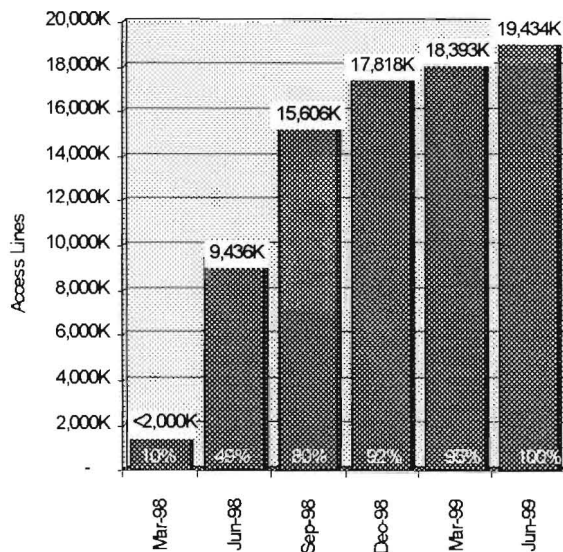
**Milestone Dates**

	Inventory		Assessment		Remediation		Unit Test		Integrated Test	
	% Complete	Est comp date	% Complete	Est comp date	% Complete	Est comp date	% Complete	Est comp date	% Complete	Est comp date
Network Elements	100		100		95	Apr-99	95	Jun-99	95	Apr-99
Support Systems	100		100		98	Apr-99	98	Jun-99	*	Jun-99
Auxiliary Systems	100		100		66	Jun-99	66	Jun-99	*	Jun-99

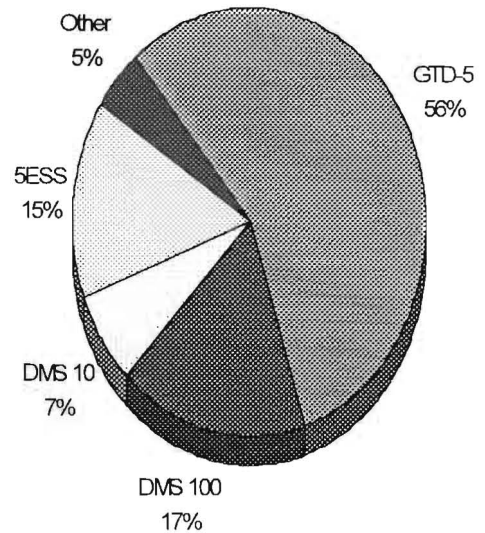
\* Figures not available

The status and current schedule for GTE's wireline network overall (including frame relay and AIN) are illustrated in the charts below.

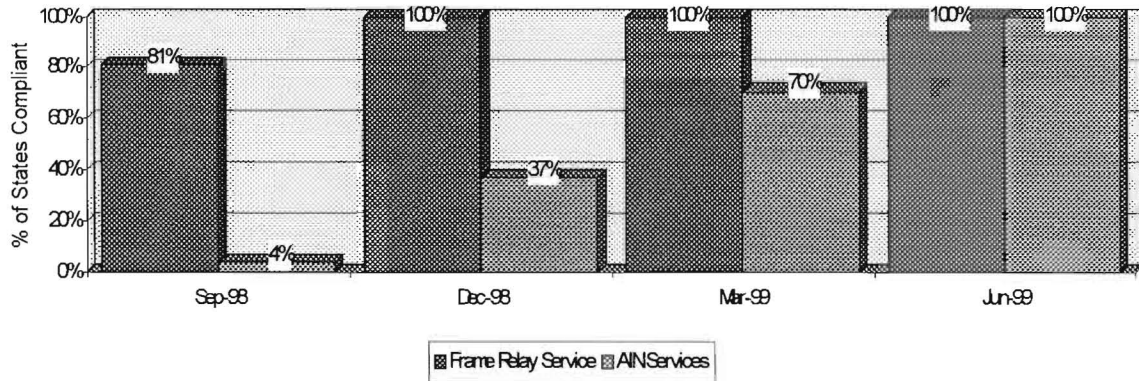
**Access Lines by Expected Central Office Year 2000 Conversion**



**Central Office Switch Types**



### Data and Advanced Intelligent Network (AIN) Status



Additionally, GTE central office switches are used to provide a variety of telecommunications services, including: public switched telephone network (PSTN) services, international direct dialing (IDD), integrated digital services network (ISDN), virtual private networks (VPN), international private line circuits (IPLC), and data circuits. With respect to these telecommunications services, GTE's overall compliance and implementation schedule is as follows:

Service	Compliance	Implementation
PSTN	12/30/98	06/30/99
IDD	12/30/98	06/30/99
ISDN	12/30/98	06/30/99
VPN	12/30/98	06/30/99
Data	02/28/99	09/30/99
IPLC	12/30/98	06/30/99
Frame	12/30/98	12/30/98

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(s) is being taken; and (4) the expected completion date for each problem identified.

**Response:**

GTE believes the inventory phase of our Year 2000 efforts to be complete. To date, GTE has experienced no extraordinary problems in its Year 2000 efforts. In addition, GTE has no indication that any specific function or system is so deficient in technical progress as to threaten GTE's present schedule.

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(s) is being taken; and (4) the expected completion date for each problem identified.

**Response:**

GTE believes the assessment phase of our Year 2000 efforts to be complete. To date, GTE has experienced no extraordinary problems in its Year 2000 efforts. In addition, GTE has no indication that any specific function or system is so deficient in technical progress as to threaten GTE's present schedule.

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.

**Response:**

GTE's Year 2000 program is focused on both information technology (IT) and non-IT systems, including: 1) telecommunications network elements that constitute the portion of the public switched telephone network (PSTN) for which GTE is responsible; 2) systems that directly support GTE's telecommunications network operations and interactions with customers; 3) legacy software that supports basic business operations, customer premise equipment and interconnection with other telecommunications carriers; and, 4) systems that support GTE's physical infrastructure, financial operations and facilities. All are considered critical "A &B" systems. Critical A systems "touch," or impact customers and Critical B systems are internal business support systems.

GTE's general corporate remediation and testing for Year 2000 includes approximately 160 million lines of COBOL-equivalent software and more than 15,000 unique external supplier products. GTE's program addresses both information technology (IT) (e.g., voice and data telecommunications networks, legacy computer systems, customer premise equipment, and corporate end-user desktop computers) and non-information technology (non-IT) systems (e.g., facilities and infrastructure).

GTE uses a variety of technical methods to implement Year 2000 compliance including (in no order of preference) windowing, date expansion, and encapsulation, depending upon the requirements of the particular application. GTE also employs bridging techniques so that variously renovated applications using various renovation techniques may continue to operate together.

GTE has worked with its external suppliers to obtain and verify the correct releases and upgrades to meet Year 2000 requirements. Network interoperability testing for critical systems was concluded in December 1998 and enterprise tests (i.e., tests not of individual components but of the "threads" that constitute various business processes) are currently on target for completion by June 1999.

In summary, compliant product roll out (deployment) and enterprise testing of GTE's telecommunications-related businesses, including national and international interoperability and verification, are presently expected to be complete by the end of June 1999. To date, GTE has experienced no extraordinary problems in its Year 2000 remediation efforts. In addition, GTE has no indication that any specific function or system is so deficient in technical

progress as to threaten GTE's present schedule.

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(s) is being taken; and (4) the expected completion date for each problem identified.

**Response:**

See response to No. 1 & 2 – Milestone chart. To date, GTE has experienced no extraordinary problems in its Year 2000 efforts. In addition, GTE has no indication that any specific function or system is so deficient in technical progress as to threaten GTE's present schedule.

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(s) 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.

**Response:**

See response to No. 1 & 2 – Milestone chart for answers to 7(1-2). For 7(3-4), to date, GTE has experienced no extraordinary problems in its Year 2000 efforts. In addition, GTE has no indication that any specific function or system is so deficient in technical progress as to threaten GTE's present schedule. GTE is continuing to conduct Functional Assurance Continuity Testing (FACT) through June 1999.



8. Please describe your company's plans to address interoperability issues with other domestic carriers, such as LECs, IXC's, 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.

**Response:**

GTE is an active participant in the voluntary Year 2000 Telco Forum that was organized in early 1997. Other members are Bell Atlantic, SBC, Bell South, US West, Cincinnati Bell, Ameritech and Southern New England Telephone.

The Telco Year 2000 Forum intra-networking portion of interoperability testing was recently concluded. The Forum conducted these tests voluntarily and used self-funded test facilities specifically configured for Year 2000 intranetwork interoperability testing. The tests addressed hardware and software configurations for (1) emergency services, (2) basic, enhanced and intelligent network services, (3) network management systems, and (4) CPE and data networks. High level results of those tests are now available on the World Wide Web at ([www.telcoyear2000.org](http://www.telcoyear2000.org)).

GTE is also working in a leadership capacity with the Network Reliability and Interoperability Council (NRIC). GTE's Vice President of Technology, Gerry Roth, serves as the Telecommunications Testing Subcommittee Chair. NRIC has been chartered by the Federal Communications Commission to investigate:

1. What is the impact of the "year 2000 problem" on access to the telecommunications networks?
2. What is the impact of the "year 2000 problem" on access to the telecommunications networks and services (i.e. CPE perspective)?
3. What is the current status of network reliability?

Additional Public Switched Telecommunications Network internetworking testing is currently close to completion through the Alliance for Telecommunications Industry Solutions (ATIS) Network Test Committee (NTC) of which GTE (and most of the industry, including mid & small LECs and the three major IXC's) is a member. A report of the test results will be released at the end of this month. The ATIS tests assessed the Year 2000 date change impact for mass calling

events on 12/31/99, potential congestion, cross-network services, impact of time zones and key Year 2000 dates in a local number portability environment. There is linkage between ATIS and the Telco Year 2000 Forum, as the combined testing for Year 2000 was designed to be complementary to avoid unnecessary duplicative testing. As a result of these voluntary corporate and industry efforts, GTE presently believes that the Year 2000 issue, from a network interoperability perspective, is being well addressed.

9. What network inter-operability testing has your company conducted or will your company conduct? Is your company working with ATIS and NRIC to perform network interoperability 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(s) is being taken; and (4) the expected completion date for each problem identified.

**Response:**

See response to No. 8.

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 communications channels have been opened with other network providers?

**Response:**

See response to No. 8 and No. 9.

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 (unit and system) remain to be completed to verify that supplier's products 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?

**Response:**

Successful conclusion of GTE's Year 2000 program depends upon timely delivery of Year 2000-compliant products and services from external suppliers. Approximately 1,450 of third-party products used by GTE have been determined to be "vital" products, critical to GTE's business and operations. GTE presently expects that by March 1999, Year 2000-compliant versions, or suitable alternatives, of third-party supplier products for GTE's critical or major legacy and support systems will have been delivered.

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 its equipment?

**Response:**

Significant resources have been devoted to both external communications (customers, shareholders, etc) and internal communications with GTE management and non-management employees.

One of the key objectives of the GTE Y2K Program Office is to promote awareness, and to communicate Year 2000 status to customers, shareholders, industry participants and regulatory agencies. Each of GTE's major business units is developing or has developed and implemented external communications plans. These efforts are integrated with customer communications, public finance reporting, public and media relations, industry forums, and regulatory reviews.

Through these various channels, GTE has frequently and consistently provided Y2K information and status of its program to various customers, shareholders, governmental entities and the general public. GTE has provided and continues to provide specific written responses to individual customer requests addressing GTE's Y2K program and products or services purchased from GTE. In fact, in February, 1999 alone, over 600 individual response letters were sent to customers who had inquired about the Y2K status of their specific, installed CPE.

In 1996, GTR prepared a working technical document for internal use known as "Proposed Criteria for Century Compliance," which details the scope of the Y2K issue and provides suggested criteria for assessing century compliance. We have made that document publicly available in our customer support website, [www.gte.com/CustomerSupport/Y2K](http://www.gte.com/CustomerSupport/Y2K). Additionally, this site provides details for the GTE Y2K program and schedule.

We have developed numerous communication tools designed to share relevant Y2K information to GTE customers and the general public. At every point in our customer contact process, information is available to share with customers when it is requested. All of our Customer Contact Centers have information at hand. In fact, even our repairmen have informational cards available, which explain how the public can access GTE Y2K information.

The following is a summary listing of the customer communication activities that GTE has established and is pursuing for disseminating Y2k information:

- Billing Messages
- Continuing the education of employees, and especially those interfacing with customers, regarding Y2K issues
- Web sites
- Written responses to customer requests

These communications are intended to convey the messages that:

- GTE has a plan that is aggressively addressing the Y2K problem and is working to that plan;
- GTE's goal is to have no interruptions in service; and
- GTE is preparing a comprehensive contingency plan for dealing with unlikely interruptions in service, or other situations that may arise.

Presently, we are actively planning future communications to GTE customers and are contemplating a variety of methods from mass mailings to bill inserts to "messages-on-hold" for our customer contact centers. We will keep the Commission apprised of these activities as they move from planning into implementation.

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

**Response:**

In its normal, business as usual approach, GTE will utilize existing contacts with the Florida Department of Emergency Services to enhance normal emergency restoration plans. As reported to the Commission in an earlier Y2K filing, GTE will provide a written copy of our contingency plans by July 1999. See response #14 for more information on contingency planning.

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 completion date. If such plans are complete, please bring a copy to the workshop. If such plans are not yet complete, please submit a copy to this Commission's Division of Communications prior to July 1, 1999.

**Response:**

GTE has begun to examine the risks associated with its most reasonably likely worst case Year 2000 scenarios. To date, GTE has no indication that any specific function or system is so deficient in technical progress as to threaten GTE's present schedule. GTE's program and plans currently indicate a compliant network infrastructure to be deployed by the end of June 1999. A general, unspecific, schedule shift that would erode progress beyond January 1, 2000, cannot reasonably be calculated. If, however, there were a schedule delay lasting no more than six months, such schedule erosion would likely affect only nonessential systems due to the prioritization of work schedules.

To date, GTE has not encountered any conditions requiring tactical contingency planning to its existing Year 2000 program; however, contingency planning for business and network operations and customer contact during 1999 and 2000 is ongoing.

In this regard, GTE is augmenting its normal business continuity planning to address potential Year 2000 interruptions. In addition, GTE's disaster

preparedness recovery teams are including procedures and activities for a "multi-regional" Year 2000 contingency, if it occurs. GTE is also developing its plans with respect to possible occurrences immediately before, during, and after the millennium transition. Under consideration are: "follow-the-sun" time-zone impact analysis; coordination with other (non-PSTN) telecommunications providers; a Year 2000 "war room" operation to provide high priority recovery support, plans for key personnel availability, command structures and contingency traffic routing; and plans for round-the-clock, on-call repair teams.

GTE has undertaken a comprehensive Year 2000 Business Readiness Program that incorporates contingency planning. From GTE's perspective, contingency planning should deal with four (4) scenarios:

- **Business continuity planning** – addresses somewhat unknown risks to assure that their impact is slight and alternatives existing in the event of failures
- **Disaster recovery and emergency preparedness** – addresses the method for dealing with the potential surprises that could come from unexpected Year 2000 failures, either internal or external to the business
- **Millennium roll-over planning** – refers to the period immediately preceding December 31, 1999 (e.g., October 30, 1999) through at least March 1, 2000 (thereby capturing the leap year calculation). This will include the use of "watch" centers, alerting and coordinating centers, standby staffing plans, management decision support planning and command structures, alternative communications and routing systems and otherwise
- **Post millennium degradation tracking** – refers to the observation and correction of subtle or gradual system or process output variances in performance or accuracy which may be related to secondary or indirect Year 2000 impacts.

In addition, GTE is taking the necessary steps so that the products and services it offers to its customers do not experience material problems associated with the Year 2000 transition. GTE's current plans provide a target date of June, 1999 for the implementation of critical and key Year 2000 compliant network components and systems, subject to additional compliance testing. It should be noted, however, that GTE's target date for critical and key elements Year 2000 compliant systems depends upon GTE's suppliers meeting the dates that they have quoted to the company for delivery of Year 2000 compliant software and/or hardware.

Otherwise, GTE's contingency planning for operations and customer contact during the transition from 1999 to 2000 is currently under development. Because it is impossible to determine what specifically could go wrong during that period, GTE is taking a broad view and evaluating many alternative actions. Accordingly, GTE has begun to examine the potential risks associated with its most reasonably likely worst case Year 2000 scenarios. To date, GTE has no indication that any specific function or system is so deficient in technical progress as to threaten GTE's present schedule.

Some of the variables that will trigger the contingency plans are as follows:

- when any forecasted delays in scheduled completion is outside an acceptable range
- when technical concerns are not under GTE control
- when a supplier is unable or unwilling to meet necessary schedule and technical requirements.

The precise plan with respect to any particular contingency will depend upon the degree of date vulnerability involved as well as the foreseeable ultimate effect upon GTE, the services it provides, or, most importantly, GTE's customers.

Part of GTE's contingency planning involves the monitoring for potential problems utilizing the GTE Network Operations Center ("NOC") which has been in operation since January of 1993. The GTE NOC operates 24 hours a day, 7 days a week, and 365 days a year with five functional units. Each unit performs specific functions in support of the Center's overall mission. These units are diversified with multi-functional and multi-disciplined capabilities.

The following outlines the functions performed by the GTE Network Operations Center units in support of the GTE Public Switched and Private Customer Networks:

#### **A. Monitoring and Control (M&C):**

This unit performs switch and facility surveillance and control functions for Central Office and facilities such as, GTD-5, DMS, 5ESS, other switches and remotes. It also provides the same functions for all associated peripheral equipment inside and outside of the Central Office for network infrastructure.

**B. Online Support (OLS):**

Online Support provides 2<sup>nd</sup> level technical assistance by phone and onsite if necessary to support GTE and its field technicians in performing their duties. As the technical experts for GTE, Online Support provides the highest level of support for outage restoration activities, Unsatisfactory Condition Reports, configuration management, cause base analysis and performance reporting across the technologies utilized by GTE.

**C. Internal Networks (IN):**

Internal Networks monitors and manages GTE's Advanced Intelligent Network Services (AIN), Signaling System 7 Network and other high bandwidth services like SONET, Frame Relay, ATM, X.25 and the T-1 Network.

This unit is also responsible for managing and maintaining GTE's six (6) Data Centers and provisioning 800 services.

**D. NOC Support (OSS):**

This unit maintains all systems and equipment utilized in supporting GTE's Network Infrastructure in the Network Operations Center. This unit performs all preventive maintenance, support systems administration, outage reports, systems application definitions and reporting.

**E. Customer Network Support (CNS):**

Customer Network Support (CNS) is a section of the Network Operations Center (NOC) serving GTE's deregulated customer base.

Originally designed to support the installation and maintenance of GTE's "core" voice, video and data product lines, Customer Network Support has now extended its role to providing the capability and support for many of GTE's Advanced Service offerings.

CNS performs monitoring and control, on-line-support, network management, and remote service order functions across a wide variety of private customer's voice, video and data telecommunications products and networks.