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March 17, 1999

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

In Re: Undocketed - Review of Regulated Utilities' Year 2000
Preparations and Readiness (Telecommunications)

Dear Ms. Bayo:

Pursuant to a Notice of Workshop in the above captioned matter, issued on March 5, 1999, each company was requested to file written responses to specific questions and file the responses on or before March 17, 1999.

Attached hereto are the responses of GT Com. These have been hand delivered to the Commission this date by the undersigned. Please distribute these to the appropriate staff members. In order to assist you, we have attached 15 copies of the responses.

Sincerely,



David B. Erwin, Attorney
GT Com

- ACK _____
- AFA _____
- APP _____
- CAF _____
- CMU Frubelhorn
- CTR _____
- EAG _____
- LEG DBE:jm
- LIN 2/Melinda Butler
- OPC _____
- RCH _____
- SEC I
- WAS _____
- OTH _____

Copy to: John Vaughan
John Vaughan

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

**GT COM
 YEAR 2000 READINESS
 WORKSHOP QUESTIONS**

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.

60%

2. What specific timetable 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.

		<u>% Complete</u>
Begin Inventory Phase	6/98	99%
Complete Inventory Phase	4/99	
Begin Assessment Phase	6/98	95%
Complete Assessment Phase	6/99	
Begin Remediation Phase	6/98	60%
Complete Remediation Phase	12/99	
Begin Developing Contingency Plans	4/99	
Complete contingency Plans	7/99	

2.(2) and 2.(3): Refer to answer to succeeding questions for this information

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.

- (1) 99% complete (For the most part complete, but plan to keep this phase open and to remain villigent for anything missed in the initial process).
- (2) None
- (3) Please see answer to question 4
- (4) Please see answer to question 4

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.

Assessment Phase: 95% complete Full completion 6/30/99

<u>Objective</u>	<u>% Complete</u>	<u>Task Remaining</u>	<u>Completion Date</u>
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Compliance Subset:

NETWORK ELEMENTS Replacement of Central Office Switches in the St. Joe & Florala divisions

Divisions:

St. Joe South	100%	Cut over	4/30/99
St. Joe North	100%	Cut over 8/15/99	8/15/99
Florala	100%	Cut over 12/4/99	12/4/99

Gulf	Install Siemens Software Release 16		Install week of 8/23/99
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911/ECS1000	Install software upgrade	100%	Order & install 6/99
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SUPPORT SYSTEMS

Operations, CABS, Billing	Y2K Compliance	100%	Vendor Compliance	4/99
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AUXILIARY SYSTEMS

Payroll, HR, Accounting, Purchasing, Environmental, Alarm Control	Y2K Compliance	100%	0	In Place
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*Note: Specific task remaining: Obtaining replies from some suppliers/manufacturers (i.e. General Motors, Ford Motor Company, etc.)

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.

All of the systems named above are critical systems and all of the above systems function via a mainframe computer except carrier access billing. All of the systems are provided by a software vendors. Carrier Access Billings (CABS) and Subscriber Management Software is Y2K compliant. All other software is scheduled to be compliant in April 1999.

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.

REMEDIATION PHASE: 60% complete Full completion 12/4/99

	<u>Objective</u>	<u>% Complete</u>	<u>Task Remaining</u>	<u>Completion Date</u>
Compliance Subset:				
<u>NETWORK ELEMENTS</u>				
	Replacement of Central Office switches in the St. Joe & Florala Divisions			
<i>Divisions:</i>				
St. Joe South		70%		Cut over 4/30/99
St. Joe North		25%		Cut over 8/15/99
Florala		25%		Cut over 12/4/99
Gulf	Install Siemens Software Release 16			Install week of 8/23/99 8/15/99
911/ECS 1000	Install software upgrade	0%	Order and install 6/99	
<u>SUPPORT SYSTEMS</u>				
Operations, CABS, Billing	Y2K Compliance	30%	Vendor Compliance	4/99

AUXILIARY SYSTEMS

Payroll, HR, Accounting, Y2K Compliance 100% 0 In Place
Purchasing, Environmental,
Alarm Control

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.

Due to the limited resources of our Company, we have not pursued active testing of software and hardware for Year 2000 compliance. In many instances the actual software or hardware in question, is providing service which can not be interrupted for long periods of time for testing purposes. We have made an inventory listing hardware and software that might not be Year 2000 compliant. The vendors of this hardware and software have been contacted and asked if it is Year 2000 compliant. We are depending on the testing of our vendors and others in the industry to determine Year 2000 capability.

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.

We are obtaining reports of interoperability testing performed by the Telco Year 2000 Forum. Many of the systems we use that require interoperability testing are providing service and can not be interrupted for extensive testing, therefore; we are dependant on results of interoperability testing of others in the industry.

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.

Our company does not anticipate significant interoperability testing. The systems we are using to provide services can not be interrupted for extensive testing. We do not have the resources to provide equipment for off line testing. We will have to depend on testing performed by vendors and other industry related companies who have those resources.

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?

Our first objective is to become Year 2000 compliant ourselves. We are somewhat limited in being able to control network failures in networks provided by others. If failures do occur we will take actions depending on the circumstances. We already have normal channels of communications with other network providers. We are sure the industry will take actions to enhance these channels as we approach the Year 2000.

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?

GT Com chose to replace its Northern Telecom central office switches at its St. Joe and Florala divisions with a Siemens EWSD host/remote network that when installed will be fully Y2K compliant. The company is working with its major software provider to reach compliance on those systems detailed in Question 5. System testing will follow on the installation of the replacement software. As a precautionary measure, the company has been negotiating with a second vendor whose software is currently Y2K compliant and has been given verbal assurance that GT Com can convert to their systems within 90 days. Supplier and third party products were included in the inventory process. If a supplier's product is found to be non-compliant, then GT Com will go back to that supplier and have the product made compliant or, will as discussed above, obtain a compliant replacement product from another supplier.

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?

GT Com routinely answers inquiries from customers. The company will follow the directions given in FPSC Executive Director's letter dated 12/30/98. In that letter, Mr. Talbot advised that GT Com should send out bill inserts or some other form of notice to convey three messages. The telephone company does not supply CPE.

- 1. The utility has a plan to address any potential Year 2000 problem and it*

- is working on that plan;*
2. *The utility has a goal to have no interruption in service; and*
 3. *In the unlikely event of an interruption in service or a situation beyond its control, the utility has a contingency plan.*

GT Com's customers can use GT Com's Network for transmission function ability testing of customer systems today because no data is passed for the signaling of voice and data calls.

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?

Attended Y2K Consequence Planning Issues meeting at Florida Division of Emergency Management on 1/14/99.

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.

Contingency and disaster recovery plans will be developed and submitted prior to July 1, 1999 in accordance with Mr. Talbot's letter of December 30, 1998.