

Voice Unfulfilled Service Requirement

VITELCO-Innovative had eleven unfulfilled service requests at the end of 2014. Five of these orders were staged to our Outside Plant Engineering department for evaluation and six orders were in the Construction stage.

Over the past few years, our network has been undergoing an upgrade from a legacy wireline network to an HFC network. Although the HFC network is in the completion phase, there exists certain locations/areas that remain difficult to access for various reasons. When service requests are received for these areas, they require engineering intervention, evaluation, redesign and construction to extend the HFC network to serve these locations.

Broadband Unfulfilled Service Requirement

VITELCO-Innovative had twenty-two unfulfilled service requests at the end of 2014. Five of these orders were staged to our Outside Plant Engineering department for evaluation and seventeen orders were in the Construction stage.

Over the past few years, our network has been undergoing an upgrade from a legacy network to an HFC network, allowing us to upgrade our service offering from DSL to high speed broadband. Although the HFC network is in the completion phase, there exists certain locations/areas that remain difficult to access for various reasons. When service requests are received for these areas, they require engineering intervention, evaluation, redesign and construction to extend the HFC network to serve these locations.

Service Quality Standards

Innovative Telephone has worked with the VI Public Services Commission to develop service quality standards to monitor the company's performance as it completes a significant infrastructure upgrade, which will positively impact its overall service standards and reporting capabilities. Innovative Telephone is currently required to report performance based on the following metrics on a monthly basis:

Current Quality of Service Status- Monthly Reports (8 Objectives/Metrics are in bold)

Innovative Telephone submits a monthly PSC report which consists of the following metrics:

- Customer Service
 - Total calls received
 - Total calls abandoned
 - Total calls answered
 - **Percent of calls answered within 20 seconds (Objective: 90%)**
- Repair (912)- Call Volume
 - Total calls received
 - Total calls abandoned
 - Total calls answered
 - **Percent of calls answered within 20 seconds (Objective: 90%)**
- Service Center
 - Customer repair reports
 - Total trouble repair reports received
 - **Percent repair reports cleared within 24 hours (Objective: 85%)**
 - **Percent repair reports cleared within 48 hours (Objective: 85%)**
 - **Percent repair reports cleared within 72 hours (Objective: 85%)**
 - **Percent repair commitments met (Objective: 90%)**
 - **Customer repair reports (Troubles per 100; Objective: less than 9.5 troubles per 100)**
 - Customer installation reports
 - Number of install requests received
 - **Installations completed within 5 days of scheduled date (Objective: 90%)**

In providing services to its customers, Innovative Telephone has faced numerous challenges. As a result of the failure to make investments or otherwise take steps reasonably necessary to compete in today's communications marketplace, prior ownership of Innovative Telephone neglected the network, which caused the company's service quality to suffer. However, after Innovative Telephone's parent company emerged from bankruptcy in 2010, the company's current ownership launched a multi-year and multi-million dollar program to modernize Innovative Telephone's network. As a result of these efforts,

Innovative Telephone has been improving service quality month over month for the variables identified above.

Innovative Telephone's activities to upgrade and modernize its network, equipment and service will translate into fewer trouble tickets and quicker resolution of service and customer care issues. Likewise, customer familiarity with the new billing statements will result in less demand on the customer facing staff.

The Modernization Plan

The cornerstone of the improvement of Innovative Telephone's quality of service is its modernization project. The project, which has been accelerated, was originally a four to five year plan --- now, it has an estimated completion date of October 2015. When complete, the project will address the need for new services and improve the quality of voice, video and high speed data offerings throughout the US Virgin Islands. The Company is making concerted efforts to notify customers of the changes and advise them that their service interface to the new plant must be upgraded. This is occurring in each of the areas where the new network is activated.

Innovative Telephone's modernization project is the ultimate remediation plan and will resolve all of the issues with the legacy plant. This type of network was essential to launch the advanced services that have been launched which allows the company to offer high internet speeds comparable with the mainland, telephone service this is not being maintained on obsolete equipment, and the ability to launch over 53 HD channels in the last two years. Further, customers did not have access to High-Definition Digital Video Recorders and were only able to access an internet speed of 1.5 Mbps. Now they can receive 25 Mbps in their homes and up to 1 Gbps at business locations. The conversion of an entire network is a challenge for both the organization and the customer because it is a major change for employees and end-users. It is important to note that, despite various challenges during the conversion process, Innovative Telephone has increased significantly the number of performance standards it met in 2014 as the company continues to convert customers to the new network. For standards that are not met, Innovative Telephone is required to submit a remediation plan, and the company continues to work cooperatively with the VI Public Services Commission to address any concerns about its quality of service.

Throughout this project, Innovative has listened to its customers' feedback and is constantly making adjustments to the process. All complaints are taken seriously and issues are resolved in a timely manner. There is an "EVO Welcome Kit" which is distributed to the customer at the time of installation to include additional questions that arose from conversations during the various types of customer interactions.

Consumer Protection Rules Compliance

- Innovative Telephone participates fully in the Virgin Islands Public Service Commission's telecommunications billing dispute resolution process by which consumers may enlist the PSC to review and resolve billing disputes, a process explained in the General Regulations section of the Company's local services tariff (see Local Tariff, Section 2 – General Regulations, Page 11) and on the PSC website (<http://www.psc.gov.vi/telecom.html>) .
- The Company provides appropriate credits to consumers for significant interruptions in service in accordance with its tariff provisions (see Local Tariff, Section 2, Page 15).
- No disconnection of service for nonpayment is made until a specified period time after the customer is provided with a delinquency notice (see Local Tariff, Section 2, Page 21).
- In compliance with PSC-approved tariff regulations all customer challenges to billed amounts are subject to provisions of the federal Truth in Lending Act as related to the required written recognition of a customer complaint and the time period during which resolution must be achieved (see Local Tariff, Section 2, Pages 23 – 24).
- The Company complies fully with PSC-approved regulations regarding the amount of customer deposits, the documentation of receipt of deposits, the accrual of and payment of interest on deposits, and prompt repayment of deposits upon termination of service (see Local Tariff, Section 2, Pages 60 - 61 regarding collection/interest and Page 68 regarding refunds).
- The Company complies fully with the FCC's rules regarding Customer Proprietary Network Information (CPNI).

Implemented Procedures to Function in Emergency Situations

Innovative has backup power including battery banks and dual generator sets at their CO's to provide un-interrupted power in case of an emergency. In addition, to provide backup power for the nodes out of reach of the CO's, AlphaGens are used that can provide un-interrupted power, for as long as the tanks are refilled as they get used. These rely on smaller tanks of fuel, and a plan is in place to constantly monitor and refill these in case of an emergency lasting for days. Innovative is able to reroute traffic around damaged facilities (via fiber cable - underground and aerial and/or via microwave), and is capable of managing traffic spikes resulting from emergency situations. The community of interest can be served from the central offices and remotes.

Voice Services Rate Comparability

Virgin Islands Telephone Corporation certifies that our pricing of fixed voice services in no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. section 54.313(a) (10). The detailed rates below support the certification:

Flat Rate for residential local service:	\$21.65
State SLC, USF, Mandatory EAS and Zone Charges:	0.00
Total Residential Rate	<u>\$21.65</u>
Urban Rate Floor	\$21.22
Benchmark plus two standard deviations	\$47.48