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August 9, 2004

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: Buckeye Telesystem, Inc. ("Buckeye TeleSystem") / Subscriber  
Notification Report, WC Docket No. 05-196**

Dear Ms. Dortch:

We write on behalf of Buckeye TeleSystem. This Report summarizes Buckeye TeleSystem's compliance with the customer notification requirements of 47 CFR § 9.5. We also provide some background information on Buckeye TeleSystem's voice service. Buckeye TeleSystem's service differs significantly from typical VoIP service, and provides more robust E911 services.

## **Buckeye TeleSystem's voice services**

Buckeye TeleSystem provides its voice and data services over the cable plant owned by a sister company, Buckeye Cablevision, Inc. Buckeye TeleSystem provides business services only, and has about 60 subscribers for its small-business service. Customers are not required to subscribe to Buckeye TeleSystem's Internet services to receive the voice services. Buckeye TeleSystem configures its customer premise facilities as follows:

**The NID and cable modem.** Buckeye TeleSystem installs at the customer premises a company-owned all-weather unit which contains a NID, a 4-output cable modem, and a CATV output. The unit transfers the subscriber's inside wiring from the ILEC's NID to Buckeye TeleSystem's NID. The unit is fastened to a wall or equipment board on the outside of the customer's premises. The unit has an external backup battery that provides at least 8 hours of backup power in the event of a power outage. Unlike most VoIP services, Buckeye TeleSystem's voice and E911 services continue to function during a short-term power outage.

**The traffic.** The subscriber originates a call over a traditional telephone. The call goes as analog traffic to the NID/modem/CATV unit, where the modem function converts the call to IP. The IP traffic travels over fiber optic and coaxial plant which

Buckeye TeleSystem leases from Buckeye Cablevision, its sister company. About 80% of that plant is underground and therefore less vulnerable to outages than the ILEC's overhead plant. The traffic is delivered to Buckeye TeleSystem's network operations center, where Buckeye TeleSystem has a soft switch. The call is converted to analog at the soft switch and enters the PSTN. The call never traverses the Internet, accordingly, Buckeye TeleSystem's voice service is not vulnerable to Internet outages.

**PSAP and ALI Subscriber Location Information.** Buckeye TeleSystem's network has trunking to the PSAP for E911 services. Buckeye TeleSystem provides the same subscriber information to the PSAP as any traditional voice services provider. Because Buckeye TeleSystem's NID/cable modem/CATV unit is permanently affixed to the subscriber's premises, Buckeye TeleSystem's subscriber location information is not vulnerable to error like a portable VoIP service.

### **Buckeye TeleSystem's Subscriber Notification Report**

Below, we provide information on Buckeye TeleSystem's customer notification and acknowledgement status.

**Advisories of circumstances when E911 service may not be available.** Buckeye TeleSystem is already in the process of having technicians visit each and every subscriber with a written advisory warning the subscriber of the limitations on Buckeye TeleSystem's E911 service. The subscribers are required to read and affirmatively acknowledge that they have understood the advisory by signing it.

**Percent of subscribers from whom Buckeye TeleSystem has obtained acknowledgements.** Buckeye TeleSystem has obtained signed acknowledgements from 29% of its voice service subscribers. Buckeye TeleSystem expects to receive signed acknowledgements from 100% of its voice service subscribers by August 29, 2005.

**Distribution of warning stickers.** At the time Buckeye TeleSystem's technician visits the subscriber's premises with the written advisory, the technician also places warning stickers on the subscriber's equipment. The stickers advise the subscriber of the limitations on Buckeye TeleSystem's E911 service.

**Percent of subscribers not provided with advisories or warning stickers.** As of the date of this report, Buckeye TeleSystem has not yet provided 71% of its subscribers with advisories or warning stickers, however, it anticipates visiting all of its subscribers to provide the advisories and stickers by August 19, 2005.

**Buckeye TeleSystem's planned actions toward customers who do not affirmatively acknowledge having received and understood the advisory.** Buckeye TeleSystem anticipates no need to take action against any subscribers because its technicians will personally obtain acknowledgements from each and every subscriber by August 29, 2005.

**Recordkeeping.** Buckeye TeleSystem keeps its subscribers' acknowledgements in each customer's master file at its offices located at 4818 Angola Road, Toledo, Ohio 43615. That file is kept as long as the customer remains with Buckeye TeleSystem.

**E911 Compliance personnel contact information.** Buckeye TeleSystem's E911 compliance contact is:

Name: Thomas K. Dawson  
Title: Vice President, Regulatory Affairs  
Address: 5566 Southwyck Boulevard, Toledo, Ohio 43614  
Phone: (419) 724-7216  
Email: [tdawson@buckeye-telesystem.com](mailto:tdawson@buckeye-telesystem.com)

If you have any further questions, please contact me.

Regards,

Fritz Byers