BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Investigation in which to)	
Gather Information about the Facility)	
Extension Practices of ETCs Eligible to)	File No. TO-2016-0184
Receive High Cost USF Support)	

RESPONSES OF MARK TWAIN COMMUNICATIONS COMPANY

Questions for companies receiving high-cost USF support regarding service requests in areas where the company lacks sufficient facilities to provide service.

1. Provide a direct link to the specific portion of a company's website or alternatively cite the specific portion of a company's tariff that describes the charges, allowances and other relevant information for line extensions or situations where facilities are not in place to fulfill an applicant's request for service.

Mark Twain Communications Company (Mark Twain) has multiple sections in its tariff referencing construction charges. The section we follow is listed below:

Section 16
Original Sheet 4

CONSTRUCTION, INSTALLATION, AND MAINTENANCE CHARGES - Continued

H. Special Construction and Facilities

The Telephone Company will provide an estimate of actual charges to the customer prior to the start of construction.

The customer will provide the Company without charge written permission for the placing of the Company's facilities on the property.

Where no facilities are in place, the Company will build and extend facilities at prices to be determined on an individual case basis. Rates for Dedicated Access, Private Lines and Centrex services will be determined on an Individual Case Basis (ICB). ICB rates will be structured to recover the Company's cost of providing the services and will be made available to customers in a non-discriminatory manner. Terms of specific ICB contracts will be made available to the Missouri Public Service Commission Staff upon request on a proprietary basis.

Ownership of all facilities constructed under this section up to the demarcation point will remain with the Telephone Company.

Special construction is that construction undertaken:

- 1. where facilities are not presently available, and there is no other requirement for the facilities so constructed;
- 2. of a type other than that which the Company would normally utilize in the furnishing of its services;
- 3. over a route other than that which the Company would normally utilize in the furnishing of its services;
- 4. in a quantity greater than that which the Company would normally construct;
- 5. on an expedited basis;
- 6. on a temporary basis until permanent facilities are available;
- 7. in advance of its normal construction;
- 8. involving abnormal costs.

Where the Company furnishes a facility on a special construction basis, or any facility for which a rate or charge is not specified in the Company's tariff, charges will be based on the costs incurred by the Company and may include: (1) non-recurring type charges; (2) recurring type charges for contract periods longer than one month; (3) termination liabilities; or (4) combinations thereof.

2. Does your company <u>not</u> apply any construction or similar one-time charges if the distance to extend facilities is within a certain distance? If yes, what is the maximum distance whereby the company will not apply any special charges to extend facilities?

Mark Twain doesn't apply any construction change for extending facilities under 1,750 ft. If these facilities need to be extended past the 1,750 ft., we would propose to charge the customer \$.20 per ft.

3. Does your company provide the customer with a certain dollar allowance for construction costs to extend facilities? If yes, what is the allowance?

See response to No. 1 above.

4. Are charges for extending facilities applied based on a set formula (i.e., \$100 per 1/10 mile) or alternatively are charges determined on an individual case basis?

- a. If charges are based on a set formula then identify the formula.
- b. If charges are based on an ICB basis then:
 - i. Explain what types of costs are identified to form the basis for these charges.
 - ii. Approximately what percent of all costs for extending facilities is the customer expected to pay?

See response to No. 2 above.

5. If a customer agrees to pay special construction charges and facilities are installed, does the company generally install sufficient facilities to serve other neighboring customers in the subdivision or nearby area? If yes, explain what happens, if anything, to the initial customer as well as any subsequent customers requesting service in that area. For example are subsequent customers assessed any special construction charges? Can the initial customer receive a credit or refund? Explain how the company handles such situations.

Yes, we always install sufficient facilities at the time of construction. See response to Nos 1 & 2 above.

6. If the company lacks facilities to provide service is the customer required to agree to any special terms or conditions for obtaining service (i.e., subscribe to service for a minimum length of time) that typically are not applied to other customers where sufficient facilities are in place? If yes, describe such any terms or conditions.

"Not applicable."

7. Does your company apply any termination charge(s) if a customer fails to subscribe to service for a certain length of time? If yes, identify the charge(s).

"Not applicable."

8. How long have the existing policies in response to Questions 1 thru 7 been in place in Missouri?

July 28, 1998.

9. If your company operates in other states besides Missouri does the company apply the same policies (as provided in responses to Questions 1 thru 7) in these other states for service requests in areas where the company lacks sufficient facilities to provide service? If yes, identify the states. If no, identify the states and explain how and why the company's policies differ.

"Not applicable."

10. Describe or provide a script of what information is provided by the company to the customer if the company lacks facilities to respond to the customer's service request.

Mark Twain covers the costs for construction of new facilities up to 1,750 feet. If the new location is more than 1,750 feet from Mark Twain's current facilities, there will be a construction pre-payment required of \$.20 per foot. Once the footage and costs are determined, Mark Twain will let you know the amount of the pre-payment. The pre-payment is required before the construction is started.

- 11. Please provide the following information for your company's Missouri operations for the most recent 12 month time period:
 - a. Total requests for service. 55
 - b. Service requests for an area where the company lacks sufficient facilities to provide service. Among these requests break this number down into the following categories:
 - i. Number of requests where the company installed facilities without applying special construction or similar charges. 4
 - ii. Number of requests where the customer paid the construction charges. 0
 - iii. Number of requests where the customer declined to pay the construction charges and service was not installed. 0
 - iv. Other. Explain.
- 12. Does the company consider an unfilled service request as reported in Form 489(481) to include a customer who requests service but ultimately declines to pay construction or similar charges? If no, explain why not.

If we had a customer decline to pay to have facilities extended, this was the customer's choice not to pay the costs to extend facilities. It is not, in Mark Twain's opinion, an unfilled service request

- 13. Please provide the following information for any customer requesting service in the past 12 months whereby the company attempted to apply construction or similar charges in order to have service be extended to the customer:
 - a. Name of applicant.
 - b. Location of applicant.
 - c. Total amount of construction charges.
- d. Indicate whether the customer paid the charges and service was installed.

"Not applicable."

14. If a company has detariffed is the link provided in response to Question No. 1 a link to the company's rates and charges for all other retail services or is the link to some other separate document?

"Not applicable."