

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of an Investigation into the)
Quality of Wireline Telecommunications)
Services in the State of Missouri)

File No. TO-2011-0047

**RESPONSE OF SOCKET TELECOM, LLC
TO ORDER OPENING AN INVESTIGATION INTO THE QUALITY
OF WIRELINE TELECOMMUNICATIONS SERVICES IN MISSOURI**

Comes now Socket Telecom LLC and for its Response to Order Opening An Investigation into the Quality of Wireline Telecommunications Services In Missouri states as follows:

A. Does your company own or maintain telecommunications facilities in Missouri? If yes, please answer all of the following questions. If no, then your survey is complete and should be submitted at this point.

Yes.

B. Does your company track on a regular basis any of the following: If yes, explain how your company tracks it (include whether such information is tracked by exchange or some other area). If no, explain why not.

- i. Timeliness of installing service after a customer orders service.
- ii. Timeliness of repairing service after a customer reports trouble.
- iii. Amount of service trouble.

Socket operates as a facilities-based LEC using leased UNE-Loops (UNE-L) in the exchanges traditionally served by AT&T and CenturyLink, including both the legacy Embarq exchanges and the legacy CenturyTel exchanges. In the AT&T areas, Socket leases DS1 and DS3 loops. In the legacy CenturyTel and legacy Embarq exchanges, Socket leases xDSL-capable two and four wire copper loops as well as DS1 and DS3 loops.

Socket tracks installation performance by ILEC operating territory and by loop type rather than by exchange. This is because each ILEC and each loop-type have different standard-intervals for the ILEC to complete their work. Socket's own installation performance is very much tied to the ILEC's interval. Thus, it makes sense to base Socket's own retail installation performance on the wholesale performance of the underlying local exchange carrier.

Socket does not track this information by exchange. Socket operates across many exchanges and may have only a single customer in a particular exchange. For this reason, tracking by exchange may not produce useful information. Socket also monitors its network Uptime and Mean Time to Repair for both its Outside and Inside network operations. Socket's Outside network consists of Socket's switches, routers, and circuits that connect and route traffic. The Inside network consists of Socket's servers that provide telecommunications and information services that are provided over Socket's Outside network.

In addition to installation performance, Socket tracks a number of other metrics in a monthly "score card". A copy of a recent Score Card that sets out Socket's metrics and performance is attached. Socket considers this information to be Highly Confidential because it is market specific information relating to services offered in competition with others (4 CSR 240-2.135).

C. Please provide your most recent results for any of the information tracked above.

Please see above.

D. Explain your company's preventative maintenance procedures. Include in your explanation specific methods you utilize to be certain that telephone equipment and plant is kept in good working condition. State whether your preventative maintenance program is tracked by exchange, area, or state. Please provide results of this measurement for the past two years.

Socket routinely performs routine network maintenance on its equipment. When such maintenance is necessary, Socket prepares a Maintenance Work Report that summarizes the work that will be performed. That summary is reviewed to determine the potential network impact of the maintenance activity and whether the activity has the potential to impact customers. The work cannot take place until the activity is approved by two members of Socket's Executive Staff.

If it is determined that the maintenance activity has no potential on impact customers, the maintenance is scheduled and performed. If it is determined that the maintenance may impact customers, actions are taken to minimize the impact such as scheduling the work activity during the maintenance window and, when necessary, notifying customers of the potential impact.

Socket's network maintenance is not separately tracked.

E. What percentage of your company's annual budget is spent on maintaining existing telephone plant?

Socket does not directly track maintenance expenses as a separate expense.

It is important to consider the fact that as a CLEC providing local exchange services through unbundled loops, much of the expense that is typically considered to be a maintenance expense for outside plant by a company that owns an outside plant network such as an incumbent local exchange carrier is captured in the monthly recurring charges that we pay for unbundled elements.

F. What percentage of your company's annual budget is spent on training its technical staff?

Less than one percent.

Respectfully Submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed by U.S. Mail postage paid this 1st day of November, 2010, to the following:

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