

State of Vermont
Department of Public Service
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June 10, 2008

William Hunt, III, Vice President Public Policy and Government Affairs
Level3 Communications, LLC
1025 Eldorado Blvd.
Broomfield, CO 80021

Dear Mr. Hunt:

Directly and indirectly, Level3 serves a number of critical users of telecommunications services in Vermont, including hospitals, public safety entities, major employers, and the State of Vermont itself. Therefore, a series of major outages this month and last month have been of great concern to the Vermont Department of Public Service. The Department submits the following information requests to Level3 Communications, LLC, and requests that complete and accurate responses thereto be delivered to the Department's offices in Montpelier, Vermont, no later than the close of business on July 1, 2008.

- 1) With respect to the outages on May 20, June 9, and June 10, 2008 that affected Level3 customers in Vermont, please describe the incidents in detail including:
 - The services and number of customers and lines affected for each service;
 - The root cause of each outage;
 - The duration of each outage;
 - The steps taken to restore service;
 - The steps taken to address the root cause of each outage; and,
 - Any additional information the company believes is relevant to this inquiry.
- 2) The Department understands that the outages of June 9 and 10, 2008 were the result of simultaneous interruptions of multiple legs of a network with geographically diverse routes. Is this correct? If so, please provide any explanations the company has as to how such a simultaneous interruption could have occurred.
- 3) Have there been any other incidents in Vermont since January 2006 that affected more than 10% of Level3's total number of Vermont access lines? If so, please describe these incidents in detail, including the nature of the incident, the duration of the incident, the number of customers impacted, the nature of the impacts and the steps taken in response to the incident.

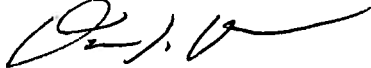


- 4) The Vermont E911 Board requires notification any time customers are isolated from E911. Have there been any incidents in Vermont since January 2006 when customers were so isolated? If so, please describe these incidents in detail, including the nature of the incident, the duration of the incident, the number of customers affected, and the steps taken in response to the incident. Has Level3 informed the E911 Board about these incidents, in accordance with the E911 Board policy?
- 5) Please describe the Level3 network in Vermont, and identify the routes connecting Vermont network to the rest of Level3's national network.
- 6) Does Level3 employ technology to ensure uninterrupted service to Vermont customers in the event of a cut or failure along one of these routes? If so, please identify and describe this technology.
- 7) Does Level3 have redundancy built into the equipment required to ensure uninterrupted service in the event of a component failure? Please provide separate responses for each device required to support service during an interruption. Please provide for each response information about a) the processor in the device, b) the line card(s) and c) power supplies in each device.
- 8) Please identify the locations of switches that provide local telephone and long distance telephone services for Level3's Vermont customers.
- 9) Please identify the locations of the major IP routers serving Level3's network in Vermont and connecting the Vermont network to the rest of Level3's IP backbone.
- 10) What staffing levels does Level3 have to support the network that serves its Vermont customers? How many of these personnel are located in Vermont? Please provide separate responses for 2006, 2007 and the present.
- 11) What are the minimum training and/or certification requirements specified by the manufacturer for personnel to maintain and repair Level3's equipment located in Vermont? Do all members of Level3's Vermont staff currently meet these training and certification requirements? If not, please identify who Level3 utilizes to maintain and repair its equipment in Vermont.
- 12) Is Level3 compliant with the Federal TSP program in Vermont? If not, please explain how it is not.
- 13) Does Level3 provide any services in Vermont that have TSP designations? If so, please list the number of voice channel equivalents with these designations.
- 14) What staffing levels does Level3 maintain for Vermont customer support? How many of these personnel are located in Vermont? Please provide separate responses for 2006, 2007 and the present.

- 15) Is it Level3 policy to direct customers to call a centralized out-of-state call center to report network outages?
- 16) Where is this call center?
- 17) What is the staffing level of this call center?
- 18) What is the average wait time for calls at this call center?
- 19) Does Level3 have service contracts with customers in Vermont that have Service Level Agreement clauses? If so, please describe typical SLA clauses and provide several examples for each type of service.
- 20) Has Level3 failed meet the requirements of any of these SLA clauses in the last 24 months? If so, please provide information about the violations, and any concessions Level3 has offered as a result.
- 21) Please provide complete and accurate copies of the company's Service Quality and Reliability report required pursuant to Docket 5903 for each quarter from Q1 2007 to the present.

In closing, let me add that business and institutional customers in Vermont rely on Level3 and have relied on Level3, predecessors for many years to provide reliable telecommunications services. I sincerely hope that they will be able to do so in the future. Thank you for your prompt attention to this matter.

Respectfully,



David O'Brien
Commissioner
Vermont Department of Public Service

Cc: Michael P. Donahue, Senior Regulatory Counsel