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Michael P. Donahue, Esq.
Director of Regulatory Affairs
5350 Shawnee Road, Suite 240
Alexandria, Virginia 22312
(703) 720-5533 (Direct)
(703) 720-5539 (Facsimile)
Michael.Donahue@telcove.com

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OF

February 21, 2006

Via Overnight Delivery

Honorable Jaclyn A. Brilling
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Case 03-C-0922

Dear Ms. Brilling:

This letter provides TelCove Investment, LLC's and TelCove Operations, Inc.'s (collectively, "TelCove") responses to Ordering Paragraphs 3 and 4 of the Commission's June 15, 2005 Order Directing Filings Concerning Critical Facilities Administration and Telecommunications Service Priority Services and Requesting Comment on This National Security Program ("CFA Order").

Ordering Clause 3 of the CFA Order directed all carriers that provide services with Telecommunications Service Priority authorization codes to provide a description to the Commission of the processes, procedures and practices used with each company to ensure priority treatment is given to provisioning new circuits, and to restoring such services when (1) the customer reports a problem with the service, or (2) when no report is received. TelCove's procedures are as follows:

Provisioning

- (1) The customer applies through the National Communications System for a TSP authorization code.
- (2) The customer requests TSP service from TelCove. The customer must:
 - a. Certify that its telecommunications service is an Emergency service;
 - b. Verify that the Company cannot meet the service due date without a TSP assignment; and

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703.720.5520
703.720.5539 fax

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- c. Obtain approval from the end user's invocation official to request a provisioning priority.
- (3) Upon receipt of a TSP Authorization Code, TelCove will input a service order into its account information system, populating the TSP field in the service order with the priority assignment for the TSP circuit.
- (4) TelCove provisions and installs emergency TSP circuits (TSP circuits that the Federal government has assigned an "E" provisioning priority) as quickly as possible, twenty-four (24) hours a day, seven (7) days a week, during all phases of the provisioning process. TelCove provisions and installs essential TSP circuits (TSP circuits that the Federal government has assigned provisioning priorities 1-5), using best efforts to meet the customer's requested service date.
- (5) Once the TSP order is entered into TelCove's system, it immediately goes to the top of TelCove's worklist in order to obtain the highest priority for install.
- (6) TSP Program priorities supersede all other telecommunications priorities, except for those circuits that enable TelCove to communicate internally among critical functions, such as repairs.

Restoration

- (1) To obtain a TSP restoration priority assignment, the customer follows the same process described above in (1).
- (2) TelCove provides a twenty-four (24) hour point of contact to receive reports of TSP service outages from customers.
- (3) When a customer reports a circuit problem and identifies the circuit as a TSP circuit, TelCove immediately elevates the problem to the top of TelCove's repair worklist, and TelCove provides that circuit with priority restoration even if TelCove's records do not identify the circuit as having a TSP designation. If the customer does not identify the circuit as a TSP circuit, but TelCove's records show that the circuit is a TSP circuit, TelCove immediately elevates the problem to the top of TelCove's repair worklist.
- (4) When a customer reports trouble with a TSP circuit that the Federal government has assigned a restoration priority of 1, 2, or 3, TelCove

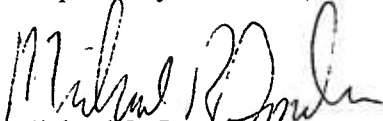
will dispatch technicians to restore the circuit as quickly as possible, including incidents that take place outside business hours. When a customer reports trouble with a TSP circuit that the Federal government has assigned a restoration priority of 4 or 5, TelCove will dispatch technicians to restore the circuit during normal business hours. If the next business day is more than twenty-four (24) hours away, TelCove will dispatch technicians to restore the circuit outside normal business hours.

- (5) TelCove monitors its network, including TSP circuits, twenty-four (24) hours per day, seven (7) days per week; however, it is not possible for TelCove to separately monitor each individual TSP circuit. Therefore, as TelCove has advised its customers and this Commission, it is critical that customers report any problems with TSP circuits to TelCove promptly.

Ordering Paragraph 4 of the CFA Order further directed all carriers that provide services with TSP authorization codes to provide a description of the educational outreach efforts the carrier generally makes to the end users of those services. In December 2005 and January 2006, TelCove sent a letter to each of its TSP customers, describing and informing them of the availability Critical Facilities Administration Service, and informing them that in order to receive priority restoration for TSP circuits, the customer must report the trouble with the TSP circuit to TelCove.

Should you have any questions concerning this matter, please do not hesitate to contact the undersigned.

Respectfully submitted,



Michael P. Donahue

cc: James E. Means, Esq.
Jeffrey A. Heins, Esq.