

Thursday, March 24, 2021

**Via Electronic Filing**

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350

St. Paul, MN 55101-2147

**Re: Petition by Big River Telephone Company, LLC, to Amend its Certificate of Authority to Provide Local Facilities-Based Services, Docket No. P6652/SA-21-82**

Dear Mr. Seuffert:

Big River Telephone Company, LLC (“Big River”) respectfully submits to the Commission, additional comments regarding its’ application to amend its Certificate of Authority, to Provide Local Facilities-Based Services and to address certain customer service issues that Garden Valley Telephone Company, dba Garden Valley Technologies (Garden Valley) had raised in its February 10<sup>th</sup>, 2021 comments.

Big River believes that there could have been a more customer-focused approach in resolving certain call completion issues reported, as originating from Big River to Garden Valley.

Garden Valley stated that “the problems relate to failed completion of calls originating with current Big River customers, who attempt to make calls to Garden Valley Thief River Falls CLEC customers, who were formerly Big River customers.” There was no correlation between call failures, specifically involving current to former Big River/current Garden Valley customers. These were plain call completion failures.

Big River investigated these failures over a lengthy period and found a root-cause in the route selection it took for calls bound for Garden Valley. We are open to discussing the details of our findings with Garden Valley and the Commission if the Commission so desires. At a high level, we discovered that a carrier (within a group of termination carriers) was not completing Big River calls that were handed off. We received no alerts from our surveillance systems that these failures had occurred. Thus, no visibility. As a result, Garden Valley did not see the calls come in. On February 19<sup>th</sup>, Big River placed a state-wide block on the offending carrier. We have not received any reports from Garden Valley since the block was enabled.

Big River suggests the following items to improve service:

- Both companies should create and exchange trouble tickets, containing as much information as possible.
- If either company does NOT feel the trouble ticket is being efficiently handled, an escalation to our respective management chains, should be initiated. Our respective Network Operations Center teams would have lists to facilitate the escalation.
- A point of contact should be identified for each company. A NOC manager or supervisor would be logical.
- A direct trunking connection should be established between Garden Valley and Big River via IP/SIP trunks. Both companies would then see the same path, the same timestamps and possibly resolve/prevent trouble before our customers are affected. A direct connection would also eliminate the need to introduce third-party carriers entirely.

Call completion failures affect customers of both companies. Satisfied customers should be our only focus. I am sure that these suggestions would help with future issues.

Feel free to contact me at: kkeaveny@bigrivercom.com or (573) 651-3373, if you have any questions regarding this matter.

Big River looks forward to working with Garden Valley to implementing these improvements.

Sincerely,

BIG RIVER TELEPHONE COMPANY, LLC

/s/ Kevin Keaveny