

MINUTES OF THE CC COMMUNICATIONS MANAGEMENT

155 N. Taylor St., Fallon, NV 89406

January 3, 2023

Call to Order:

The regular meeting of the CC Communications was called to order at 1:45 PM on January 3, 2023.

PRESENT: Commissioner Myles Getto
Commissioner Harry Scharmann
Commissioner Justin Heath
General Manager Mark Feest
Administrative Assistant Shelly Bunyard

ABSENT:

Public Comment:

Chairman Myles Getto asked if there was any public comment but there was none.

Verification of Posting of Agenda:

It was verified by Shelly Bunyard, Administrative Assistant, that the Agenda for this meeting was posted on the 27th day of December, 2022 between the hours of 1 pm and 5 pm. at all of the locations listed on the Agenda, in accordance with NRS 241.

Consideration and possible action re: Approval of Agenda as submitted or revised:

Commissioner Justin Heath made a motion to approve the Agenda as submitted. Commissioner Harry Scharmann seconded the motion, which carried by unanimous vote.

Consideration and possible action re: Approval of Minutes of the meeting held on:

A- December 1, 2022

Commissioner Harry Scharmann made a motion to approve the minutes of the meeting held on December 1, 2022 as submitted. Commissioner Justin Heath seconded the motion, which carried by unanimous vote.

New Business:

A- Consideration and possible action re: OC 192 outage report.

Mark Feest, CC Communications. This item is just informational due to the outage being widespread and persisted for a period of time. I hope everyone received their emails from me regarding this situation. On December 23, 2022, at approximately 4 PM, CC Communications technicians began seeing alarms for T1s riding the OC 48 from AT&T to CC Communications. The OC 48 is part of a AT&T OC 192 that runs between Reno and Fallon, which passes through the AT&T central office in Fernley. AT&T had an OC 192 that is broken out into four OC 48s. One of those OC 48s comes to us from the Fernley central office. OC 48 is just a measurement of volume of voice calls that is a data transfer. It is very antiquated and is on legacy equipment called an OC 48, which is how we exchange traffic between us and AT&T. I foresee the outage continuing and CC Communications will have to come up with some sort of solution to keep this from impacting our customers. We are not able to get parts or hire anyone to work on the OC 48. This issue has been going on since the former General Manager, Bob Adams, had my position. We have been willing to hand off voice traffic to AT&T in Reno for over a decade. We are an

incumbent local exchange carrier. Every single location in the United States has an incumbent local exchange carrier. Fernley's local exchange carrier is AT&T. We pass voice traffic only between us and AT&T at the county line. Any ILEC whether it's us or AT&T can demand that it is at the exchange boundary line. For us, this is the county line. AT&T demands it to be at the exchange boundary even though we want to exchange the traffic at their office in Reno and control the entire facility. We can take it at Leeteville Junction and send it to Carson City back up to the southside of Reno and at Leeteville Junction it can be taken straight in on the railroad right-of-way all the way into Reno. We could have a diverse route. AT&T has not agreed to this. In the past, they have not agreed to exchange traffic in that manor. They demand that the traffic is exchanged at the county boundary via OC 48.

Commissioner Harry Scharmann. So, it has been exchanged on the other side of Hazen.

Mark Feest, CC Communications. Yes, that is where the traffic exchange meet point is according to the FCC.

I look at this outage as we have no network issues at all. Our OC 48 on this side, worked within parameters. There were no issues with it. Any traffic that stayed on our network worked perfectly fine. The problem is when you receive a wireless or VoIP call, the traffic of that call goes all the way to Reno and is switched by AT&T and sent back to us onto our network.

We notified AT&T around 4:00 pm on Friday, December 23, 2022. AT&T never responded and to this date have not responded with a technical explanation regarding what happened, why it was down and how it came back up. I have had conversations with AT&T regulatory in Nevada as well as Texas. We're trying to work something out.

Our employees notified AT&T advising them they had a problem. AT&T ignored our notifications, and it went down to what we refer to as a "hard down" meaning completely down on Christmas around 9:00 p.m. Our employees worked every single day of that holiday trying to get the outage back up, contrary to the Fallon 411 commentors. It was completely off of our network. I apologized to my employees on Tuesday following the outage, as they should have gone home because there was nothing we could do about it.

We use a company called Syniverse along with many other companies who also use Syniverse. When two carriers pass voice traffic between them, you have to have a company like Syniverse which provides called data and routing information. For example, when you think you have moved your number to another carrier and let's say you are a Spectrum customer, and you take your 423-1234 and move to Charter. You may think you moved your number to them, but they have actually given you a brand-new number say 867-1234. They will not tell you about it. They will send us a notice to forward the number you thought you moved in our switch through the new number. We just do call forwarding. Your number never moves, it's just forwarded. That creates a problem when we connect with other carriers, how do you get the data to know what number has been forwarded. Data base is then checked to show the number has been forwarded. If AT&T is linked to us and that database is in Reno, we do not know if a number has been forwarded. These are really antiquated traffic exchange rules and procedures for a period of time when AT&T had a monopoly. A number couldn't be ported to a new carrier and there was no

wireless carrier. These rules and mechanisms don't work well. The FCC for some time had an intention to do a rule making, that is what is exchanged traffic in an IP to IP world. IP to IP handoffs make everything much easier. AT&T happens to be one of the biggest opponents and proponents of this. They're an opponent advising they will not do this without national rules. On the national level they're advising the need for national rules. CC Communications is ready to change the method so it's more efficient and provides redundancies, so far, AT&T has refused.

Right now, we're working with AT&T Regulatory to demand support and communication procedures to be adopted hereto going forward. The one thing we have received from this outage is an escalation procedure from them. They will adhere to when we don't have a response back from them. Unfortunately, we still haven't heard anything back, but everything is working now. I'm not so sure how well exactly the escalation procedure is going to work.

We are currently working with AT&T regulatory regarding the mandated PUCN and FCC outage reporting. We have engaged with consultants to determine what ability, if any, CC Communications has to bypass AT&T. I have a theory, but I am not a network engineer. I think we can create our own redundant route, bypass AT&T and still keep the current FCC mandated connection. We're checking with someone to make sure this is a possibility.

We are engaging with AT&T in an attempt to change the meeting point for traffic exchange. We will contact their regulatory people, who are not happy about having to do the outage reporting. We will see if we can put pressure on them to let us meet them in Reno at their central office. As a side note, meet point traffic exchange was based on something called meet point billing. We used to exchange money when you passed traffic between two ILEC's. If you are a company like us with high costs, we received more money than AT&T for one minute and one mile of moving traffic. Money can actually be made off of traffic exchange. For that reason, as the larger ILEC meaning AT&T, you would want to always push the meet point as far as you can towards the other company because of the meet point billing. This isn't done anymore.

We are working on a faster, more efficient, 911 failover. They did actually do a work around, which was basically forwarding calls that came in on a cell phone. I think with a VoIP solution, we can get a faster more efficient 911 failover in the future.

Commissioner Harry Scharmann. What do you mean a failover?

Mark Feest, CC Communications. When you make a wireless call in Fallon, Nevada, you will go to let's say Verizon's tower and then all the way to Reno. If that OC 48 is down coming back to Fallon, your 911 call will stop in Reno and never be sent back to Fallon. Through forwarding calls to another cell phone that took a different route into town, the Sheriff's office was still able to receive that phone call. Theoretically, you can take that same call and forward it through a VoIP phone that travels over the internet and the call will be able to get back into town even if the OC 48 is down. I think there is a more efficient way to re-route a 911 call from a cell phone back to our PSAP.

Commissioner Justin Heath. The PSAP is the Public Safety Answering Points.

Mark Feest, CC Communications. PSAP is the place where you answer emergency phone calls and receive location data to dispatch.

We will look further into the OC 48 issue. If we can just ride it but also ride our own facility all the way to Reno but I'd prefer to do an IP traffic exchange which would create a lot more redundancies. There are a lot of regulatory requirements. They can require us to meet them at that border. We cannot force them off of that position.

Commissioner Harry Scharmann. You will go all the way into Reno, if you need to.

Mark Feest, CC Communications. We will, but they still have the right to force us to meet them at the boundary of exchanges. I believe that this is a nationwide AT&T position. They will not change this until there is a nationwide rule. They won't do a one off and make changes, even for the benefit to our customers. You might have saw on the news, the issue with 911 in Yerington recently it was out for a week. That was the same type of issue involving a traffic exchange issue, because Frontier rides AT&T back into Reno and that's where they switch their 911 calls. Maybe the fear of the outage reporting will motivate them to just meet us in Reno.

There is no action on this at this time. However, potential solutions may require funding approvals back before this board. It may require regulatory actions and or authorization to file actions against third parties to compel cooperation or fulfillment of obligations.

Commissioner Justin Heath. Can the regulatory board in Nevada force them?

Mark Feest CC Communications. No.

Commissioner Justin Heath. It has to be national.

Mark Feest, CC Communications. That is correct. The FCC will have to force them, and they are not going to until they complete a rule making. Even at that, we have been told, once they adopt a new traffic exchange rule, they will probably give people three years to comply.

We told AT&T we can't get a new OC 48 and they said they had a bunch of them, and they would send us one. We actually have equipment in our central office that was given to us by AT&T because they don't want to switch their side of the equipment to something newer than 1982 or 1984. This equipment can no longer be purchased. They said they have a bunch of them and will make sure we stay up. The problem is, we don't have anyone who knows how to operate the equipment because it's at end of life, there's no training on this equipment and you can't even find a manual. We are working on these things, but it's a bit of a problem and that's why I would like a work around. A work around would involve something called a circuit emulation, where we make an IP circuit look like an OC 48. This work around may require funding approvals. If we have to emulate a circuit to look like the old even though we don't own that equipment. This may be a stability issue and we will have to weighed if we want stability for phone or just wait this out until everyone is mandated to go to a new methodology for exchange in traffic.

I brought this up for two reasons. The first was what we are doing to try to fix the problem and the extent in which we can control it. The Second is I am displeased about people on the internet saying CC Communications was just sitting at home when they call their grandkids or whatever the situation was. It was completely out of our control, and we had people there the whole time. I'm sure you know that, but I did want to mention it.

Commissioner Myles Getto. How often are those outages?

Mark Feest, CC Communications. This is actually from this particular issue about the third time it was probably the most extended, and that's over the last ten years. This was the most extended and the difference is AT&T just would talk to us. We received information on what happened through a third party. On Monday, when I finally got in touch with a regulatory person, they verified to me that the third party was correct about the outage information they gave us. It was an OC192 that had an overheating issue on a card that went bad in the Fernley central office. I am concerned because it's substantially the same issue has happened as when 911 went down in Lyon County. I am concerned that this might become a more common issue and their complete lack of urgency to resolve the issue. The outage also affected their rural customers, us and Frontier rural customers.

Informational Only.

Chairman Myles Getto asked if there was any public comment but there was none.

Reports: General Manager Report:

1. Grants

a. SCA

- i. Between weather and purchasing process, we will see further delays in getting started.

b. Te-Moak Elko Band

- i. Awarded 8/26/2022
- ii. EAS
- iii. 6-month plan
- iv. BIA to provide authorization

c. Yerington Paiute

- i. Awarded 8/26/2022
- ii. EAS
- iii. 6-month plan

- iv. BIA to provide authorization
- d. WRPT and FPST
 - i. Awarded 11/30/22
 - 1. WRPT to provide agreement
 - 2. BIA to provide authorization
- e. Upcoming Grant Opportunities
 - i. OSIT RFP Due December 19, 2022
 - 1. RFP's submitted
- 2. Network
 - a. OC 192 (discussed as agenda item)
 - b. Various Power Outages affected service
- 3. Audits
 - a. USAC (no new updates, but still open)
 - b. PERS (no new updates, but still open)
- 4. Human Resources
 - a. Senior Sales Engineer is retiring
 - i. Zoom interviews have been conducted
 - ii. One candidate has been interviewed in-person, one candidate will be interviewed week of January 16th in-person
 - b. Zoom interviews set up for
 - i. Network Engineering
 - ii. COO
- 5. IPTV
 - a. Current vendor will EOL equipment December 2024
 - i. This will necessitate a decision around end of first quart 2024
 - 1. OTT
 - 2. Exit subscription TV
 - 3. Traditional Linear platform

Affidavit of Posting:

Public Comment:


Chairman Myles Getto asked if there was any public comment but there was none.


Adjournment:

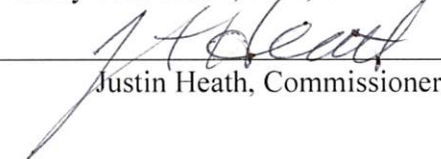
The meeting was adjourned at 2:10 p.m.


Shelly Bunyard, Administrative Assistant


Mark Feest, General Manager/CEO

APPROVED: 
Myles Getto, Chairman

APPROVED: 
Harry Scharmann, Vice, Chairman

APPROVED: 
Justin Heath, Commissioner