

Comments regarding the proposed Rule Governing Outage Reports

Below are a few areas of concern to me in the *proposed outage report requirements* for telecom and electric utilities. I appreciate your efforts to clarify and bring the outdated document current with today's issues and technology.

I strongly believe that as little as one household without service should require reporting at some point. Please reconsider and implement a time limit at which point the OC would be required to report. Perhaps it's okay for it to be three days or a week as they work to address the issue, but not for multiple weeks as I'm aware of happening to an elderly couple in southern Vermont - a case of which I've both spoken of and written about in my various pieces of testimony. We have many back roads here in Vermont where folks can easily be forgotten if there's no accountability.

As a citizen with limited understanding of the telecom systems, I appreciate your definition section at the beginning and urge you to add to that section a definition of CMRS.

I am not clear on whether the issue of fiber optic telephone systems and backup batteries which will discharge in cases of long power outages is being sufficiently addressed. It appears the only way you will be notified of our inability to get a dial tone during long power outages is through power company reports on the 15th of each month (or quarterly if deemed appropriate) That language and possible change of timing feel too vague and I recommend eliminating Section 5.1.1.

Is Section 4.1 intended to cover battery failure during power outages?

All facilities based fixed voice service OC's providing voice service in the State of Vermont shall report any known outage lasting more than 30 minutes,

> Please make it clear that it **IS** intended to cover power outage failures and resulting discharged batteries.

Again, this is not to shame or blame anyone - this is purely to try and avoid loss of life and obtain the most complete information so that all can better serve the public by seeing where holes in our systems exist - this should help improve the functionality of both our utilities and public services as a whole.

I also encourage the elimination of the language in section 6 which is already covered by Vermont Statute - 1 VSA Sec. 315-320. I would never have learned that we were not in the E 911 outage records during major power outages if this information wasn't available upon request. Transparency is the hallmark of good government and something we should be striving for, not building more barriers to public information and participation.

Thank you for your consideration.

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