

## TOWN OF SHREWSBURY

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January 16, 2019

Commissioner June Tierney  
Department of Public Service  
112 State St., 3<sup>rd</sup> Floor  
Montpelier, VT 05620-2601

Dear Commissioner Tierney:

Thank you for the opportunity to comment on the 2018 Vermont Telecommunications Plan. We want to focus our attention on one very serious deficiency in the Plan. The Plan does not deal with the need for adequate back-up power at the home to provide basic voice service during extended power outages. The fiber optic cable to the home service provided by Vermont Telephone Company, Inc. (VTEL) for a significant portion of Shrewsbury is dependent on the availability of electricity and in cases of a power shortage of significant duration is non-existent. VTEL is not meeting the basic tenet of Universal Service by failing to maintain voice service during power outages.

As Selectmen we are charged with establishing and maintaining the conditions and infrastructure to promote the safety and welfare of the residents of Shrewsbury. We take this responsibility seriously, and our residents' welfare is threatened by the ever-present vulnerability of power outage-related loss of communication capacity and of access to emergency services.

When VTEL installed fiber optic cable in Shrewsbury in 2015, our telecom service became dependent on electric service. VTEL installed a backup battery at each home to support telephone service, we were told, for up to eight hours during a power outage (these are CyberPower units containing a B.B. Battery lead acid VRLA rechargeable battery, PB 7.2-12). They do not last for eight hours, and in any outage greater than the battery capacity (as we had November 27-29, 2018), our residents have NO TELEPHONE SERVICE AT ALL.

Around-the-clock telephone access is essential for preservation of personal and public safety. If there is a power outage and the telephone battery is not working, people who are elderly, infirm, or living alone cannot request help. In fact, no one who has an emergency situation can get help for an accident, stroke, or heart attack; a child who is hurt or suddenly ill; a house or chimney fire; a school crisis; or any number of welfare- or life-threatening circumstances. Our concern for interruption of emergency phone service is heightened by the fact that Shrewsbury has very limited cell telephone coverage.

The consequences of not having telephone service in a natural disaster, often accompanied by a power outage, would be disastrous on a community-wide scale. And even when loss of telephone service due to lack of power occurs in non-emergency conditions, vital everyday functions like conducting personal or professional affairs, working from home, and running a business are interrupted, with attendant economic impacts.

We acknowledge the expanded use of generators for power outages, but we emphasize that many residents do not choose, or cannot afford, to purchase this equipment – nor should an ill-advised telecom company investment or installation decision force them to.

Perhaps the utility should upgrade the existing telephone backup batteries with high efficiency long-lasting ones so that basic voice service is maintained during power outages.

Lacking technical expertise ourselves, we look to our governmental and private entities to identify and propose solutions. We believe it is the responsibility of regulatory agencies to require solutions and of the telecom companies to implement and finance them.

The experience with VTEL we've had in Shrewsbury should be a cautionary warning for the Department in other requests for approval of fiber optic telecom installations: Do not permit electricity-dependent systems unless the telecom company provides for continued communication service for both emergency and customary use during power outage events.

We ask the Department of Public Service:

1. NOT to finalize the 2018 Telecom Plan until you have examined the issue of telecommunication electricity-dependency and amended the Plan and to acknowledge the problems that this dependency causes and to propose solutions for these problems.
2. To extend or reopen the public comment period specifically to obtain input on the amended Plan and on how adequately it defines and proposes measures to address and fix the problems associated with the electricity-dependency issue.

We also ask our Legislators to open inquiries in their House and Senate committees of jurisdiction to address the telecommunication electricity-dependency issue.

Finally, we ask the Department and VTEL to address our local telecom situation. The Plan states, "Vermonters need and expect affordable telecommunication services of good quality." VTEL, with the Department's knowledge, took dependable service away by disconnecting the copper lines and installing fiber optic. We ask you to find provide a solution for Shrewsbury. Do not leave our residents and first responders in the current unacceptable situation.

Please contact us if you have any questions. Thank you in advance for your attention.

Shrewsbury Selectboard,

/ss/

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