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January 7, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

In Re: PaPUC Docket Nos. A-2020-3020004; A-2020-3020005; A-2020-3020006; A-2020-3020007; A-2020-3020009; A-2020-3020010; A-2020-3020011; A-2020-3020012; A-2020-3020013; and A-2020-3020014

Joint Application of Frontier Communications Corporation, et al., for Expedited Waiver of Approval of Administrative Change in Control Or, In the Alternative, Approval of a Pro Forma Transaction

Dear Secretary Chiavetta:

We are counsel to Frontier Communications Corporation and its Pennsylvania Operating Subsidiaries in the above matter which concerns their Joint Application to the Public Utility Commission ("Commission") for approval of a change in control as a result of a corporate reorganization under the United States Bankruptcy Code. Joint Applicants filed the Joint Application on May 22, 2020.

With the objective of moving the Joint Application to resolution, Frontier offers for Commission consideration the *Frontier Voluntary Commitments* enclosed with this letter. Frontier respectfully requests that the Commission approve the Joint Application conditioned upon the *Frontier Voluntary Commitments* by January 22, 2021

Please contact me with any questions concerning this matter.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

Enclosure

cc: Scott J. Rubin, Esq. (via email, w/encl.)
Frederick Thomas, Esq. (via email, w/encl.)

Frontier Voluntary Commitments

Frontier proposes the following terms to resolve issues raised by Commission Staff in the context of its pending Application and to provide reasonably comparable conditions agreed to by the Company in other states as appropriate for Pennsylvania. If approved by the Commission, the Frontier operating companies in Pennsylvania will be permitted to emerge from bankruptcy and be a part of the restructured Frontier organization.

Service Improvements

1. Within 90 days after emergence from Chapter 11, Frontier will evaluate and identify the specific geographic areas that have experienced the highest number of customer complaints. Frontier shall advise Staff of the actions it intends to take to improve service quality, including broadband access on the basis of Chapter 30 of the Public Utility Code or other applicable federal broadband deployment obligations, based on this review, including but not limited to network enhancements and maintenance. Frontier will submit an annual report on actions taken and expenditures made to Staff.
2. Frontier shall perform a detailed quarterly review of all customer complaints filed with BCS concerning the availability of broadband access service at 1.544 Mbps download speed and conduct testing/analysis to confirm that broadband access service is available consistent with the applicable Chapter 30 requirements. If Frontier identifies a group or geographic area with multiple complaints, Frontier shall conduct a review and evaluation of potential network improvements to be made to improve broadband access service and will advise BCS of planned network improvements in those areas and/or other actions Frontier plans to undertake to fulfill the applicable Chapter 30 requirements.
3. Frontier will expend a minimum of \$50 million in total capital expenditures over a four-year period ending on December 31, 2024, including expenditures on service quality, maintenance and network enhancement projects to improve service quality and reliability and enhance its services in Pennsylvania. Frontier will fulfill this commitment using funds it generates from its Pennsylvania ILECs and other operations, including any state or federal support funds that the Frontier ILECs in Pennsylvania currently receive or may receive. Each year, commencing on March 31, 2022 and annually thereafter through March 31, 2025, Frontier will submit a report, broken out by individual Pennsylvania ILEC identifying the amount of capital expenditures for the prior calendar year.
4. Frontier shall deploy fiber based broadband access services to no fewer than fifteen thousand (15,000) locations in Pennsylvania by December 31, 2027. Frontier will annually report to BCS, on a confidential basis, the number and location of completed deployments in the previous year along with service speeds available. The locations to fulfill this commitment may include any locations awarded to Frontier pursuant to the Federal Communications Commission's ("FCC") Rural Digital Opportunity Fund ("RDOF").

Customer Complaint Handling

5. Frontier shall meet with BCS on a quarterly basis to identify and discuss any customer service, complaint or complaint response issues.
6. Frontier shall work with BCS to implement a "warm-transfer" process for complaints similar to what is currently in place with Verizon, in order to attempt to more effectively handle and resolve customer issues that have been raised with BCS.
7. Frontier shall meet with BCS to develop a check list of items to be addressed in its responses to complaints forwarded by BCS to ensure that BCS has sufficient detail to effectively review the complaint and the company's response. The check list shall, at a minimum, include, a complete

response to the customer's complaint, the speed at the customer's premises (in the case of speed complaints), whether and when the customer was referred to Frontier's partner for meeting Chapter 30 (currently HughesNet), and the outcome of that referral. Frontier will also ensure that each complaint received from BCS receives management level review.

8. Within 90 days of the date of Commission's approval, Frontier shall review, improve and reinforce, as needed, its Call Center representative training regarding how to advise dissatisfied customers of their ability to seek assistance from the Commission.
9. Frontier shall review, improve and reinforce, as needed, its training and process for referring customers to Frontier's partner for meeting Chapter 30 (currently HughesNet), which may include but is not limited to additional training to ensure that its Call Center representatives are aware of Frontier's obligations under Chapter 30 and the correct process and procedure for referring customers.

Miscellaneous

10. Frontier shall notify the Commission when the Frontier companies emerge from Chapter 11 bankruptcy.
11. Frontier shall advise BCS in writing, as soon as practicable, of any changes to its customer service practices or procedures that have the potential to impact call volume to the BCS.
12. For a period of two years from the date of Frontier's emergence from Chapter 11, Frontier shall quarterly report to BCS on a confidential basis the following service quality metrics broken out by individual Pennsylvania ILEC:
 - Business Office Answer Performance;
 - Repair Answer Performance;
 - Customer Trouble Report Rate per 100 access lines;
 - Number of service outages and rate of service outages per 100 access lines.
 - Number of service outages lasting more than 24 hours and rate of service outages lasting more than 24 hours per 100 access lines.
 - Repair Commitments Met;
 - Installation Commitments Met;
 - Mean time to repair all troubles, excluding weekend hours; and
 - Number of warm transfers to Frontier's Pennsylvania Complaint dedicated team and the types of complaints received/issues resolved by category.
13. Unless otherwise specified herein, the obligations under these voluntary commitments will expire three years from Frontier's emergence from Chapter 11.
14. These voluntary commitments are contingent upon approval of Frontier's Application by the Commission occurring on or before January 22, 2021, finding that the proposed Restructuring is in the public interest as requested in the Application and as modified by these voluntary commitments. These voluntary commitments are offered as full and final resolution of the Application and any additional obligations associated with a "most favored state" provision or any other conditions or contingencies.