



THOMAS, NIESEN & THOMAS, LLC

Attorneys and Counsellors at Law

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April 21, 2021

Via Electronic Filing

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

In re: PaPUC Docket No. ~~P-00971281~~

P-00971281-AEL-4/21/21

Joint Petition of Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; and Frontier Communications of Pennsylvania, LLC, For Expansion of Eligible Telecommunications Carrier Status to Include Additional Census Blocks

Dear Secretary Chiavetta:

We are counsel to Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; and Frontier Communications of Pennsylvania, LLC in the above matter and are submitting with this letter, via electronic filing, their Responses to Staff Second Data Requests.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

cc: Tiffany L. Tran, Assistant Counsel (via email, w/encl.)
Theresa Mingarell, BCS, (via email, w/encl.)
Frederick Thomas, Esq. (via email, w/encl.)

**FRONTIER COMMUNICATIONS COMMONWEALTH
FRONTIER COMMUNICATIONS OF BREEZEWOOD
FRONTIER COMMUNICATIONS OF CANTON
FRONTIER COMMUNICATIONS OF PENNSYLVANIA
SECOND DATA REQUEST**

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1. In response to first data request #2, Frontier will satisfy FCC Lifeline [voice and broadband access] minimum service standards published annually in the RDOF census block areas subject to Frontier's Petition for *expansion* of its ETC designation.

Frontier's Residential Internet Service Agreement Terms and Conditions applies to DSL-based Internet services; fiber-based Internet services, including Frontier FiberOptic Internet and Frontier Internet, satellite Internet service; Fixed Wireless Broadband; and in some locations, Wi-Fi access. Please explain what network technology(ies) and agent arrangements Frontier might use to satisfy FCC Lifeline voice and broadband access minimum service standards throughout 1897 census blocks awarded during RDOF Phase 1 Auction 904.

RESPONSE:

For its RDOF locations, Frontier will expand its existing network and offer fiber-to-the-premise service, relying on a passive optical network ("xPON") architecture. Frontier is a well-established fiber broadband provider with fiber-to-the-premise available to approximately 3,000,000 locations.¹ Forty-five percent of Frontier's approximately 2,700,000 broadband customers are fiber customers. Frontier has experience using xPON architecture where Frontier makes fiber-to-the-premise available, including, for example, markets in California, Connecticut, Texas, Florida, New York, Indiana and South Carolina. The architecture to be utilized for RDOF locations is capable of supporting 1 Gbps/500 Mbps broadband speeds and voice service using industry standard profiles and configurations. Additionally, as reflected by the publicly available results of the FCC's Measuring

¹ See Frontier Communications Quarterly Investor Update, p. 11, (Dec. 15, 2020), available at https://s1.q4cdn.com/144417568/files/doc_financials/2020/q3/FTR-Q3-2020-Investor-Update-Final.pdf.

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Broadband America Program, xPON technologies readily meet speed and latency requirements.²

Voice service will be provided using POTS or VOIP technology, depending upon network availability. For VOIP technology, Frontier operates a distributed IP Softswitch from Metaswitch to provide voice services. The node-based architecture consists of a) three Metasphere Call Feature Server (CFS) and call processor sites and b) twenty (20) Universal Media Gateway (UMG) sites. This softswitch can offer voice services in any of Frontier VoIP enabled market areas, such as those planned for RDOF. The CFS and UMG nodes are diverse when connected over the data network with the inherent diversity and redundancy of the backbone network.

² See generally FCC, *Measuring Broadband America* (last accessed Jan.30, 2021).
<https://www.fcc.gov/general/measuring-broadband-america>.

Respondent: Michael J. Cicchetti

Date: April 21, 2021

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2. Please clarify that Frontier will also provide at least one standalone voice and one service that provides broadband that satisfies its RDOF winning bid performance tier and latency requirements at rates comparable to rates offered in urban areas to all 1897 census blocks awarded to Frontier during RDOF Phase 1 Auction 904.

RESPONSE:

Confirmed. Consistent with its obligations as an ETC and under the RDOF rules, Frontier will provide at least one standalone voice and one broadband service capable of 1 Gbps/500 Mbps and with latency below RDOF requirements, as detailed in answer 1 above. Consistent with its public interest obligations, Frontier will ensure its RDOF offerings are within the FCC's reasonable comparability benchmarks, as it has done in its CAF II areas.

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3. In addition to a bi-annual bill message required by §3019(f), please explain:
- How Frontier explicitly advises customers of the availability of Lifeline service and determines whether a customer wishes to subscribe.
 - How Frontier ensures that the Pennsylvania Department of Human Services maintains information about Frontier’s Lifeline service and geographic service area.
 - Will Frontier include on its semi-annual bill message that that consumers can request an application be mailed by calling USAC at 1-800-234-9473, or Frontier at ####-####-#####?

RESPONSE:

Frontier’s scripting for inbound calls requires an agent to ask prospective customers whether he or she is interested in Lifeline. If the prospective customer indicates “yes” then they are taken through the details for eligibility and the application process. Frontier ensures that the Universal Service Administration Company (USAC) maintains information and geographic areas regarding its lifeline service through www.lifelinesupport.org or 800-234-9473, which the Pennsylvania Department of Human Services utilizes as a source in providing customer information regarding Lifeline services. Frontier will update its semi-annual bill message to inform customers that they can request an application by calling USAC at 1-800-234-9473.

Respondent: Michael J. Cicchetti

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4. Will Frontier add the following to Frontier's bi-annual Lifeline bill message?
Contact the PA PUC Bureau of Consumer Services for help with unresolved questions or complaints at 1-800-692-7380 or [Online Informal Complaint Form](#).

RESPONSE:

Frontier will add the above language to its semi-annual bill message.

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5. How does Frontier ensure that public information about Lifeline is current when a change occurs? Please note that, at the following link, the Lifeline discount for “monthly telephone service only” needs to be updated from \$7.25 to \$5.25 (effective 12/01/2020).
<https://frontier.com/resources/discountprograms/lifelineprogram/pennsylvania>
Also, please revise the second paragraph to read Lifeline discount vs. discounts

RESPONSE:

Public information is regularly updated on www.frontier.com for program changes as they happen. The change from \$7.25 to \$5.25 was inadvertently missed on the Pennsylvania page, but has since been updated. Frontier also revised the second paragraph to read Lifeline discount vs. discounts.

Respondent: Michael J. Cicchetti

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6. Please provide a copy of Lifeline newspaper advertisement from 2020.

RESPONSE:

Frontier has attached copies of two Lifeline advertisements from 2020 published in Pennsylvania newspapers—the Journal of the Poconos Plateau and the Times Leader.

Respondent: Michael J. Cicchetti

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California Newspaper Service Bureau

Public Notice Advertising Since 1934

Tel 1-800-788-7840 Fax 1-800-474-9444

Local Offices and Representatives in:

Los Angeles, Santa Ana, San Diego, Riverside/San Bernardino,
San Francisco, Oakland, San Jose, Sacramento
Special Services Available in Phoenix

DECLARATION

I am a resident of Los Angeles County, over the age of eighteen years and not a party to or interested in the matter noticed.

The notice, of which the annexed is a printed copy appeared in the:

JOURNAL OF THE POCONOS PLATEAU

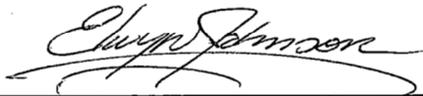
On the following dates:

02/03/2020

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Los Angeles, California, this

29th day of May 2020



Elwyn Johnson
Signature

Frontier provides flat rate residential service for \$14.97 - \$24.75, flat rate business service for \$21.24 - \$38.76 (where available) and measured business service for \$13.12 - \$22.34 (where available). Other taxes, fees, and surcharges may apply. Frontier offers single party service, touch tone, toll blocking, access to long distance, emergency services, operator assistance, and directory assistance. Use of these services may result in additional charges. Budget or economy services may also be available.

Frontier offers Lifeline service which is a nontransferable government assistance program that provides a \$9.25 discount on the cost of monthly telephone service or eligible broadband products (where available) and is limited to one discount per household. In addition to Basic Lifeline, individuals living on federally recognized Tribal Lands who meet the eligibility criteria may also qualify for additional monthly discounts through Enhanced Lifeline and up to \$100.00 toward installation fees through the Tribal Link-Up program. You may also qualify for an additional state discount where available.

If you have any questions regarding Frontier's rates or services, please call us at 1-800-FRONTIER for further information or visit us at www.Frontier.com.

2/3/20
CNS-3335664#
JOURNAL OF THE POCONOS
PLATEAU

3335664

"The only Public Notice which is justifiable from the standpoint of true economy and the public interest,"

Respondent: Michael J. Cicchetti

Date: April 21, 2021

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California Newspaper Service Bureau

Public Notice Advertising Since 1934

Tel 1-800-788-7840 Fax 1-800-474-9444

Local Offices and Representatives in:

Los Angeles, Santa Ana, San Diego, Riverside/San Bernardino,
San Francisco, Oakland, San Jose, Sacramento
Special Services Available in Phoenix

DECLARATION

I am a resident of Los Angeles County, over the age of eighteen years and not a party to or interested in the matter noticed.

The notice, of which the annexed is a printed copy appeared in the:

TIMES LEADER

On the following dates:

01/29/2020

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Los Angeles, California, this

2nd day of June 2020



Elwyn Johnson
Signature

LEGAL NOTICE
Frontier provides flat rate residential service for \$14.97 - \$24.75, flat rate business service for \$21.24 - \$38.76 (where available) and measured business service for \$13.12 - \$22.34 (where available). Other taxes, fees, and surcharges may apply. Frontier offers single party service, touch tone, toll blocking, access to long distance, emergency services, operator assistance, and directory assistance. Use of these services may result in additional charges. Budget or economy services may also be available. Frontier offers Lifeline service which is a nontransferable government assistance program that provides a \$9.25 discount on the cost of monthly telephone service or eligible broadband products (where available) and is limited to one discount per household. In addition to Basic Lifeline, individuals living on federally recognized Tribal Lands who meet the eligibility criteria may also qualify for additional monthly discounts through Enhanced Lifeline and up to \$100.00 toward installation fees through the Tribal Link-Up program. You may also qualify for an additional state discount where available. If you have any questions regarding Frontier's rates or services, please call us at 1-800-FRONTIER for further information or visit us at www.Frontier.com

3335670

"The only Public Notice which is justifiable
from the standpoint of true economy and the public interest,
is that which reaches those who are affected by it"

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7. Describe Frontier’s ability to remain functional in emergency situations. Include description of back-up power that ensures functionality without an external power source and the ability to reroute traffic, manage traffic spikes.

RESPONSE:

Frontier designs its network to exceed all state and federal requirements and to meet commercial requirements and demands. In particular, Frontier complies with all federal network reliability requirements including designing central offices that directly serve a PSAP with at least 24 hours of backup power through some combination of fixed generators, portable generators, batteries, and fuel cells, or if 24 hours is not feasible, taking alternative measures to mitigate the risk of a loss of service in that office due to a loss of power. *See* 47 C.F.R. § 9.19. If the central office does not serve a PSAP, the central office will have a minimum of 8 hours of backup power, and Frontier supplements this backup capability with permanent generators or portable generators depending on the size of the office. Frontier also offers back-up batteries for sale. More information on these offerings is available here: <https://frontier.com/helpcenter/categories/phone/troubleshooting/battery-backup-for-voice>

Additionally, Frontier will leverage its Network Operations Center (“NOC”) and associated systems, for its broadband and voice customers and has leveraged these systems for its existing voice network and upgrades completed under both CAF Phase I and CAF Phase II to monitor the network and manage the network in the event of an emergency. As Frontier has described in other contexts,³ it has widely

³ *See, e.g.,* Frontier, *Joint Application for Consent to Assign and Transfer of Control of Domestic and International Section 214 Authorizations*, Docket No. 20-197 (June 24, 2020); Frontier and Verizon, *Consolidated Application for the Partial Assignment and Transfer of Control of Domestic and International Section 214 Authorizations*, Docket No. 15-44 (Feb. 24, 2015).

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deployed longstanding systems for provisioning and maintaining the proposed network, including equipment and segments, interconnections, CPE, and customer services.

Frontier's NOC operates twenty-four hours a day, 365 days a year and continually monitors the network. The NOC's multi-tiered mission is to know the state of the network, prevent the customer from losing service, and, where there is a loss of service, put the customer back in service. To accomplish these goals, the NOC monitors voice switches and transport, DSLAMS, routers, and data switches for any alarm conditions that indicate a major service interruption or abnormality. The NOC uses remote diagnostic testing and troubleshooting to react to network abnormalities and can restore equipment service remotely. When remote restoration is not possible, the NOC deploys regional operations and engineering personnel to work through issues and restore service. NOC team members are considered subject matter experts supporting these services layered over the access and backhaul networks.

Frontier also has a Business Continuity Emergency Response Center ("ERC") consisting of a team of cross-functional experts from across Frontier that can continually monitor our operations in our 25 states in response to emergencies. The ERC will frequently activate ahead of a forecasted weather or other event that could have an impact on Frontier's network and our ability to provide services to begin preparations to respond and will stay activated during the duration of the restoration efforts. The ERC has been activated since March 2020 in response to the COVID-19 pandemic.

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8. How will Frontier satisfy applicable consumer protection and service quality standards.

RESPONSE:

Frontier's current operations already adhere to both consumer protection and service quality standards. These same standards will be followed for the additional Census Blocks that are outside of Frontier's present service territory. In addition, Frontier, through the Voluntary Commitments that is has made in Pennsylvania as a condition of its reorganization approval, will report to the Bureau of Consumer Services on a quarterly basis its service quality metrics for a two-year period. The metrics reported will include the following: business office answer performance, repair answer performance, customer trouble report rate per 100 access lines, number of service outages / rate of service outages per 100 access lines, number of service outages lasting more than 24 hours / 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 weekends) and number of warm transfers to Frontier's Pennsylvania Complaint dedicated team / types of complaints received by category.

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9. Lifeline is an affordability program. Provide a list of recurring and non-recurring charges/fees for services and equipment necessary to establish and maintain Lifeline voice and/or broadband access service in Pennsylvania - equipment, installation, activation, software, termination, and other costs to Lifeline subscribers. This can be filed with the PUC as proprietary.

RESPONSE:

A Lifeline customer can purchase any voice plan or any broadband plan that meets the minimum service standard under Lifeline. Lifeline customers receive service on the same basis as non-Lifeline customers but are provided the appropriate Lifeline discount based on either voice or broadband service. Frontier's generally available service packages are available at www.frontier.com.

Frontier is also participating in the Federal Emergency Broadband Benefit program, while federal funding lasts. Qualifying low-income customers can sign up for Frontier Essentials, a \$19.99 offering with speeds up to 25M/2M for copper and 50M/50M for fiber.

Respondent: Michael J. Cicchetti

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10. Does Frontier charge a monthly number portability charge?

RESPONSE:

Frontier presently does not charge for number portability.

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11. Identify the calling area for unlimited voice service. What vertical services are included at no additional charge and what optional service are available for an additional charge?

RESPONSE:

Frontier's local calling area for unlimited voice services varies by company and by exchange and can be referenced in each Frontier ILEC's Local Services Tariffs. Frontier offers multiple bundled service offerings that include vertical services and additional add-on services that can be purchased. These product offerings are included in each Frontier ILEC's Local Service Tariffs. The Pennsylvania Tariffs are available at:
<http://carrier.frontiercorp.com/crtf/tariffs/index.cfm?fuseaction=access&stateID=PA&sctnID=7>

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12. Describe billing and payment options available to Lifeline subscribers. In its terms of service applicable to voice service, will Frontier specify that paper billing charges do not apply to customers in Pennsylvania?

RESPONSE:

Frontier's offers 2 billing options for customers as follows: paper billing (mailing is default) or Online (ebill) which must be signed-up for with a Frontier ID through a Frontier agent or on-line. Frontier offers 4 payment options (Pay Online, Pay by Phone, Pay in Person & Pay by Mail) to all customers and are detailed below. Frontier does not charge for paper billing in Pennsylvania.

Frontier's 4 Payment Options:

Pay Online

[Log in to My Account](#) or the [MyFrontier app](#) to make a payment.

If you don't have a log in, use [Express Pay](#).

For easier, automatic monthly payments, [set up Auto Pay](#).

- No fee.
- Pay by checking account, debit card or major credit card.
- Make one-time payments or [set up Auto Pay](#). Note: If you sign up for Auto Pay, your automatic payments will begin with your next bill. If you need to make a payment right away, [log in](#) and click Make A Payment in the My Payments menu.
- Payment is marked "Pending" immediately and posted to your account in 1–2 calendar days for credit card payments or 1–2 business days for checking account payments.

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Pay by Phone

- No fee.
 - Choose our Automated System: 1.800.801.6652.
 - Or speak with a Frontier Agent: 1.800.921.8101. Service fee may apply.
 - Have your Frontier account number handy when you call.
 - Pay by checking account, debit card or major credit card.
 - Payment is posted to your account the same day.
-

Pay in Person

Find a [Frontier retail store](#) or [agent location](#) near you that accepts payments.

- \$1.50 fee at agent locations. Some retail stores charge a fee. Check your store for details.
 - Pay by cash, check or money order.
 - Payment is posted to your account the next business day.
-

Pay by Mail

Send your payment and payment stub to:
Frontier Communications
PO Box 740407
Cincinnati, OH 45274-0407

- No fee.

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- Pay by check or money order made out to Frontier Communications.
- Payment is posted to your account after 5:30 p.m. on the day it is received.
- If you need to make an overnight payment, send to:

*Frontier Communications
5050 Kingsley Drive
Cincinnati, OH 45227-1115*

Respondent: Michael J. Cicchetti

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13. When will Frontier contact which municipalities to arrange for the provision of 911/E911 emergency service for the census blocks identified in its petition for expansion?

RESPONSE:

Frontier will ensure all customers will have full access to 911/E911 emergency services for the census blocks identified in its petition for expansion. Given that Frontier is expanding from existing wirecenters/central offices with existing 911/E911 emergency services, Frontier is not sure additional outreach is necessary. However, to the extent any outreach is necessary, Frontier will conduct outreach as it turns on service.

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14. In its response to first data request #19, Frontier states that Lifeline subscribers will still have access to 911/E911 emergency service if service is suspended. In its **Notice for VoIP and Unlimited Digital Voice Services**, the company states, “You acknowledge and agree that a service outage due to suspension of your account as a result of billing issues will prevent ALL Service from being provided to you, including any 911 emergency response services.” Please clarify.

RESPONSE:

Frontier has verified that Lifeline subscribers will continue to have access to 911/E911 emergency service if service is suspended.

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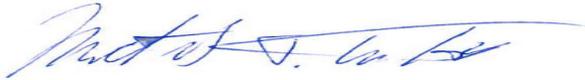
15. Of the 15,782 locations awarded in the RDOF Phase 1 Auction 904, 12,789 locations are associated with the Joint Petitioners RLEC service areas as listed in the company's response to the first set of data requests. Do the remaining 2993 awarded locations account for 1470 households within the 260 expansion census blocks identified in Exhibit A of Frontier's Joint Petition? Please clarify.

RESPONSE:

No. The FCC's location count of 15,782 was only broken down to the Census Block Group level, not the Census Block level. As previously stated, Frontier used its own estimates when providing data at the Census Block level. Frontier estimates that 12,789 locations are within its current footprint while 1,472 locations are outside its footprint. In total, Frontier presently estimates that it will serve 14,261 locations. Consistent with its previous response, Frontier acknowledges that these numbers are certain to change as Frontier continues to conduct planning over the course of the six-year buildout period. RDOF rules will count any and all locations within the eligible census blocks towards Frontier's buildout obligations, and consistent with program rules, Frontier will complete the required buildout.

VERIFICATION

I, Michael J. Cicchetti, Vice President, Government and External Affairs of Frontier Communications Corporation, hereby state that the facts set forth in the foregoing responses to Second Data Requests are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Michael J. Cicchetti
Vice President, Government and External Affairs

Date: April 21, 2021