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June 16, 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
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; Frontier
Communications of Pennsylvania, LLC, and CTSI, LLC, d/b/a Frontier
Communications CTSI, 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; Frontier Communications of Pennsylvania, LLC; and CTSI, LLC, d/b/a Frontier Communications, CTSI, LLC in the above matter and are submitting with this letter, via electronic filing, their Responses to Staff Third 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.)

Respondent: Michael J. Cicchetti

Date: June 16, 2021

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

DOCKET NO. P-00971281

1. On May 11, 2021, the Frontier Joint Petitioners filed a Supplement to include CTSI, LLC in the Joint Petition, D# P-00971281. Will the Frontier Joint Petitioners ensure that all necessary and appropriate amendments are made to its FCC Form 683 RDOF Long-Form Application pursuant to 47 CFR § 54.804(b)(6)?

RESPONSE:

Yes, Frontier will identify CTSI, LLC as the ETC designee for the identified census blocks.

Respondent: Michael J. Cicchetti

Date: June 16, 2021

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2. Do the Joint Petitioners and CTSI affirm that the February 23, 2021 and April 21, 2021 responses to BCS data requests also apply to CTSI? If CTSI's responses to the BCS data requests differ, please explain.

RESPONSE:

Yes, Frontier and CTSI affirm that the previous BCS data request responses will apply to CTSI and that CTSI will follow the same general processes and procedures as outlined in the previous data requests.

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3. In its response to the second data request #3, the Joint Petitioners indicated that the Pennsylvania Department of Human Services (PA DHS) utilizes www.lifelinesupport.org as a source in providing customer information regarding Lifeline services. BCS confirmed that DHS does not provide this website for uses in county assistance offices throughout Pennsylvania.

Per 66 C.S. § 3019(f)(5), ETCs are to supply the PA DHS with Lifeline service descriptions, subscription forms, contact telephone numbers and a listing of the geographic areas they serve. Provide a mockup of information that the Joint Petitioners will provide to the PA DHS. Please be sure that this mockup also satisfies 47 54.405(c) and (d).

Does the PA DHS currently have the above information provided by the Frontier RLECs?

Upon designation as an ETC, CTSI is to forward this information to:

Mr. Frank Slenker, Human Services Program Specialist Supervisor (HSPSS)
Department of Human Services, OIM Bureau of Policy
1006 Hemlock Drive
Harrisburg, PA 17110
Phone: 717-705-8292
Email: RA-PWDFPPMAILBOX@pa.gov

RESPONSE:

See attached documents that contain information that will be provided to PA DHS.

In order to ensure that PA DHS has the most current information, Frontier will forward its information for all PA RLEC's to the PA DHS. Frontier has also attached as part of response its current information.

Lifeline Program Application Form



Universal Service
Administrative Co.

1. About Lifeline

Lifeline is a federal benefit that lowers the monthly cost of phone or internet service.

Rules

If you qualify, your household can get Lifeline for phone or internet service, but not both.

- If you get Lifeline for phone service, you can get the benefit for one mobile phone or one home phone, but not both.
- If you get Lifeline for internet service, you can get the benefit for your mobile phone or your home connection, but not both.
- If you get Lifeline for bundled phone and internet service, you can get the benefit for your mobile phone bundled service or your home bundled service, but not both.

Your household cannot get Lifeline from more than one phone or internet company.

You are only allowed to get one Lifeline benefit per household, **not per person**. If more than one person in your household gets Lifeline, you are breaking the FCC's rules and will lose your benefit.

What is a household?

A household is a group of people who live together and share income and expenses (even if they are not related to each other).

Do not give your benefit to another person

Lifeline is non-transferable. You cannot give your Lifeline benefit to another person, even if they qualify.

Be honest on this form

You must give accurate and true information on this form and on all Lifeline-related forms or questionnaires. If you give false or fraudulent information, you will lose your Lifeline benefit (i.e., de-enrollment or being barred from the program) and the United States government can take legal actions against you. This may include (but is not limited to) fines or imprisonment.

You may need to show other documents

If the Lifeline Program Administrator is not able to validate that you or someone in your household qualify using this form and electronic databases, you may need to provide an official document from one of the government qualifying programs or documentation that proves your annual income. You can submit copies of your official documents with this application or wait until the Lifeline Program Administrator asks you for them. To add them now, include the documents in option 1 or option 2 below:

1. If you qualify through a government program, provide a copy of a document such as an approval letter or benefit letter with the name of the person in your household who qualifies, name of the program, and issue date within the past 12 months or future expiration date.
2. If you qualify through your income, provide a copy of the prior year's state, federal, or Tribal tax return or a current income statement from an employer or paycheck stub for 3 consecutive months (or other accepted documents).

Visit lifelinesupport.org to see all acceptable document guidelines.

Apply

To apply for a Lifeline benefit, fill out the required sections of this form, initial every agreement statement, and sign on page 6.

Mail the form to this address:

USAC
Lifeline Support Center
P.O. Box 7081
London, KY 40742

Lifeline Program Application Form



Universal Service
Administrative Co.

2a. Your Information

All fields are required unless indicated. Use only CAPITALIZED LETTERS and black ink to fill out this form.

What is your full legal name?

The name you use on official documents, like your Social Security Card or State ID. Not a nickname.

First

Middle (optional)

Suffix (optional)

Last

What is your phone number (if you have one)?

What is your date of birth?

Month

Day

Year

What is your email address (if you have one)?

What are the last 4 numbers of your Social Security Number (SSN)?

If you do not have a SSN, what is your Tribal Identification Number?

What is the best way to reach you?

email

phone*

text message*

mail

*If I selected the phone or text option, I consent to let USAC contact me at my Lifeline phone number for important reminders and updates to my Lifeline service.

If I selected the text message option, message and data rates may apply.

Text STOP to end messages.

Lifeline Program Application Form



Universal Service
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2b. Your Information (continued)

*Tribal lands include any federally recognized Indian tribe's reservation, pueblo, or colony, including former reservations in Oklahoma; Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688); Indian allotments; Hawaiian Home Lands—areas held in trust for Native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920 July 9, 1921, 42 Stat. 108, et. seq., as amended; and any land designated as such by the FCC for purposes of this subpart pursuant to the designation process in the FCC's Lifeline rules.

What is your home address? (The address where you will get service. Do not use a P.O. Box)

Street Number and Name

Apt., Unit, etc.

City

State

Zip Code

Is this a temporary address? Yes No **Check if you live on Tribal lands***

What is your mailing address? (Only fill this out if it is not the same as your home address.)

Street Number and Name

Apt., Unit, etc.

City

State

Zip Code



2c. Your Information (continued)

Only fill this section out if you are applying through a child or dependent.

Check if you are qualifying through a child or dependent in your household.
If so, answer the following questions:

What is their full legal name?

First

Middle (optional)

Suffix (optional)

Last

What is their date of birth?

Month

Day

Year

What are the last 4 numbers of their Social Security Number (SSN)?

If they do not have a SSN, what is their Tribal Identification Number?

Lifeline Program Application Form



3. Qualify for Lifeline

Fill out this section to show that you, your dependent, or someone in your household qualifies for Lifeline.

You can qualify through some government assistance programs or through your income (you do not need to qualify through both).

Qualify through a government program:

Check all programs that you or someone in your household have:

Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)

Supplemental Security Income (SSI)

Medicaid

Federal Public Housing Assistance (FPHA)

Veterans Pension or Survivors Benefit Programs

Tribal Specific Programs

Bureau of Indian Affairs (BIA) General Assistance

Tribal Temporary Assistance for Needy Families (Tribal TANF)

Food Distribution Program on Indian Reservations (FDPIR)

Tribal Head Start (only households that meet the income qualifying standard)

Or

Qualify through your income:

(Only fill this out if you do not qualify through a government program.)

Including you, how many people live in your household? (check one)

Is your income the same or less than the amount listed for your state and household size?

(only check yes or no next to your household size)

	All 48 States, DC, and Territories (not Alaska and Hawaii)	Alaska	Hawaii	Is your income the same or less than the amount listed for your state and household size?	
				Yes	No
1	\$17,388	\$21,722	\$20,007	Yes	No
2	\$23,517	\$29,390	\$27,054	Yes	No
3	\$29,646	\$37,058	\$34,101	Yes	No
4	\$35,775	\$44,726	\$41,148	Yes	No
5	\$41,904	\$52,394	\$48,195	Yes	No
6	\$48,033	\$60,062	\$55,242	Yes	No
7	\$54,162	\$67,730	\$62,289	Yes	No
8	\$60,291	\$75,398	\$69,336	Yes	No
If more than 8, add this amount for each extra person:	Add \$6,129	Add \$7,668	Add \$7,047	Yes	No

135% of the 2021 Federal Poverty Guidelines

*The Federal Poverty Guidelines are typically updated at the end of January.

Lifeline Program Application Form



4. Agreement

I agree, under penalty of perjury, to the following statements:

You must initial next to each statement.

I (or my dependent or other person in my household) currently get benefits from the government program(s) listed on this form or my annual household income is 135% or less than the Federal Poverty Guidelines (the amount listed in the Federal Poverty Guidelines table on this form).

Initial

I agree that if I move I will give my service provider my new address within 30 days.

Initial

I understand that I have to tell my service provider within 30 days if I do not qualify for Lifeline anymore, including:

Initial

- 1) I, or the person in my household that qualifies, do not qualify through a government program or income anymore.
- 2) Either I or someone in my household gets more than one Lifeline benefit (including more than one Lifeline broadband internet service, more than one Lifeline telephone service, or both Lifeline telephone and Lifeline broadband internet services).

I know that my household can only get one Lifeline benefit and, to the best of my knowledge, my household is not getting more than one Lifeline benefit.

Initial

I agree that all of the information I provide on this form may be collected, used, shared, and retained for the purposes of applying for and/or receiving the Lifeline Program benefit. I understand that if this information is not provided to the Lifeline Program Administrator, I will not be able to get Lifeline benefits. If the laws of my state or Tribal government require it, I agree that the state or Tribal government may share information about my benefits for a qualifying program with the Lifeline Program Administrator. The information shared by the state or Tribal government will be used only to help find out if I can get a Lifeline Program benefit.

Initial

All the answers and agreements that I provided on this form are true and correct to the best of my knowledge.

Initial

I know that willingly giving false or fraudulent information to get Lifeline Program benefits is punishable by law and can result in fines, jail time, de-enrollment, or being barred from the program.

Initial

My service provider may have to check whether I still qualify at any time. If I need to recertify (renew) my Lifeline benefit, I understand that I have to respond by the deadline or I will be removed from the Lifeline Program and my Lifeline benefit will stop.

Initial

I was truthful about whether or not I am a resident of Tribal lands, as defined in section 2 of this form.

Initial

Signature	Today's Date
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Lifeline Program Application Form



Universal Service
Administrative Co.

5. Agent Information

*Answer only if a sales
person submits this form.*

What is the agent's full legal name?

The name you use on official documents, like your Social Security Card or State ID. Not a nickname.

First

Middle (optional)

Last

Suffix (optional)

What is the agent's ID number?

What is the agent's date of birth?

Month

Day

Year



Notice

PAPERWORK REDUCTION ACT NOTICE: Section 54.410 of the Federal Communications Commission's rules requires all Lifeline subscribers to demonstrate their eligibility to receive Lifeline services. This collection of information stems from the FCC's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. §254. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.). The data provided in response to this information collection will be used by USAC to verify the applicant's eligibility for Lifeline services.

We have estimated that each response to this collection of information will take, on average, between 0.25 and 0.75 hours. Our estimate includes the time to read the questions, look through existing records, gather the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, OMD-PERM, Paperwork Reduction Project (3060-0819), Washington, D.C. 20554. We also will accept your comments via the Internet if you send them to PRA@fcc.gov. Please DO NOT SEND COMPLETED DATA COLLECTION FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid Office of Management and Budget (OMB) control number. This collection has been assigned an OMB control number of 3060-0819.

The Commission is authorized under the Communications Act of 1934, as amended, to collect the information we request on this form. If we believe there may be a violation or potential violation of a statute or a Commission regulation, rule, or order, your response may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order.

If you do not provide the information we request on this form, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, P.L. No. 104-13, 44 U.S.C. § 3501, et seq.

PRIVACY ACT STATEMENT: The Privacy Act is a law that requires the Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) to explain why we are asking individuals for personal information and what we are going to do with this information after we collect it.

Authority: Section 254 of the Communications Act (47 U.S.C. § 254), as amended, 47 U.S.C. §254, authorizes the FCC to operate the Lifeline Program. Using this authority, the FCC has designated USAC as the permanent Lifeline Administrator. The FCC has published rules detailing how consumers can qualify for Lifeline services and what Lifeline services they may receive (47 CFR §54.400 et seq.).

Purpose: We are collecting this personal information so we can verify that you qualify for the Lifeline Program and so we can efficiently provide Lifeline services to you. We access, maintain and use your personal information in the manner described in the Lifeline System of Records Notice (SORN), FCC/WCB-1, which we have published in 82 Fed. Reg. 38686 (Aug. 15, 2017).

Routine Uses: We may share the personal information you enter into this form with other parties for specific purposes, such as: with contractors that help us operate the Lifeline Program; with other federal and state government agencies that help us determine your Lifeline eligibility; with the telecommunications companies that provide you Lifeline service; and with law enforcement and other officials investigating potential violations of Lifeline rules.

A complete listing of the ways we may use your information is published in the Lifeline SORN described in the "Purpose" paragraph of this statement.

Disclosure: You are not required to provide the information we are requesting, but if you do not, you will not be eligible to receive Lifeline services under the Lifeline Program rules, 47 C.F.R. §§ 54.400-54.423.

Pennsylvania Department of Human Services

Lifeline Service Information

Frontier Communications

Frontier Communications offers Lifeline on all our voice products and all our broadband products that meet the federal Lifeline minimum standard. An approved Lifeline subscriber with voice services and no qualifying broadband product will receive a \$5.25 monthly federal Lifeline discount. An approved Lifeline subscriber with a service that includes an eligible broadband product will receive a \$9.25 monthly federal Lifeline discount.

Frontier's customer service number is 1-800-921-8101.

The local exchanges associated with the newly-awarded census blocks that are outside of Frontier's existing service area are: Bloomsburg (Verizon PA), Carbondale (Verizon PA), Chapman Lake (Verizon North), Clearville (CenturyLink), Clifford (North-Eastern Pennsylvania Telephone Company), Halifax (Verizon PA), Hopewell (CenturyLink), McConnellsburg (CenturyLink), Mercersburg (CenturyLink), Orbisonia (CenturyLink), Oxford (Verizon PA), Plymouth (Verizon PA), Roseville (North Penn Telephone Company), Shade Gap (CenturyLink), Strasburg (Verizon), Trout Run (Verizon North) and Whitehaven (Verizon PA).

Frontier's ILEC Service Territory

Atglen	Lake Winola	Pocono Lake
Bangor	Lakewood	Portland
Belvidere	Laporte	Quaker Lake
Benton	Lawrenceville	Quarryville
Blossburg	Lawsville	Rawlinsville
Breezewood	Leesport	Ringtown
Brooklyn	Leola	Rome
Canton	LeRaysville	Rush
Center Moreland	Leroy	Saint Joseph
Clarks Summit	Lewisberry	Saylorsburg
Conyngham-Drums	Liberty	Shickshinny
Coopersburg	Little Meadows	Shinglehouse
Covington	Lykens	Springville
Dallas	Mansfield	Susquehanna
Dalton	Mehoopany	Sweet Valley
	Middlebury	
Dushore	Center	Terre Hill
Eagles Mere	Millersburg	Tioga
Elizabethville	Millport	Towanda
Estella	Montrose	Tower City
Factoryville	Morris	Tremont
Ferndale	Muhlenburg	Troy
Gap	Muncy Valley	Trucksville
Genesee	Needmore	Tunkhannock
Gratz	New Albany	Uhlerstown
Hallstead	New Grenada	Ulster
Harding	New Holland	Valley View
Harveys Lake	Nicholson	Wapwallopen
Hensel	Noxen	Warfordsburg
		Warren
Huntington Mills	Nuangola	Center
Intercourse	Nuremberg	Wellsboro
Kirkwood	Orangeville	Wyalusing
Laceyville	Pen Argyl	

Pennsylvania Lifeline Discount Program

Frontier is committed to helping qualified low-income individuals pay for telephone or qualified internet services. Lifeline service is a non-transferable (from one person to another) government assistance program that provides a discount on the cost of monthly telephone service only (\$5.25) or qualified internet access service with or without telephone service (\$9.25). Lifeline is limited to one discount per household and only eligible customers may enroll. To receive the Lifeline discount each month, you must certify that you or someone in your household currently receives benefits from one of these programs:

- Medicaid
- Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance (Section 8)
- VA Veterans Pension (Supplemental Income for Wartime Veterans)
- VA Survivors Pension

You may also qualify if your annual income is at or below 135% of the Federal Poverty Guidelines. Please [download the application](#) (también disponible [en español](#)) which is to be returned to the Universal Service Administrative Company (USAC) along with proof of eligibility or apply online at [CheckLifeline.org](https://www.usac.gov/CheckLifeline.org). After USAC receives your completed application and the required proof of eligibility, they will notify you of your eligibility status. Once you have been approved for Lifeline, call Frontier at 1.800.921.8101 to have the Lifeline discount added to your account.

You must notify USAC when you are no longer eligible for Lifeline. You must also verify your continued eligibility annually (or as requested) with USAC. If there is someone else at the address who is receiving a Lifeline discount and you wish to be considered a separate economic unit, the Lifeline Application and proof of eligibility must be submitted along with the [Lifeline Household Worksheet](#) (también disponible [en español](#)).

Customers who subscribe to Seasonal, Stay Connected, or Vacation Service are not eligible for the Lifeline discount. Existing Lifeline customers must remove Lifeline in order to enroll in Seasonal, Stay Connected, or Vacation Service, and reapply for Lifeline upon restoring service.

For further information, please contact [Customer Service](#). A Frontier representative will be happy to answer your questions and assure you receive the appropriate application, if one is required.

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](#).

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4. In its response to the second data request #6, the Joint Petitioners provided copy of a newspaper advertisement that appears to be a legal public notice. Please provide a mockup of a “call to action” advertisement of Lifeline offerings and charges that is designed to reach those likely to qualify for Lifeline. Be sure this mockup includes standalone voice, satisfies minimum Lifeline service standards, and also satisfies 47 54.405(c) and (d).

RESPONSE:

The main site of advertising about Lifeline is the website www.frontier.com/discountprograms. Most customers look for their service information on our website where they can access information on all the details of the Lifeline program. They also would browse through our available service offerings available at their location on Frontier.com. As noted in #3, all voice offerings and all broadband offerings above the federal minimum standard would be eligible for the Lifeline discount, as such, we do not advertise particular “Lifeline” products.

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5. It its response to the second data request #9, Frontier referred to its website for information about recurring and non-recurring charges for service and equipment necessary to establish and maintain Lifeline standalone voice or broadband. The requested information is inaccessible without a valid street address.
- Please provide a description of equipment and related charges/fees necessary to establish and maintain Lifeline standalone voice and/or broadband service.
 - Include a list of calling features included at no additional cost.
 - Do any standalone voice service plans include unlimited long-distance calling? If so, identify the covered geographic area, e.g. the contiguous 48 states, 50 states plus territories, or other.

RESPONSE:

Lifeline is available on all Frontier offered voice plans and all Frontier offered broadband plans that meet the federal minimum standard that are available at the customer's location. Equipment, fees and related charges apply based on the service they purchase. Any charges or fees required to be waived for Lifeline services by state or federal rules would be waived.

Calling features are specific to the product purchased, not to Lifeline status. Frontier Communications provides toll-blocking and toll-control at no charge to Lifeline Service subscribers, to the extent that they are offered.

Frontier offers unlimited Nationwide, Canada and Mexico calling under the Digital Phone Essentials and Digital Phone Unlimited plans. <https://frontier.com/shop/phone/digital-phone>

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6. How would a potential Lifeline consumer know to review the Joint Petitioners' charges and fees for service, terms of service, and disclosures prior to ordering service?

RESPONSE:

The Frontier Agent will review the charges, fees and disclosures with the potential Lifeline customer prior to placing the order. In addition, the Lifeline customer will get an email with a link to Frontier's terms of service which includes a link to additional Lifeline information including the actual Lifeline application.

Respondent: Michael J. Cicchetti

Date: June 16, 2021

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7. In its response to the second data request # 12, Frontier states it may charge a Service fee to speak with a Frontier Agent when calling 1-800-921-8101. Do or will the Joint Petitioners charge a Service fee to Lifeline customers who opt to speak with a Frontier Agent when making a payment by phone? If so, how is the Service fee disclosed?

RESPONSE:

Yes, payment by phone with a Frontier Agent results in a service fee of \$4.50 and is disclosed on Frontier's Interactive Voice Response ("IVR") recording as well as verbally with the Frontier Agent at the time the payment is being made.

Respondent: Michael J. Cicchetti

Date: June 16, 2021

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8. Please provide a direct link to the Joint Petitioners' publicly accessible ISP disclosure. 47 CFR § 8.1.

RESPONSE:

<https://frontier.com/~media/corporate/policies/network-management-policy.ashx?la=en>

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9. Will the Joint Petitioners charge Lifeline subscribers a deposit for broadband service?

RESPONSE:

A deposit will not be charged if the Lifeline subscriber selects the Emergency Broadband offering or if the subscriber includes voice and opts to restrict the Long Distance.

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10. In order to retain a record, how do the Joint Petitioners obtain affirmative acknowledgement prior to initiation of service that each subscriber understands the circumstances in which access to 911/ E911 emergency service may be limited or unavailable? 47 CFR §9.11(b)(5)(ii) and (iii). 47 CFR § 9.20.

RESPONSE:

Affirmative acknowledgement is obtained by a Frontier Agent at the time of ordering as the Frontier Agent will transfer the customer to Frontier's TPV vendor for the E911 TOS acknowledgement if the order includes VOIP. The TPV agent will read the E911 TOS scripting and obtain an affirmative acknowledgment from the customer. If there is a fallout (e.g., dropped calls, failed call transfer, etc.), then Frontier has a process in the backend to obtain the customers acknowledgement of E911 TOS by SMS, email and outbound calls prior to the installation.

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11. If the Joint Petitioners' 911/E911 limitations disclosure is available in language(s) other than English, please indicate which language(s).

RESPONSE:

The disclosures are also available in Spanish.

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12. Please provide contact information for CTSI that will appear in the PUC's publication, *Stay Connected* that is linked here –
<http://www.puc.pa.gov/Telecom/pdf/Lifeline%20Brochure-StayConnected.pdf>

RESPONSE:

Frontier Communications
P.O. Box 5156
Tampa, FL 33675
800-921-8101
800-225-5282

Respondent: Michael J. Cicchetti

Date: June 16, 2021

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

DOCKET NO. P-00971281

13. CTSI currently reports annual Lifeline Tracking Data separately from the Joint Petitioners. BCS understands that CTSI offers a provider-based discount to low-income consumers throughout its service area in Pennsylvania and that CTSI does not currently seek reimbursement from the federal universal service fund for low-income support for service provided in Pennsylvania. Is that correct?

RESPONSE:

Yes, that is correct. CTSI does not currently seek reimbursement from the federal universal service fund for any customer discount that it provides.

Respondent: Michael J. Cicchetti

Date: June 16, 2021

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

DOCKET NO. P-00971281

14. With the Joint Petition, is CTSI seeking Lifeline-only ETC Designation outside of the RDOF-awarded census blocks and within Its CLEC service area?

RESPONSE:

No. CTSI is only seeking ETC designation in the identified RDOF-awarded census blocks.

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 Third 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).

A handwritten signature in blue ink, appearing to read "Michael J. Cicchetti".

Michael J. Cicchetti
Vice President, Government and External Affairs

Date: June 16, 2021