

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Formal Complaint of Wyndee Hansen dba Hole N' The Rock Inc. v. Frontier Communications	Docket No. 15-041-02 FRONTIER COMMUNICATIONS REPLY
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Citizens Telecommunications Company of Utah, Inc., dba Frontier Communications of Utah, (“Frontier” or “the Company”) respectfully submits this Reply in accordance with the Public Service Commission of Utah’s (“PSC” or “the Commission”) February 11, 2016 Scheduling Order in the formal complaint of Wyndee Hansen dba Hole N’ The Rock Inc. (Complainant).

As previously reported in the Company’s February 8, 2016 Project Report and Motion to Extend Stay, Frontier has taken substantial steps, including the start of construction, toward completion of the project and the relief sought by the Complainant. Although the Company ordered the appropriate material necessary to complete the job in an expeditious manner, several items were not delivered as expected and the vendor also notified Frontier at a late date that the equipment cabinet it needed was now a discontinued item. A spare cabinet for this project could not be located and, as a result, the Company has been forced to redesign the project by retro-fitting the existing equipment cabinet. On February 11 the Company ordered the retro-fit parts and requested an expedited shipping date of February 29. On February 17, a request for provisioning was sent to our Provisioning Group, who will schedule the installation work once all the material is received, estimated to be mid-March. Installation can start immediately, following the delivery of the remaining material including the retro-fit parts. The installation work is projected to take approximately 3-4 weeks after all material is received in Utah, which establishes a targeted finish date around mid-April.

As mentioned in the Company's February 8th Project Report, and re-iterated here, Frontier remains steadfast in its commitment to grant Complainant's requested relief; however, the project has been delayed largely due to circumstances beyond its control. It is not possible for the Company to speed up the process any further than it has already done. Further, there is no rational reason not to extend the stay of additional proceedings considering that significant steps have already been taken toward completion of the project and its estimated finish date is now established. As noted before, Frontier is willing to continue to submit monthly status reports to the Commission until the project is completed and the service issues are corrected.

Respectfully submitted this 29th day of February, 2016,



George Baker Thomson, Jr.
Associate General Counsel
Frontier Communications
1800 41st St., N-100
Everett, WA 98203
george.thomson@ftr.com
425-261-5844