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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

_____	)	
Formal Complaint of SRR Partners, LLC d/b/a	)	Docket No. 19-041-01
Sorrel River Resort & Spa against Frontier	)	
Communications	)	
	)	
Formal Complaint of Jayne Dillon May against	)	Docket No. 19-041-02
Frontier Communications	)	
	)	
Investigation of Citizens Telecommunications	)	Docket No. 19-041-04
Company of Utah d/b/a Frontier Communications of	)	
Utah	)	Reply in Support of Motion to
	)	Compel Complete Answers to the
	)	Office of Consumer Services’
	)	Second Set of Data Requests
	)	
_____	)	

Pursuant to Utah Code § 54-10a-301 and Utah Admin. Code r. 746-1, the Utah Office of Consumer Services (“Office”) files this Reply in Support of the Office’s Motion to Compel Full and Complete Answers to the Office of Consumer Services’ Second Set of Discovery Requests.

**ARGUMENT**

In its October 1, 2019 Motion to Compel Full and Complete Answers to the Office’s Second Set of Data Requests (“Motion to Compel”), the Office identified seven instances where Citizens Telecom Company of Utah d/b/a Frontier Communications of Utah (“Frontier”) failed to adequately reply to the Office’s discovery requests. Motion to Compel at 5-13. In its

Response to the Office of Consumer Services' Motion to Compel ("Frontier's Response"), Frontier addressed these contentions in turn. Frontier's Response at 2-7. The Office now replies to Frontier's arguments.

*(1) Discovery Request No. 2-13.*

Discovery Request 2-13 asks that if Frontier's parent corporation or the parent's other subsidiaries providing land line telecom services in other states are under investigation relating to service quality issues, Frontier must "identify the investigations with sufficient specificity to allow the Office of Consumer Services to easily access public information regarding the investigation." Motion to Compel, Exhibit B at 11. As the Office demonstrated in its Motion to Compel, this request is not a fishing expedition. The Office has uncovered investigations in five states into Frontier's parent's and/or its subsidiaries landline telecom services. *Id.*, Exhibits D, E, F, G and H. In addition, the Office produced evidence demonstrating that both Frontier and its parent are undergoing significant financial distress and Frontier's parent is not planning on making any significant investment into elements of its business in decline. *Id.* at 5-6, Exhibits I, J and K. This question is therefore relevant to this investigation of Frontier because it seeks to uncover whether Frontier's service quality issues are explained by "systemic problems with [Frontier's parent's] business model . . . or Frontier and [its parent's] financial ability to adequately service its customers." *Id.* at 6.

Nevertheless, Frontier did not reply to this request and instead objected arguing that the actions of Frontier's parent corporation and its affiliates are outside the Commission's jurisdiction and therefore irrelevant. *Id.*, Exhibit B at 11. Frontier repeats these contentions in its Response to the Motion to Compel. Frontier's Response at 2-4.

Neither Frontier’s arguments concerning relevance or jurisdiction have merit. First, as discussed above, the information sought by this request is clearly relevant. Second, the claim that though the Commission has jurisdiction over Frontier, Frontier nevertheless is not required to produce relevant information regarding the actions of its parent and affiliate corporations because the Commission does not have direct jurisdiction over the parent or affiliate is in error. The Public Service Commission of Utah (“Commission”) has the power to require a utility certified to operate in Utah to provide information touching upon the Utah utility’s affiliate corporation’s activities to the extent that the information is relevant to the Utah utility’s actions under review. *See e.g.*, Utah Admin. Code r. 746-700-40, Information for a General Rate Case Application for a Telecommunication Corporation;<sup>1</sup> 746-700-22, Additional Information for a General Rate Case Application Using a Forecast Test Period Filed by an Electrical Corporation or a Gas Corporation.<sup>2</sup>

This approach is consistent with general law on the discovery of information relating to parent corporations. *Jackam v. Hospital Corporation of America Mideast, LTD.*, 800 F.2d 1577, 1579-80 (11<sup>th</sup> Cir. 1986); *Edgar v. Fred Jones Lincoln-Mercury of Oklahoma City, Inc.*, 524 F.2d 162, 166-67 (10<sup>th</sup> Cir. 1975) (both holding that discovery into parent corporation allowed

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<sup>1</sup> Rule 746-700-40 A. 9., requires a Utah utility to:

provide the affiliates organization chart . . . including a clear indication of affiliates, parent companies, divisions and subsidiaries indicating their regulatory status. Include a personal organization chart with names the provide lines of authority and reporting for board members, management and mid-management including joint responsibilities for non-regulated affiliate responsibilities.

<sup>2</sup> Rule 746-700-22 D. 3-6, requires a Utah utility to provide:

the affiliates organizational chart for the utility including a clear indication of affiliates, parent companies, divisions and subsidiaries indicating their regulatory status. . . . A detailed description of corporate restructurings and changes in affiliate relationships since the filing of the prior general rate case. . . . A copy of Material new or Materially modified contracts or agreements . . . between the utility and/or its parent company and affiliated companies for services and/or goods rendered between or among them.

when an adequate showing is made that the information is relevant to a plaintiff's claim).

Indeed, the Commission has even exercised subject matter jurisdiction over a merger involving an out-of-state corporation and a nonutility parent corporation of a major Utah gas utility. *See In the Matter of the Joint Notice and Application of Questar Gas Company and Dominion Resources, Inc. of Proposed Merger of Questar Corporation and Dominion resources Inc.*, Order Memorializing Bench Ruling Approving Settlement Stipulation, Docket16-057-01 (September 14, 2016, Utah P.S.C.) Accordingly, the claim that Frontier is not required to produce relevant information regarding the actions of its parent and/or affiliate corporations because the Commission does not have direct jurisdiction parent or affiliates fails.

Also, it must be remembered that the Office is not seeking this information directly from Frontier's parent and/or affiliate corporations. Rather, the Office request the information from Frontier, and the Commission unquestionably has jurisdiction over Frontier. Moreover, the Office is not seeking confidential information that may be only available to the parent corporation. Discovery Requests 2.13 only asks Frontier to "identify the investigations with sufficient specificity to allow the Office of Consumer Services to easily access public information regarding the investigation." Utah R. Civ. P. 26(d) requires a party to respond to discovery requests "based on information then known or reasonably available to the party." The requested information clearly is "reasonably available" to Frontier and Frontier does not argue otherwise.

Accordingly, the Office requests that the Commission order Frontier to fully and completely answer the Office's Discovery Request 2.13.

(2) *Discovery Request No. 2.5 (a), (b), (c) and (d).*

Discovery Request 2.5 (a) asks Frontier if it contends that its terms and conditions' limitation of liability language is consistent with the limitation of liability language in Frontier's

tariff and if so, explain how the language is consistent. Discovery Requests 2.5 (b), (c) and (d) ask follow-up questions that are dependent on the answer to Discovery Request 2.5 (a). Motion to Compel, Exhibit B at 5-6. Frontier's response was ambiguous, stating "Frontier's Terms and Conditions set out the precedence of the contract language as opposed to the tariff language." *Id.* Frontier relied on this statement for its refusal to answer follow up questions contained in Discovery 2.5 (b), (c) and (d).

In its response to the arguments presented in the Motion to Compel, Frontier advances two contentions: (1) that the terms and conditions includes a term providing that "the liability of Frontier's and its affiliates related to the Service shall in no event exceed the limitations of liability set forth in the applicable tariff . . ." and therefore, Frontier argues, if the "tariff or written contract language runs contrary to language in the Terms and Conditions, the tariff or contract controls;" and (2) Frontier should not be required to answer questions concerning its litigation positions "while such positions are currently under development . . ." Frontier's Response at 4-5. Nether argument is persuasive.

First, Frontier's contentions remain ambiguous. Other language in the terms and conditions contradicts the provision quoted by Frontier and provides:

You acknowledge that certain Services may be governed by tariff or schedules filed with the Federal Communications Commission and/or the state public utilities commission. In the event of any inconsistencies between this Agreement and an applicable tariff or schedule, this Agreement shall control . . .

<https://frontier.com/corporate/terms>

Moreover, Frontier's interpretation of the terms and condition's limitation of liability language is also ambiguous because this interpretation provides that in case of inconsistencies between the "terms and conditions and a contract or tariff the contract or tariff govern," however,

in response to Discovery Request 2.1 Frontier claims that the terms and conditions “constitute the contract between Frontier and its customers for residential services.” Frontier’s Response at 6 & n. 4; Motion to Compel, Exhibit B at 3. The Office is entitled to a clear answer to Discovery Request 2.5 (a). Furthermore, to the extent that Frontier’s response can be read as indicating that in the event of inconsistencies the tariff governs, Frontier still has to answer the follow up questions contained in Discovery Requests 2.5 (c) and (d). Nether Frontier’s answers to the Office’s Discovery Request nor Frontier’s Response to the Motion to Compel gives any reason for its failure to address these follow up requests.

Second, the contention that it should not be asked questions dependent on legal and factual positions at a point in time when Frontier’s positions “are currently under development” is countered by the length of time these proceedings have been ongoing and the simple nature of the questions the Office is posing. The genesis of these combined dockets are two formal complaints. The Sorrel River Ranch formal complaint was filed on February 27, 2019, almost nine months ago, The May formal Complaint was filed on March 18, 2019, approximately eight month ago and the Office’s Request for Agency Action was filed on May 17, 2019 more than six month ago. Since that time there have been multiple rounds of written discovery and a hearing. Moreover, the question presented in Discovery Request 2.5 simply inquires into Frontier’s interpretation of its own contract provisions, information that Frontier presumably should know from the inception of these proceedings. Clearly, Frontier has had adequate time to develop its positions relating to its interpretation of its own contract language.

Accordingly, the Office requests that the Commission order Frontier to fully, completely and unambiguously answer the Office’s Discovery Request 2.5 (a) and provide answers to the follow up questions presented in Discovery Requests 2.5 (a), (b) and (c).

(3) *Discovery Request No. 2.6.*

Discovery Requests 2.6 states: “Provide copies of all descriptions of your inspection and testing programs that you have filled with the Commission, pursuant to Utah Admin. Code R746-340-5 C from 2012 to the present.” Motion to Compel, Exhibit B at 6. Rule 746-340-5 C requires telecom companies to “file a description of its inspection and testing program with the Commission showing how it will monitor and report compliance with Commission rules or standards.”

From the date the Second Set of Discovery Requests were filed, August 1, 2009, until a day before it filed its Response to the Motion to Compel, October 15, 2019, Frontier provided no documents responsive to this request. However, on October 15<sup>th</sup> Frontier supplemented its responses and produced a document dated March 5, 2002 that purports to be filed in compliance with Rule 746-340-5 C. Frontier Response at 5; March 5, 2002 Letter, Exhibit A. In its Response to the Motion to Compel, Frontier chides the Office for its failure to uncover this seventeen-year old document prior to the filing of the Motion to Compel. Frontier Response at 5.

First, it should be noted that this document is from a time period ten years outside of the 2012 to present time period contained in the discovery requests. Accordingly, the document is not technically responsive to the requests. More to the point, by simply producing a seventeen-year old document and presumably making the dubious argument that this document satisfies its current obligations under Rule 746-340-5 C, Frontier is not fully answering the Discovery Requests 2.6. Frontier has failed to produce any documents from the requested time period and failed to acknowledge that no responsive documents exist from this time period. “If [a party] did not have the documents, [the party is] required to state so in a written response.” *Hales v. Oldroyd*, 2000 UT App. 75, ¶ 22, 999 P.2d 588.

Accordingly, the Office requests that the Commission order Frontier to produce documents from the requested time period or file a written response that no documents exists.

*(4) Discovery Request No. 2.8(a), (b) and (c).*

Discovery Requests 2.8 (a), (b) and (c) deal with Utah Admin. Code r. 746-340-5 B. 1, which requires “telecommunications corporations shall maintain a record of trouble reports made by its customers. This record shall include appropriate identification of the customers and service affected, the time, date and nature of the reports, and the action taken to clear the trouble or satisfy complaints.” At the hearing, Mr. Giles, Local Manager and Operations Supervisor for Frontier, testified that Frontier keeps trouble reports made to a specific 800 number designated for customer complaints. However, Mr. Giles also testified as follows: “Q. Is there any specific record that deals with [Frontier’s] response to email request that don’t go through the 800 number? A. No.” Hearing transcript pg. 58 ln. 8-11. Given this testimony, the Office requested all records of trouble reports from customers’ complaints that don’t go through the designated 800 number. Motion to Compel, Exhibit B at 8-9. Frontier has failed to produce any documents responsive to these discovery requests.

Rather, Frontier argues that it accepts trouble reports from a variety of sources apart from the 800 number and that it disputes the Offices characterization of Mr. Giles testimony by asserting that his testimony was limited to referring to trouble reports solely from Sorrel River Ranch. Frontier’s Response at 5-6. However, Frontier’s response cannot be reconciled with the wording of Mr. Giles testimony and the assertion that Frontier maintains trouble reports from all sources from every customer but Sorrel River Ranch is not credible.

More to the point, even if Frontier’s assertions are taken at face value, they do not excuse Frontier from failing to produce any documents in response to the requests. Frontier has



produced no documents designated as trouble reports from complaints coming from sources other than the 800 number and has not admitted that it has no documents responsive to this request. As discussed above, Frontier is required to produce this subset of trouble reports or state that these documents do not exist. *Hales*, 2000 UT App. 75, ¶ 22. Frontier has done neither.

Accordingly, the Office requests that the Commission order Frontier to either provide all copies of all trouble reports from sources other than the 800 number or state that such documents do not exist.

*(5) Discovery Request No. 2.7 (a), (b) and (c).*

Discovery Requests 2.7 (a), (b) and (c) seek production of copies of all trouble reports without regard of the source of the complaint from 2012 to the present, which Frontier maintains in compliance with Rule 746-340-5 B. 1. Motion to Compel, Exhibit B at 6-7. Initially, Frontier responded by providing a document purported to list all trouble reports from 2017 to the first half of 2019. *Id.* However, this document was in a PDF format with writing so small that it was practically illegible. *Id.*

In its Motion to Compel, the Office argues that it is entitled to the production of all reports in the requested time period, from 2012 to the present, in an Excel worksheet to enable the Office to fully review the information. *Id.* at 12. Subsequent to the filing of the Motion to Compel, Frontier supplemented its responses by providing an Excel worksheet for the years 2015-2016. *See* Frontier's Response at 6. It should also be noted that in previous discovery Frontier provided Sorrel River Ranch an Excel worksheet listing trouble reports from 2017 to the first half of 2019 for trouble reports from Moab Utah. *Id.*

In response to the Motion to Compel, Frontier asserted that it is not obligated to provide information in Excel worksheet because "it is not required to manipulate existing records into

forms not held by the Company in the ordinary course of business for the convenience of an opposing party . . . .” *Id.* However, Frontier has already provided compilations of trouble reports from Moab for the period of 2015 to 2019 in an Excel worksheet format. It is clear, therefore, that Frontier does keep this information in Excel worksheet format.

In any event, if Frontier can confirm that the all of the trouble reports from 2015 to 2019 it has in its possession are reflected in the Excel worksheets provided in the Sorrel River production and the recent supplemental filing, Frontier would not need to provide additional information from this time period. Frontier still needs to provide trouble reports from remainder of the period requested.

Accordingly, the Office requests that the Commission order Frontier to confirm that it has now provided all trouble reports in its possession in Excel worksheet from 2015 to 2019 or provide all trouble reports in Excel worksheet of from 2012 to 2019 and provide trouble reports in its possession from 2012 to 2014.

*(6) Discovery Request 2.1*

Discovery Request 2.1 asks for copies of all residential contracts from 2012 to the present. Motion to Compel, Exhibit B at 3. Frontier only identified a link to the current terms and conditions and states that the terms and conditions constitutes its residential contracts. *Id.* Frontier does not provide terms and conditions that may have existed prior to the present terms and conditions or state how often and when the terms of conditions were revised. *Id.* In its Motion to Compel, the Office requested that the Commission order Frontier to “clearly identify preexisting terms and conditions and identify when and how the terms and conditions were updated.” *Id.* at 13.

In response, Frontier states that it “has produced what exists in its system of records . . . [and] Frontier’s Terms and Conditions of Service are updated as needed, and not on any particular schedule.” Frontier Response at 6. Moreover, Frontier has previously stated that the terms and conditions constitute the residential contract. Motion to Compel, Exhibit B. at 3. Given that the terms and conditions constitute the residential contract Frontier must keep records of all versions of its terms and conditions for purposes of contract litigation if for no other reason. Therefore, Frontier’s assertion that it has searched its records is not credible and is not a sufficient basis for its failure to respond to the discovery requests.

Accordingly, the Office requests that the Commission order Frontier to fully and completely answer Request 2.1 and clearly identify previous versions of the terms and conditions and identify when and how the terms and conditions were updated.

*(7) Discovery Requests 2.3 and 2.4.*

Requests 2.3 and 2.4 ask for copies of all versions of small business and business contracts and terms and conditions from 2012 to the present. Motion to Compel, Exhibit B at 4. Frontier responded by providing links to the current and previous business terms and conditions. *Id.* However, Frontier does not state when the terms and conditions were updated or whether these two versions are the only versions that cover the requested time period, from 2012 to the present. In response to the Motion to Compel, Frontier only refers to its answers to discovery request 2.1, i.e., it has produced what exist in its system of records. However, for the same reasons as this response was insufficient in reply to request 2.1, this response is insufficient to answer requests 2.3 and 2.4.



# **EXHIBIT A**



4 Triad Center, Suite 200  
Salt Lake City, Utah 84180  
(801) 924-6358 voice  
(801) 924-6363 facsimile

5 March 2002

Ms. Julie Orchard  
Commission Secretary  
Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, Utah 84111

RE: Frontier Communications of Utah Preventive Maintenance Program, Inspections and Tests.

Dear Ms. Orchard,

In accordance with the Utah Administrative Code, Public Service Commission Administrative Rules, Rule 746-340-5 (C) – Inspections and Tests, Frontier Communications of Utah is hereby submitting for Commission record its program of periodic tests, inspections, and preventive maintenance. The attached program documents the routine tests and inspections, as well as the frequency with which they are performed.

Eight copies of the program are hereby submitted. Also included is an additional copy of this letter. Please stamp this copy received and return it in the enclosed self-addressed, stamped envelope.

Should you have any questions regarding the submission of this program, please do not hesitate to contact me at (801) 924-6358, or at [chuttself@czn.com](mailto:chuttself@czn.com).

Sincerely,



Curt Huttzell  
State Government Affairs  
Frontier Communications

RCH:glb  
Enclosures

For the sake of consistency and proper maintenance, there is a recommended schedule of core routines that should be completed for each switch type. This routine preventative maintenance program is designed to find and remedy problems before they could potentially affect service. Routine maintenance is absolutely necessary – it allows the Company to exceed expected service quality requirements as well as ensure the safety to its employees and customers. This inspection and testing routine also prevents service interruptions, and

This program is also set forth to comply with the Public Service Commission's Service Quality Rules (R746-340-5, Subsection C), which require that each telecommunications corporation file a description of its inspection and testing program with the Commission.

In addition to establishing and following this inspection and testing program, Frontier follows a verification program to ensure that these inspections and test do indeed happen. Frontier's internal monitoring program tracks and scores each region, district, and supervisor according to the frequency of the testing and the results of those tests.

The following program is a list of routine inspection, testing, and safety measures that should be undertaken on a daily to annual basis.

#### Daily

##### Routine Description

- NOC DCO DTI Reports
- NOC DCO Alarm Verification
- NOC DCO Status

##### Routine Type

Verify T-1 Integrity  
Verify Active Alarms  
Check Status of Office

#### Weekly

##### Routine Description

- DMS10 DCM Faults
- DMS10 Trunks OOS/Lines OOS
- NOC DCO Copy Verification
- NOC DCO DBVER Error Report
- NOC DCO MBI Report
- NOC DMS10 CPU RTU
- NOC DMS10 Check Log
- Office Image
- Tape Back-Up & Rotate

##### Routine Type

Check all DCMs for Faults  
List all Fault OVLY CKT  
Verify Copy Completed  
Data Base Verification  
Correct Masked Items  
Check for % Memory Used  
Output to Collect Device  
Office Image Backup  
Copy & Rotate All System Tapes

#### Monthly

##### Routine Description

- 3M Tape Head
- AC Surge Protector/Arrest
- Air Filters (Switch)
- Alarm AC Power Failure
- Alarms C.O. Functional Tests
- Alarm Door
- Alarm Fan

##### Routine Type

Clean Tape Head  
Inspection – Check LED's  
Inspect, Clean, Replace  
Test all Alarms Back to NOC  
Test all Alarms – NOC  
Test Alarm Back to NOC  
Test Alarm Back to NOC

- Alarm High & Low Temperature
- APC Dump Tapes
- Battery Maintenance Monthly
- Battery Safety Board
- C.O. Communications
- CPU Maintenance Display
- DC-AC Inverter, Voltage & Frequency
- Emergency Lights
- Emergency Power Down-Up
- Fire Extinguisher
- First Aid Kit
- FTU Facilities Test Unit
- Generator Batter Connections
- Generator Batter Maintenance
- Generator 20 Minute
- Housekeeping
- NOC DCO MSS Disk Verification
- NOC DMS10 List Store All
- NOC DMS10 Patches
- NOC DMS10 Managers Report
- NOC DMS10 Patch Application
- NOC DMS10 Patch Verification
- NOC DMS10 SPMS
- GTD 5 Switch Status
- Ring Voltage
- Ventilation Fan

- Test Alarm Back to NOC
- APC Dump Tapes
- Monthly Routines
- Inspect & Replenish
- Verify Dial Tone
- Test CPU Maintenance Display
- Inspection, Load & Line
- Function Test
- Check Instructions Posted
- Visual Inspection
- Inspect & Replenish
- FTU
- Inspect & Tighten
- Monthly Routines
- Functional Test
- Inspect & Clean
- Verify Free Space
- List Available Memory
- Check Patches
- Pull, Review & Analyze
- Verify Latest Patch Level
- Verify Latest Patch Level
  
- NOC Routines
- Check & Test
- Ensure Proper Operation

**Quarterly**

- | <u>Routine Description</u>                     |
|--|
| • Alarms – C.O. Quarterly                      |
| • Battery Maintenance Quarterly                |
| • C.O. Ground Connections                      |
| • Clean – Inspect MDF                          |
| • Fan Filter                                   |
| • Housekeeping – Quarterly                     |
| • Ladders                                      |
| • NOC DCO Redundant Devices                    |
| • NOC DMS10 DLND ESAC's                        |
| • NOC DMS10 DLND LCMC                          |
| • NOC DMS10 DLND RMM'S                         |
| • NOC DMS10 Scheduler Check LED, CED, DED, IOD |
| • NOC DMS10 Long Memory Test                   |
| • NOC DMS10 Memory Calculation                 |
| • NOC DMS10 Run Tab Audit                      |
| • Spare Card Inventory                         |
| • Tape Drive                                   |
| • Voltage – All Power Supplies                 |
| • Voltage – All Power Converters               |

- | <u>Routine Type</u>                |
|------------------------------------|
| Test Alarms Back to NOC            |
| Quarterly Routines                 |
| Inspections                        |
| Inspect, Clean, Correct            |
| Clean, Inspect, Replace            |
| Inspect & Clean                    |
| Inspect                            |
| Load & Switch Devices              |
| NED PED SCM SED Tests, Active & On |
| Run, Analyze & React               |
| Verify Memory Utilization          |
| Analyze & Correct                  |
| Perform Inventory                  |
| Clean Tape Drive                   |
| Check Voltage                      |
| Check Voltage                      |



**Semi –Annually**

<u>Routine Description</u>	<u>Routine Type</u>
• NOC DMS10 Overlay CED Dumps	Switch Clocks in Overlay CED
• NOC DMS10 SCM/RCT	Preventive Maintenance Program Routine
• NOC DMS10 SS7 LAN Shelves	Preventive Maintenance Program Routine
• Static Control Devices	Available & Working Properly

**Annually**

<u>Routine Description</u>	<u>Routine Type</u>
• C.O. Grounding System	Inspection
• C.O. Power Panel Fuse Audit	Check for Proper Sizing
• Generator 3 Hour	Functional Test 3 Hours
• Power Connections (Batteries)	Inspect & Tighten
• Power Connections at PDU	Inspect/Scan all Connections
• Ringing Generator Load Test	Test
• Ringing Generator Frequency	Test

**Acronyms**

- APC            Adaptive Predictive Coding
- CED            Common Equipment Diagnostics
- CPU            Call Processing Unit
- CPU            Central Processing Unit
- DCM FALTS    Digital Circuit Multiplication Faults
- DCO            Digital Central Office
- DTI            Digital Trunk Interface
- FTU            Facilities Test Unit
- LED            Light Emitting Diode
- LED            Line Equipment Diagnostics
- MBI            Maintenance Buss Interface
- MDF            Main Distribution Frame
- MSS            Mass Storage System
- NED            Network Equipment Diagnostics
- NOC            Network Operations Center
- OOS            Out of Service
- OVLY CKT     Overlay Circuit
- PDU            Power Distribution Unit – Protocol Data Unit
- PED            Peripheral Equipment Diagnostics
- PMP            Preventive Maintenance Program
- RTU            Remote Test Unit/ Remote Termination Unit
- REX            Routine Exercise
- ESAC          Emergency Stand Alone C?
- IOD            Identified Outward Dialing (PBX Feature which provides identification of the PBX extension making the outward toll calls)
- SCM            Subscriber carrier mode