

Phillip J. Russell (10445)  
JAMES DODGE RUSSELL & STEPHENS P.C.  
10 West Broadway, Suite 400  
Salt Lake City, Utah 84101  
Telephone: (801) 363-6363  
Email: prussell@jdrsllaw.com

Gregory C. Brubaker  
Associate General Counsel  
Frontier Communications  
Telephone: (260) 241-3606  
Email: gregory.c.brubaker@ftr.com

*Attorneys for Citizens Telecommunications Company of Utah  
d/b/a Frontier Communications*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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<p>In the Consolidated Matter of:</p> <p>The Applications of E Fiber Moab, LLC and E Fiber San Juan, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Service and Be Designated as a Carrier of Last Resort in Certain Rural Exchanges</p>	<p>Docket No. 20-2618-01</p>
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**FRONTIER COMMUNICATIONS' RESPONSE TO  
APPLICANTS' SECOND SET OF DATA REQUESTS TO FRONTIER**

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Citizens Telecommunications Company of Utah d/b/a Frontier Communications (“Frontier”) hereby responds to the Second Set of Data Request to Frontier Communications from the E Fiber Moab, LLC and E Fiber San Juan, LLC (“E Fiber” or “Applicants”) as follows:

- 2.1 In the Direct Testimony of John H. Hansen, beginning on Line 155, Mr. Hansen indicated that Frontier’s affiliates in California, Texas, Florida, and Indiana provide a VoIP service called Frontier FiOS Digital Voice (“FDV”).
- a. Do Frontier’s affiliates offer the FDV as a voice only product? Or is the subscriber required to subscribe to broadband service from Frontier’s affiliates in order to get the FDV service?

**Frontier Response to E Fiber Data Request 2.1:**

Frontier’s affiliates offer the FDV as a voice only product and do not require the subscriber to also subscribe to broadband service from Frontier’s affiliates in order to get FDV service.

- 2.2 In the Direct Testimony of Carl Erhart, beginning on Line 129, Mr. Erhart states that revenue reductions are exceeding Frontier's ability to reduce costs and Frontier is approaching the point where eligible costs will soon exceed eligible revenues, at which point Frontier will once again be entitled to receive UUSF distributions.
- a. Please provide the detail of Frontier's capital expenditures in Utah (exchange by exchange) in the past 5 years.
  - b. Please provide the proposed detail of Frontier's capital expenditures in Utah (exchange by exchange) for the next 5 years.

**Frontier Response to E Fiber Data Request 2.2:**

Please see HIGHLY CONFIDENTIAL Attach E Fiber 2.2, which reflects capital expenditures closed to the book for 2015 thru 2020 year to date. The capital budget for 2021 and beyond has not yet been finalized.

- 2.3 In the Direct Testimony of Carl Erhart beginning on Line 152, Mr. Erhart indicates that the 7 exchanges where Applicants seek to provide service include approximately 46% of the business access lines and 44% of the total access lines served by Frontier in the State. Mr. Erhart indicates the average number of total access lines served by Frontier in the Local Exchanges is approximately 558 access lines per exchange.
- a. Please provide the total number of access lines per exchange for each of the 23 exchanges that Frontier serves in Utah. Please separate business lines from residential lines.

**Frontier Response to E Fiber Data Request 2.3:**

Please see Attach EMERY 2.3 – CTC ACCESS LINES, which reflects the residential and business access lines by exchange.

- 2.4 Beginning on Line 173 of Mr. Erhart's testimony, Mr. Erhart states that generally speaking the greater number of access lines in an exchange, the less costly it is to provide service to each access line, but in Footnote 1, Mr. Erhart indicates Frontier does not keep accounting data of its costs in each exchange. Additionally, Mr. Erhart states that "all other things being equal, the unit cost (or cost per access line) tends to decline as the number of access lines served in an exchange increase.
- a. Is Mr. Erhart saying that Frontier is unable to identify the particular costs for providing service in each exchange?
  - b. On Lines 363-377 of his Direct Testimony, Mr. Erhart states that the Applicants want to gradually take away the lowest-cost customers to serve until they leave only the most-costly customers to Frontier. Please provide all data in Frontier's possession or control to support this assertion. Please specifically identify how Frontier will determine the least costly customers to serve and the most-costly customers to service and provide all supporting data.
  - c. Can Frontier identify its most costly exchanges in Utah? If so, please identify the exchanges in order of most costly to least costly?
  - d. Please provide any and all data available to Frontier to support the statement that "Applicants seek to service areas that are generally lower cost per access line than Frontier's overall service area in Utah."
  - e. Does Frontier maintain technicians in the Local Exchanges? Or are technicians dispatched from other areas in the state or out of state?
  - f. If technicians are dispatched from other areas of the state or out of state to service the Local Exchanges, where are such technicians dispatched from? In other words, how far do they have to travel to service the Local Exchanges?
  - g. Do technicians that service the Local Exchanges service other Frontier Exchanges in Utah or out of state?

**Frontier Response to E Fiber Data Request 2.4:**

- a. Yes, such an analysis would require a special study with numerous assumptions regarding the allocation of joint and common costs for both expenses and investments.
- b. The referenced portion of Mr. Erhart's testimony is based on the statement on page 22 of Mr. Johansen's direct testimony where he describes the existing business strategy of ET&V as it relates to Frontier's Moab exchange, which is the

only Frontier exchange that has ever served more than 5,000 access lines. Mr. Johansen states that “the ET&V fiber facilities were constructed to provide service to primary businesses and certain high-density residential areas in Moab.” Mr. Johansen goes on to explain that as a result of this approach, “the costs associated with construction were relatively low, while the revenues from such customers was relatively high”. Therefore, ET&V’s strategy over the past several years has been to leave Frontier as the COLR with the most-costly customers to serve.

- c. This type of analysis would require a special study that Frontier has not performed.
- d. The statement is based on Frontier’s general agreement with the Testimony of Mr. Woolsey on page 10, where he describes the general “economies of scale” associated with the telecommunications industry where the high fixed costs associated with a network, especially for a carrier with COLR obligations, and the associated labor and other operating costs become more economic as the number of customers increase. Given that the seven exchanges where the Applicants requested certification collectively represent nearly half of the business access lines served by Frontier statewide, it is reasonable to conclude that the costs to provide services to these customers would be lower
- e. Yes, Frontier maintains technicians in the local exchanges. Four technicians are based in Moab and have responsibility for that exchange, as well as for the Thompson and La Sal Exchanges. An additional technician is based in Monticello along with one technician in Blanding. These two technicians have responsibility for the exchanges in which they are based, as well as for the Bluff and Mexican Hat exchanges. While Frontier does not generally dispatch technicians from other parts of the state or from out of state to address issues in the Local Exchanges, in the event of an emergency or natural disaster, Frontier has the ability to call upon additional technicians or other resources from across the entire Frontier affiliates’ footprint.
- f. See the response to e. above.
- g. See the response to e. above

- 2.5 On lines 693-704 of Mr. Erhart's Direct Testimony he identifies that Frontier received \$15.28M to deploy broadband services to 5140 homes in Utah over six years.
- a. Please identify by exchange and census block the capital investments that Frontier has already made of these CAF Phase II funds. Please include the type of facilities installed.
  - b. b. Please identify the capital investments by census block and exchange that Frontier will make using the CAF Phase II funds. For investments to be made, please identify the particular expected date of completion and the type of facilities to be installed.
  - c. Please identify the number of households served in each census block with 10/1 broadband.
  - d. Please identify the type of facilities being used by Frontier to deliver 10/1 broadband?
  - e. Has Frontier deployed any fiber facilities with the \$15.28M in CAF Phase II dollars? If so, please identify the census blocks where fiber facilities have been deployed.
  - f. Please describe and identify the "adjacent non-CAF households" mentioned on line 698 of Mr. Erhart's testimony, including, but not limited to, the speeds offered and the number of households.

**Frontier Response to E Fiber Data Request 2.5:**

- a. Please see responses to OCS Set 4, questions 4.3 – 4.5.
- b. Please see responses to OCS Set 4, questions 4-3 - 4.5.
- c. Please see response to OCS Set 4, questions 4.3, 4.4 and 4.7.
- d. Please see response to OCS Set 4, question 4.3.
- e. Please see response to OCS Set 4, question 4.3.
- f. Please see response to OCS Set 4, questions 4.3 – 4.4.

- 2.6 Beginning on Line 779 of Mr. Erhart's testimony, Mr. Erhart indicates that Frontier accepted \$9.26M over 6 years to deploy broadband services to 3867 households in Utah.
- a. Please identify by exchange and census block the capital investments that Frontier has already made of these CAF Phase II funds. Please include the type of facilities installed.
  - b. Please identify the capital investments by census block and exchange that Frontier will make using the CAF Phase II funds. For investments to be made, please identify the particular expected date of completion and the type of facilities to be installed.
  - c. Please identify the number of households served in each census block with 10/1 broadband.
  - d. Please identify the type of facilities being used by Frontier to deliver 10/1 broadband?
  - e. Has Frontier deployed any fiber facilities with the \$9.26M in CAF Phase II dollars? If so, please identify the census blocks where fiber facilities have been deployed.
  - f. Please describe and identify the "adjacent non-CAF households" mentioned on line 784 of Mr. Erhart's testimony, including, but not limited to, the speeds offered and the number of households.

**Frontier Response to E Fiber Data Request 2.6:**

- a. Please see responses to OCS Set 4, questions 4.3 – 4.5.
- b. Please see responses to OCS Set 4, questions 4-3 - 4.5.
- c. Please see response to OCS Set 4, questions 4.3, 4.4 and 4.7.
- d. Please see response to OCS Set 4, question 4.3.
- e. Please see response to OCS Set 4, question 4.3.
- f. Please see response to OCS Set 4, questions 4.3 – 4.4.

Certificate of Service  
**Docket No. 20-2618-01**

I hereby certify that a true and correct copy of the foregoing was served by email this 14th day of October, 2020, on the following:

**DIVISION OF PUBLIC UTILITIES**

Artie Powell	wpowell@utah.gov
Brenda Salter	bsalter@utah.gov
Ron Slusher	rslusher@utah.gov
Patricia Schmid	pschmid@agutah.gov
Justin Jetter	jjetter@agutah.gov
	dpudatarequest@utah.gov

**OFFICE OF CONSUMER SERVICES**

Michele Beck	mbeck@utah.gov
Alyson Anderson	akanderson@utah.gov
Robert Moore	rmoore@agutah.gov

**E FIBER MOAB & E FIBER SAN JUAN**

Kira M. Slawson	KiraM@blackburn-stoll.com
Brock Johansen	bjohansen@emerytelcom.com

**URTA**

Kira M. Slawson	KiraM@blackburn-stoll.com
Brett Anderson	BrettA@blackburn-stoll.com

/s/ Phillip J. Russell