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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Applications of E Fiber Moab, LLC)	
and E Fiber San Juan, LLC for Certificates)	
of Public Convenience and Necessity)	Docket No. 20-2618-01
to Provide Facilities-Based Local)	
Exchange Service and Be Designated as Carriers)	
Of Last Resort in Certain Rural Exchanges)	

SURREBUTTAL TESTIMONY

OF

BROCK JOHANSEN

ON BEHALF OF APPLICANTS

October 26, 2020

INTRODUCTION

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Q. Are you the same Brock Johansen that provided Rebuttal and Direct Testimony on behalf of E Fiber Moab, LLC and E Fiber San Juan, LLC (collectively the “Applicants”)?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. In this Surrebuttal Testimony, I address the Rebuttal Testimony of Carl Erhart filed in support of Citizens Telecommunications Company of Utah d/b/a Frontier Communications (“Frontier”).

Q. Have you reviewed the Rebuttal Testimony filed in this proceeding?

A. Yes.

Q. In reviewing the testimony pre-filed in this proceeding has there been any testimony questioning the financial, technical, or managerial resources of the Applicants?

A. No. The Division of Public Utilities (“DPU”) and the Office of Consumer Services have recommended approval of the Applications. And Frontier has not offered any testimony in opposition to, or rebutting, Applicants’ financial, managerial, or technical resources.

Q. In Mr. Erhart’s Rebuttal Testimony on lines 70-87, he indicates that the OCS Exhibit incorrectly presents each of the 11 NORS reportable events over the past 5 years as a complete outage of voice service and erroneously extrapolates that into a total number of “outage” minutes from all the reports. Have you reviewed the NORS data provide by Frontier?

22 **A.** Yes. I found it interesting that Frontier focused on the total number of outage minutes. It
23 is difficult to tell from the NORS reports how many outage minutes should be calculated
24 so I understand why the OCS made the assumption they did. But, what I found more
25 interesting from the Frontier NORS reports was the fact that they actually had 13
26 reportable events in the Local Exchanges over a five year period, many of which
27 degraded or impacted 911 service. A degradation in 911 service is still service affecting.

28 **Q. In what way?**

29 **A.** Well, if the 911 service is degraded so that the ALI/ANI data is not transmitted, the public
30 safety answering point (“PSAP”) is not automatically aware of the number or location a
31 911 caller. This means the PSAP must obtain such information from the caller. If the
32 caller is unable to respond or the call is terminated before such information is obtained
33 from the caller, emergency assistance cannot be dispatched.

34 **Q. What else do you note from the NORS reports?**

35 **A.** Reviewing the NORS Reports for the Local Exchanges, which were provided by Frontier
36 in response to OCS DR 3.2, and attached to the Rebuttal Testimony of Douglas Meredith
37 at DDM -R02, Frontier had 13 reportable events, and the outage times were between
38 2452 hours 46 minutes and 4 hours 38 minutes. All but five of the reported outages were
39 over 10 hours, with several over 15 hours. By comparison, over the same time period,
40 the Emery companies had one reportable event that did not affect 911, and our event was
41 resolved in 4 hours, during a maintenance window. Frontier wants to argue about the
42 number of outage minutes, when the real question is why is their service degrading or
43 going out so frequently?

44 **Q. What does Frontier list as the reasons for the outages?**

45 **A.** Frontier identifies a variety of causes ranging from tripped breakers, to faulty power
46 supplies, to cable cuts. The interesting thing to me is the time it takes Frontier to resolve
47 their outages. For example, the May 18, 2020 outage took out the Grand and San Juan
48 County Sheriffs' PSAPs. The cause of the outage was listed as "the Frontier technician
49 found the breakers for all three rectifiers had tripped and found many other breakers
50 throughout the CO tripped." Still, this outage took 7 hours and 34 minutes to resolve.
51 On July 9, 2019 Frontier experienced a fiber cut that took down the San Juan County
52 Sheriff's Office PSAP. Wireless calls were rerouted, but landline calls were not. This
53 outage affected 3,348 customers in Monticello and 364 customers in Moab. It took
54 Frontier 22 hours to repair the cut. Frontier notes that a semi driver hit the lines, but did
55 not identify the outage as the fault of a third party on the NORS report. On November 8,
56 2018, the San Juan County Sheriff's PSAP reported that calls from Blanding, UT were
57 getting a fast busy when calling 911, potentially affecting 4305 E911 Customers. The
58 PSAP reported their Blanding calls to the admin lines without ALI. The Frontier
59 technician found the trunks in the switch in Blanding, UT were in overload causing the
60 outage. Frontier's NORS report indicated that "Frontier's translations team busied out
61 the trunks (bounced the T1 the trunks were on) and the trunks restored." Nevertheless,
62 that outage took 18 hours and 51 minutes to resolve.

63 **Q. In your experience are those resolution times reasonable?**

64 **A.** No. Frontier's response time does not appear to be reasonable. If circuit breakers have
65 tripped, I would expect resolution within 2-3 hours, not over seven hours. Two to three

66 hours would provide time for a technician to reach the site; to find that the power is out to
67 some equipment; to isolate the breakers and perform resets; and to identify what caused
68 the breakers to trip. Overloaded TDM circuits due to some circuits being locked up
69 should be resolved within 4 hours. Four hours gives the technician sufficient time to
70 identify the issue on the voice switch and to diagnose and restore the TDM circuit.

71 **Q. Mr. Erhart states in lines 125-139 of his testimony that Emery Telecommunications**
72 **& Video, Inc. (“ET&V”), your non-regulated affiliate is already building out a**
73 **competitive broadband network and does not need certification to sell its carrier**
74 **grade VoIP service. Do you agree?**

75 **A.** No. As was discussed in length in my Rebuttal Testimony, the service that Applicants
76 propose to provide is regulated rate of return local exchange service using IP transport. It
77 is not VoIP that can be provided without a CPCN.

78 **Q. Mr. Erhart also states that ET&V should not receive UUSF funding to deploy a**
79 **duplicative voice service. How do you respond?**

80 **A.** First, ET&V is not seeking UUSF support. The UUSF support would be sought by the
81 Applicants. Second, Applicants are not seeking to deploy a duplicative voice service. On
82 the contrary, Applicants are seeking to deploy a state of the art fiber to the home network
83 capable of providing access lines and wholesale broadband internet access service in
84 addition to every other public telecommunications service identified in the Emery
85 Telephone Local Tariff. The network will not be duplicative. It will be a reliable fiber
86 network which is a considerable upgrade to the service being provided by Frontier in the
87 Local Exchanges now.

88 **Q.** Does this conclude your Surrebuttal Testimony?

89 **A.** Yes.

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October, 2020, I served a true and correct copy of the Surrebuttal Testimony of Brock Johansen in Docket 20-2618-01 via e-mail transmission to following persons at the e-mail addresses listed below:

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