

Charles L. Best
Associate General Counsel
Citizens Telecommunications of Utah
Dbas Frontier Telecommunications of Utah
4400 NE 77th Ave
Vancouver, Washington 98662
Telephone: (360) 816-3311
Facsimile: (360) 816-0999
E-mail: charles_best@eli.net

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Complaint of)	Docket No. _____
Beehive Telephone Co., Inc. against)	
Citizens Telecommunications of Utah, Inc.)	Answer of Citizens
Dbas Frontier Telecommunications of)	Telecommunications of
Utah for providing inadequate service)	Utah

Pursuant to Utah Code 63-46b-6 and Utah Administrative Code R746-100-3, Citizens Telecommunications of Utah, Inc. dbas Frontier Telecommunications of Utah (Frontier) respectfully submits this Answer in response to the Motion to Compel of Beehive Telephone Co., Inc. (Beehive) dated December 28, 2004. Although the Beehive pleading is captioned as a motion, Frontier assumes it is meant to be a complaint. Frontier admits and denies the allegations as follows:

1.

Admits that Frontier is a certified local exchange carrier in Utah.

2.

Admits that Beehive provides telephone service in Ticaboo and Caineville.

3.

Frontier is without sufficient information to determine whether the number of long distance trunks serving Ticaboo and Caineville is inadequate and therefore denies same.

4.

Frontier is without sufficient information to determine whether at certain times of the day all long distance circuits serving Ticaboo and Caineville are busy and therefore denies same.

5.

Admits that Beehive may use these long distance circuits to complete emergency calls, but denies Beehive's routing of 911 traffic over long distance trunks is appropriate.

6.

Admits that the traffic at issue routes as described in the complaint and that Qwest may monitor said traffic.

7.

Frontier is without sufficient information to determine whether Qwest asks Beehive if it would like to increase the level of trunking or whether Beehive always answers in the affirmative. Therefore, Frontier denies these allegations.

8.

Denies that Frontier has refused to provision new circuits.

9.

Denies that Beehive is powerless to prevent the daily blockage of calls.

10.

Frontier is without sufficient information to determine whether 911 or other calls are being blocked and therefore denies same. Frontier also denies the implication that it is appropriate for Beehive to route 911 or other emergency calls over long distance trunks.

11.

Denies that Frontier is refusing to cooperate or failing to follow “industry standard.”

12.

Denies that problems with required data being provided to Frontier to assist Beehive are beyond the control of Beehive and unrelated to ensuring adequate levels of trunking.

13.

Denies that both Beehive and Qwest transmit call detail records in an EMI format conforming to ATIS/OBF SECAB CABS billing standards.

14.

Denies that Frontier is refusing to augment trunking, acting in any way to restrain trade, and is causing risk to life and property.

15.

Frontier denies each and every other allegation in the complaint except as specifically admitted above.

AFFIRMATIVE DEFENSES

1.

Beehive has all necessary records in a format useable by Frontier to augment Beehive's trunking. Beehive has refused to provide those records.

2.

Frontier has offered to provide Beehive with Special Access trunks if Beehive cannot provide the records necessary for Frontier and Beehive to share a jointly provided route serving Ticaboo and Caineville. Beehive has declined that offer.

3.

Beehive improperly routes 911 and other emergency calls over long distance trunks thereby placing its customers in jeopardy

4.

Beehive has failed to state a claim upon which relief may be granted.

WHEREFORE, Frontier having fully answered Beehive's complaint requests the Commission dismiss the complaint or issue an order denying it.

Respectfully submitted this ____ day of January, 2005

By: _____
Charles L. Best
Associate General Counsel
Citizens Telecommunications of Utah, Inc.