

1 Mailing Address

2 Beehive Telephone Co., Inc.

3 2000 East Sunset Rd.

4 Lake Point, UT 84074

5 Judith O. Hooper, Esq. (# 8676)

6
7 **BEFORE THE UTAH PUBLIC SERVICE COMMISSION**

8 Motion to Compel Frontier Telephone)

9 aka Citizens Telephone Co., to) Docket #

10 Cooperate with Qwest & Beehive to)

11 Provide Necessary Trunking.)

12
13 Beehive Telephone Company, Inc. (“Beehive”), pursuant Utah Administrative Code R746-100-
14 1.H., and Rule 7(b) of the Utah Rules of Civil Procedure, hereby respectfully moves that Frontier
15 Telephone Company (“Frontier”), a corporation, certified as a local exchange carrier in the State
16 of Utah, be compelled by way of order from the Utah Public Service Commission to provide
17 adequate levels of trunk circuits to Beehive.

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19 **HISTORY:**

20 The communities of Ticaboo and Caineville in Southeastern Utah are provided local telephone
21 service by Beehive. As the communities have grown and internet usage has grown, the number
22 of long distance trunk circuits serving these communities has become inadequate. There are
23 times during the day that all long distance circuits are in use. These exact same long distance
24 circuits are required to complete 911 calls to emergency service providers.

25
26 The long distance circuits route from Beehive, through Frontier, through Emery Telecom and
27 terminate in Salt Lake City on Qwest’s tandem. Qwest monitors the amount of traffic and
28 recommends trunk augmentation to prevent overflow conditions. When the level of traffic has
29 increased to a point that more trunks are required to prevent blockage, Qwest asks Beehive if

1 Beehive would like to increase the level of trunking. Beehive always answers in the affirmative.
2 However, in the case of Ticaboo and Caineville, Frontier has refused to provision the new
3 circuits.

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5 **JUSTIFICATION:**

6 Beehive is powerless to prevent the daily blockage of calls. 911 and other essential calls are
7 being blocked along with all other calls. Frontier has no technical or legal reason for refusing to
8 cooperate in this industry standard method of ensuring adequate levels of circuits in the rural
9 areas.

10
11 Frontier does cite problems in using data, largely provided by Qwest, to bill long distance carriers
12 for the calls. This problem is beyond the control of Beehive and is totally unrelated to the
13 problem of ensuring adequate levels of trunking. Both Beehive and Qwest transmit call detail
14 records in an EMI format conforming to ATIS/OBF SECAB CABS billing standards.
15 Frontier's act in refusing to augment the trunking to this area is an illegal restraint of trade and is
16 causing risk to life and property of the residents of this area.

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18 **CONCLUSION AND REQUEST FOR RELIEF:**

19 Therefore, Beehive prays the Commission to act with alacrity and accept this motion to compel
20 Frontier to provide the necessary trunking and order the relief Beehive requests.

21 RESPECTFULLY SUBMITTED this 28th day of December 2004.

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24 By: BEEHIVE TELEPHONE CO., INC.

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