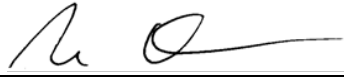


**FORMAL COMPLAINT FORM  
PUBLIC SERVICE COMMISSION  
Heber M. Wells State Office Building  
160 East 300 South, Fourth Floor  
P.O. Box 45585  
Salt Lake City, Utah 84114**

1. Name of Complainant: Susan Hilliard
- Address: 1000 Porcupine Ranch Road, Road 79, Castle Valley, UT 84352
- Telephone No.: (206) 724-3394
- If represented by counsel, list:*
- Name: Utah Counsel – [tbd] ; Foreign Counsel – Nathan Karman
- Address: \_\_\_\_\_ ; 1331 NW Lovejoy St., Suite 900  
Portland, OR 97209
- Telephone No.: \_\_\_\_\_ ; (503) 226-8632
2. The utility being complained against is: Frontier Communications
3. What did the utility do which you (the Complainant) think is illegal, unjust, or improper? Include exact dates, times, locations and persons involved, as closely as you can.
- See attached “ADDENDUM TO FORMAL COMPLAINT”
4. Why do you (the Complainant) think these activities are illegal, unjust or improper?
- Frontier has failed to meet its statutory obligation to provide service to Complainant. In addition, Frontier discontinued service to Complainant without obtaining Commission approval.
5. What relief does the Complainant request? Restored landline service; daily penalties pursuant to UCA § 54-7-25.
6. Signature of Complainant: , Nathan A. Karman, attorney for Susan Hilliard
7. Date: 9/14/2015

## ADDENDUM TO FORMAL COMPLAINT

Frontier Communications (Frontier) failed to restore appropriate landline service after service was interrupted on account of a flood in October of 2008. Complainant has repeatedly requested that Frontier restore landline service to the property, and Frontier has repeatedly refused to do so. In a letter dated April 14, 2015, a copy of which is attached hereto as Exhibit 1, Complainant again requested service restoration. Frontier ignored this request, making no response at all. On May 18, 2015, Complainant filed an Informal Complaint with the Division of Public Utilities, a copy of which is attached hereto as Exhibit 2. Frontier responded to the Informal Complaint on May 28, 2015. Frontier's response, a copy of which is attached hereto as Exhibit 3, seeks to justify its refusal to restore service by asserting, without any evidentiary support, that the restoration "is too expensive" and that Frontier would "likely need" new right-of-way agreements. Complainant responded in a June 18, 2015 letter, a copy of which is attached hereto as Exhibit 4, disagreeing with and requesting documentation to support the assertions in Frontier's response. Frontier refused to supply any support for the factual assertions in its formal response to the Informal Complaint, but instead replied with a letter emailed on July 10, 2015, a copy of which is attached hereto as Exhibit 5, repeating its unsupported assertions regarding cost, and thereby necessitating this Formal Complaint.

**CERTIFICATE OF SERVICE**

I certify that on this 14th day of September, 2015, a true and correct copy of the foregoing was served by email and regular mail to the following:

George Baker Thomson, Jr.  
Associate General Counsel  
Frontier Communications  
1800 41<sup>st</sup> Street – Suite N-100  
Everett, WA 98203  
[George.thomson@ftr.com](mailto:George.thomson@ftr.com)



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Nathan A. Karman