

June 18, 2015

Via E-Mail

Barbara Saunders (barbara.saundersscaccia@ftr.com)
Consumer Relations Specialist, West Region
Frontier Communications

Re: Susan Hilliard v. Frontier Communications
Complaint Number 5662

Dear Ms. Saunders:

I am an attorney at Ater Wynne LLP. We represent Susan Hilliard in the above-referenced matter. As detailed in prior communications to Frontier Communications (“Frontier”), including the recent letter attached hereto as Exhibit 1, Ms. Hilliard has repeatedly requested that Frontier restore service to her property located at 1000 Porcupine Ranch, Road 79, Castle Valley, UT 84532 (the “Property”). Frontier continually ignored these requests, forcing Ms. Hilliard to take additional action. In particular, on May 18, 2015, Ms. Hilliard filed an informal complaint with the Utah Division of Public Utilities requesting that Frontier restore service, a copy of which is attached as Exhibit 2. In response, Frontier argued that it does not need to restore service because, according to Frontier, “the cost is too expensive to justify repair” and “new right-of-way agreements will likely need to be obtained as well.”

Ms. Hilliard not only questions the accuracy of these statements, but disagrees with Frontier’s understanding of its obligations under the Utah Public Utility Code. However, before pursuing additional actions—namely, requesting mediation and/or submitting a formal complaint to the Utah Public Service Commission (“PSC”)—Ms. Hilliard would like to offer Frontier a final opportunity to resolve this matter informally. To facilitate that process, Ms. Hilliard requests that Frontier provide Ms. Hilliard with all documents, which shall include, without limitation, all files, reports, notes, correspondence (including e-mail and memoranda), records, maps, cost estimates, and other documentation, whether in paper, electronic, or audio format, arising from or relating to the following:

- The October 3, 2009 interruption of service to the Property and subsequent repairs, including the investigation and repairs pursuant to Trouble Ticket #591694 and associated costs;
- The investigation of any subsequent (i.e., post October 3, 2009) service interruption to the Property and analysis of possible repairs, including, without limitation, all costs

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related to the \$80,000 cost estimate discussed in Frontier's response to Complaint Number 5662;

- New right-of-way agreements that Frontier believes will be need to restore service to the Property;
- Any PSC proceedings relating to service to the Property;
- Any other open wire used by Frontier in Utah; and
- Other circumstances where Frontier refused to restore service based on expense.

Ms. Hilliard hopes to resolve this matter without a formal PSC proceeding. However, she is prepared to file a formal complaint, in which case the documentation requested above would be discoverable. As such, if you do not send me responsive documents by July 10, 2015, Ms. Hilliard will pursue additional action to obtain the required service to her Property.

Thank you in advance for your anticipated courtesies, and feel free to call or e-mail with questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Nathan A. Karman', with a long horizontal flourish extending to the right.

Nathan A. Karman

cc: Erika Tedder
Susan Hilliard

Exhibit 1

April 14, 2015

Mr. Larry G. Bowen
Construction Control Supervisor UT
Frontier Communications
40 W 100 N
Tremonton, UT 84337

Re: Restoration of Service to 1000 Porcupine Ranch Road, Castle Valley, UT

Dear Mr. Bowen:

I am the owner of the above-referenced property (the "Property"). As you are aware, the landline phone service at the Property was interrupted a few years ago, apparently because of weather-related events. I previously requested that Frontier Communications ("Frontier") restore landline service to the Property, but Frontier refused to do so. Frontier has identified no basis for failing to restore the landline service, and in preliminary conversations with the Utah Division of Public Utilities ("Division"), Division personnel were also unaware of any such basis for a public utility to decline to restore and provide service.

Because our prior discussions regarding this matter have not been in writing, I wanted to write here and ask that you please advise whether Frontier will restore landline telephone service to the Property. I ask that you please do so by April 24, 2015, and also advise your timeline for restoring service. You may write me at:

Susan Hilliard
c/o Todd Mitchell
Ater Wynne LLP
1331 NW Lovejoy St., Ste. 900
Portland, OR 97209

Thank you.

Sincerely,



Susan Hilliard

DPU ONLINE COMPLAINT

UTILITY CUSTOMER

FROM: Susan Hilliard

PHONE: [\(206\) 724-3394](tel:2067243394)

EMAIL: susanhilliard@yahoo.com

SERVICE ADDRESS:

1000 Porcupine Ranch, Road 79 Castle Valley, UT 84532

INCIDENT DETAILS

UTILITY: Frontier Communications

ACCOUNT NUMBER: see below

COMPLAINT TYPE: Repair

COMPLAINT:

Account No. - 435-259-5680-0305-078 Frontier Communications (Frontier) has failed to restore landline service after service was interrupted years ago. I have repeatedly requested that Frontier restore landline service to the property, including in two recent letters dated April 14, 2015 and April 30, 2015, but Frontier has continually refused to restore landline service or provide a justification for its continued failure.

SUGGESTED RESOLUTION: Prompt restoration of landline service.

TECH INFO

BROWSER: Google Chrome 42.0.2311.152

PLATFORM: Windows

SCREENRES: 1280 x 1024

IP: 66.193.100.82

FORM: /compform.html