



George Baker Thomson, Jr.
Associate General Counsel
West Region
1800 41st. St., Suite N-100
Everett, WA 98203
425-261-5844
george.thomson@ftr.com

Via E-Mail

Nathan A. Karman, Esq.
1331 NW Lovejoy St., Suite 900
Portland, OR 97209-3280

Re: Susan Hilliard v. Frontier Communications
Complaint Number 5662

Dear Mr. Karman:

I am an Associate General Counsel representing Frontier Communications. I write in response to your June 18th, 2015 letter to Barbara Saunders regarding Susan Hilliard's complaint about service to her remote property in Castle Valley, UT. Please direct all further correspondence on this subject to my attention.

Frontier is bound by the filed rate doctrine to strictly follow its Utah Public Service Commission-approved tariff, which in pertinent part reads as follows:

A3 Obligation to provide service

B1 The utility's obligation to furnish service is dependent upon its ability to secure and retain without unreasonable expense suitable facilities and rights for the construction and maintenance of the necessary pole lines, circuits, and equipment.

Frontier's records reflect that Ms. Hilliard requested that Frontier disconnect her service on September 22, 2010. She had been served prior to that time with open wire, an obsolete technology. In the ensuing five years, storms have toppled several poles and the wire that was attached to the poles leading to her property has been damaged. Replacement of all unsafe poles and stringing new cable would have to be accomplished along the 4 to 5 mile length of the line, and Frontier has estimated that such replacement would cost approximately \$80,000. It is my understanding that certain right-of-way agreements will also have to be obtained or renewed, which may add additional cost to any attempt to restore service.

Given that Ms. Hilliard is the only customer seeking service from that line, Frontier's position is that the Company has no obligation to furnish service because construction and maintenance of suitable facilities (i.e., the poles and cable) would be unreasonably expensive, absent any agreement by Ms. Hilliard to pay amounts above the line extension allowance for the reconstructed facilities.



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Frontier previously offered, and renews that offer, to furnish voice and/or data services to Ms. Hilliard via satellite. To date, Ms. Hilliard has declined that alternative. Please let me know if Ms. Hilliard reconsiders that position.

Sincerely,

A handwritten signature in black ink, appearing to read "George Thomson".

George Baker Thomson, Jr.

CC: etedder@utah.gov