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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

Formal Complaint of SRR Partners, LLC d/b/a Sorrel River Ranch Resort & Spa against Frontier Communications	DOCKET NO. 19-041-01  Motion for Scheduling Conference and Hearing
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SRR Partners, LLC d/b/a Sorrel River Ranch Resort & Spa (“Sorrel”) moves the Public Service Commission of Utah (“Commission”), pursuant to Utah Admin. Code R746-1-301, to set a scheduling conference and establish a schedule and a hearing to resolve Sorrel’s complaint against Citizens Telecommunications Company of Utah d/b/a Frontier Communications of Utah (“Frontier”). Sorrel also moves the Commission under Utah Admin. Code R746-1-109 to deviate from the response times allowed in R747-1-301 since Sorrel and Frontier have each made responsive filings in this docket as allowed by statute or rule or required by the Commission. It is evident from Frontier’s April 12, 2019 supplemental response that Frontier has nothing more to say. Additionally, more response time could worsen Sorrel’s troubles as their telecommunications service continues to fail or is only intermittently available, and Frontier would have the opportunity to respond in the proceeding scheduled by the Commission.

With this motion, Sorrel fully supports the Division of Public Utilities’ position filed March 29, 2019 recommending that the Commission establish a hearing to resolve this matter. In addition, Sorrel recommends that the schedule include a technical conference at the outset of the proceeding in which Sorrel, the Division, and the Commission can pursue and clarify the steps

Frontier has taken and will take to address and repair Sorrel's telecommunications services. Despite Frontier's claims to the contrary in their March 22, 2019 answer and their April 12, 2019 supplemental response, their services to Sorrel remain woefully inadequate and are chronically down. The issue is not moot and must not be dismissed and Frontier's April 12<sup>th</sup> response gave no additional clarification as to when Sorrel can expect their service to be repaired.

Frontier's failed services are not just damaging Sorrel's business, they are creating serious risk to Sorrel's employees and customers because there are long periods of time when they cannot make emergency calls. Under Utah Code Ann. §§54-3-1, 54-8b-3.3 and Utah Admin. Code R746-340, Frontier is obligated to provide safe, adequate equipment and continuous services to their customers. They have failed to provide safe, adequate, or continuous services to Sorrel. Under Utah Code Ann. §54-4a-6, the Division is charged with promoting safe and reliable operation of all public utilities and their services and has recommended that the Commission set this matter for hearing to enable the Division to do that.

If Frontier is unable to meet its statutory obligations to Sorrel immediately, Sorrel further moves the Commission to expand this investigation to determine if Frontier's poor service to Sorrel is unique or if it represents Frontier's approach throughout their service territory. If the Commission finds that Frontier's service is generally poor, Sorrel requests that the Commission require Frontier to show cause why their certificate of public convenience and necessity to operate in Utah not be revoked so that another service provider might be allowed to enter the market to provide safe, adequate, and continuous service required by statute and rule to Frontier's customers.

Respectfully submitted this 15<sup>th</sup> day of April, 2019.

/s/Stephen F. Mecham  
Stephen F. Mecham Law

CERTIFICATE OF SERVICE

I certify that on April 15, 2019, I sent a true and correct copy of the foregoing Request for Scheduling Conference to the following:

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Dated this 15<sup>th</sup> day of April, 2019

/s/Stephen F. Mecham  
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