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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Consolidated Matter of the Applications of E Fiber Moab, LLC and E Fiber San Juan, LLC For Certificates of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Service and Be Designated as Carriers Of Last Resort in Certain Rural Exchanges	))))))	Docket No. 20-2618-01

RESPONSES OF E FIBER MOAB, LLC AND E FIBER SAN JUAN, LLC TO FRONTIER COMMUNICATIONS' THIRD SET OF DATA REQUESTS

3.1 In your response to Frontier data request 2.1, you state that E Fiber will connect its fiber optic network to homes and businesses using an Optical Network Terminal (ONT).

a. Please state whether you will require the customer's permission to access the property to install the ONT.

Response: E Fiber will obtain the customers permission prior to accessing the customer's property to install the service drop and the ONT, as per industry standards.

b. Please state whether the ONT will be installed inside or outside the home or business.

Response: The ONT can be installed inside or outside the home and business depending on the circumstances. If the Commission determines that the location of the ONT is critical to the classification of the service, E Fiber commits to installing the ONT wherever needed to ensure its service is classified as regulated public telecommunications service.

c. Please state whether the ONT will be powered by electricity from the home or business and who—E Fiber or the customer—will be responsible for installing backup batteries to operate the ONT in the case of a power outage.

Response: The ONT will be powered by electricity from the home or business. E Fiber is responsible for installing backup batteries to the ONT in the case of a power outage.

3.2 Will E Fiber own the ONT installed at the customer's home or business?

Response: Yes. See E Fiber Response to DPU DR 1.1 and OCS DR 2.1.

3.3 Will E Fiber impose any charge on the customer for the use of the ONT installed at the customer's home or business?

Response: No. See E Fiber Response to DPU DR 1.1; and E Fiber Response to OCS DR 2.1 and 2.6.

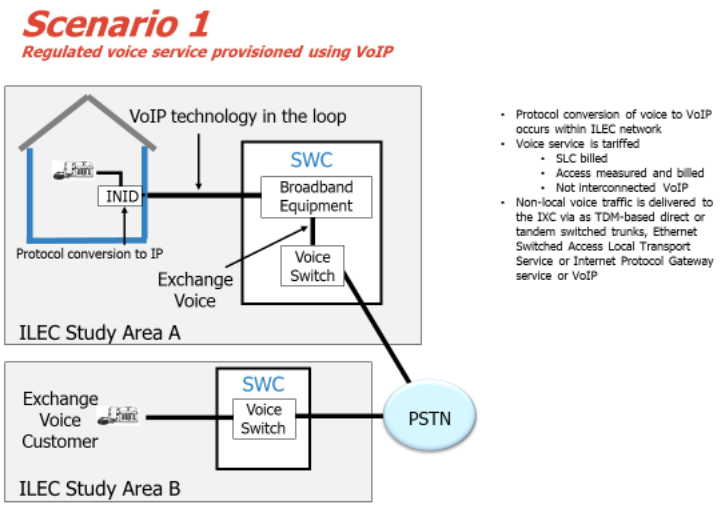
3.4 Please identify the IP protocol that will be used to carry data packets for either voice or internet service between the ONT at the customer's home/business and the OLT.

Response: E Fiber objects to this question as vague and ambiguous. Subject to and without waiving this objection, the voice traffic provided by E Fiber will be transported using Session Initiation Protocol (SIP) from the customer to the switch and will travel from the ONT to the OLT using ONT Management Control Interface (OMCI) with a private IP address on a VLAN dedicated for voice traffic; and the Internet service provided by ET&V will be transported using IPV4 and/or IPV6 from the customer to the Public Internet and will travel from the ONT to the OLT using OMCI with a public IP address on a separate VLAN

See E Fiber Response to DPU DR 1.7 and OCS 2.9.

The E Fiber voice will be provided as a telecommunications service following the National Exchange Carrier Association (NECA) Reporting Guideline outlined in 8.11 "Providing Local Exchange Telephone Service Using Voice over Internet Protocol (VoIP) Technology," attached as Exhibit FTR DR 3.4 – NECA Reporting Guideline 8.11. This guideline states:

"NECA member companies may provide a variety of voice service offerings that involve the use of VoIP technology. The following descriptions outline three common scenarios, which are further illustrated in diagrams attached to this NRG: 1. The ILEC provides voice telephone exchange service to the end user using VoIP technology between the switch and the customer premises. Except for the use of VoIP technology in the loop, no change is made in the way the service is offered to the end users. The ILEC bills the end users its local exchange service tariff rate as well as an interstate SLC charge, and assesses originating and terminating access charges on non-local (interexchange) traffic. (Attachment, Figure 1)"



The E Fiber companies agree to follow this guideline in the provision of voice service. The diagram provided earlier in Exhibit DPU DR 1.7 – Service Over Fiber outlines this exact scenario.

3.5 Please identify the IP protocol that will be used to carry data packets for either voice or internet service between the OLT and the PTSN (for voice) and between the OLT and the public internet (for internet).

Response: E Fiber objects to this question as vague and ambiguous. Subject to and without waiving this objection, see E Fiber Response to DR 3.4 above.

3.6 In your response to Frontier data request 2.2, you state that "[f]or areas of fiber infrastructure constructed or to be constructed with grant funds by ET&V, E Fiber will purchase voice capacity from ET&V to provide its voice service."

a. Please state whether ET&V has received permission to sell voice capacity to E Fiber.

Response: ET&V does not believe permission to sell capacity for an ancillary voice service is required. To the extent such permission is required, ET&V will obtain such permission. E Fiber does not intend to overbuild the ET&V Fiber network that will be constructed with grant funds.

b. Please produce any communications between ET&V and the relevant federal agency regarding this plan to sell voice capacity to E Fiber.

Response: ET&V had one telephone conversation with Peter Aimable, Deputy Assistant Administrator at the USDA in March 2020 about the possible assignment of the ET&V grant assets to the E Fiber companies. Mr. Aimable indicated that such an assignment could happen pursuant to the agreement if permission were obtained from USDA, but that it would be easier for the E Fiber companies to just provide the voice service across the ET&V network.

3.7 At the conclusion of E Fiber's proposed 5-year plan to install fiber broadband infrastructure, what portion of the line extensions in each of the Local Exchanges will be capable of being served by infrastructure installed pursuant to federal grants obtained by ET&V?[1]

Response: E Fiber objects to this question as vague and ambiguous. Subject to, and without waiving the foregoing objection, see the attached Exhibit FTR DR 3.7 – Grant Build Out Maps, which show the proposed grant build out locations.

3.8 In your response to Frontier data request 2.10(a), you state that "[t]he real-time, two-way voice communication for E Fiber's customers originates or terminates at their location in analog form, not in Internet Protocol." Please state what you understand to be the "user's location" in responding to that data request, particularly in light of the fact that the ONT is located at the user's home.

Response: See E Fiber Response to OCS DR 2.2. The point of demarcation between E Fiber's network and the customer's inside wiring is the RJ-11 port in the ONT. Further, see DR 3.4 above, such service will be provided in accordance with the NECA guidelines.

3.9 In your response to Frontier data request 2.10(b), you state that "E Fiber's voice telephone service does not use a broadband connection from the end user's location."

a. Please state what you understand to be the "end user's location" in responding to that data request, particularly in light of the fact that the ONT is located at the user's home.

Response: See E Fiber Response to OCS DR 2.2. The point of demarcation between E Fiber's network and the customer's inside wiring is the RJ-11 port in the ONT.

b. Please confirm that the ONT utilizes a broadband connection.

Response: Denied. See E Fiber Response to OCS DR 2.8. When a customer takes only voice service, there is no broadband connection at the end user's location. See E Fiber Response to DPU DR 1.1, 1.5, 1.7 and OCS DR 2.9 and 2.11.

3.10 In your response to Frontier data request 2.12, you state that "[t]he E Fiber network does not use Internet protocol at the end-users location to provide telephone service as explained DR 2.4." Frontier data request 2.12 did not make reference to the use of Internet protocol at the "end-users location." Rather, Frontier data request 2.12 asked "whether the proposed E Fiber network uses Internet protocol or a successor protocol that enables an end-user to send or

[1] This data request is modified slightly from Frontier data request 2.9. This version is intended to address the capability of the installed plant, rather than the intentions of the customers in the area.

receive voice, data, or video communications." Please respond to the following:

a. Does the E Fiber network use Internet protocol or a successor protocol?

Response: See E Fiber Response to DPU DR 1.7 and OCS DR 2.1 and 2.8 and DR 3.4 above.

b. Does the E Fiber network's use of Internet protocol or a successor protocol enable an end-user to send or receive voice, data, or video communications?

Response: See E Fiber Response to DPU DR 1.7 and OCS 2.1 and 2.8. E Fiber will provide voice telephone exchange service to the end user using VoIP technology between the switch and the customer premises. Except for the use of VoIP technology in the loop, no change will be made in the way the service is offered to the end users. E Fiber will bill the end users its local exchange service tariff rate as well as an interstate SLC charge, and assesses originating and terminating access charges on non-local (interexchange) traffic. The E Fiber voice service will originate and terminate at the customer location as an analog signal. Such voice service will be provided according to the NECA guidelines. See DR 3.4 above.

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September, 2020, I served a true and correct copy of Applicant's Responses to Frontier's First Set of Data Requests via e-mail transmission to following persons at the e-mail addresses listed below:

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