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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) Docket No. 20-2618-01
Necessity to Provide Facilities-Based Local)
Exchange Service and Be Designated as Carriers)
Of Last Resort in Certain Rural Exchanges)

**RESPONSES OF E FIBER MOAB, LLC AND E FIBER SAN JUAN, LLC TO THE
OFFICE OF CONSUMER SERVICES' SECOND SET OF DATA REQUESTS**

2.1 Please confirm that the Optical Network Terminal (“ONT”) (as described in Brock Johansen’s Declaration) alters the format of voice calls between an analog electrical signal—as transmitted by the customer’s handset—and the IP data packets transmitted over E Fiber’s fiber network.

Response: Confirmed. Analog voice calls are received by the customer’s telephone as electrical signals. The electrical signal enters the ONT from the telephone through the RJ-11 port and the electrical signals are converted to IP data packets which exit the ONT on a separate VLAN using a private IP address and are transported over E Fiber’s fiber network to Carbon/Emery Telcom’s class 5 switch. See also Exhibit DPU DR 1.7 – Service Over Fiber, previously provided.

2.2 If the demarcation point is defined as the interface between E Fiber’s network and the customer’s inside wiring, where is the demarcation point in a standard E Fiber installation? Please provide a diagram.

Response: The demarcation point in a standard E Fiber fiber installation is at the RJ-11 port on the ONT. The ONT is E Fiber’s proprietary network equipment owned, controlled, managed, repaired, and replaced by E Fiber at no cost to the customer. As required by federal law, the ONT has an RJ-11 demarcation port, which is connected directly to the public switched telephone network via E Fiber’s fiber network. The RJ-11

port on the ONT is the actual point of demarcation between the customer inside wiring and the E Fiber fiber network. This is the point where E Fiber's fiber network interfaces with the customer's inside wiring. See Exhibit DPU DR 1.7 – Services Over Fiber, previously provided.

2.3 Is the ONT located on the customer side of the demarcation point, or the E Fiber side of the demarcation point?

Response. The ONT is E Fiber's proprietary network equipment and is on the E Fiber side of the demarcation point. See Exhibit DPU DR 1.7 – Services Over Fiber.

2.4 Does this change if the ONT is located inside the house or outside the house?

Response: No. The RJ-11 port on the ONT is the point of interconnection between E Fiber's fiber network facilities and the customer's inside wiring, regardless of whether the ONT is located inside or outside the home. The customer can plug a telephone directly into this RJ-11 port, or this port can be connected to the copper NID to allow for the customer's inside wiring to be used. See Exhibit DPU DR 1.7 – Services Over Fiber.

2.5 Confirm that after E Fiber enters into contracts with customers in the subject exchanges, E Fiber will own all of the equipment on its side of the demarcation point. Does the customer have any control of the ONT?

Response: E Fiber's affiliates do not currently, and E Fiber will not, require contracts with the customers unless a line extension is required. E Fiber owns, controls, maintains, repairs, and replaces all of the equipment on the E Fiber side of the demarcation point, including, but not limited to the ONT. The E Fiber customers have no control of, or responsibility for, the ONT.

2.6 Does the customer pay for or lease the ONT from the Company?

Response: No. The ONT is E Fiber proprietary network equipment. The customer is only charged for the ONT if the customer refuses to return the ONT after terminating service.

2.7 Does the customer have to return the ONT to E Fiber when it terminates service?

Response: Yes. E Fiber will ask the customer to return the ONT to E Fiber upon termination of service. If the customer fails to return the ONT to E Fiber, an E Fiber technician will go to the customer's residence or place of business and retrieve the ONT. If the customer fails to return the ONT to E Fiber, then the customer will be charged a fee to replace the ONT.

2.8 Define the term “Ethernet” (as used in the Brock Johansen’s Declaration) and distinguish the term “ethernet” from the terms “internet protocol,” “Internet,” and “broadband connection,” and “broadband Internet access.”

Response:

(1) **“Ethernet,”** as used in Brock Johansen’s Declaration, means a way of connecting computers together in a local area network (LAN) enabling the computers to communicate with each other via a set of rules or common network language (protocol). The basic idea of ethernet’s design is that multiple computers have access to it and can send data at any time. Systems communicating over ethernet divide a stream of data into shorter pieces called frames or packets. Each packet contains a source and destination address.

(2) **“Internet protocol”** is a set of rules for routing and addressing packets of data so that they can travel across interconnected networks and arrive at the correct destination. The main task and purpose of Internet protocol is the delivery of packets of information from the source computer to the receiving computer. Each packet contains the address (IP address) of the receiving computer. The IP address may be a public IP address, used to access the Internet; or a private IP address. Private IP addresses are not routed to the Internet, rather they are used to route packets of data within a LAN.

(3) **“Internet”** means a vast network that connects computers all over the world. The most common use of the Internet is the World Wide Web, with its millions of publicly viewable websites.

(4) **“Broadband connection”** means a high-speed access to the Internet that is always on. The FCC currently defines broadband as 25Mbps download and 3 Mbps upload speeds.

(5) **“Broadband Internet access.”** For non-rate of return carriers, broadband Internet access service is the broadband connection identified in (4) above. For rate of return regulated carriers, broadband Internet access is a wholesale service they offer to internet service providers (ISPs) to enable ISPs to provide broadband connections (as defined above) to end-users (also known as “wholesale broadband internet access service” as defined in U.C.A. Section 54-8b-15(g)).

In the context of Brock Johansen’s Declaration, “ethernet” either refers to (a) the method of connecting computers in a LAN and is the physical and data link layers over which packets of data are transported within E Fiber’s fiber network, or (b) when used in the context of “ethernet port,” refers to the RJ-45 port on the ONT. Internet protocol is the set of rules used for routing the packets of data so they can travel across the E Fiber network. It is important to understand that internet protocol does not automatically mean the data is routed to the public Internet. Rather, internet protocol can include giving data packets public IP addresses that route the data packets to the public

Internet, or giving the data packets private IP addresses that route the data packets to a private LAN.

2.9 You have indicated that your affiliate will provide Internet service (aka broadband). Will the Internet traffic travel on the same network as your voice traffic? If not, please explain.

Response: The Internet traffic and voice traffic will originate on separate copper networks within the customer's home. The Internet traffic will enter the E Fiber network IP through the RJ-45 port on the ONT. The E Fiber voice traffic will enter the E Fiber network analog through the RJ-11 port on the ONT. The Internet traffic will have a public IP address and will be routed through a separate virtual local area network data links (VLANs) along the fiber to the Public Internet. The voice traffic will be converted at the ONT to IP data packets, will be given a private IP address, and will be routed through a separate VLAN to the Carbon/Emery switch which is a class 5 switch that is registered with the Local Exchange Routing Guide and is considered part of the PSTN..

2.10 What call features will be included in E Fiber's basic local exchange service?

Response: No Custom Local Area Signaling Services (CLASS) will be included in the basic local exchange service.

2.11 Do any of the features identified in 2.10 require or use a broadband connection?

Response: No.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of September, 2020, I served a true and correct copy of Applicant's Responses to the DPU's First Set of Data Requests via e-mail transmission to following persons at the e-mail addresses listed below:

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