

Phillip J. Russell (10445)
JAMES DODGE RUSSELL & STEPHENS P.C.
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: prussell@jdrsllaw.com

Gregory C. Brubaker
Associate General Counsel
Frontier Communications
Telephone: (260) 241-3606
Email: gregory.c.brubaker@ftr.com

*Attorneys for Citizens Telecommunications Company of Utah
d/b/a Frontier Communications*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

| | |
|--|------------------------------|
| <p>In the Consolidated Matter of:</p> <p>The Applications of E Fiber Moab, LLC and E Fiber San Juan, LLC for a Certificate of Public Convenience and Necessity to Provide Facilities-Based Local Exchange Service and Be Designated as a Carrier of Last Resort in Certain Rural Exchanges</p> | <p>Docket No. 20-2618-01</p> |
|--|------------------------------|

FRONTIER COMMUNICATIONS’ RESPONSE TO THIRD SET OF DATA REQUESTS TO FRONTIER BY THE OFFICE OF CONSUMER SERVICES

Citizens Telecommunications Company of Utah d/b/a Frontier Communications

(“Frontier”) hereby responds to the Third Set of Data Request to Frontier Communications from the Office of Consumer Services (“OCS”) as follows:

- 3.1 Describe Frontier’s fiber voice services in its regulated exchanges in Utah governed by Frontier’s tariff, trace the voice signals from a hypothetical customer in a regulated exchange who makes a call to a number outside the exchange that uses traditional phone service, describe in detail any mechanism that 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 Frontier’s fiber network and device that alters voice signals from IP data packets to analog electrical signals, indicate the manufacture of any such device,

and the exact location of the device on E Frontier's system, indicate any instance where and when Frontier's fiber network interfaces with broadband internet.

RESPONSE: Frontier objects to this request on the grounds that the documents and materials responsive to this request are not relevant to the issues in this docket and production of the requested materials will not lead to the discovery of admissible evidence. Subject to and without waiving this objection, Frontier states that in Utah it utilizes time-division multiplexing ("TDM") switching technology for transmitting and receiving voice signals. Frontier maintains 6 host switches and 21 remote switches in Utah that deliver voice services over copper distribution lines. Frontier delivers voice services from its central office ("CO") either directly over copper lines to subscribers or through generic requirement 303 ("GR303") links to a Digital Loop Carrier ("DLC") that combines the analog and digital signals on the copper lines for service delivery to the subscriber. The signals are not converted to an IP protocol when transmitted. Instead, when a subscriber places a call, it originates from the handset as an analog signal and transmits over the copper line to the Frontier CO. At the CO, the call runs through a routing table to determine its egress route, which would either be a TDM trunk to the next switch or a line on the current switch if the call is local. For a call on a TDM trunk, the trunking runs up to the Tandem supporting the class 5 switch. From there the call is either routed to another Class 5 switch in the LATA or to an IXC carrier via TDM trunking, leaving Frontier's network at the far end.

3.2 The FCC's Network Outage Reporting System ("NORS"), 47 CFR Part 4. requires reporting of general outages and outages that impact enhanced 9-1-1 facilities when these outages meet specific thresholds. Specifically, the NORS regulations require (1) notification within two hours of the discovery of the outage, (2) a more detailed initial outage report within 72 hours, and (3) a final outage report within 30 days.

- a) Provide copies of all reports generated in compliance with NORS for the last five years.
- b) Provide copies of all reports generated in compliance with NORS for the last five years concerning outages that of a duration of 30 minutes or more that effected 900,000 or more user minutes as defined by the NORS regulations.
- c) Provide copies of all reports generated in compliance with NORS regulations for the last five years of loss of communications potentially affecting one or more public safety answering points impacting at least 900,000 user-minutes.

RESPONSE: Frontier objects to this request on the grounds that the documents and materials responsive to this request are not relevant to the issues in this docket and production of the requested materials will not lead to the discovery of admissible evidence. Subject to and without waiving this objection, Frontier produces herewith Attachment OCS 3.2, which contains copies of all reports generated for the Local Exchanges in compliance with NORS for the last five years. The documents produced in Attachment OCS 3.2 contain the information sought in OCS 3.2(a), (b), and (c).

DATED this 16th day of September, 2020.

Certificate of Service
Docket No. 20-2618-01

I hereby certify that a true and correct copy of the foregoing was served by email this 16th day of September 2020 on the following:

DIVISION OF PUBLIC UTILITIES

| | |
|-----------------|-------------------------|
| Artie Powell | wpowell@utah.gov |
| Brenda Salter | bsalter@utah.gov |
| Ron Slusher | rslusher@utah.gov |
| Patricia Schmid | pschmid@agutah.gov |
| Justin Jetter | jjetter@agutah.gov |
| | dpudatarequest@utah.gov |

OFFICE OF CONSUMER SERVICES

| | |
|-----------------|---------------------|
| Michele Beck | mbeck@utah.gov |
| Alyson Anderson | akanderson@utah.gov |
| Robert Moore | rmoore@agutah.gov |

E FIBER MOAB & E FIBER SAN JUAN

| | |
|-----------------|---------------------------|
| Kira M. Slawson | KiraM@blackburn-stoll.com |
| Brock Johansen | bjohansen@emerytelcom.com |

URTA

| | |
|-----------------|----------------------------|
| Kira M. Slawson | KiraM@blackburn-stoll.com |
| Brett Anderson | BrettA@blackburn-stoll.com |

/s/ Phillip J. Russell