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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>
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FRONTIER COMMUNICATIONS' RESPONSE TO FOURTH 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 Fourth Set of Data Request to Frontier Communications from the Office of Consumer Services (“OCS”) as follows:

4.1 Please confirm that Frontier was awarded CAF Phase II support, in the approximate amount as shown in the following chart.

County Name	Homes and Business Supported	County Carrier Total Support
Box Elder, UT	287	\$136,240
Garfield, UT	11	\$10,791
Grand, UT	427	\$142,873
Juab, UT	12	\$17,834
Kane, UT	107	\$57,037
Millard, UT	1,702	\$648,096
San Juan, UT	2,594	\$1,534,177

Frontier Response: Yes, Frontier accepted this amount of support in Utah under the FCC’s CAF II program to provide voice and broadband services to a total of 5,140 locations in the state that are within the eligible census blocks. The FCC developed the “offered” CAF level of support based on a forward-looking cost model.

4.2 Please confirm that the funding was provided to Frontier to subsidize the cost of building new network infrastructure or performing network upgrades to provide voice and broadband services in areas where those services are lacking.

Frontier Response: The Connect America Fund (CAF) – a part of the Universal Service High-Cost program – is an FCC program designed to expand access to voice and broadband services for areas where they are unavailable at speeds of at least 4/1 Mbps. Through CAF Phase II, the FCC provides funding over a defined period of time to service providers to assist in the deployment of broadband service at a minimum of 10/1 Mbps speeds and the operation and maintenance of the network to the designated number of eligible locations. The FCC model used to determine the amount of support included estimated operating expenses in its calculation of support that was made available to the price cap carriers. Under the CAF Phase II rules, federal price cap companies like Frontier no longer receive Federal high cost universal service funding support for providing voice service in any high cost areas, including the eligible CAF II census blocks.

- 4.3 For each county identified in OCS 4.1 above, please provide the following:
- a) Type of new network infrastructure of network upgrades constructed or installed;
 - b) Number of customers supported with new network infrastructure or network upgrades;
 - c) Dollar amount spent to date on constructing new network infrastructure or network upgrades;
 - d) Data speeds (download and upload) available to Frontier in the counties;
 - e) Is the build out of network infrastructure or network upgrades complete?

Frontier Response:

- a) Frontier will supplement this response as soon as it is able to obtain the requested information.
- b) Currently, the number of locations enabled under the CAF II program by county are as follows:

Box Elder	184 CAF and 29 Non-CAF locations enabled
Grand	376 CAF and 3,088 Non-CAF locations enabled
Millard	1,719 CAF and 2,505 Non-CAF locations enabled
San Juan	1,325 CAF and 1,573 Non-CAF locations enabled

- c) Below is the amount of expenditures associated with network construction that have been recorded as of September 2020 by County:

Box Elder	\$35,130
Grand	\$534,015
Juab	\$21,284
Millard	\$1,960,062
San Juan	\$1,313,268
Total	\$3,863,759

Note: These amounts are the network construction expenditures recorded to date and do not include construction costs that have not yet been closed. This also does not include any estimate of the operating and maintenance expenses to provide the broadband and voice services in the supported areas as there is no expense tracking at the census block level.

- d) Consistent with the FCC’s requirements under the CAF II program, minimum broadband speeds of 10/1 Mbps are available to the CAF “enabled” locations. However, depending on the customers loop distances, speeds of up to 115/7 Mbps may be available.
- e) The final buildout is not yet complete within any qualifying county.

4.4 If the build out for any county is not yet complete, what percentage of the buildout has been completed? Please provide specific detail about the number of customers supported with the new network infrastructure or network upgrades to date.

Frontier Response: Currently, the company has enabled qualifying broadband service to 3,604 locations within the designated CAF II census blocks or 70% of the total of 5,140 locations to be enabled with a minimum 10/1 Mbps broadband service under the program. In addition, the company has enabled an additional 7,195 “Non-CAF” locations with a minimum 10/1 Mbps broadband service.

4.5 For any area where the build out is not yet completed, please identify the facilities left to install; the dollar amount left to spend; the number of customers left to support; and the estimated date of completion.

Frontier Response: Below is the estimated remaining budgeted network construction expenditures by County:

Box Elder	\$15,828
Grand	\$160,932
Juab	\$9,114
Millard	\$1,027,033
San Juan	\$2,506,017
Total	\$3,718,925

4.6 Please identify any location, data, buildout, or service milestone reporting deadlines under the CAF Phase II Program.

Frontier Response: FCC reporting for the CAF II program started 3/1/2016, with additional submissions each March through the plan. The next reporting deadline is 3/1/2021 to capture the results through year-end 2020.

4.7 Has Frontier made any location, date, buildout, or service milestone reports to the FCC related to CAF Phase II support? If so, please provide a copy of any such report(s). If not, please explain.

Frontier Response: The locations submitted are identified in the spreadsheet included in CONFIDENTIAL Attach OCS 4.7, which is a download from USAC's HUBB Portal. This contains the submissions made beginning in 2016 through early 2020. The balance of the 2020 build will be submitted by 3/1/2021.

4.8 What percentage of homes and business in Grand County and San Juan County are currently able to receive telephone service from Frontier?

Frontier Response: Frontier will supplement this response as soon as it is able to obtain the requested information.

4.9 Does Frontier currently have service available to all of the customers in the following areas in Moab? If not, does Frontier have any plans to build into the areas?

- a) Entrada (approximately 400 North 600 West)
- b) Sage Creek (2771 S Hwy 191)
- c) Bonita and Valley View (888 S Millcreek Drive)
- d) Rim Village Vista (Meador Drive and Hwy 191)
- e) Buried Hatchet (La Sal Loop Road)
- f) Moab Business Park Last Phase (11850 S Hwy 191)
- g) White Horse Subdivision (South end of Heather St)
- h) Vista Antigua (very end of Chapman Lane)
- i) Wingate Subdivision (end of South Gate Drive)
- j) Arroyo Crossing (approximately 2211 Spanish Valley Drive)

Frontier Response: Frontier will supplement this response as soon as it is able to obtain the requested information.

4.10 Please identify any outage Frontier has had in Grand or San Juan County since January 1, 2018 which affected 100 or more customers. For any such outage please provide the following:

- a) The date of the outage.
- b) The number of customers affected.
- c) The number of minutes the outage lasted.
- d) Frontier's calculation of the number of user-minutes
- e) A brief explanation of the cause of the outage.
- f) Please provide a copy of any outage report provided to the FCC or the Utah PSC for such outage.

Frontier Response:

- a-e) Please see attached spreadsheet labeled Attach OCS 4.10-1, which includes a separate tab for 2018, 2019 and 2020 with the requested information for the seven exchanges in Grand and San Juan Counties that are the subject of E-Fiber's applications.
- f) All NORS outage reports for past five years were provided in response to OCS 3.1. Please see the notification included in Attach OCS 4.10-2, which is an email to the Utah PSC for the relevant 2020 outage. The company has searched its records and cannot locate similar email notifications for 2018 and 2019.

- 4.11 In response to OCS 2.5 Frontier referred to a previously issued data request saying in part, “This question is a duplicate of OCS DR 3.5 in Docket Nos. 19-041-01, 19-041-02, and 19-041-04 and the Division of Public Utilities undocketed investigation. Please see Frontier’s response to that data request, produced herewith.” The explanation provided by Frontier in response to that data request was that the backup battery failure was triggered by a commercial power outage and resolved when power was restored. This did not fully answer the OCS’s question regarding the backup battery.
- a) Please confirm that the purpose of backup battery is to protect telephone service from such power outages.
 - b) If confirmed, please explain in detail why the backup battery did not prevent customers from losing telephone service. What is the in-service date of the Moab exchange backup battery?
 - c) If not confirmed, please explain in detail the purpose of the backup battery.

Frontier Response: Frontier will supplement this response as soon as it is able to obtain the requested information.

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 23rd day of September, 2020, on the following:

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**FRONTIER COMMUNICATIONS' 1ST SUPPLEMENTAL RESPONSE TO
FOURTH SET OF DATA REQUESTS TO FRONTIER BY THE OFFICE OF
CONSUMER SERVICES**

Citizens Telecommunications Company of Utah d/b/a Frontier Communications (“Frontier”) hereby submits this first supplemental response to the Fourth Set of Data Request to Frontier Communications from the Office of Consumer Services (“OCS”) as follows:

- 4.3 For each county identified in OCS 4.1 above, please provide the following:
- a) Type of new network infrastructure of network upgrades constructed or installed;
 - b) Number of customers supported with new network infrastructure or network upgrades;
 - c) Dollar amount spent to date on constructing new network infrastructure or network upgrades;
 - d) Data speeds (download and upload) available to Frontier in the counties;
 - e) Is the build out of network infrastructure or network upgrades complete?

Frontier Response:

- a) Frontier uses a Packet Optical network infrastructure for broadband services with fiber cable to removes capable of supporting the CAF II speed and latency requirements. Please see the CAF II Network Architecture Design and Engineering Guidelines included in CONFIDENTIAL Attach 4.3a, provided herewith.

4.8 What percentage of homes and business in Grand County and San Juan County are currently able to receive telephone service from Frontier?

Frontier Response: Frontier's service area does not include all of Grand County and San Juan County, so this response is limited to the Frontier exchange areas within the two counties. Frontier is not aware of any existing home or business location that would not be capable of receiving voice telephone service.

4.9 Does Frontier currently have service available to all of the customers in the following areas in Moab? If not, does Frontier have any plans to build into the areas?

- a) Entrada (approximately 400 North 600 West)
- b) Sage Creek (2771 S Hwy 191)
- c) Bonita and Valley View (888 S Millcreek Drive)
- d) Rim Village Vista (Meador Drive and Hwy 191)
- e) Buried Hatchet (La Sal Loop Road)
- f) Moab Business Park Last Phase (11850 S Hwy 191)
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- h) Vista Antigua (very end of Chapman Lane)
- i) Wingate Subdivision (end of South Gate Drive)
- j) Arroyo Crossing (approximately 2211 Spanish Valley Drive)

Frontier Response:

- a) Yes, voice service is available.
- b) Yes, voice service is available.
- c) Yes, voice service is available.
- d) Yes, voice service is available.
- e) This is still a planned development. Frontier has not yet received a request from the developer to extend service to the development. If Frontier receives such a request, an 18KFT copper build will be required to provide voice service.
- f) Yes, voice service is available.
- g) Yes, voice service is available.
- h) Yes, voice service is available.
- i) Yes, voice service is available.
- j) Yes, voice service is available.

- 4.11 In response to OCS 2.5 Frontier referred to a previously issued data request saying in part, “This question is a duplicate of OCS DR 3.5 in Docket Nos. 19-041-01, 19-041-02, and 19-041-04 and the Division of Public Utilities undocketed investigation. Please see Frontier’s response to that data request, produced herewith.” The explanation provided by Frontier in response to that data request was that the backup battery failure was triggered by a commercial power outage and resolved when power was restored. This did not fully answer the OCS’s question regarding the backup battery.
- a) Please confirm that the purpose of backup battery is to protect telephone service from such power outages.
 - b) If confirmed, please explain in detail why the backup battery did not prevent customers from losing telephone service. What is the in-service date of the Moab exchange backup battery?
 - c) If not confirmed, please explain in detail the purpose of the backup battery.

Frontier Response:

- a) Yes, consistent with PSC rules, the company’s network design includes backup power, generally with batteries, generators or a combination of both, to make reasonable arrangements to meet emergencies resulting from the failure of commercial power. The backup power design in place in the Moab central office and the remote switch that services the Castle Valley community both exceed the PSC standards in R746-340-4.
- b) The length of the commercial power outage at the Castle Valley remote exceeded the capabilities of the backup power facilities in that particular location. The backup battery design in the Moab central office includes thirteen battery strings all of which were replaced at various dates in the past five years, (seven in June 2015 & six in June 2017). In addition, an onsite generator is in place in the Moab central office.
- c) N/A

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 25th day of September, 2020, on the following:

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/s/ Phillip J. Russell