

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Betsy Wergin	Commissioner
Dennis O'Brien	Commissioner

In the Matter of the Farmers Mutual Telephone  
Company Complaint Against Frontier  
Communications of Minnesota, Inc. re Early  
Termination Fees

PUC Docket No.  
P-522, 405/C-13-941

**REQUEST FOR RECONSIDERATION OR AMENDMENT**

**Introduction**

On January 30, 2014, the Minnesota Public Utilities Commission (“Commission”) issued its ORDER FINDING JURISDICTION, FINDING GROUNDS TO INVESTIGATE, AND REQUIRING ANSWER (“Order”) in the Matter of Farmers Mutual Telephone Company (“Farmers”) Complaint Against Frontier Communications of Minnesota, Inc. (“Frontier”). As the basis for jurisdiction to investigate the entirety of Farmers’ complaint, and without differentiating between local services provided by Frontier and the high-speed Internet services also provided by Frontier, the Commission asserted its authority to maintain “just and reasonable rates” and encourage “fair and reasonable completion for local exchange telephone service.”<sup>1</sup>

Pursuant to Minn. R. 7829.3000, a party “aggrieved and directly affected” by a Commission order may petition for reconsideration or amendment within 20 days of the aggrieving order. Frontier hereby petitions the Commission to reconsider or amend its January 30, 2014 ORDER FINDING JURISDICTION, FINDING GROUNDS TO INVESTIGATE, AND REQUIRING ANSWER.

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<sup>1</sup> Order Finding Jurisdiction, Finding Grounds to Investigate, and Requiring Answer (Jan. 30, 2014) at 5.

Frontier respectfully requests that the Commission reconsider or amend its Order to make clear: (1) that the Commission is not asserting jurisdiction with respect to Internet or interstate phone services, and (2) the Commission will exercise jurisdiction only with respect to that portion of services provided by Frontier that encompass intrastate telephone services.

## **BACKGROUND**

Frontier offers customers services that fall into three categories: local telephone service (and features), high-speed Internet access, and long distance telephone service via its affiliated company, Frontier Communications of America, Inc. The long distance offerings may include both interstate and intrastate calling. Frontier offers service bundles which include some combination of local telephone service, features, and long distance services. While there are a number of different product names for these types of bundles, in previous discussion in this docket they have been generically referred to as “Digital Phone.” With very limited exceptions,<sup>2</sup> early termination fees only apply in instances when a customer has subscribed to a term offering of an interstate long distance or high-speed Internet access service. The termination fees for the interstate long distance component of Digital Phone term offerings and for the high-speed Internet term offerings are separate and distinct. And, the early termination fee is expressly tied to the non-intrastate service: interstate long distance or high-speed Internet.

On October 8, 2013, Farmers filed a complaint with the Commission regarding Frontier’s contracts and early termination fees. Farmers’ complaint made no distinction between intrastate local telephone services, long distance services, and the high-speed Internet services offered by Frontier. Most tellingly, Farmers’ complaint failed to inform the Commission that cancellation

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<sup>2</sup> There are some tariffed intrastate services that are offered as a term offering with associated early termination fees. However, those services are generally business services, and are not at issue in the context of this Farmers Mutual complaint in this docket.

of intrastate telephone services does *not* trigger *any* early termination fee for consumers.

Frontier does not impose a single or combined early termination fee that is tied to any intrastate service being considered in this docket.

Frontier filed a motion to dismiss Farmers' complaint based in part on two points: (1) the early termination fee for high-speed Internet service is outside the scope of the Commission's jurisdiction; and (2) there is no basis for the Commission to investigate because Frontier fully notifies customers of applicable rates, terms, and conditions. On January 30, 2014, the Commission issued its ORDER FINDING JURISDICTION, FINDING GROUNDS TO INVESTIGATE, AND REQUIRING ANSWER.

In the Order, the Commission asserted jurisdiction to investigate Farmers' complaint, without differentiating the investigation of local service issues and interstate issues, much less high-speed Internet services. Because Frontier believes that the Commission lacks jurisdiction to investigate the high-speed Internet services offered by Frontier or any other carrier, and that a significant portion of its Digital Phone offerings is interstate in nature, Frontier respectfully requests that the Commission reconsider its Order, and craft a revised Order that more clearly delineates the extent of the investigation intended by the Commission. Specifically, Frontier requests that the Commission clarify whether any investigation will extend beyond intrastate telephone service issues to include interstate telephone services, or even more expansively, whether the Commission intends to exercise jurisdiction over Frontier's high-speed Internet services.

## DISCUSSION

### I. Frontier's Telephone and Internet Services Are A La Carte, and Not Bundled

This Commission's Order asserts that Frontier's intrastate telephone services are part of a "package or bundle that includes long distance telephone service as well as high-speed Internet services."<sup>3</sup> As set forth in the Affidavit of Mr. Scott Bohler, and as explained more fully below, the undifferentiated use of the term "bundling" is incorrect and misleading when referring to Frontier's high-speed Internet service. Unlike Frontier's Digital Phone products, some of which arguably could be thought of as a "bundled" service that includes both intra- and interstate telephone services, Frontier's high-speed Internet service is in no way "bundled" with its telephone services. The Commission's Order reasoned, again without differentiating between the telephone services provided Frontier and Frontier's high-speed Internet services, that "[p]ackaging a jurisdictional service with non-jurisdiction services does not defeat jurisdiction."<sup>4</sup> Frontier agrees with this statement as a general proposition when referring to certain of its arguably "bundled" Digital Phone services, with the understanding that the Commission is not suggesting the opposite corollary: that bundling a regulated intrastate service with an unregulated interstate service could somehow *create* jurisdiction over the unregulated interstate service, in this case the interstate portion of the Digital Phone service. It would be incorrect and *ultra vires* therefore for the Commission to attempt to exercise jurisdiction over the interstate component of Digital Phone's long distance telephone services under the rubric of exercising jurisdiction over the intrastate component of those services, the latter of which Frontier concedes the Commission has jurisdiction.

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<sup>3</sup> *Id.* at 4.

<sup>4</sup> *Id.*

Perhaps even more importantly, however, it would be overreaching and unprecedented if the Commission were to attempt to exercise jurisdiction over Frontier's high-speed Internet services, which cannot reasonably be argued to be bundled with intrastate telephone services. Although purchasers of both Frontier's Digital Phone service and broadband high speed Internet services receive discounts to the rates for each of those services if both services are purchased, it is inaccurate to call these "bundled services."<sup>5</sup> Customers are purchasing two distinct sets of services, each of which has its own set of rates to which the discount applies, and each of which has a separate early termination fee. The early termination fee for Digital Phone service is reflected in Frontier Communications of America's interstate price list which replaced the tariff on file with the FCC after the FCC deregulated interstate long distance service. The early termination fee for High Speed Internet service reflects the additional costs Frontier incurs in providing a modem and installation, as well as the discounted rates billed customers that subscribe to a one or two year term for high speed Internet service. The ETF clearly reflects a "rate" element for the service in that customers electing to subscribe to service on a month-to-month basis do not receive discounted service at a "protected" rate during the one or two year term they subscribed to service. By no stretch of the imagination, therefore, can Frontier's potential early termination fee for Internet services be considered a cancellation fee for intrastate services, since it is abundantly clear that the fee would apply only to the termination of the high-speed Internet services. As a result of this critical fact distinction, it is absolutely clear that early termination fees related to high speed Internet service are not jurisdictionally "intrastate" and in fact reflect an "interstate" non-telecommunications service (i.e., "information service") rate issue which is unequivocally beyond the scope of the Minnesota Commission's jurisdiction.

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<sup>5</sup> See Affidavit of Scott Bohler (Feb. 4, 2014) at 1.

## II. The Commission Has No Jurisdictional Authority to Regulate Internet Services

### A. Minnesota Statutes

The Commission's jurisdictional authority in the area of telecommunications derives from four sections of Minnesota Statutes Chapter 237.<sup>6</sup> None of these four sections grants the Commission authority over an information service such as Frontier's high-speed Internet. While Minn. Stat. § 237.02 gives the Commission jurisdiction and supervisory power over telephone and telecommunications companies generally, that jurisdiction does not extend to unregulated or interstate services.

In its Order, the intended scope of which is not clear by its express terms, the Commission primarily relies upon Minn. Stat. § 237.081 as the basis for its investigation.<sup>7</sup> The Commission notes that this section authorizes opening an investigation "whenever it believes an investigation 'should for any reason be made.'"<sup>8</sup> This quotation, however, omits critical language limiting the Commission's jurisdiction to situations where it decides to investigate "any matter *relating to telephone service.*"<sup>9</sup> It is beyond dispute that high-speed Internet is an information service, not a telephone service. To the extent that the Order might be read as authorizing an investigation into the provision of high-speed Internet services – and it is not clear whether that is the Commission's intention – the Commission's Order provides no legal support whatsoever for any assertion of jurisdiction over Internet rates or billing practices.<sup>10</sup>

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<sup>6</sup> See Minn. Stat. § 237.011; Minn. Stat. § 237.21; Minn. Stat. § 237.081; Minn. Stat. § 237.02.

<sup>7</sup> Order at 3.

<sup>8</sup> *Id.* (quoting Minn. Stat. § 237.081).

<sup>9</sup> Minn. Stat. § 237.081, subd. 1 (emphasis added).

<sup>10</sup> Plainly the lower rates offered in exchange for term commitment, enforced by an early termination fee, are "rates" set for Frontier's internet service offering.

## **B. Federal Law Preemption of State Commission Jurisdiction over Internet Services.**

The distinction between Internet services and telephone services has been crystal clear for many years: high-speed Internet *is not* a telephone service, but rather an information service.<sup>11</sup> Even where Internet services perform in a manner functionally equivalent to more traditional land line phone services, such as with VoIP, the District of Minnesota and the Eighth Circuit have held repeatedly that the FCC preempts state regulators in this arena.<sup>12</sup>

Unlike situations where the Commission and the FCC arguably share jurisdiction in areas where their jurisdictions may intersect or even overlap for telephone services, there is no statutory basis whatsoever to support the contention that this Commission shares some power to exercise jurisdiction over the Internet, which is not even a telephone service, and fundamentally interstate in nature.

The clarity of the distinction between information services and telephone services contrasts sharply with the less-clear division of responsibility for the regulation of intrastate and interstate telephone services, where federal law acknowledges that there may be aspects of the service that are regulated by the state and others that are regulated by federal authorities.<sup>13</sup> Unlike the area of telephone services, Federal law contains not even the slightest hint of a suggestion that state co-jurisdiction might exist with respect to informational services like the

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<sup>11</sup> See, e.g., *In re Appropriate Framework for Broadband Access to Internet Over Wireline Facilities*, 20 F.C.C.R. 14853 (Aug. 5, 2005).

<sup>12</sup> See *Minnesota Pub. Utils. Comm'n v. Fed. Comm'n Comm'n*, 483 F.3d 570, 574 (8th Cir. 2007) (affirming the FCC's order preempting state regulation of telecommunication services that use Voice over Internet Protocol); *Vonage Holdings Corp. v. Minnesota Pub. Utils. Comm'n*, 394 F.3d 568 (8th Cir. 2004) (holding that the PUC may not impose common carrier telecommunications regulations on a VoIP provider), *aff'g*, 290 F. Supp. 2d 993 (D. Minn. 2003). See also *Vonage Holdings Corp. v. Nebraska Public Service Commission*, 543 F. Supp. 2d 1064 (D. Neb. 2008) (holding the Nebraska Public Service Commission is barred by federal preemption from requiring a nomadic VoIP provider to contribute to the USF).

<sup>13</sup> See Telecommunications Act of 1996. See also *AT & T Corp v. Iowa Utils. Bd.*, 525 U.S. 366 (1999).

Internet. On the contrary, Internet services, to the extent they are regulable at all, are indisputably considered to be within the domain of federal law. Federal law establishes the policy of the United States to “promote the continued development of the Internet.”<sup>14</sup> Congress has made its intentions clear “to preserve the vibrant and competitive free market that presently exists for the Internet and other interactive computer services *unfettered by Federal or State regulation.*”<sup>15</sup> Furthermore, federal law and policy establish that the Internet is an “information service” that should remain “free from almost all federal and state regulation.”<sup>16</sup> With respect, it is beyond any reasoned debate that the Commission has no basis for asserting jurisdiction over provision of this interstate service.

### CONCLUSION

Frontier concedes that it offers both jurisdictional and nonjurisdictional services as part of some of its Digital Phone products, and that the Commission has the authority to investigate the intrastate component of that combined product, as well as of course Frontier’s strictly local telephone product offering. No such division of authority, however, is needed or appropriate in the case of Frontier’s Internet services. The separate billing for such Internet services, and the separate structure of early termination fees for Internet services as opposed to Digital Phone services, eliminates any opportunity for inquiry into the Internet product offered by Frontier. Nevertheless, the Commission’s Order as currently phrased could be interpreted as expressing an intent to investigate how Frontier provides Internet services, and in particular, how it structures its rates to provide discounts for term commitments for Internet services, and early termination fees in the event that a customer fails to live up to the term commitment to purchase Internet services. Accordingly, Frontier respectfully requests that either the Commission make clear in a

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<sup>14</sup> 47 U.S.C. § 230(b).

<sup>15</sup> 47 U.S.C. § 230(b).



modified order that it is not intending to exercise such jurisdiction over Internet services, or in the alternative, reconsider its decision to attempt to exercise jurisdiction over Internet services.

With regard to the exercise of jurisdiction over Digital Phone services, Frontier likewise requests that the Commission clarify its Order to make clear that it will exercise such jurisdiction only in a manner commensurate with its regulation of intrastate telephone services, and will not intervene or attempt to regulate Frontier's provision of interstate telephone services.

Any attempt to regulate Internet services, or the discrete and independent aspects of Frontier's interstate telephone services, would be in direct conflict with federal law and unsupported in state statute. For these reasons, Frontier respectfully requests that the Commission reconsider its January 30, 2014 ORDER FINDING JURISDICTION, FINDING GROUNDS TO INVESTIGATE, AND REQUIRING ANSWER to make clear that any investigation will be carefully limited to Frontier's provision of local services, and not extend to interstate or Internet services.

Dated: February 10, 2014

Respectfully submitted,

By /s/ Robert E. Cattanach  
Robert E. Cattanach (153734)  
Cattanach.robert@dorsey.com  
Dorsey & Whitney LLP  
Suite 1500, 50 South Sixth Street  
Minneapolis, MN 55402-1498  
Telephone: (612) 340-2873

Attorney for Frontier Communications of  
Minnesota, Inc.

Kevin Saville  
Vice President & Associate General Counsel  
Frontier Communications Corporation  
2378 Wilshire Blvd.  
Mound, Minnesota 55364  
Telephone: (952) 491-5564  
Facsimile: (952) 491-5577  
Kevin.Saville@FTR.com

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<sup>16</sup> *Minnesota Pub. Utils. Comm'n*, 483 F.3d at 575.

STATE OF Minnesota )  
 ) ss:  
COUNTY OF Hennepin )

The undersigned affiant does hereby depose and state:

I, Scott Bohler, am a duly appointed representative or employee of Frontier Communications of Minnesota, Inc., and hold the position of Manager, Government and External Affairs.

I am familiar with the billing by Frontier Communications of Minnesota, Inc. for its retail services.

I hereby attest that Frontier Communications of Minnesota, Inc. prices and bills for its high-speed Internet access service independently. The high-speed internet access service is not provided as part of a single-priced, bundled service with other services.

Frontier offers customers three categories of service: (1) local telephone service (and features), (2) high-speed Internet access, and (3) long distance telephone service, which is provided through our affiliate Frontier Communications of America, Inc.. Frontier's long distance services include both interstate and intrastate long distance calling. Many of Frontier's telephone customers elect to purchase some combination of local telephone service, features, and long distance services (often called "Digital Phone").

The termination fees for the interstate long distance component of Digital Phone and for the high-speed Internet term offerings are separate and distinct. As shown in the sample bills attached as Attachment A, the monthly charge for high-speed access is separately identified on the bill, and appears on a separate line. In addition, the Early Termination Fee associated with the high-speed internet service is shown separately on the bill, and appears on a separate line. There is no comingling of charges or early termination fees related to telecommunications services and high-speed internet services.

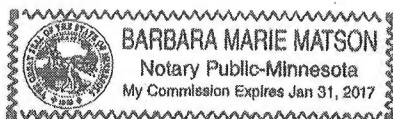
Though some may view the telephone services that make up Digital Phone as constituting a "bundle", that concept cannot be extended to include Frontier's high-speed Internet service. While customers receive a discount on each service when they purchase both Frontier's telephone and high-speed Internet services, any early termination fee associated with a premature cancellation of either of those services prior to the expiration of its agreed-upon term will be accrued and assessed independently.

All foregoing acknowledgements and attestations in this affidavit are true and correct to the best of my information and belief.

*Scott Bohler*

\_\_\_\_\_  
Scott Bohler, Affiant  
Manager, Government and External Affairs  
Frontier Communications of Minnesota, Inc.  
2378 Wilshire Boulevard  
Mound, Minnesota 55364  
Telephone: (952) 491-5534

Acknowledged, subscribed, and sworn to me on this 10 day of FEBRUARY, 2014.



*Barbara D. Matson*  
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Notary Public

TEXT CODE: MNBBA  
PIN: 3831

Date of Bill 3/13/13  
Current Amount Due By Date 4/08/13

Account Number 320/769-2953 Total Amount Due \$167.83

RANDY MOSENG  
2516 150TH ST  
DAWSON, MN 56232-4169  
Amount Paid

562324169 0

56503320769295309299400000167837

www.frontier.com  
Residential 800-921-8101

Account Number 320/769-2953 Date of Bill 3/13/13

Amount of Last Bill 167.83  
Payments Received Thru 3/11/13 167.83CR  
Balance Before Current Charges .00  
Current Charges 167.83

Total Amount Due \$167.83

Frontier Benefits  
Connections Premium Credit 14.98  
Term Credit - Gateway 2.49  
HSI Loyalty Credit 6.00  
Digital Phone Loyalty Credit 10.00  
Total Benefits And Savings \$33.47

FRONTIER MONTHLY SERVICE CHARGES FROM 3/13/13 to 4/12/13  
Frontier Digital Phone Service Term 1/18/13 - 1/17/15 39.99  
High Speed Internet Max Term 3/25/13 - 3/24/15 30.01  
TumTiki (tumtiki.com) FREE .00  
SE567 High Speed Internet Gateway Modem 4.50  
Frontier Mail - Standard .00  
Frontier Plus 4.95  
TOTAL MONTHLY SERVICE CHARGES 79.45

OTHER SERVICE CHARGES AND CREDITS  
Carrier Cost Recovery Surcharge .50  
Dish Network Service 74.81  
TOTAL OTHER SERVICE CHARGES AND CREDITS 75.31

TAXES AND OTHER CHARGES  
Federal Taxes and Charges\* 7.23  
State Taxes and Other Charges\* 5.84  
TOTAL TAXES AND OTHER CHARGES 13.07

TOTAL 167.83

Detail of Taxes and Other Charges on Pg.4 >

\*Includes Basic Charges

DETAIL OF TAXES AND OTHER CHARGES  
DETAIL OF FEDERAL TAXES AND CHARGES\*  
Frontier  
Federal Tax .15  
Federal Subscriber Line Charge 7.00  
FCA Long Distance - Federal USF Surcharge .08  
TOTAL FEDERAL TAXES AND CHARGES 7.23

320/769-2953

Date of Bill 3/13/13

DETAIL OF STATE TAXES AND OTHER CHARGES\*

Frontier	
MN State Sales Tax	3.92
911/TELE-RELAY/TAP SURCHG	.92
HSI Surcharge	1.50
HSI Surcharge Credit	.50CR
TOTAL STATE TAXES AND OTHER CHARGES	5.84
TOTAL TAXES AND OTHER CHARGES	13.07

\*Includes Basic Charges

DETAIL OF OTHER SERVICES CHARGES AND CREDITS

C1DISH

Detail of DISH Network Services

FOR SERVICE QUESTIONS PLEASE CONTACT 1-888-742-0240.

Description	
CR: DISH BUNDLE	
FROM 03/06/2013	5.00CR
OUTDOOR SPORTS	
FROM 03/13/2013 TO 04/12/2013	3.00
DVR SERVICE	
FROM 03/13/2013 TO 04/12/2013	7.00
AMERICA'S TOP 200	
FROM 03/13/2013 TO 04/12/2013	64.99
STATE/LOCAL TAXES	4.82
Subtotal DISH Network Service	74.81

\*\*\*\*\*Start suppression of detail

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Detail of Frontier Com of America Charges

Charges and Credits for 320/769-2953

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
E	1 FEB 20	7:23A	1.0	DD	MONTEVIDEO MN (320)226-5489	.00 U
E	2 FEB 23	5:31P	4.0	DD	ST PAUL MN (651)731-2220	.00 U
E	3 FEB 23	5:36P	6.0	DD	ST PAUL MN (651)225-1515	.00 U
E	4 FEB 23	5:43P	1.0	DD	ST PAUL MN (651)731-2220	.00 U
E	5 FEB 28	6:36P	1.0	DD	MONTEVIDEO MN (320)226-4099	.00 U
E	6 MAR 12	8:10P	1.0	DD	ST CLOUD MN (320)253-9000	.00 U
320/769-2953						Subtotal .00

Subtotal Minutes: 14.0 \*\*\*REP LINE ONLY

\*\*\*\*\*Resume printing of detail

Legend Call Types:

DD - Day

320/769-2953

Date of Bill 3/13/13

Please immediately pay any Balance Before Current Charges to avoid collection activities. All other charges should be paid when due to keep your account current. To avoid disconnection of local service, you must pay \$24.08.

Effective April 2013, the Carrier Cost Recovery Surcharge which applies to your Frontier Communications of America, Inc. long distance plan will increase from \$.50 to \$.99 per month. This surcharge is not a tax or government charge but helps Frontier Communications of America to recover various costs, including costs the company incurs in the administration of the Universal Service Fund, the national fund for Telecommunications Relay Service, regulatory filing expenses and compliance items.

Frontier is providing High-Speed Internet Service to its end user customers pursuant to the Terms and Conditions described at <http://www.frontier.com/terms>. In the past, Frontier filed this information with the Federal Communications Commission (FCC). As a result of recent FCC rulings, we are now providing High-Speed Internet service per these Terms and Conditions. If you have any questions, please call the customer service number on your bill.

Your Digital Phone agreement will automatically renew effective 01/18/15.

Your High Speed Internet agreement will automatically renew effective 03/25/15.

As you agreed, your Frontier service includes a 1-year (or multi-year) term commitment with convenient automatic renewal at then applicable pricing (excluding promotions). If you wish to cancel your auto-renewal, please call Frontier at least 30 days prior to your renewal date above. As noted on page 2 of every bill, visit [Frontier.com/terms](http://Frontier.com/terms), [Frontier.com/tariffs](http://Frontier.com/tariffs) or call Customer Service for other important service Terms, Conditions and Policies.

RETURN: Frontier Communications  
1398 S. Woodland Blvd. Suite B  
Deland, FL 32720

REMITTANCE: FRONTIER  
PO BOX 20550  
ROCHESTER NY 14602-0550

CDPIMNBBA32032076956232MNLF-V21RESR1 0694NY 0100000090000167.83  
N Y Y Y Y N 800-921-8101

TEXT CODE: MNBBA  
PIN: 3831

Date of Bill 4/13/13  
Current Amount Due By Date 5/07/13

Account Number 320/769-2953/1 Total Amount Due \$515.85

RANDY MOSENG  
2516 150TH ST  
DAWSON, MN 56232-4169  
Amount Paid

562324169 0

16588320769295309299410000515857

www.frontier.com  
Business 800-921-8102

Account Number 320/769-2953/1 Date of Bill 4/13/13

Amount of Last Bill 167.83  
Payments Received Thru 4/08/13 167.83CR  
Thank you for your payment]  
Balance Before Current Charges .00  
New Charges 515.85

Total Amount Due \$515.85

CURRENT BILLING SUMMARY

Qty Description	Local Service from 04/13/13 to 05/12/13 320/769-2953.1	Charge
Basic Charges		
TumTiki (tumtiki.com) FREE		.00
Prorated Charges-Detailed Below		18.99CR
Federal Tax		.08CR
FCA Long Distance - Federal USF Surcharge		.52CR
MN State Sales Tax		1.34CR
Total Basic Charges		20.93CR
Optional Services		
Frontier Mail - Standard		.00
Prorated Charges-Detailed Below		179.02
MN State Sales Tax		.27CR
Total Optional Services		178.75
Dish Network		
Dish Network Service		90.84
Total Dish Network		90.84
Toll/Other		
Prorated Charges-Detailed Below		250.00
MN State Sales Tax		17.19
Total Toll/Other		267.19
	TOTAL	515.85

\*\* ACCOUNT ACTIVITY \*\*  
Qty Description

Order Number Effective Dates

Prorated Charges		
HSI Loyalty Term Fee	PROMOTION 4/13 5/12	200.00

320/769-2953/1

		Date of Bill	4/13/13
Digital Phone Loyalty Term Fee	PROMOTION	4/13 5/12	250.00
Frontier Digital Phone Service	066254948	4/03 4/12	16.65CR
Access Recovery Chrg-Res	066254948	4/03 4/12	.17CR
Federal Subscriber Line Charge	066254948	4/03 4/12	2.17CR
High Speed Internet Max	066254948	4/03 4/12	17.00CR
SE567 High Speed Internet Gateway Modem			
	066254948	4/03 4/12	2.33CR
Frontier Plus	066254948	4/03 4/12	1.65CR
320/769-2953			
	Subtotal		410.03
	Subtotal		410.03

CLDISH

Detail of DISH Network Services

FOR SERVICE QUESTIONS PLEASE CONTACT 1-888-742-0240.

Description	
SHIPPING & HANDLING	
FROM 03/19/2013	15.00
CR: DISH BUNDLE	
FROM 04/06/2013	5.00CR
OUTDOOR SPORTS	
FROM 04/13/2013 TO 05/12/2013	3.00
DVR SERVICE	
FROM 04/13/2013 TO 05/12/2013	7.00
AMERICA'S TOP 200	
FROM 04/13/2013 TO 05/12/2013	64.99
STATE/LOCAL TAXES	5.85
Subtotal DISH Network Service	90.84

Detail of Frontier Com of America Charges

Toll charged to 320/769-2953 1  
 \*\*\*\*\*Start suppression of detail

Ref #	Date	Time	Min	*Type	Place and Number Called	Charge
E 1	MAR 13	6:45P	1.0	DD	MONTEVIDEO MN (320)226-5489	.00 U
E 2	MAR 14	6:56A	1.0	DD	WILLMAR MN (320)235-1025	.00 U
E 3	MAR 16	8:28A	1.0	DD	MONTEVIDEO MN (320)226-1100	.00 U
E 4	MAR 16	8:32A	1.0	DD	MONTEVIDEO MN (320)226-5489	.00 U
E 5	MAR 16	8:36A	1.0	DD	MONTEVIDEO MN (320)226-1100	.00 U
E 6	MAR 16	8:45A	8.0	DD	MARSHALL MN (507)829-6187	.00 U
E 7	MAR 16	8:54A	3.0	DD	MARSHALL MN (507)829-6187	.00 U
E 8	MAR 16	10:41A	1.0	DD	MONTEVIDEO MN (320)226-1100	.00 U
E 9	MAR 19	7:40P	1.0	DD	MONTEVIDEO MN (320)841-2600	.00 U
E 10	MAR 25	5:25P	1.0	DD	MONTEVIDEO MN (320)226-5489	.00 U
E 11	MAR 30	7:17P	1.0	DD	MONTEVIDEO MN (320)226-5489	.00 U
E 12	MAR 31	8:03P	3.0	DD	MONTEVIDEO MN (320)226-4099	.00 U
			320/769-2953	1	Subtotal	.00

Subtotal Minutes: 23.0 \*\*\*REP LINE ONLY  
 \*\*\*\*\*Resume printing of detail  
 Legend Call Types:  
 DD - Day

Caller Summary Report

Main Number	Calls	Minutes	Amount
	12	23.0	.00
***Customer Summary	12	23.0	.00

Caller Summary Report

Intra-Lata	Calls	Minutes	Amount
	10	12.0	.00
Intrastate	2	11.0	.00
***Customer Summary	12	23.0	.00

320/769-2953/1

Date of Bill 4/13/13

Effective April 1, 2013, the Federal Universal Service Fund (USF) Surcharge applied to certain services is decreasing to 15.5%. The USF is critical to keeping service affordable in rural markets and provides discounts on communications services purchased by schools, libraries and rural health care providers. USF funds allow Frontier to continue to invest in high-cost areas bringing advanced services to our customers.

If you have Frontier as your long distance carrier, the Long Distance Federal USF Surcharge is also decreasing to 15.5%.

Frontier is providing High-Speed Internet Service to its end user customers pursuant to the Terms and Conditions described at <http://www.frontier.com/terms>. In the past, Frontier filed this information with the Federal Communications Commission (FCC). As a result of recent FCC rulings, we are now providing High-Speed Internet service per these Terms and Conditions. If you have any questions, please call the customer service number on your bill.

RETURN: Frontier Communications  
1398 S. Woodland Blvd. Suite B  
Deland, FL 32720

REMITTANCE: FRONTIER  
PO BOX 20550  
ROCHESTER NY 14602-0550

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N N N N N N 800-921-8102