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February 19, 2014

Dr. Burl W. Haar  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101-2147

Via: E-File

Re: In the Matter of the Farmers Mutual Telephone Company Complaint Against Frontier  
Communications of Minnesota, Inc. re Early Termination Fees  
Docket No. P-522, 405/C-13-941

Dear Dr. Haar:

I enclose via e-filing in the above-referenced docket Comments of Farmers Mutual  
Telephone Company in Response to Petition for Reconsideration and Affidavit of Service.

Please contact me if you have any questions.

Sincerely,

/s/Gregory R. Merz

Gregory Merz

GRM/akm  
Enclosures

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lang	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

In The Matter Of The Farmers Mutual Telephone Company Complaint Against Frontier Communications of Minnesota, Inc. re Early Termination Fees	Docket No. P-522, 405/C-13-941
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**COMMENTS OF FARMERS MUTUAL TELEPHONE COMPANY IN RESPONSE TO  
PETITION FOR RECONSIDERATION**

**INTRODUCTION**

Farmers Mutual Telephone Company (“Farmers”) filed its Verified Complaint in this matter seeking a Commission investigation and remedial action with respect to anticompetitive conduct by Frontier Communications of Minnesota, Inc. (“Frontier”) involving the inappropriate imposition of early termination fees and use of automatic contract renewals without first obtaining customer consent. Frontier moved to dismiss the Verified Complaint, arguing that its early termination fees and automatic contract renewals applied only to interstate phone and Internet service over which the Commission has no jurisdiction. The Commission rejected Frontier’s argument. To that end, the Commission held:

The Commission concludes that it has subject matter jurisdiction to investigate the matters raised in the Complaint. The Commission has broad authority under Minn. Stat. § 237.081 to open an investigation whenever it believes that an investigation “should for any reason be made.” While federal law preempts Commission authority to determine prices or other terms for a stand-alone retail interstate long distance service or stand-alone retail internet access service, that is not the issue in this docket. Frontier offers and advertises its intrastate digital phone service, which is clearly within Commission jurisdiction, within a service package and bundle that includes long distance service as well as high-speed

internet. Packaging a jurisdictional service with a non-jurisdictional service does not defeat jurisdiction.

Order Finding Jurisdiction, Finding Grounds to Investigate, and Requiring Answer, at pp. 3-4.

In its Request for Reconsideration, Frontier does nothing more than repeat the arguments that the Commission has already rejected. Frontier's arguments have not improved with repetition. The reasoning supporting the Commission's Order is sound and should be affirmed. The issues raised by Farmers' Verified Complaint fall squarely within the Commission's jurisdiction. To the extent that the Commission's investigation ultimately supports Frontier's claim that its early termination fees and automatic contract renewals are completely separate from, and wholly unrelated to, intrastate phone service – a development that, in light of the evidence that exists now, Farmers regards as extremely unlikely – Frontier will have an opportunity to renew its arguments in light of that new evidence. Certainly the evidence adduced so far does not warrant cutting off the investigation even before it has begun.

### **DISCUSSION**

Frontier's motion hinges on the claim that its high speed Internet services "cannot reasonably be argued to be bundled with interstate telephone services." Request for Reconsideration or Amendment at p. 5. This claim cannot be squared with Frontier's own advertising, which shows that bundling of Internet and telephone service is a key part of Frontier's marketing strategy. Attached to this brief are two examples of Frontier's advertisement of its bundled offerings – Digital Phone Service and High Speed Internet – printed from Frontier's website. Exhibit A includes the following statements:

#### **"SAVE WITH FRONTIER BUNDLES"**

"Get more for your money with a Frontier bundle. Pay one price and get two great services: high-speed Internet and full-featured home phone. Stay in touch and stay connected for an affordable price. Call now to build your bundle!"

**“Two Services, One Price”**

“Bundling Frontier services is both convenient and affordable. Pay less for your bundled services than you would pay individually.”

**“Build Your Perfect Package”**

“Not sure which package is right for you? Give us a call – we’ll help you find the perfect plan. Frontier packages are tailored to your usage habits. Need more speed from your Internet connection? What about more calling features? You got it.”

Exhibit B includes the following statements:

**“DOUBLE YOUR SAVINGS WITH A FRONTIER DOUBLE PLAY.”**

**“HIGH-SPEED INTERNET & PHONE Plans Start At \$47.98 per month.”**

**“CALL NOW TO BUILD YOUR BUNDLE!”**

Compare these statements from Frontier’s marketing materials with its assertion to this Commission, in support of its request for reconsideration, that “Frontier Communications of Minnesota, Inc. prices and bills 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.” Affidavit of Scott Bohler. In light of the way Frontier has chosen to market its services, Frontier’s claim that it does not bundle its telephone service with its Internet service cannot withstand even modest scrutiny.

Nor does the evidence establish that Frontier markets interstate Digital Phone service separately from intrastate service. The bill example provided as an attachment to Frontier’s Request for Reconsideration reflects an early termination fee, referred to as a “Digital Phone Loyalty Term Fee.” There is certainly nothing in the bill that supports a conclusion that the early termination charge applies only to the “interstate portion” of the customer’s service. Frontier’s advertising refers generally to “phone service;” it does not distinguish between “intrastate,”

“interstate,” “local,” or “long distance” phone service. Training documents that Frontier provides to its sales personnel show that a customer subscribing to Frontier’s Digital Phone service must use Frontier for both intra and interstate long distance calling. Ex. C at p. 6 (Frontier Response to DOC IR #7). That same training document also shows that while it might be technically possible for a customer to take only the “local pieces” of Frontier’s Digital Phone service, Frontier sales personnel are cautioned to not offer this service to customers as part of their sales pitch and to make it available only to those customers who specifically request it. *Id.*

Frontier urges the Commission to turn a blind eye to the way that Frontier actually markets its services and to limit any investigation to intrastate service. Such an investigation, however, promises to be very narrow indeed; it does not appear that Frontier offers any product that is exclusively intrastate. Frontier has chosen to market intrastate phone service combined with interstate phone service combined with High-Speed Internet services. Frontier’s claim that these services are not “bundled” borders on the frivolous. Although Frontier insists that its early termination fees and automatic contract renewal apply only to services that are beyond this Commission’s jurisdiction, Frontier’s marketing strategies entitle the Commission to investigate whether that attempted distinction is anything more than a regulatory fiction.<sup>1</sup>

### **CONCLUSION**

Frontier’s Request for Reconsideration is nothing more than a replay of an argument that the Commission has already properly rejected. The Request for Reconsideration should be denied, the Commission’s prior order should be affirmed, and the Commission’s investigation should proceed without further delay.

---

<sup>1</sup> Farmers has propounded information requests that seek, among other things, data concerning Frontier’s bundling strategy, which is clearly central to Frontier’s claim regarding lack of Commission jurisdiction. See Exhibit D. Frontier, however, takes the position that it will not respond to discovery until after the Commission has determined the request for reconsideration. See Exhibit E.

Dated: February 19, 2014

GRAY, PLANT, MOOTY, MOOTY  
& BENNETT

By: /s/Gregory R. Merz

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500 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402-3796  
(612) 632-3257 (phone)  
(612) 632-4257 (fax)

ATTORNEYS FOR FARMERS MUTUAL  
TELEPHONE COMPANY

GP:3604255 v1

# Exhibit A



[HOME](#)

- [SHOP PLANS](#)
- [INTERNET](#)
- [PHONE](#)
- [BUNDLE & SAVE](#)
- [FRONTIER SECURE](#)
- [ORDER NOW](#)

- [EXISTING CUSTOMERS](#)
- [MY ACCOUNT](#)
- [BACK TO TOP](#)

**We're Open!** Only 4 hours and 56 minutes minutes left!

[1-877-350-0422](tel:1-877-350-0422)

Promo Code:J74-278

## **SAVE WITH FRONTIER BUNDLES**

[Frontier Internet Starts At \\$19.99 per month with qualifying phone service](#)  
[Shop Now](#)



Get more for your money with a Frontier bundle. Pay one price and get two great services: high-speed Internet and full-featured home phone. Stay in touch and stay connected for an affordable price. Call now to build your bundle!

[Plans and Pricing](#) [Order Now](#)

### **Two Services, One Price**

Bundling Frontier services is both convenient and affordable. Pay less for your bundled services than you would pay individually. Plus get free installation, free activation, and free equipment for some or all of your chosen services!

[Shop Plans](#)

### **Stay in Touch with Frontier Phone**

Get all the features you expect from a home phone service and more. Unlimited local and nationwide calling, call waiting, voice mail, caller ID and more. Experience clear call quality with Frontier's reliable home phone service.

[Order Now](#)

### **Build Your Perfect Package**

Not sure which package is right for you? Give us a call - we'll help you find the perfect plan. Frontier packages are tailored to your usage habits. Need more speed from your Internet connection? What about more calling features? You got it.

[Shop Bundles](#)



**Bundle & Save**

At Frontier, we put the customer first by offering top-of-the-line services at affordable prices. Get more for your money when you bundle, including Frontier freebies like free installation and freemail addresses.

[Order Now](#)

**STREAM, PLAY, WATCH & SHOP WITH FRONTIER**

Do what you want online, no contracts, no price hikes!

*Call Now*

[1-877-350-0422](tel:1-877-350-0422)

**TALK WITH US**

We'll help you find the plan that's right for you. Fill out the form and we'll get in touch with you.

First Name	Last Name	Phone Number	Email Address	ZIP Code	Contact Me
------------	-----------	--------------	---------------	----------	------------

By pressing the "contact me" button, I consent to receive a phone call from a Frontier Sales Representative at the phone number(s) provided. I understand these calls may be generated using automated technology and my consent is not required to make a purchase.

**CALL NOW & SAVE WITH A FRONTIER BUNDLE** [1-877-350-0422](tel:1-877-350-0422)

**HOME**

- [SHOP PLANS](#)
- [INTERNET](#)
- [PHONE](#)
- [BUNDLE & SAVE](#)
- [FRONTIER SECURE](#)
- [ORDER NOW](#)
  
- [EXISTING CUSTOMERS](#)
- [MY ACCOUNT](#)
- [BACK TO TOP](#)
  
- [Legal](#)
- [Terms & Conditions](#)
- [Privacy Policy](#)

Limited time offer available only to new Frontier Internet customers, including current voice-only customers. Must subscribe to a qualifying package of Frontier residential local service with features, long-distance and new qualifying High Speed Internet service. Actual speeds may vary. Service subject to availability. Installation fee applies, discounted fee waived for self-install. Price guaranteed for 24 months. A \$9.99 broadband processing fee upon disconnection of service applies. Up to 12Mbps available in limited areas. Taxes, governmental and other Frontier imposed surcharges apply. New Frontier customers are subject to credit approval. Frontier reserves the right to withdraw this promotional offer at any time. Other restrictions apply.

©2013 Frontier Communications Corporation. All rights reserved.

**New Customers**

*Get started with Frontier and lock-in your price for two years!*

Enter ZIP Code  [Shop Now](#)

Ready to order? [1-877-350-0422](tel:1-877-350-0422)

**Existing Customers**

For technical support, service upgrades, and account or billing questions, call 1-800-921-8101.

[Existing Customers](#)

# Exhibit B



[HOME](#)

- [SHOP PLANS](#)
- [INTERNET](#)
- [PHONE](#)
- [BUNDLE & SAVE](#)
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- [MY ACCOUNT](#)
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**We're Open!** Only 4 hours and 57 minutes minutes left!

[1-877-350-0422](tel:1-877-350-0422)

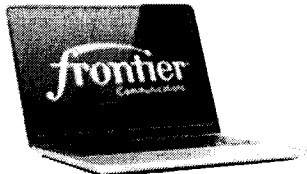
Promo Code:J74-278

## **DOUBLE YOUR SAVINGS WITH A FRONTIER DOUBLE PLAY.**

**FiOS Internet is not available in your area. Call today to learn about other internet options!  
Call now for special offers on high-speed, high-quality Internet for your home! 1-877-350-0422**

SHOWING PRICING FOR ZIP CODE **55402**. [Change Location](#)

### **HIGH-SPEED INTERNET**



Plans Start At  
\$ 19 99 per month with qualifying phone service

### **HIGH-SPEED INTERNET**

- FAST DOWNLOADS UP TO 6 Mbps
- FREE Wi-Fi ROUTER
- NO CONTRACTS OR ACTIVATION FEES

ORDER NOW TO LOCK-IN YOUR PRICE FOR 2 YEARS!

### **HIGH-SPEED INTERNET**



Plans Start At  
\$ 29 99 per month

### **HIGH-SPEED INTERNET**

- FAST DOWNLOADS UP TO 6 Mbps
- FREE Wi-Fi ROUTER
- NO CONTRACTS OR ACTIVATION FEES
- **NO PHONE LINE REQUIRED!**

ORDER NOW TO LOCK-IN YOUR PRICE FOR 2 YEARS!

## HIGH-SPEED INTERNET & PHONE



Plans Start At  
\$ 47.98 per month

### HIGH-SPEED INTERNET

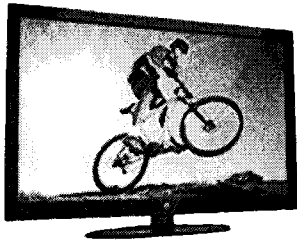
- FAST DOWNLOADS UP TO 6 Mbps
- FREE Wi-Fi ROUTER
- NO CONTRACTS OR ACTIVATION FEES

### HOME PHONE

- VOICE MAIL, CALLER ID, CALL WAITING
- LONG DISTANCE CALLING AVAILABLE

ORDER NOW TO LOCK-IN YOUR PRICE FOR 2 YEARS!

## ADD DIGITAL TV TO ANY PLAN!



Plans Start At  
\$ 24.99 per month

### ADD DIGITAL TV

- Over 100+ CHANNELS  
(Locals Included)
- ADD YOUR FAVORITE PREMIUM CHANNELS
- WATCH, RECORD & REWIND LIVE TV WITH INCLUDED DVR

CALL NOW TO BUILD YOUR BUNDLE!

GET MORE VALUE WITH FRONTIER. ORDER NOW! [1-877-350-0422](tel:1-877-350-0422)

### FRONTIER INTERNET

Download, stream, watch and play with high-speed Internet from Frontier. Lock-in your price for two years, without a contract.

[Learn More](#)

### FRONTIER PHONE

Stay in touch with unlimited nationwide calling. Plus get advanced phone features like, caller ID, call forwarding, call waiting and much more.

[Learn More](#)

### DIGITAL TV

Watch your favorite shows in high definition with crystal clear digital TV. Get more than 100 channels plus access to live sports and local stations. Add premium channels for even more entertainment! Call to learn more about our TV packages.

**STREAM, PLAY, WATCH & SHOP WITH FRONTIER**

Do what you want online, no contracts, no price hikes!

[Call Now](#)  
1-877-350-0422

**TALK WITH US**

We'll help you find the plan that's right for you. Fill out the form and we'll get in touch with you.

First Name	Last Name	Phone Number	Email Address	ZIP Code	Contact Me
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By pressing the "contact me" button, I consent to receive a phone call from a Frontier Sales Representative at the phone number(s) provided. I understand these calls may be generated using automated technology and my consent is not required to make a purchase.

**CALL NOW & SAVE WITH A FRONTIER BUNDLE [1-877-350-0422](#)****HOME**

- [SHOP PLANS](#)
- [INTERNET](#)
- [PHONE](#)
- [BUNDLE & SAVE](#)
- [FRONTIER SECURE](#)
- [ORDER NOW](#)
  
- [EXISTING CUSTOMERS](#)
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Limited time offer available only to new Frontier Internet customers, including current voice-only customers. Must subscribe to a qualifying package of Frontier residential local service with features, long-distance and new qualifying High-Speed Internet service. Actual speeds may vary. Service subject to availability. Installation fee applies; discounted fee waived for self-install. Price guaranteed for 24 months. A \$9.99 broadband processing fee upon disconnection of service applies. Up to 12Mbps available in limited areas. Taxes, governmental and other Frontier-imposed surcharges apply. New Frontier customers are subject to credit approval. Frontier reserves the right to withdraw this promotional offer at any time. Other restrictions apply.

©2013 Frontier Communications Corporation. All rights reserved.

**New Customers**

*Get started with Frontier and lock-in your price for two years!*

Enter ZIP Code	<input type="button" value="Shop Now"/>
----------------	---

Ready to order? [1-877-350-0422](#)

**Existing Customers**

For technical support, service upgrades, and account or billing questions, call 1-800-921-8101.

**[Existing Customers](#)**

# Exhibit C

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**

**Utility Information Request**

Docket Number: P522,P405/C-13-941

Date of Request: October 18, 2013

Requested From: Frontier Communications of Minnesota, Inc.

Response Due: October 30, 2013

Analyst Requesting Information: Katherine Doherty

Type of Inquiry:    ..... Financial                    ..... Rate of Return            ..... Rate Design  
                          ..... Engineering                ..... Forecasting                ..... Conservation  
                          ..... Cost of Service               ..... CIP                            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
7	<p>Please provide a copy of the training that Frontier provides to its customer service representatives with respect to negotiating and selling term agreements to customers.</p> <p><b>Objection) Frontier objects to this request to the extent it seeks information related to services or entities not regulated by the Minnesota Public Utilities Commission (“Commission”) or within the scope of the Commission’s jurisdiction.</b></p> <p><b>Answer) Service representatives receive ongoing verbal coaching regarding how to be more responsive and effective with customers. In addition, representatives have access to a variety of online resources and training materials regarding Frontier’s products and services, including Digital Phone service. See example training documents available to Frontier service representatives at Attachment Response # 7.</b></p>

Response by: Scott Bohler\_\_\_\_\_

List sources of information: \_\_\_\_\_

Title: Manager, Government and External Affairs \_\_\_\_\_

Department: Government and External Affairs\_\_\_\_\_

Telephone: (952) 491-5534\_\_\_\_\_

## Attachment for Request No. 7



**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

Issue Date: **07/09/13**

Page:

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**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

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**(DPE) Digital Phone Essentials**

**Overview** DPE offers reliable residential telephone service with popular features for customers who are looking for a product that offers exceptional value. Great for customers with low long distance usage. This product gets 30 minutes of long distance calling per month.

**Custom Value** DPE is a premier product that qualifies the customer for a Custom Value discount:

- Double Play Discount - \$5
- Triple Play Discount – \$10
- FiOS Triple Play Discount - \$15

**Applicability** DPE is available in all tariffs except the following:

State	Tariff Code	Tariff Name
GA	FAIRMOUNT	Frontier Communications of Fairmount, Inc (FAI)
GA	STATESBORO	Frontier Communications of Georgia, Inc
IL	DEPUE	Frontier Communications of DePue (DEP)
IL	ILLINOIS	Frontier Communications of Illinois
IL	LAKESIDE	Frontier Communications of Lakeside
IL	MIDLAND	Frontier Communications of Midland
IL	ORION	Frontier Communications of Orion (ORI)
IL	PRAIRE	Frontier Communications of Prairie (PRA)
IL	PULASKI	Frontier Communications of Mt. Pulaski
IL	TC700	CTC of Illinois, North (TC700)
IL	TC710	CTC of Illinois, South (TC710)
IL	SCHUYLER	Frontier Communications of Schuyler (SCH)
WV	WV	CTC of WV

**DPE Family S&E codes** [Click here](#) for S&E codes prior to Custom Value launch on 10/04/10

**DPE 2010 codes** [Click here](#) for S&E codes between 10/04/10 and 07/14/12

*Continued on next page*

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**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

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**(DPE) Digital Phone Essentials, Continued**

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**Product offering**

Digital Phone Essentials has one version and pricing for both the Leader and Challenger Markets. CERT provides details.

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**Leader – Challenger markets**

DPE - includes:

- Access line with unlimited local calling
  - Touchtone
  - EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
  - Caller ID
  - Call Waiting
  - Call Waiting ID (where available)
  - Call Forwarding
  - 3 Way Calling
  - 30 long distance Block of Time (BOT) minutes with rollover to a max of 300 minutes in a 12 month period. On month 13, rollover minutes go back to zero.
  - \$0.10/per minute overage (w/no maximum)
  - \$0.05/per minute Canada
- 

**Custom Value requirements**

- Customer must take a 1 or 2 year Price Protection Plan to receive discounts.
  - DISH Packages needed to qualify are America's Everything Pak, AT120, AT200 and AT250.
  - Security software, Frontier Secure, and Optional feature packs can be added to the above product. No additional discount will apply to the Custom Value bundle.
- 

*Continued on next page*

**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

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**(DPE) Digital Phone Essentials, Continued**

**Custom Value products & discounts**

The following table provides products required to qualify for \$5, \$10, or \$15 discount off of DPE Custom Value bundle:

<b>\$5 Discount</b>	<b>\$10 Discount</b>	<b>\$15 Discount</b>
DPE plus: <ul style="list-style-type: none"> <li>▪ Broadband</li> <li>▪ FiOS Broadband</li> <li>▪ DISH</li> <li>▪ FiOS TV</li> </ul>	DPE plus: <ul style="list-style-type: none"> <li>▪ Broadband &amp; DISH</li> <li>▪ FiOS Broadband &amp; DISH</li> </ul>	DPE plus: <ul style="list-style-type: none"> <li>▪ FiOS Broadband &amp; FiOS TV</li> </ul>

**Sales Commissions**

Commission payout for the new DPE will remain the same as the old DPE.

**Enhanced Feature Pack**

Customer can upgrade to Unlimited Features (\$2.99- UDPFT) which includes Deluxe or Family Voice Mail.

See Enhanced Feature Packs in CERT for a list of features.

**2<sup>nd</sup> line free/whole house dialing**

Customers who have the DPE and Broadband Max Custom Value products are qualified for 2nd Line Free/Whole House Dialing (WHD)

*Continued on next page*

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**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

Issue Date: **07/09/13**

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**(DPE) Digital Phone Essentials, Continued**

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**Can be sold with**

DPE can be sold with:

- Broadband (formerly High Speed Internet)
- FiOS Broadband
- DISH Network Services
- Unlimited Features with Voice Mail Pack (\$2.99- DPFFP)
- Frontier Secure products
- Stay Connected
- LifeLine
- International Calling Plans
- 2<sup>nd</sup> line free/Whole House Dialing (WHD)

**NOTE:** Former Verizon customers currently in a bundle with DirecTV should NOT be offered DISH.

---

**Can not be sold with**

DPE can not be sold with:

- Business lines or services
  - Centrex lines
  - VoIP Centrex
  - Ring Down Circuits
- 

**Vacation service**

DPE is available for :

- Vacation services
- Seasonal services
- Stay Connected

The Custom Value Discount will not be applied while on these services.

**NOTE:** Rollover minutes continue to accrue up to 300 minutes if customer goes on Seasonal or Stay Connected service.

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**Employee concessions**

Refer to Employee Concessions CORG documentation.

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**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

Issue Date: **07/09/13**

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## Long Distance Guidelines

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**PIC requirement**

30 minutes of long distance requires customer use of Frontier for both intra and interstate long distance services.

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**DPE without Frontier LD**

A customer can take the local pieces of DPE without taking Frontier for long distance. This is NOT encouraged and should not be part of the sales pitch, but it must be available ONLY if customer specifically requests it.

Consultant will need to change PIC to place the order.

**NOTE:** If order will not go in after PIC is changed, please submit a HEAT ticket.

---

**Long distance guidelines**

Following guidelines apply to DPE 30 minute BOT:

- Requires Frontier Long distance for both intra and interstate long distance service
  - Long Distance calls count towards the BOT in 1 minute increments
  - Minutes are prorated, if S&E item is not active for the full billing period
  - EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
  - Data calls are allowed and will be deducted based on usage from 30 minutes of long distance.
  - Carrier Cost Recovery Charge of 50 cents per month applies to this package.
  - Customers can rollover unused minutes month to month up to 300 minutes during a 12 month period. On month 13, rollover minutes go back to zero.
- 

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**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

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## **Long Distance Guidelines, Continued**

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**Data calls**

Long distance data calls count towards minutes used in 30-minute BOT. After 30 minutes are utilized, standard overage rates apply (\$.10/min).

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**International rates**

Following International plans can be sold with Digital Phone Essentials:

- Frontier Simply International plans
  - Standard International rates apply
  - Optional International is available for additional MRC
  - Canada calls are .05/min
-

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CUSTOMER OPERATIONS REFERENCE GUIDE

Module: **Products & Services – Custom Value**

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## Billing

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### PPP

1 or 2 Year Price Protection Plan available for Digital Phone Essentials.

The discount increases with the number of custom value products customer purchases :

- Double Play – \$5 discount
- Triple Play – \$10 discount
- FiOS Triple Play - \$15 discount

All Custom Value products will default to auto renew unless changed by CSR.

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### Electronic signature

Electronic signature is required for any PPP over 12 months.

Customer Service Representative must send Electronic Signature to customers who take a PPP.

Click Here for [Electronic Signature Email](#).

Click Here for [Electronic Signature](#).

Email address customer provides to receive Electronic Signature does not have to be Frontier's domain.

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## **Billing, Continued**

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**Early term fee** If customer agrees to a 1 or 2 year Price Protection Plan and cancels during their commitment period, a \$100.00 termination charge will be applied to customer's next bill.

Customers with multiple Frontier services carrying an ETF should not receive an ETF to exceed over \$200.00 unless otherwise specified by specialty promotions (example: laptop promotion).

**Example:** Customer has DPE, Broadband Max and POM with a 2 year PPP and cancels services after 1 year:

- System will automatically charge ETF of \$250.00
- CSR will issue credit of \$50
- Customer will receive ETF of \$200.00 on their next bill

**NOTE:** Customers with a double Play (HSI & Digital Phone Family product,) should only incur one \$50.00 early termination fee if they move out of territory. For more information regarding out of territory moves, click [here](#).

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## **Order Entry**

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**S&E codes**

See CERT for DPE S&E codes and pricing.

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**Service order charges**

Standard service order charges apply.

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**Assumptive Sales Transition Statements**

**Assumptive sales transition statements**

The following table lists sample sales transition statements.

**NOTE:** Follow CPNI Guidelines when transitioning to a sales opportunity.

<b>Customer Response</b>	<b>Sales Transition</b>
Thanks for helping me with my billing question.	Thanks for being a Frontier customer. I like to let all my customers know what's new. We rolled out an awesome package...
I don't think I'm interested in that promotion, but thanks for your help.	Before I let you go, I noticed you only have a basic line. We've rolled out a new package that is only a few dollars more and you get more!
Ok, that takes care of my long distance questions.	I noticed you spent a few dollars in long distance last month. Let me tell you about a package that can give you 30 Long Distance minutes each month....
I use my cell phone for most of my long distance.	Frontier just rolled out a new package for customers who make some long distance calls. Let me tell you about it....
Thanks, I'm just checking around for pricing right now.	If you're doing comparative shopping, I have just the right package that will fit your budget.
I just don't know if I really need unlimited long distance. I use my cell phone all the time.	You mentioned you don't make many long distance calls. We've rolled out a new package that fits your needs exactly...

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**Assumptive Sales Transition Statements, Continued**

Assumptive sales transition statements (continued)

<b>Customer Response</b>	<b>Sales Transition</b>
Do you have anything less expensive?	You mentioned the Time Warner rate. Let me tell you about the new package that easily beats that rate.
Most of my family lives in the local calling area.	Since you stated you don't make much calling, let me tell you about the new package that includes unlimited local calling...
I'd like to keep my bill as low as possible.	Starting today, Frontier has a new offer with a great rate. It's called Digital Phone Essentials; let me tell you the details.
I want to down grade. This bill is too high. My budget is tight right now.	You mentioned you want to downgrade. I can understand that especially with costs like current gas prices. I'd like to let you know we have a new package that rolled out that could fit your need to save money.
I really can't afford this right now.	Are you looking for the cheapest line? Let me tell you about a new option
I find I'm using my cell phone more than my home phone.	Many customers have a home line just for emergencies. A new discounted package has arrived that will benefit you.

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**Frequently Asked Questions**

**FAQs**

The following table lists frequently asked questions.

<b>Question</b>	<b>Answer</b>
Is there a cost of I go over my 30 minutes?	Yes Customers will be billed at \$.10 cents/min. Canada is .05 cents/min.
Can “Stay Connected” be used when a customer has Digital Phone Essentials?	Yes. Standard rates and rules apply.
Are there any areas that will not have Digital Phone Essentials?	Yes. Digital Phone Essentials will not roll out in Georgia, Legacy Illinois, West Virginia and PA Commonwealth CLEC.
Can employees get the Digital Essentials package?	Yes. Same rules apply. Employees cannot receive employee discounts if they want the offer.
How are EAS charges billed?	EAS flat rate and per minute charges are included in the package. Any existing EAS codes or calling plans will automatically be removed in CRM once new bundle is selected.

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## **(DPE) Digital Phone Essentials**

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### **Overview**

DPE offers reliable residential telephone service with popular features for customers who are looking for a product that offers exceptional value. Great for customers with low long distance usage. This product gets 30 minutes of long distance calling per month.

---

### **Custom Value**

DPE is a premier product eligible for discounting of:

- Single Play Discount - 5%
- Double Play Discount -10%
- Triple Play Discount – 15%

The percentage amount of discount provided increases with the number of Custom Value products customer selects.

---

### **Applicability**

DPE is available to residential customers in all states except:

- Georgia
  - Illinois
  - Pennsylvania Commonwealth CLEC
  - West Virginia (entire state)
  - Virginia
- 

### **DPE Family S&E codes**

[Click here](#) for S&E codes prior to Custom Value launch on 10/04/10

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### **Product offering**

There are four different versions of the DPE package.

CERT will provide quadrant assigned to each NPA/NXX.

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**(DPE) Digital Phone Essentials, Continued**

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**Quadrant 1**

DPE - Quadrant 1 includes:

- Access line with unlimited local calling
  - Touchtone
  - EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
  - Caller ID
  - Call Waiting
  - Call Waiting ID (where available)
  - Call Forwarding
  - 3 Way Calling
  - 30 long distance Block of Time (BOT) minutes with rollover to a max of 300 minutes in a 12 month period. On month 13, rollover minutes go back to zero.
  - \$0.10/per minute overage (w/no maximum)
  - \$0.05/per minute Canada
- 

**Quadrant 2**

DPE - Quadrant 2 includes:

- Access line with unlimited local calling
  - Touchtone
  - EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
  - Caller ID
  - Call Waiting
  - Call Waiting ID (where available)
  - 3 Way Calling
  - 30 long distance Block of Time (BOT) minutes with rollover to a max of 300 minutes in a 12 month period. On month 13, rollover minutes go back to zero.
  - \$0.10/per minute overage (w/no maximum)
  - \$0.05/per minute Canada
- 

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**(DPE) Digital Phone Essentials, Continued**

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**Quadrant 3**

DPE - Quadrant 3 includes:

- Access line with unlimited local calling
  - Touchtone
  - EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
  - Caller ID
  - Call Waiting
  - Call Waiting ID (where available)
  - Speed Calling 8
  - 30 long distance Block of Time (BOT) minutes with rollover to a max of 300 minutes in a 12 month period. On month 13, rollover minutes go back to zero.
  - \$0.10/per minute overage (w/no maximum)
  - \$0.05/per minute Canada
- 

**Quadrant 4**

DPE - Quadrant 4 includes:

- Access line with unlimited local calling
  - Touchtone
  - EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
  - Caller ID
  - Call Waiting
  - Call Waiting ID (where available)
  - 30 long distance Block of Time (BOT) minutes with rollover to a max of 300 minutes in a 12 month period. On month 13, rollover minutes go back to zero.
  - \$0.10/per minute overage (w/no maximum)
  - \$0.05/per minute Canada
- 

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**(DPE) Digital Phone Essentials, Continued**

**Custom Value requirements**

- Customer must take a 1, 2, or 3 year Price Protection Plan to receive discounts.
- DISH Packages needed to qualify are America’s Everything Pak, AT120, AT200 and AT250.
- Security software, POM, Optional feature packs and modems can be added to the above and would also receive the Custom Value discount.
- All services must be on the new Custom Value pricing to receive 5%, 10% or 15% discount.

**NOTE:** Effective April 15th, 2012, Custom Value Pricing discount no longer applies to Residential DISH packages AT120, AT200, AT250 and America’s Everything Pack. See **Removal of CVP Discount for Residential DISH** in this document for additional information.

**Custom Value products & percentage off**

The following table provides products required to qualify for 5%, 10% or 15% discount off of DPE discount:

5%	10%	15%
DPE	DPE plus: <ul style="list-style-type: none"> <li>• HSI Lite,</li> <li>• HSI Max or</li> <li>• DISH</li> </ul>	DPE plus: <ul style="list-style-type: none"> <li>• HSI Lite &amp; DISH or</li> <li>• HSI Max &amp; DISH</li> </ul>

**Sales Commissions**

Commission payout for the new DPE will remain the same as the old DPE.

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**(DPE) Digital Phone Essentials, Continued**

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**Removal of  
CVP Discount  
for Residential  
DISH**

Effective April 15th, 2012, Custom Value Pricing discount no longer applies to Residential DISH packages AT120, AT200, AT250 and America's Everything Pack.

CVP discounts apply to the following:

- The 15% discount still applies to Voice and Internet products when customers purchase a triple play and one of the core DISH packages listed above. A 15% discount still applies to the modem and Frontier Secure products.
- The 10% discount will still apply to Voice or Internet portion when customers purchase a double play and one of the core DISH packages listed above. A 10% discount will still apply to the modem and Frontier Secure products.

Existing customers still receive the CVP DISH discount through the length of their current Price Protection Plan (PPP). When the customer auto-renews, the CVP DISH portion of the discount will no longer be available. CVP discounts will continue on Voice and Internet.

This change occurred because the current CVP discount on the TV product is being funded monthly by Frontier, NOT DISH; and a business decision was made to retire the credit to the TV portion of the bundle. The great news for our customers is that they still receive 10% off Frontier products (Voice and Internet) and an additional 5% will be added to the voice and Internet (totaling 15%) when they purchase a triple play.

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## **Add Ons**

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### **Enhanced Feature Pack**

Customer can upgrade to Unlimited Features (\$2.99- DPFFP) which includes Deluxe or Family Voice Mail.

See Enhanced Feature Packs in CERT for a list of features.

---

### **2<sup>nd</sup> line free/whole house dialing**

Customers who have the DPE and HSI Max Custom Value products are qualified for 2nd Line Free/Whole House Dialing (WHD)

---

### **Can be sold with**

DPE can be sold with:

- High Speed Internet
- DISH Network Services
- Unlimited Features with Voice Mail Pack (\$2.99- DPFFP)
- POM
- Stay Connected
- LifeLine
- International Calling Plans
- 2<sup>nd</sup> line free/Whole House Dialing (WHD)

**NOTE:** Former VZN WV customers that are currently with DirecTV should not be offered DISH products.

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**Add Ons, Continued**

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**Can not be sold with** DPE can not be sold with:

- Business lines or services
- Centrex lines
- VoIP Centrex
- Ring Down Circuits

---

**Vacation service** DPE is available for :

- Vacation services
- Seasonal services
- Stay Connected

The Custom Value percentage off discounting will not be applied while on these services.

**NOTE:** Rollover minutes continue to accrue up to 300 minutes if customer goes on Seasonal or Stay Connected service.

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**Employee concessions** Refer to Employee Concessions CORG documentation.

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## Long Distance Guidelines

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**PIC requirement**

30 minutes of long distance requires customer use of Frontier for both intra and interstate long distance services.

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**DPE without Frontier LD**

A customer can take the local pieces of DPE without taking Frontier for long distance. This is NOT encouraged and should not be part of the sales pitch, but it must be available ONLY if customer specifically requests it.

Consultant will need to change PIC to place the order.

**NOTE:** If order will not go in after PIC is changed, please submit a HEAT ticket.

---

**Long distance guidelines**

Following guidelines apply to DPE 30 minute BOT:

- Requires Frontier Long distance for both intra and interstate long distance service
- Long Distance calls count towards the BOT in 1 minute increments
- Minutes are prorated, if S&E item is not active for the full billing period
- EAS flat rate and EAS per minute charges are included in unlimited local calling and will not count as part of the 30 long distance minutes.
- Data calls are allowed and will be deducted based on usage from 30 minutes of long distance.
- Carrier Cost Recovery Charge of 50 cents per month applies to this package.
- Customers can rollover unused minutes month to month up to 300 minutes during a 12 month period. On month 13, rollover minutes go back to zero.

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## **Long Distance Guidelines, Continued**

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**Data calls** Long distance data calls count towards minutes used in 30-minute BOT. After 30 minutes are utilized, standard overage rates apply (\$.10/min).

---

**International rates** Following International plans can be sold with Digital Phone Essentials:

- Frontier Simply International plans
  - Standard International rates apply
  - Optional International is available for additional MRC
  - Canada calls are .05/min
-



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## Billing

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### PPP

1, 2 or 3 Year Price Protection Plan available which will provide customer with a Single Play - 5% discount.

The percentage amount of discount increases with the number of custom value products customer purchases :

- Double Play – 10% discount
- Triple Play – 15% discount

All Custom Value products will default to auto renew unless changed by CSR.

**EXCEPTION:** CVP DISH portion of the discount is no longer available. CVP discounts will continue on Voice and Internet. See **Removal of CVP Discount for Residential DISH** in this document for additional information.

---

### Electronic signature

Electronic signature is required for any PPP over 12 months.

Customer Service Representative must send Electronic Signature to customers who take a PPP.

Click Here for [Electronic Signature Email](#).

Click Here for [Electronic Signature](#).

Email address customer provides to receive Electronic Signature does not have to be Frontier's domain.

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**Billing, Continued**

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**Early term fee** If customer agrees to a 1, 2 or 3 year Price Protection Plan and cancels during their commitment period, a \$50.00 termination charge will be applied to customer's next bill.

Customers with multiple Frontier services carrying an ETF should not receive an ETF to exceed over \$200.00 unless otherwise specified by specialty promotions (example: laptop promotion).

**Example:** Customer has R1 line, HSI Max and POM with a 2 year PPP and cancels services after 1 year:

- System will automatically charge ETF of \$250.00
  - CSR will issue credit of \$50.00
  - Customer will receive ETF of \$200.00 on their next bill
- 

**Bill appearance** A double asterisk (\*\*) will be located next to the Custom Value Products eligible for discounts.

Depending if customers takes a Single, Double or Triple Play Custom Value package, billing will read:

- Your 5% discount totals \$xx.xx in savings,
- Your 10% double play discount totals \$xx.xx in savings or
- Your 15% triple play discount totals \$xx.xx in savings.

DPE bundled rate will appear as a single line item on monthly billing.

DISH (existing customers that still receive the CVP DISH discount through the length of their current PPP) and HSI add ons will not roll up to single bundle price. They will appear as separate charges.

All applicable surcharges and taxes, including all interstate end user subscriber line charges, will be billed separately from and in addition to bundle rate.

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**Billing, Continued**

**Screenshot of  
billing changes**

Account Number	315/846-5865	Date of Bill	11/10/10
Amount of Last Bill			229.69
Payments Received Thru 11/10/10			.00
Balance Before Current Charges			229.69
New Charges			106.30
		<b>Total Amount Due</b>	<b>\$335.99</b>
Monthly Service from 11/10/10 to 12/09/10			
Qty Description	315/846-5865.0	Charge	
DP Nationwide Unlimited Essentials Term 9/01/10 - 8/31/11		39.99	**
High Speed Internet Lite Term 9/01/10 - 8/31/11		32.99	**
Peace of Mind HD Back Up Tech/Wire Support		12.99	**
Digital Phone Unlimited Feature Package		2.99	**
Additional Emailboxes Over 3		.00	
SE567 High Speed Internet Gateway Modem		6.99	**
<b>Total Monthly Service Charges</b>		<b>95.95</b>	
Other Charges and Credits			
Custom Value Pricing Credits		9.60CR	
<b>Total Other Charges and Credits</b>		<b>9.60CR</b>	
Items flagged with a double asterisk (**) are included in the discount amount. Your 10% double play discount totals \$9.60 in savings.			
Taxes and Other Charges			
Federal Charges			
Frontier			
Federal Tax		.38	
Federal Subscriber Line Charge		6.50	
Federal USF Recovery Charge		.88	
Frontier Com of America			
FCA Long Distance - Federal USF Surcharge		1.43	
<b>Total Federal Charges</b>		<b>9.19</b>	
State and Other Charges			
Frontier			
Carrier Cost Recovery Surcharge		.50	
Jefferson County Sales Tax		3.12	
NY Entertainment Tax		.50	
NY State Gross Receipts Surcharge		.26	
NY State Sales Tax		3.34	
Revenue Surcharge		1.69	
NY Jefferson Cnty 911 Chg		.35	
HSI Surcharge		1.00	
<b>Total State and Other Charges</b>		<b>10.76</b>	
<b>Total Taxes and Other Charges</b>		<b>19.95</b>	
		<b>TOTAL</b>	<b>106.30</b>

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**Order Entry**

**S&E codes** See CERT for DPE S&E codes and pricing.

**Service order charges** Standard service order charges apply.

**Salesforce Custom Value quadrant indicator** Salesforce will display Quadrant a customer is located within:

Overview	Billing	Adjustments	Products	Memos	Additional Info
<b>▼ Credit History</b> Account in Dispute <b>No</b>			<b>Treatment Information</b> Last Notice On 12/26/2001		
<b>▼ Heads Up Indicators</b>					
Open Red Flag	<b>No</b>	CPM Required	Yes		
Open TT's	0	At Risk to Churn			
Open SO's	0	High Value Cust	★		
HSI Capable	Yes	Propensity to Pay	🇺🇸		
Available Speed	2.824M/768K - VERIFIED	Salesworthy Deny Reason			
Fiber	No	Stay Connected Flag	No		
Quadrant	<b>2</b>				
<b>▼ Current Billing Information</b>			<b>▼ Equal Access</b>		
Past Due Info	0.00	Last Payment Date			
Amt Due > 60 Days	81.50	Last Pymnt Amt	0.00		
Last Stmt Issue Date	07/05/2010	Current Balance	81.50		
Last Stmt Issue Amt	81.50	EBPP Customer	No		
Last Stmt Due Date	07/23/2010	Block EBPP	No		
Last ADJ Amt	0.00	AutoPay is On	<input type="checkbox"/>		
Bank Draft	No	Bill Printing is On	<input type="checkbox"/>		
<b>▼ Group Billing</b>					

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**Order Entry, Continued**

**DPI Custom  
Value quadrant  
indicator**

DPI/GUI will display Quadrant a customer is located within:

The screenshot shows a web application interface for a customer inquiry. The browser title is "Subscriber Inquiry - AZ - PRDCTN - CHARLES DUDA - 9285642578". The page has a navigation menu with options like "Directory", "A/R Info", "S & E", "Phys Addr", "Credit / Prior", "Memo", "Statement", "Toll Inv", "SO Maint", "A/R Adj", and "Promos". The main content area is titled "Subscriber Inquiry - AZ - PRDCTN - CHARLES DUDA - 9285642578" and includes a "Quick View" section with "Sub Inq" and "Quad 02". The account information is displayed in a table format, including "Summary Account Info" and "Current Billing Info".

Summary Account Info		Current Billing Info	
Name	CHARLES DUDA	Past Due Information	.00
Address	PO BOX 1015	Amount Due Over 60 Days	.00
		Last Stmt Issu Dt / Amt	9/05/10 81.39
		Last Stmt Due Dt	9/23/10
Telephone Number	MEADVIEW, AZ 86444-1015 928/564-2578.0 175	Last Adjustment Amount	.00
Bill to Number	928/564-2578.0 ARIZONA EMBEDDED	Last Pymnt Dt / Amt	9/23/10 81.39
Summary Number		Current Balance	.00
Publish/Nonpublished	LN		
Service Type	R1 RESIDENCE		
Bill Cycle	05		
<b>Credit History</b>		<b>Treatment</b>	
Account Password		Last Notice on	12/26/01
Social Security Number	***** 4800		
Authorized User			
Update Credit Information		<b>Current Products</b>	
		ATTCC AT&T Calling Card	
		RUSF AZ Universal Service Fund	
		R20XX AZ 911 Funding Fee	
<b>Equal Access</b>		<b>Group Billing</b>	
Interlata Carrier	0096 Frontier Com of Amer	928/564-2578.0	
Intralata Carrier	0096 Frontier Com of Amer		
PIC Freeze	FORCED PIC		
PLOC Freeze	No PLOC Freeze		
Telephone / Reassignment Num 9285642578 0		Specials Promotions CRM Order CERT	

**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

Issue Date: **04/12/12**

Page:

**17**

**Assumptive Sales Transition Statements**

**Assumptive sales transition statements**

The following table lists sample sales transition statements.

**NOTE:** Follow CPNI Guidelines when transitioning to a sales opportunity.

<b>Customer Response</b>	<b>Sales Transition</b>
Thanks for helping me with my billing question.	Thanks for being a Frontier customer. I like to let all my customers know what's new. We rolled out an awesome package...
I don't think I'm interested in that promotion, but thanks for your help.	Before I let you go, I noticed you only have a basic line. We've rolled out a new package that is only a few dollars more and you get more!
Ok, that takes care of my long distance questions.	I noticed you spent a few dollars in long distance last month. Let me tell you about a package that can give you 30 Long Distance minutes each month....
I use my cell phone for most of my long distance.	Frontier just rolled out a new package for customers who make some long distance calls. Let me tell you about it....
Thanks, I'm just checking around for pricing right now.	If you're doing comparative shopping, I have just the right package that will fit your budget.
I just don't know if I really need unlimited long distance. I use my cell phone all the time.	You mentioned you don't make many long distance calls. We've rolled out a new package that fits your needs exactly...

*Continued on next page*

**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**  
Issue Date: **04/12/12**

Section: **Digital Phone Essentials**  
Page: **18**

**Assumptive Sales Transition Statements, Continued**

Assumptive sales transition statements (continued)

<b>Customer Response</b>	<b>Sales Transition</b>
Do you have anything less expensive?	You mentioned the Time Warner rate. Let me tell you about the new package that easily beats that rate.
Most of my family lives in the local calling area.	Since you stated you don't make much calling, let me tell you about the new package that includes unlimited local calling...
I'd like to keep my bill as low as possible.	Starting today, Frontier has a new offer with a great rate. It's called Digital Phone Essentials; let me tell you the details.
I want to down grade. This bill is too high. My budget is tight right now.	You mentioned you want to downgrade. I can understand that especially with costs like current gas prices. I'd like to let you know we have a new package that rolled out that could fit your need to save money.
I really can't afford this right now.	Are you looking for the cheapest line? Let me tell you about a new option
I find I'm using my cell phone more than my home phone.	Many customers have a home line just for emergencies. A new discounted package has arrived that will benefit you.

**CUSTOMER OPERATIONS REFERENCE GUIDE**

Module: **Products & Services – Custom Value**

Section: **Digital Phone Essentials**

Issue Date: **04/12/12**

Page:

**19**

## Frequently Asked Questions

**FAQs**

The following table lists frequently asked questions.

<b>Question</b>	<b>Answer</b>
Is there a cost of I go over my 30 minutes?	Yes Customers will be billed at \$.10 cents/min. Canada is .05 cents/min.
Can “Stay Connected” be used when a customer has Digital Phone Essentials?	Yes. Standard rates and rules apply.
Are there any areas that will not have Digital Phone Essentials?	Yes. Digital Phone Essentials will not roll out in Georgia, Illinois, West Virginia and PA Commonwealth CLEC.
Can employees get the Digital Essentials package?	Yes. Same rules apply. Employees cannot receive employee discounts if they want the offer.
How are EAS charges billed?	EAS flat rate and per minute charges are included in the package. Any existing EAS codes or calling plans will automatically be removed in CRM once new bundle is selected.
What if I accidentally quote the wrong quadrant to customer?	<p>Explain to customer: Frontier Communications Corporation is a full-service communications provider and one of the largest local exchange telephone companies in the country serving rural areas, small and medium-sized towns and cities.</p> <p>Frontier offers telephone, television and Internet services, including wireless Internet data access, and bundled offerings. We have designed quadrants to align with our geographic territory.</p>



# Exhibit D



500 IDS CENTER  
80 SOUTH EIGHTH STREET  
MINNEAPOLIS, MN 55402  
MAIN: 612.632.3000  
FAX: 612.632.4444

GREGORY R. MERZ  
ATTORNEY  
DIRECT DIAL (612) 632-3257  
DIRECT FAX (612) 632-4257  
GREGORY.MERZ@GPMLAW.COM

January 30, 2014

Via U.S. Mail

Kevin Saville  
Frontier Communications of Minnesota, Inc.  
2378 Wilshire Blvd.  
Mound, Minnesota 55364

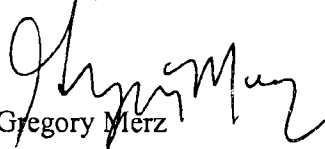
Re: In the Matter of the Farmers Mutual Telephone Company Complaint Against Frontier Communications of Minnesota, Inc. re Early Termination Fees

Dear Mr. Seville:

I enclose with this letter and serve upon Frontier Communications of Minnesota, Inc., Farmers Mutual Telephone Company's First Set of Information Requests in the above-referenced matter.

Please note that Exhibit A to the Information Requests contains information that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use, and that has been the subject of reasonable efforts on the part of Farmers Regional Telephone to maintain secrecy.

Sincerely,



Gregory Merz

GRM/sma  
Enclosures

cc: Linda Jensen  
Office of the Attorney General  
Department of Commerce  
1800 Bremer Tower  
445 Minnesota Street  
St. Paul, MN 55101

GP:3595167 v1

GRAY, PLANT, MOOTY, MOOTY & BENNETT, P. A.  
A FULL-SERVICE LAW FIRM  
MINNEAPOLIS, MN • ST. CLOUD, MN • WASHINGTON, DC  
WWW.GPMLAW.COM



500 IDS CENTER  
80 SOUTH EIGHTH STREET  
MINNEAPOLIS, MN 55402  
MAIN: 612.632.3000  
FAX: 612.632.4444

GREGORY R. MERZ  
ATTORNEY  
DIRECT DIAL (612) 632-3257  
DIRECT FAX (612) 632-4257  
GREGORY.MERZ@GPMLAW.COM

January 31, 2014

Via U.S. Mail

Assistant Attorney General  
Office of the Attorney General  
Residential Utilities Division  
1400 Bremer Tower  
445 Minnesota Street  
St. Paul, MN 55101

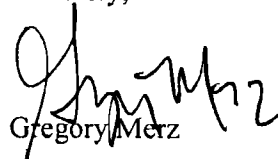
Re: In the Matter of the Farmers Mutual Telephone Company Complaint Against Frontier  
Communications of Minnesota, Inc. re Early Termination Fees

Dear Sir or Madam:

I enclose with this letter is a copy of Farmers Mutual Telephone Company's First Set of Information Requests, which were served on Frontier Communications of Minnesota, Inc., in the above-referenced matter.

Please note that Exhibit A to the Information Requests contains information that derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use, and that has been the subject of reasonable efforts on the part of Farmers Regional Telephone to maintain secrecy.

Sincerely,



Gregory Merz

GRM/sma  
Enclosures

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lang	Commissioner
Daniel Lipschultz	Commissioner
Betsy Wergin	Commissioner

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

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

**FARMERS MUTUAL TELEPHONE CO.'S  
FIRST SET OF INFORMATION REQUESTS**

TO: FRONTIER COMMUNICATIONS OF MINNESOTA, INC., AND ITS ATTORNEYS

You are hereby requested, pursuant to Minn. R. part 1400.6700, to provide written answers to the following information requests and produce responsive documents within ten business days of their service on you. To the extent that you are unable to provide the information requested within that time, please produce so much responsive information as you are able and state the date upon which you expect to be able to provide complete responses.

**DEFINITIONS**

“You” and “your,” as used in these information requests, refers to Frontier Communications of Minnesota, Inc., and any company or entity affiliated with it, as well as any person acting as an agent of any such company.

These information requests are intended to be continuing in nature. You are asked to promptly supplement your responses to any of these requests to the extent you become aware of information that makes any response inaccurate or incomplete.

For each of the following information requests, provide the names, titles and employer of the persons preparing the responses.

Responsive information that is maintained by you in electronic form should be produced in native, executable format (e.g., Excel, Word) to the extent possible.

### **INFORMATION REQUESTS**

REQUEST NO. 1 Provide copies of your responses to any information requests propounded in this case by any other party.

REQUEST NO. 2 How many Digital Phone customers do you currently have in Minnesota?

REQUEST NO. 3 How many of your current Digital Phone customers in Minnesota also receive High Speed Internet service from you or an affiliated entity?

REQUEST NO. 4 Provide copies of all contracts or agreements relating to the joint marketing of Digital Phone service and High Speed Internet service.

REQUEST NO. 5 Please provide exemplars of all advertising and promotional materials used in Minnesota to promote the sale of Digital Phone service, either by itself or in combination with any other service.

REQUEST NO. 6 For how many of your current Digital Phone customers in Minnesota do you have an electronic acknowledgement of the customer's acceptance of the terms and conditions of service?

REQUEST NO. 7 For each year from January 1, 2011, through the present, state the number of Minnesota Digital Phone customers that you have discontinued providing service to because the customer has failed to provide an electronic acknowledgement of the customer's acceptance of the terms and conditions of service?

REQUEST NO. 8 Describe, and provide documentation reflecting, any of your policies, procedures or practices regarding the discontinuance of service to customers who have failed to provide an electronic acknowledgment of the customer's acceptance of the terms and conditions of service.

REQUEST NO. 9 For each year from January 1, 2011, through the present, how many Minnesota Digital Phone customers were charged an early termination fee?

REQUEST NO. 10 In each year from January 1, 2011, through the present, for how many Digital Phone customers who were charged an early termination fee did you have electronic acknowledgment of the customer's acceptance of the terms and conditions of service?

REQUEST NO. 11 For each year from January 1, 2011, state the amount, in dollars, of early termination fees paid by Minnesota Digital Phone customers relating to their Digital Phone service.

REQUEST NO. 12 For each year from January 1, 2011, state the amount, in dollars, of early termination fees charged to Minnesota Digital Phone customers relating to their Digital Phone service that was not collected.

REQUEST NO. 13 For each year from January 1, 2011, state the amount, in dollars, of early termination fees paid by Minnesota Digital Phone customers relating to High Speed Internet service.

REQUEST NO. 14 For each year from January 1, 2011, state the amount, in dollars, of early termination fees charged to Minnesota Digital Phone customers relating to High Speed Internet service that was not collected.

REQUEST NO. 15 Do you have a policy requiring that you have an electronic acknowledgment of a customer's acceptance of the terms and conditions of service BEFORE the

customer may be billed for an early termination charge? If so, please provide documentation that evidences, reflects, refers, or relates to such policies.

REQUEST NO. 16 Describe, and provide documentation reflecting, any of your policies, procedures or practices regarding determining whether a Digital Phone customer has provided an electronic acknowledgment of the customer's acceptance of the terms and conditions of service BEFORE billing that customer for an early termination charge.

REQUEST NO. 17 How do you document a Digital Phone customer's acceptance of the terms and conditions of service if the customer does not have Internet service?

REQUEST NO. 18 For each year from January 1, 2011, through the present, how many Minnesota Digital Phone customers have disputed being charged an early termination fee?

REQUEST NO. 19 Describe, and provide documentation reflecting, any of your policies, procedures or practices regarding the handling of customer disputes regarding early termination charges.

REQUEST NO. 20 Describe, and provide documentation reflecting, any of your policies, procedures or practices regarding collection of early termination fees from customers who have not paid by the date when such fees are due.

REQUEST NO. 21 Describe, and provide documentation reflecting, any of your policies, procedures or practices regarding whether to waive early termination fees.

REQUEST NO. 22 For the period January 1, 2011, through the present, provide copies of all documents that evidence, refer, or relate to any complaint or dispute received from a Minnesota Digital Phone customer regarding early termination fees.

REQUEST NO. 23 For the period January 1, 2011, through the present, provide copies of all documents that evidence, refer, or relate to any complaint or dispute received from a Minnesota Digital Phone customer regarding automatic contract renewals.

REQUEST NO. 24 For the period January 1, 2011, through the present, provide copies of all correspondence with the Minnesota Attorney General's Office, Minnesota Public Utilities Commission, and/or Minnesota Department of Commerce concerning early termination charges.

REQUEST NO. 25 For the period January 1, 2011, through the present, provide copies of all correspondence with the Minnesota Attorney General's Office, Minnesota Public Utilities Commission, and/or Minnesota Department of Commerce concerning automatic contract renewals.

REQUEST NO. 26 Describe, and provide documentation reflecting, changes made to any of your policies, procedures or practices regarding early termination fees as a result of the investigation by the New York Attorney General that is referred to in the Verified Complaint at Paragraph 14.

REQUEST NO. 27 Any documents evidencing, referring or relating to any internal communications since January 1, 2009, regarding early termination fees.

REQUEST NO. 28 Any documents evidencing, referring or relating to any internal communications since January 1, 2009, regarding automatic contract renewals.

REQUEST NO. 29 For each of the customers listed on the attached Trade Secret Exhibit A, please provide documentation of the customer's acceptance of the terms and conditions of service.



Dated: January 30, 2014

GRAY, PLANT, MOOTY, MOOTY  
& BENNETT

By: \_\_\_\_\_

  
Gregory R. Merz

500 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402-3796  
Telephone: (612) 632-3257  
Facsimile: (612) 632-4257  
Gregory.merz@gpmlaw.com

ATTORNEYS FOR FARMERS MUTUAL  
TELEPHONE COMPANY

GP:3592111 v1

STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger  
David C. Boyd  
Nancy Lang  
J. Dennis O'Brien  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

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

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

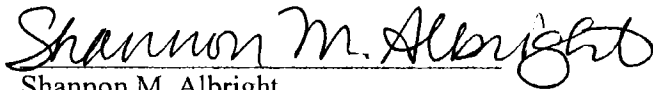
**CERTIFICATE OF SERVICE**

I, Shannon M. Albright, hereby certify that I have this day, served copies of *Farmers Mutual Telephone Company's First Set of Information Requests* upon the person(s) listed below:

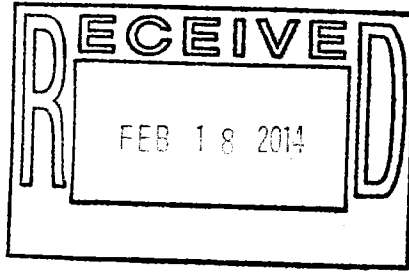
Assistant Attorney General  
Office of the Attorney General  
Residential Utilities Division  
1400 Bremer Tower  
445 Minnesota Street  
St. Paul, MN 55101

by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

Dated this 31st day of January, 2014

  
Shannon M. Albright

# Exhibit E



VIA U.S. MAIL

February 14, 2014

Gregory Merz  
GRAY, PLANT, MOOTY & BENNETT, P.A.  
500 IDS Center  
80 South Eighth Street  
Minneapolis, Minnesota 55402

**RE: In the Matter of the Farmers Mutual Telephone Company Complaint Against Frontier Communications of Minnesota, Inc., re: Early Termination Fees  
Docket No. P-522, 405/C-13-941**

Dear Mr. Merz:

Frontier Communications of Minnesota, Inc. ("Frontier") is in receipt of your client, Farmers Mutual Telephone Company's First Set of Information Requests dated January 30, 2014. As you are aware, Frontier has filed a Motion for Reconsideration of the pending matter with the Minnesota Public Utilities Commission ("Commission") and does not intend to respond to any Discovery until the Commission has addressed our Motion.

Please contact me if you have any questions.

Sincerely,

Kevin Saville  
Vice President & Associate General Counsel  
2378 Wilshire Blvd.  
Mound, Minnesota 55364  
Tel: 952-491-5564  
Fax: 952-491-5577  
Kevin.Saville@FTR.com

cc: Linda Jensen  
Office of the Attorney General  
Department of Commerce  
1800 Bremer Tower  
445 Minnesota Street  
St. Paul, Minnesota 55101



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-941_C-13-941
Robert E.	Cattanach	cattanach.robert@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_13-941_C-13-941
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_13-941_C-13-941
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-941_C-13-941
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-941_C-13-941
Gregory R.	Merz	gregory.merz@gpmlaw.com	Gray, Plant, Mooty	80 S 8th St Ste 500  Minneapolis, MN 55402-5383	Electronic Service	No	OFF_SL_13-941_C-13-941
Kevin	Saville	kevin.saville@fr.com	Citizens/Frontier Communications	2378 Wilshire Blvd.  Mound, MN 55364	Electronic Service	No	OFF_SL_13-941_C-13-941