

# Attachment 2

Docket No. P405-P407/CI-18-  
122

Department Comments

Jan. 4, 2019

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: February 27, 2018  
Citizens Telecommunications Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General Response Due: March 9, 2018  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 1  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

- a. Minn. Rule 7810.1200 requires utilities to keep a record of all complaints received from its customers, including the name and address of the customer, the date and nature of the complaint, and its disposition and date. The utility is required to keep records of customer complaints in such a manner as will enable it to review and analyze its procedures and actions.

Please explain in detail how Citizens Telecommunications Company of MN, LLC, and Frontier Communications of Minnesota, Inc. (collectively referred to as Frontier/Citizens in these Information Requests unless noted otherwise) records complaints.

**Response)**

Complaints received from outside agencies (such as the PUC or the FCC) are recorded in a Frontier system called Unisys. The Unisys system is used to track and retain customer information related to the complaints (such account number, contact information including address), copies of the original complaint received from the agency, and the Frontier responses. In addition, direct interactions with the customer related to these complaints are recorded in the account notes component of our customer records systems and are therefore available for review if the customer contacts Frontier at a later date with questions or concerns.

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To be completed by responder

Response Date: 3/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: February 27, 2018  
Citizens Telecommunications Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General Response Due: March 9, 2018  
Requested by: Bonnie Johnson/Diane Dietz  
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- b. Please outline the criteria Frontier/Citizens uses to determine whether a customer's communication is considered a complaint. For example, if a customer contacts the company and complains about a bill, the company determines it made an error and the company corrects the problem or bill, does Frontier/Citizens consider that a complaint and keep a record of the incident?

**Response)**

Any complaints received by an outside agency such as the PUC is considered a complaint. A customer request or question is not a complaint. In the example proffered, Frontier would not necessarily consider this event as a complaint. The customer questioned a billing matter, and Frontier determined the customer was correct. The matter would be resolved promptly and directly to the customer's satisfaction.

Frontier representatives record the particulars of all direct customer interactions in the account notes component of our customer records systems. An interaction does not have to be classified as a complaint to receive this treatment.

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To be completed by responder

Response Date: 3/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

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**Request Number:** 2  
Topic: NA  
Reference(s): NA

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**Request:**

For the calendar year 2017, please identify all customer complaints received by Frontier/Citizens for regulated services and service bundles that include a regulated service. Provide the complaints in the same format used by Frontier, which enables it to review and analyze its procedures and actions.

**Response)**

This material is still being collected, and will be provided in response when collection is complete.

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To be completed by responder

Response Date: 3/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 4/24/2018  
Citizens Telecommunications Company of MN, LLC Response Due: 5/4/2018  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 11  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

The Department understands that Frontier bills all customers one month in advance for local service.

- a. Since local service is billed in advance, if a customer terminates service in the middle of the billing period, is a customer provided a bill credit for the unused portion of the billing period?
- b. If a customer subscribes to both local and long distance service from Frontier, does Frontier postpone providing any bill credit owed to the customer for the unused portion of the billing period prior to the final bill being prepared that includes post-paid services, such as long distance?
- c. Do other long distance service providers bill customers via Frontier's bill?
- d. If another long distance service provider bills a customer via the Frontier bill for local service, does Frontier wait for that long distance carrier to provide billing information before Frontier can provide the customer with a final bill?
- e. If another long distance service provider bills a customer via the Frontier bill, and the customer terminates service from both Frontier for local service and the other carrier for long distance service, how long may it take for that other carrier to provide Frontier will billing information?
- f. Of Frontier's residential customers for all services, what percentage purchase local telephone service?
- g. What percentage of residential customers are billed per minute rates for long distance service?

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To be completed by responder

Response Date:  
Response by:  
Email Address:  
Phone Number:

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 4/24/2018  
Citizens Telecommunications Company of MN, LLC Response Due: 5/4/2018  
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Type of Inquiry: General  
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Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
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Answer)

- a. It is Frontier policy to provide a bill credit in instances when a customer terminates local service in the middle of the billing period
- b. In such instances, it is Frontier policy to postpone processing a local service bill credit to allow for long-distance and/or 3rd party services charges to post.
- c. Yes, other long distance providers bill via Frontier bills.
- d. Yes.
- e. It can take up to 60 days for other long distance providers to provide billing information.
- f. As of December 2017, approximately 70% of Frontier's residential customers purchased local telephone service from Frontier.
- g. This material is being researched, and will be provided as a supplemental response when it is available.

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To be completed by responder

Response Date:  
Response by:  
Email Address:  
Phone Number:

**Minnesota Department of Commerce  
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---

Answer)

- g. Approximately 57% of Frontier's residential customers are billed per minute rates for long distance service.

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To be completed by responder

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Request Number: 12  
Topic: NA  
Reference(s): NA

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Please identify all steps taken by Frontier after the Commission initiated its investigation (February 12, 2018) to address the concerns/problems identified in all those complaints filed with the Commission regarding Frontier. Include with your response any additional investment made and the specific areas receiving that investment. **This request is continuing; please supplement your response once per month until this docket is closed.**

Answer)

With respect to the complaints filed with the Commission, Frontier has investigated the circumstances and particulars of each complaint and responded to the specific customer concern. Those responses included the application of bill credits for service interruptions, correction of billing errors, remediation of facility issues, etc.

Regarding Frontier's operations as a whole, several actions have been taken. Frontier has revisited its processes for receiving and responding to customer complaints, including focusing its complaint intake and tracking functions, acknowledgement of receipt of complaints, and instituting new processes to track the investigation and response to complaints.

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**Request Number:** 13  
Topic: NA  
Reference(s): NA

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Section V of the Frontier AFOR entitled Service Quality outlines Frontier's service quality standards and customer remedies. Specifically, E (2) of Section V (Customer Remedies) states that:

If Frontier fails to reinstate basic primary residential service within 48 hours and basic primary business service within 24 hours of the outage or a later date requested by the customer for the repair to be made, for Company reasons, Frontier will provide the customer a pro rata adjustment (i.e., 1/30<sup>th</sup>) of the monthly recurring charge for the first two days (Residential) and one day (Business) that there is a service outage. Frontier shall provide the customer \$5 for each day thereafter that the Residential customer is out-of-service and \$10 for each day the Business customer is out-of-service.

Describe in detail Frontier's process for ensuring compliance with out of service remedies. Provide all internal work papers and training materials related to this process.

Answer)

Within the week after month-end, a senior analyst runs a list of all trouble tickets closed in the previous month and flags those that potentially qualify for a credit. The next step is to review the tickets to verify there was a no-dial tone condition as a result of failure on the Frontier network and that the time-to-repair exceeded 24 hours. Time-to-repair is measured from the date/time the trouble was reported to the date/time the trouble was cleared. Finally, a pro-rata adjustment is calculated based on the monthly regulated charge for voice service, along with any additional daily credits that may apply. A spreadsheet with all customer credits is passed to another team who administers the credit to the customer bill.

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See attached policy, "Frontier Policy MN customer credits.pdf".

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To be completed by responder

Response Date:  
Response by:  
Email Address:  
Phone Number:

## Overview

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### **Purpose**

This section describes Frontier's obligations to provide bill credit as it relates to service quality. Obligations may arise from language in the tariffs/product guides or state rule/statute/order. Sometimes the company is required to automatically provide credit to the customer without requiring the customer to request credit. Other times, the obligation kicks in upon a customer's request for credit.

Credits are sometimes referred to as Performance Guarantees.

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### **Applicability**

All credits/Performance Guarantees are tied to service quality for dial tone service provisioned either on copper or fiber (FTTP or FiOS). VoIP is excluded. Video and high speed internet are excluded.

Credit/Guarantee does not include nor apply to any service, feature, or product that is offered, provided, made available, or subject of a separately negotiated contract, understanding, or agreement.

Credit/Guarantee does not apply to non-dial tone or secondary line services.

Frontier is not obligated to provide credit on services that are already paid for.

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*Continued on next page*

## Minnesota Guidelines

**Description**

Out of Service (OOS): A credit for an out of service dial tone condition exceeding 24 hours from the time the trouble is reported.

Missed Repair or Installation Appointment: A credit for missing an appointment to repair dial tone service or to install primary line dial tone service.

Repeat: A credit for when a customer experiences a second network trouble on the dial tone line within 30 days.

**Public Utility Commission (PUC)/Tariff**

Public Utility Commission (PUC)/Tariff	Type of Service Guarantee
Alternative Form of Regulation Plan	<u>Residential</u> Out of Service > 48 hours <u>Business</u> Out of Service > 24 hours
	Missed Repair or Installation Appointment
	Same Trouble Repeat within 30 days

**Process**

The customer does not need to request a credit; customer credits are automatically issued through Regulatory and the Offline groups.

*Continued on next page*

## Minnesota Guidelines, Continued

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### Exclusions

Out of Service (OOS): The following are ineligible for credit:

- Repair appointments set by the customer past 24 hours.
- Troubles resulting from the negligent or willful act of the customer.
- Troubles resulting from customer equipment, including inside wire.

Missed Repair or Installation Appointment: The following are ineligible for credit:

- Installation or repair appointments that were missed due to the customer.
- Repairs that resulted from the customer's willful or negligent act, from inside wire or customer owned equipment, payphone troubles or emergency situations.
- Missing installation appointments for non-dial tone or secondary line service.

Repeat: The following are ineligible for credit:

- Repeats that resulted from the customer's willful or negligent act, from inside wire or customer owned equipment, payphone troubles or emergency situations.
-

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 4/25/2018  
Citizens Telecommunications Company of MN, LLC Response Due: 5/7/2018  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 16  
**Topic:** NA  
**Reference(s):** NA

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Section V of the Frontier AFOR entitled Service Quality outlines Frontier's service quality standards and customer remedies. Specifically, E (2) of Section V (Customer Remedies) states that:

If Frontier fails to reinstate basic primary residential service within 48 hours and basic primary business service within 24 hours of the outage or a later date requested by the customer for the repair to be made, for Company reasons, Frontier will provide the customer a pro rata adjustment (i.e., 1/30<sup>th</sup>) of the monthly recurring charge for the first two days (Residential) and one day (Business) that there is a service outage. Frontier shall provide the customer \$5 for each day thereafter that the Residential customer is out-of-service and \$10 for each day the Business customer is out-of-service.

Email correspondence between Frontier representative Cindy McConaghy and the CAO staff Tracy Smetana in CAO complaint Case# 69442 regarding [Confidential Customer Identifying Information Redacted] July 9, 2017 out of service condition complaint states, in part:

From: McConaghy, Cindy <Cindy.Mcconaghy@FTR.com>  
Sent: Thursday, July 20, 2017 7:53 AM  
To: staff, cao (PUC)  
Subject: RE: MN PUC 69442-TS [Confidential Customer Identifying Information Redacted]

*Continued on next page*

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To be completed by responder

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Response by:  
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Phone Number:

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Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
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Good Morning Tracy,

[Confidential Customer Identifying Information Redacted] is in a **Common Cause grouped with 45 other customers** that are out of service due to a lightning strike to some equipment.

The Local Manager and his team are working to restore all customers.

I will get you a final resolution once the service is restored and credits have been issued. (Emphasis added)

Frontier's Local Manager has confirmed that [Confidential Customer Identifying Information Redacted] service was restored on 7/17/17.

Frontier contacted [Confidential Customer Identifying Information Redacted] on 7/20/17 and he also confirmed service was restored. He was advised that the service issue was due to a lightning strike to Frontier equipment.

**Frontier advised that a \$15.00 adjustment for time out of service had been issued** and would generate on his 7/22/17 billing statement.

**The responsive email from CAO to Frontier states in part:**

Hi Cindy,

Since his service was out for one week, the credit should be more – a prorated credit for the first 2 days, then \$5/day after that.

AFOR Customer Remedies  
2. Out of Service

*Continued on next page*

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If Frontier fails to reinstate basic primary residential service within 48 hours and basic primary business service within 24 hours of the outage or a later date requested by the customer for the repair to be made, for Company reasons, Frontier will provide the customer a pro rata adjustment (i.e., 1/30th) of the monthly recurring charge for the first two days (Residential) and one day (Business) that there is a service outage. Frontier shall provide the customer \$5 for each day thereafter that the Residential customer is out-of-service.

Tracy Smetana, Consumer Affairs Office  
Minnesota Public Utilities Commission

**The responsive email from Frontier to CAO states in part**

Tracy,  
I have issued an additional \$25 to [Confidential Customer Identifying Information Redacted] billing statement for a total of \$40.00.

a. Frontier is required to provide the AFOR credit without a request to do so. The CAO had to request the credit for this customer. Identify all 45 customers that were out of service for 19 days due to a lightning storm that damaged equipment. Provide copies of all bills that show Frontier timely provided credit in the appropriate amount to all customers impacted by the "Common Cause" ticket.

Answer)

As reported in response to Department of Commerce IR#4, there were 24 reported troubles associated with the common event on July 8, 2017. The 45 count indicates potential lines impacted, but only 24 customers reported a trouble. Of the 24 reported troubles, 7 were troubles on broadband service and do not qualify for an automatic credit. The other 17 tickets were for voice service. Upon investigation, it was determined that those 17 tickets were closed out by the technician with an erroneous cause code which identified the troubles as being "customer caused". In general, "customer caused" troubles do

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Requested From: Scott Bohler  
Citizens Telecommunications Company of MN; LLC  
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Nonpublic  Public  
Date of Request: 4/25/2018  
Response Due: 5/7/2018

Type of Inquiry: General

Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
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not qualify for a credit, and in the credit processing system are eliminated from review for an automated credit. Thus, the customers did not get credits at that time. However, we are in the process of issuing appropriate credits to those customers. The customers are identified as follows:

Confidential Customer Identifying Information Redacted

Billing First Name	Billing Last Name	Telephone Number

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**Request Number:** 18  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

What process does Frontier use to create rehab reports?

Answer)

The DCR process is a formal on-line submission process to identify and report defective cable issues which was established by Frontier in 2010. When a local operations technician becomes aware of an area of cable trouble, they create an on-line DCR submission. The reporting form has required fields that the technician fills out including the exchange, cable size and gauge, type of cable, cable number and count, lead/grid number, location address, physical section length, electrical section length, shield fault, pairs in trouble, testing equipment used, etc. Once this required information is filled in, the technician submits the DCR and automatic emails regarding the submitted DCR are sent to the technician entering the submission, their manager, the local engineer, and the engineering manager. Once the DCR submission is received by network engineering, it is reviewed to ensure proper testing was completed on the cable in question. If improper or insufficient testing was performed, the submission is sent back to the local technician for the required testing to be performed. When the DCR submission has met all requirements, network engineering then begins the engineering review. This review includes reviewing trouble ticket history on the cable and looking for noted defective cable pairs in the cable. If the engineering review indicates that cable replacement is necessary, network engineering will then engineer the required capital project and request approval of the capital funds needed to complete the project.

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Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 32  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

Minnesota Statute § 237.11 states: "Every telephone company subject to the provisions of this chapter, wherever organized, shall keep an office in this state, and make such reports to the department as it shall from time to time require."

The Frontier AFOR plan (Docket No. P405/AR-14-735), and Citizens AFOR plan (Docket No. P-407/AR-15-388) included the requirement to report on five service quality standards described in Section V, C (Standards) of the AFOR. The Department requests monthly reports on two service quality standards that were incorporated into the Frontier and Citizens AFOR plans, specifically, time intervals for restoration of repair service (Section V, C, ii) and answer time (Section V, C, v). The Department requests a report with the same information, level of detail, and format as was/is reported under the AFOR plans.

The Department has access to reports through December 2017 for Citizen's and February 2018 for Frontier. Thus, the Department requests reports from Frontier for starting with the month of March 2018, and each month hereafter, during the term of this investigation. The Department requests reports from Citizen's for the month of January 2018, and each month hereafter, during the term of this investigation. The reports should be provided monthly for the previous month by the 15<sup>th</sup> day of the following month, or the following business day if the 15<sup>th</sup> day of the month falls on a weekend or holiday.

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To be completed by responder

Response Date: May 23, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

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Answer)

Frontier agrees to provide the previous month's AFOR service quality report. Attached are January through April 2018 results for CTC-MN, and March and April 2018 for Frontier-MN.

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To be completed by responder

Response Date: May 23, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

# CTC Minnesota Summary Results

	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18
<b>Out of Service Tickets</b>	<b>95.3%</b>	<b>94.6%</b>	<b>97.8%</b>	<b>99.0%</b>	<b>97.1%</b>	<b>97.0%</b>	<b>91.8%</b>	<b>95.4%</b>	<b>99.1%</b>	<b>96.7%</b>	<b>96.6%</b>	<b>95.2%</b>
restored	305	263	269	192	329	263	247	474	452	467	455	413
total	320	278	275	194	339	271	269	497	456	483	471	434

  

<b>Answer Time (ASA)</b>	<b>348</b>	<b>156</b>	<b>441</b>	<b>247</b>	<b>154</b>	<b>113</b>	<b>64</b>	<b>55</b>	<b>85</b>	<b>90</b>	<b>156</b>	<b>198</b>
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**Request Number:** 33  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

For each calendar year from 2013 through 2018, provide the number of outside network technicians Frontier employed who perform repair and installation duties in Minnesota, for all Frontier products/services.

Provide the information by the geographic area to which the technicians are assigned and identify the geographic area. Please specify the number of technicians who are assigned to perform repair, the number assigned to perform installation, and the number who are assigned to perform both repair and installation work. If technicians are assigned to specific products/services, specify the number for each type of product or service.

Answer)

Frontier technicians are trained and enabled to perform all types of outside plant work including repair, installation, and maintenance for all Frontier services. There are no specific technicians dedicated to only one type of work or particular service. See following table for numbers and locations of technicians.

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To be completed by responder

Response Date: May 23, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: May 22, 2018  
Citizens Telecommunications Response Due: June 1, 2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 38  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

Does the central office that serves Marine on St. Croix have a back-up power generator on site in the event the electric company serving the area has a power outage? If the answer is no, how does Frontier maintain service to its customers in this area in the event of a power outage?

**Answer)**

The site does not have a permanent back-up power generator on site. Portable generators are available to be brought to the site to provide power in the event of a commercial power outage.

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To be completed by responder

Response Date: June 1, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122      Nonpublic Public  
Requested From: Scott Bohler      Date of Request: 6/7/2018  
Citizens Telecommunications Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General      Response Due: 6/18/2018  
  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 39  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

On May 17, 2018, the Department received an inquiry from a customer asking why Frontier began charging a new \$1.99 monthly recurring fee entitled "Internet Infrastructure Surcharge" beginning in March of 2018. The Department sent a request for Frontier to contact the customer to explain the charge. In an email to the customer dated May, 24, 2018, Sharon Armstrong, a Frontier Executive Customer Relations representative, stated "The Internet Infrastructure Surcharge is not a government tax or government surcharge. ***This fee is to defray some of the costs of maintenance of the local network.***" (Emphasis added)

- a. Is the surcharge applied to only customers who purchase internet access service?
- b. Define what constitutes the "local network" in Ms. Armstrong's statement?
- c. Does the \$1.99 monthly charge referred to as the "internet infrastructure surcharge" apply to customers who purchase only telephone service?
- d. What date did Frontier implement this surcharge in Minnesota?
- e. A consumer reported their concern that the surcharge is a result of the Commission's investigation. Is this true?
- f. Has an Internet Infrastructure Surcharge been implemented across all states where Frontier provides service in a manner identical to its implementation in Minnesota?
- g. If not, please identify the states in which the charge has been implemented and those where it has not been implemented, and describe the differences in implementation, if any.
- h. If the surcharge applies to any telecommunications service, please provide all information from which the reasonableness of the surcharge can be determined.

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To be completed by responder

Response Date: June 18, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534



**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 6/7/2018  
Citizens Telecommunications Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General Response Due: 6/18/2018  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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Answer)

Frontier objects to this request on the basis that it seeks information beyond the Commission's and Department's jurisdiction as the Internet Infrastructure Surcharge only applies to Internet access service, which is an interstate service not regulated by the Commission.

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To be completed by responder

Response Date: June 18, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 6/7/2018  
Citizens Telecommunications Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General Response Due: 6/18/2018  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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Answer)

While maintaining its previously expressed objection to this request on the basis that it seeks information beyond the Commission's and Department's jurisdiction as the Internet Infrastructure Surcharge only applies to Internet access service (which is an interstate service not regulated by the Commission), Frontier responds to the specific questions:

- a. The Internet Infrastructure Surcharge applies only to customers who purchase internet access service.
- b. Components of the "local network" in Ms. Armstrong's statement would include electronics used to provide internet service as well as the facilities used to house, power, and protect those electronics. In addition, this would include the transport facilities used to transit internet traffic between the customer and Frontier's central offices and between central offices and major internet peering locations.
- c. The Internet Infrastructure Surcharge does not apply to customers who purchase only telephone service.
- d. The Internet Infrastructure Surcharge was implemented in November 2017.
- e. The implementation of the Internet Infrastructure Surcharge is entirely unrelated to Docket 18-122.
- f. Frontier has implemented the Internet Infrastructure Surcharge across all states where Frontier provides service as it has been implemented in Minnesota.
- g. N/A.
- h. The Internet Infrastructure Surcharge does not apply to any telecommunications service.

---

To be completed by responder

Response Date: November 8, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 6/7/2018  
Citizens Telecommunications Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General Response Due: 6/18/2018  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 40  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

Information Request No. 38 asked Frontier "Does the central office that serves Marine on the St. Croix have a back-up power generator on site in the event the electric company serving the area has a power outage? If the answer is no, how does Frontier maintain service to its customers in this area in the event of a power outage?" Frontier responded that "The site does not have a permanent back-up power generator on site. Portable generators are available to be brought to the site to provide power in the event of a commercial power outage."

- a. Are there other central offices in Minnesota, remote or otherwise, that do not have a permanent back-up power generator on site?
- b. If so, identify those central offices.
- c. How does Frontier learn of a commercial power outage?
- d. Describe in detail the process Frontier follows when commercial power is lost in a central office with no permanent back-up power generator on site, including whether Frontier immediately delivers a portable generator to the site so customers do not lose the ability to dial 911. Provide all training materials associated with this process.
- e. Does Frontier notify customers served by a central office that does not have permanent back-up power generator on site that there is no back-up power?
- f. Provide all communications with public safety agencies or other third parties relating to the practices of Frontier regarding the use of portable generators, and all documents demonstrating the reasonableness of the practice.

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To be completed by responder

Response Date: June 18, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 6/27/2018  
Citizens Telecommunications Response Due: 7/9/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

---

**Request Number:** 44  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

- A. Regarding the technician(s) referenced in your response to DOC IR 16, please provide all trouble tickets on which this technician worked and closed with a cause/fault code during June 1, 2017 to September 1, 2017.
- B. In Frontier's review of the above referenced tickets, does Frontier believe that the tickets are accurately coded?

**Answer)**

- A. Relevant trouble tickets are attached.
- B. Frontier has reviewed these tickets and believes the technician's coding is generally accurate. However, our review of the treatment of the July troubles in the Wyoming exchange revealed a different error. A reference table in the data warehouse assigned the wrong description to fault code 8. The fault code was erroneously tagged as "customer action", thus excluding the ticket from receiving an automated credit. Frontier is reviewing all the codes in each clearing code reference table to ensure they are accurate and will also identify and grant credits for other tickets that were excluded from automated credits based on a fault code of 8.

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To be completed by responder

Response Date: July 18, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 6/27/2018  
Citizens Telecommunications Response Due: 7/9/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 46  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

Frontier stated in response to DOC IR 16 that the "45 count indicates potential lines impacted, but only 24 customers reported a trouble" regarding an outage.

In a table similar to that provided in Frontier's response to DOC IR 16, provide the billing first name, billing last name and telephone number, for the 21 customers who were potentially impacted by the outage but Frontier said did not open a trouble ticket. Include in your response all communications with the 21 customers during the month of July 2017 that Frontier did not include in its response to DOC IR 42.

Answer)

Upon further investigation, Frontier has determined that 43 customers did report trouble in that July event. 17 customers reported trouble related to voice service, the remainder reported trouble related to internet service. The actual number of lines impacted in the event was 43, not the 45 potentially impacted as mentioned previously.

The billing first name, billing last name, and telephone number of all 43 customers are shown in the following table. Communications with all these customers was previously provided in response to IR #42.

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To be completed by responder

Response Date: July 18, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 7/23/2018  
Citizens Telecommunications Response Due: 8/2/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

---

**Request Number:** 48  
Topic: NA  
Reference(s): NA

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**Request:**

What percentage of Frontier's customers that purchase internet service from Frontier, also purchase local phone service from Frontier, in the state of Minnesota?

Answer)

As of June 30, 2018, approximately 60% of Frontier's Minnesota internet service customers also purchase local telephone service from Frontier.

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To be completed by responder

Response Date: July 31, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

Minnesota Department of Commerce  
Information Request

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 7/26/2018  
Citizens Telecommunications Response Due: 8/6/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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Request Number: 49  
Topic: NA  
Reference(s): NA

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**Request:**

Frontier's May 7, 2018 response in DOC IR 16 stated that "Upon further investigation it was determined that those 17 tickets were closed out by the technician with an erroneous cause code which identified the troubles as being "customer caused". Frontier's July 18, 2018 response to DOC IR 44B stated in part, "However, our review of the treatment of the July troubles in the Wyoming exchange revealed a different error. A reference table in the data warehouse assigned the wrong description to fault code 8. The fault code was erroneously tagged as "customer action", thus excluding the ticket from receiving automated credit. **Frontier is reviewing all the codes in each clearing code reference table to ensure they are accurate and will also identify and grant credits for other tickets that were excluded from automated credits based on a fault code of 8.**" (Emphasis added)

1. During what time period has the reference table in the data warehouse been assigning the wrong description to fault code 8?
2. Will Frontier review the tickets excluded for the same time period as when the error has occurred?
3. Who at Frontier is conducting the review?
4. Does this error impact all residential and business customers? If not, what set or subset of customers did this error impact?
5. Describe in detail Frontier's process for identifying trends, system issues or training issues. For example in this case the Public Utilities Consumer Affairs Office advised Frontier's executive consumer affairs office that Frontier did not apply the appropriate AFOR credit for

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To be completed by responder

Response Date: August 9, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 7/26/2018  
Citizens Telecommunications Response Due: 8/6/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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out of service. Please explain why, as a result of this escalation, the Frontier representative did not request a review to determine why the credit was not applied.

Answer)

1. It appears the changes occurred within the past two years.
2. Yes, Frontier will endeavor to review excluded troubles back to the point when codes were changed.
3. Director of Regulatory Compliance
4. This error would impact both residence and business customers.
5. Frontier management and supervisory personnel regularly monitor employee performance and service outcomes. Service results are tracked and reviewed monthly. See following response to Office of Attorney General Information Request #6.

In light of the circumstances of this July 2017 outage, Frontier is reviewing the eligibility of customers for service outage credits both related to the July 2017 outage and previous trouble tickets as mentioned above.

---

To be completed by responder

Response Date: August 9, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534



OAG No. 6

**State Of Minnesota  
Office Of The Attorney General  
Utility Information Request**

*In the Matter of a Commission Inquiry into the Service Quality, Customer Service, and Billing Practices of Frontier Communications.* **MPUC Docket No.** P407, 405/CI-18-122

Requested from:  
Scott Bohler

<b>By:</b>	Joseph A. Dammel	<b>Date of Request:</b>	March 9, 2018
<b>Telephone:</b>	(651) 757-1061	<b>Due Date:</b>	March 21, 2018

---

Reference: Minn. R. § 7810.5000.

Does Frontier conduct a regularly-scheduled review of its service? If so, provide all meeting agendas and notes related to this review for the past five years. If not, describe how Frontier reviews its performance of service quality obligations.

Answer)

See response to Request 5 which includes Frontier's service performance under its AFOR plans for the last five years. Frontier's operations group reviews service performance results on an on-going regular basis throughout various groups and levels of the operations organization. Generally, most of these reviews are accomplished via telephone due to the geographic spread of Frontier's service areas and personnel. The service results of various areas and personnel are evaluated against benchmarks for metrics that address a wide variety of service aspects. These metrics include the items specifically identified in the AFOR plan, which are included in the response to Request #5. Local managers meet with technicians daily to properly allocate workload for the day, and review performance. Local managers meet with the state director three times per week to review service performance and address needs to reallocate workforce to areas with higher volumes. The state director meets with the regional operations vice president to review service performances and plan for any changes or modifications in procedures to assist in improving service outcomes. Attached is an example of a report used by the operations group with specific personnel information and rankings redacted.

**Response by Scott Bohler**  
**Title Manager**  
**Department Government and External Affairs**  
**Telephone (952) 491-5534**

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122      Nonpublic Public  
Requested From: Scott Bohler      Date of Request: 7/26/2018  
Citizens Telecommunications      Response Due: 8/6/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

---

**Request Number:** 50  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

The following questions concern the customers referenced in DOC IRs 42 and 46 who were impacted by the July 7, 2017 outage referenced in DOC IRs 4, 16, and 34. Frontier has stated that the July 7, 2017 outage was a result of a lightning strike and both local phone service and internet access were impacted (not working).

In its response to DOC IR 42, Frontier provided the June, July and August 2017 bills and a portion of the trouble report associated with the July 7, 2017 outage. The Department reviewed the bills to identify local phone service and internet access customers only. The customer may have also had other services on their bills that are not mentioned here.

In its response to DOC IR 46, Frontier identified 43 residential customers and no business customers impacted by the outage. Of the 43 residential customers Frontier identified:

- 31 customers have both local phone service and internet. Of these 31 customers, 12 customers had a report code associated with local phone service. The remaining 19 customers had a report code associated with DSL on the trouble ticket, but no indications in the trouble report that the local phone service was not working.
- 7 customers purchase local phone service only. All tickets had a report code associated with local phone service.
- 5 customers had internet access service only. All tickets had a report code of DSL.

---

To be completed by responder

Response Date: August 9, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 7/26/2018  
Citizens Telecommunications Response Due: 8/6/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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- a. Confirm that no business customers, or additional residential customers, were impacted by this outage.
- b. Please provide the telephone number a Minnesota residential customer calls to report a trouble on their local phone service. If there are multiple telephone numbers, provide them all.
- c. For the number(s) provided in b, please provide a detailed response explaining every VRU prompt and the options provided for each, until no options remain.
- d. Is there a different phone number a customer should call to report internet trouble?
- e. Does Frontier's system allow a customer who calls to report a trouble, to report that both their local phone service and internet access are not working, or is the customer required to choose either local phone service or internet access when selecting an option.
- f. For the 19 customers whose trouble report shows a report code of DSL, did Frontier provide these customers the appropriate AFOR out of service credit because the customer had no local phone service? If your answer is "no", state when the credit will be provided.
- g. Do Frontier's processes and systems allow for the appropriate AFOR credit for local phone service when the report code is DSL but the local phone service is also not working?
- h. If the answer to (g.) is no, does the Frontier representative taking the trouble ticket information review the customer's account for all services the customer purchases from Frontier and ask the working status of such services?
- i. If the answer above is yes, is it Frontier's policy to change the report code to reflect the local phone service and not the DSL report code? If no, provide a detailed explanation why not.
- j. If the answer to (h.) is no, is the customer provided any information advising the customer they need to open the ticket on the local phone service to get the credit for which the customer is entitled when purchasing more than one service?

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To be completed by responder

Response Date: August 9, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 7/26/2018  
Citizens Telecommunications Response Due: 8/6/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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Answer)

- a. Frontier records do not show any business customers or additional residential customers impacted by the event.
- b. (800) 921-8104; (800) 376-6843.
- c. Frontier's VRU system is currently in a state of flux, with modifications in capability, functions, and interface being made on a weekly basis. That improvement process is continuing, and is expected to continue for some time yet. As a result, there is no definitive documentation available at this time that describes the particulars of the VRU system as it operates at this point in time.
- d. No.
- e. A customer has an option to report both that internet access and voice service are not working. In cases where both services are reported as not working, a specific ticket type is placed on the ticket.
- f. In cases where the customer's local service was not reported to be impacted, an AFOR out of service credit would not be provided.
- g. A customer may report that both DSL and voice services are not working. When this is the case, a specific ticket type is placed on the ticket and the customer is eligible for service credit under the AFOR. If just the DSL is reported not working, a different ticket type is assigned and credit under the AFOR plan would not apply.
- h. The response to g is yes.
- i. A customer may report that both DSL and voice are impacted on the same ticket. Therefore, Frontier does not need to change report codes.
- j. A customer may report that both DSL and voice are impacted on the same ticket.

---

To be completed by responder

Response Date: August 9, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 8/30/2018  
Citizens Telecommunications Response Due: 9/10/2018  
Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number: 51**  
Topic: NA  
Reference(s): NA

---

DOC IR 12 asks for Frontier to "Please identify all steps taken by Frontier after the Commission initiated its investigation (February 12, 2018) to address the concerns/problems identified in all those complaints filed with the Commission regarding Frontier. Include with your response any additional investment made and the specific areas receiving that investment. **This request is continuing; please supplement your response once per month until this docket is closed.**"

On May 4, 2018, Frontier responded:

"With respect to the complaints filed with the Commission, Frontier has investigated the circumstances and particulars of each complaint and responded to the specific customer concern. Those responses included the application of bill credits for service interruptions, correction of billing errors, remediation of facility issues, etc.

Regarding Frontier's operations as a whole, several actions have been taken. Frontier has revisited its processes for receiving and responding to customer complaints, including focusing its complaint intake and tracking functions, acknowledgement of receipt of complaints, and instituting new processes to track the investigation and response to complaints."

*(Continued on next page)*

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To be completed by responder

Response Date: September 10, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

---

**Request:**

- a. For the complaints filed by Frontier customers with the Commission in the course of this investigation, including public comments and using the Commission's online "speak up" forum, identify each customer and all actions taken by Frontier regarding the customer's concerns. Please indicate whether the customer's concern is resolved, and provide any documents showing that the concern has or has not been resolved.
- b. As to Frontier's response that "Frontier has revisited its processes for receiving and responding to customer complaints, including focusing its complaint intake and tracking functions, acknowledgement of receipt of complaints, and instituting new processes to track the investigation and response to complaints," state in specific detail the changes that were made, and provide any documents demonstrating the changes that were made.

**Answer)**

- a. Attached are Frontier's responses to complaints filed by Frontier customers with the Commission during this investigation.
- b. Frontier has clarified with Public Utility Commission staff and Department of Commerce staff that all complaints should be sent to Frontier's common "consumer.affairs@ftr.com" mailbox. Adherence to this process will ensure that any complaints sent to Frontier will be received by the relevant personnel. Frontier has designated one person to be the point of contact for all Minnesota complaints, overseeing the complaint response process. This person responds to the agency submitting a complaint, acknowledging Frontier's receipt of the complaint. Records are made to track the receipt of complaints from agencies, and responses provided by Frontier. This person also monitors the status of responses to complaints, to make sure that responses are prepared and submitted in a timely fashion. Finally, all proposed responses are reviewed and approved to ensure consistent and appropriate complaint responses for all customers.

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To be completed by responder

Response Date: September 10, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122      Nonpublic Public  
Requested From: Scott Bohler      Date of Request: 9/17/18  
Citizens Telecommunications      Response Due: 9/27/18  
Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 53  
Topic: NA  
Reference(s): NA

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In response to DOC IR 1(a)(b), Frontier stated that complaints received by an outside agency, such as the PUC or FCC, are recorded in a system called Unisys and are considered a complaint for purposes of Minn. Rule 7810.1200. DOC IR 2 requested complaints for the calendar year 2017. DOC IR 51 asked Frontier to provide the complaints filed by Frontier customers with the Commission in the course of this investigation, including public comments and using the Commission's online "speak up" forum, and to identify each customer and all actions taken by Frontier regarding the customer's concerns.  
Request:

- a. Provide all complaints Frontier tracked in Unisys or any other record keeping system since January 1, 2017 that were not previously provided to the Department. Include the original communication from the State or Federal agency, or any third party (e.g. The Better Business Bureau) from which the complaint originated, and the response sent to the State or Federal agency, third party or the customer. All documents provided should be in an unaltered form and not redacted. If not contained in the documents provided, state the customer name, address, telephone number, the date the complaint was received, the date the incident(s) took place, when the complaint was resolved, and whether the customer was a customer of Frontier Communications of Minnesota Inc. or Citizens Telecommunications of Minnesota, LLC.

**This request is ongoing and should be supplemented monthly until the proceeding has concluded.**

*(Continued on next page)*

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To be completed by responder

Response Date: September 28, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

- b. Frontier provided what appear to be partially redacted documents in its Response to DOC IR 51. For each complaint Frontier provided in its response to DOC IR 51, supplement the response with the original communication from the State or Federal agency, or any third party (e.g. The Better Business Bureau) from which the complaint originated, and the response sent to the State or Federal agency, third party or the customer. All documents provided should be in an unaltered form and not redacted. If not contained in the documents provided, state the customer name, address, telephone number, the date the complaint was received, the date the incident(s) took place, when the complaint was resolved, and whether the customer was a customer of Frontier Communications of Minnesota Inc. or Citizens Telecommunications of Minnesota, LLC.

Answer)

- a. This material relating to 2017 was supplied in response to the Department's IR #2 in March, 2018. Material relating to 2018 activity is being gathered, and will be provided at a later date.
- b. See attached material in "*IR 53b.pdf*" file.

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To be completed by responder

Response Date: September 28, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534



**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122                      Nonpublic Public  
Requested From: Scott Bohler                              Date of Request: 9/19/2018  
Citizens Telecommunications                              Response Due: 10/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 55  
**Topic:** NA  
**Reference(s):** NA

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Regarding Frontier's policy, processes and trouble ticket management for voice and internet access services:

**Request:**

- a. Provide the local and toll free number Frontier makes available to residential customers to report trouble on the customer's voice service. If there are Voice Response Unit (VRU) options associated with opening a trouble ticket, identify all questions and potential response options.
- b. Provide the local and toll free number Frontier makes available to business customers to report trouble on the customer's voice service. If there are VRU options associated with opening a trouble ticket, identify all questions and potential response options.
- c. Provide the local and toll free number Frontier makes available to residential customers to report trouble on the customer's internet service. If there are VRU options associated with opening a trouble ticket, identify all questions and potential response options.
- d. Provide the local and toll free number Frontier makes available to business customers to report trouble on the customer's internet service. If there are VRU options associated with opening a trouble ticket, identify all questions and potential response options.
- e. If a residential or business customer needs to report that both the voice and internet service is not working, does Frontier open two trouble tickets?

*(Continued on next page)*

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To be completed by responder

Response Date: October 6, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 9/19/2018  
Citizens Telecommunications Response Due: 10/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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- i. If the answer is no, is the ticket opened on the voice service, the internet service, or with a trouble code that identifies a bundle of services? If there is a separate trouble code for a voice and internet bundle, what is it?
- ii. Are there any instances when a customer's voice service is out of service but there is no repair ticket for the voice service?

Answer)

- a. (800) 921-8104; (800) 376-6843. Frontier's VRU system is currently in a state of flux, with modifications in capability, functions, and interface being made on a weekly basis. That improvement process is continuing, and is expected to continue for some time yet. As a result, there is no definitive documentation available at this time that describes the particulars of the VRU system as it operates at this point in time.
- b. (800) 921-8104; (800) 376-6843. Frontier's VRU system is currently in a state of flux, with modifications in capability, functions, and interface being made on a weekly basis. That improvement process is continuing, and is expected to continue for some time yet. As a result, there is no definitive documentation available at this time that describes the particulars of the VRU system as it operates at this point in time.
- c. (800) 921-8104; (800) 376-6843. Frontier's VRU system is currently in a state of flux, with modifications in capability, functions, and interface being made on a weekly basis. That improvement process is continuing, and is expected to continue for some time yet. As a result, there is no definitive documentation available at this time that describes the particulars of the VRU system as it operates at this point in time.

---

To be completed by responder

Response Date: October 6, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 9/19/2018  
Citizens Telecommunications Response Due: 10/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

---

d. (800) 921-8104; (800) 376-6843. Frontier's VRU system is currently in a state of flux, with modifications in capability, functions, and interface being made on a weekly basis. That improvement process is continuing, and is expected to continue for some time yet. As a result, there is no definitive documentation available at this time that describes the particulars of the VRU system as it operates at this point in time.

- e. No, both voice and internet troubles can be reported on one ticket.
- i. If the customer informs the Frontier representative that both their internet and voice services are out of service, the Frontier representative will open a voice service ticket.
  - ii. An unreported voice service outage would not be captured on a repair ticket. When the customer informs a Frontier representative that their voice service is out of service, a repair ticket for the voice service is entered.

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To be completed by responder

Response Date: October 6, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

Minnesota Department of Commerce  
Division of Energy Resources  
Information Request

Docket Number: P405, 407/CI-18-122      Nonpublic Public  
Requested From: Scott Bohler      Date of Request: 9/20/2018  
Company of MN, LLC      Response Due: 10/1/2018  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address (es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 58  
Topic: NA  
Reference(s): NA

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**Request:**

In Docket No. P-522, 405/C-13-941, the "Commission Order Dismissing Complaint" included a settlement dated October 14, 2014 that was agreed to by Farmers, Frontier, and the Department (2014 Settlement). The 2014 Settlement requires Frontier to do the following:

- 1) With respect to new customers, Frontier will provide notice clarifying the terms of the agreement (such notice subject to review by DOC). Frontier will also file a tariff addressing the conditions under which Early Termination Fees (ETFs) will apply.
- 2) Frontier will provide additional training to its customer service representatives to aid them in explaining to customers the terms of their agreements with Frontier.
- 3) Frontier will post terms and conditions to its website clarifying which services in a bundle are associated with ETFs and will specify that a customer can opt out of any portion of a bundle without being held responsible for an ETF that applies to other portions of the bundle.

**Request:**

Provide all documentation that shows compliance with the 2014 Settlement including:

- 1) the notice Frontier provides new customers clarifying the terms of agreement, and how that notice is given;

*(Continued on next page)*

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To be completed by responder

Response Date: October 6, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405, 407/CI-18-122                       Nonpublic    Public  
Requested From: Scott Bohler                              Date of Request: 9/20/2018  
Company of MN, LLC    Response Due: 10/1/2018  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address (es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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- 2) all documents relating to the training Frontier gives to its customer service representatives that aid the representatives in explaining to customers the terms and conditions of their agreements with Frontier; and
- 3) links to all tariffs that discuss ETFs and how that ETF applies to portions of a bundle; and links to the portion of Frontier's website(s) that has the terms and conditions that clarify which services in a bundle are associated with ETFs and that specifies that a customer can opt out of any portion of a bundle without being held responsible for an ETF that applies to other portions of the bund

Answer)

1. Currently, the auto-renew feature is not included when customers subscribe to new term plans. As a result, the content of the customer bill message notice has changed to:

"You are currently subscribing to a term plan for [TERM PLAN NAME], which provides you a discount on your long distance services for [LENGTH OF TERM]. If you prematurely terminate this plan, an Early Termination Fee of [ETF AMOUNT] will apply."

In addition, each monthly bill of a customer in a term plan identifies the service subject to a term plan, the beginning and ending dates of that term plan, and information regarding any early termination fee liability.

2. See attached files "*Minnesota Customers - Early Termination Fees.pdf*", "*Early Termination Fee (ETF) - Residential.pdf*", and "*Early Termination Fee (ETF) - Business.pdf*".
3. The Citizens Telecommunications Company of Minnesota and Frontier Communications of Minnesota local tariffs are available online at this link:

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To be completed by responder

Response Date: October 6, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405, 407/CI-18-122       Nonpublic    Public  
Requested From: Scott Bohler      Date of Request: 9/20/2018  
Company of MN, LLC      Response Due: 10/1/2018  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address (es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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<http://carrier.frontiercorp.com/crtf/tariffs/index.cfm?fuseaction=local&sctnID=6&stateID=MN>

The following offerings of Citizens Telecommunications Company of Minnesota may involve an ETF and are all found in Tariff #3:

-Frontier Choices Tier Bundles;	Section 4, page 8 and following
-FrontierWorks Small Business Solutions;	Section 4, page 13 and following
-FrontierWorks Small Business Connections;	Section 4, page 24 and following
-Frontier Small Business Advantage;	Section 4, page 35 and following
-Frontier OneVoice;	Section 4, page 85 and following
-Frontier Commercial Voice Unlimited;	Section 4, page 87 and following.

The following offerings of Frontier Communications of Minnesota may involve an ETF and are all found in Tariff #2:

-Versaline;	Section 2, page 1 and following
-Frontier Choices Tier Bundles;	Section 6, page 3 and following
-FrontierWorks Small Business Solutions;	Section 6, page 8.2 and following
-FrontierWorks Small Business Connections;	Section 6, page 37 and following
-Frontier Small Business Advantage;	Section 6, page 49 and following
-Frontier OneVoice;	Section 6, page 115 and following
-Frontier Commercial Voice Unlimited;	Section 6, page 118 and following.

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To be completed by responder

Response Date: October 6, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405, 407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 9/20/2018  
Citizens Telecommunications Response Due: 10/1/2018  
Company of MN, LLC  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address (es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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**Request Number:** 59  
**Topic:** NA  
**Reference(s):** NA

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**Request:**

For the time period of January 1, 2015 to present:

- a. Identify each Minnesota customer who was required to pay an ETF to Frontier, even though the customer did not have a signed written agreement. As to each customer, provide the customer name, service address, contact telephone number, the contact email address, the amount of the termination fee charged, the services provided to the customer, and which service the ETF applied to. Also provide the notice that was provided to the customer clarifying the terms of agreement and specify how that notice was given to each customer.
- b. For each person identified in response to the above, identify which customers were referred to a collection agency for late or non-payment, and describe the outcome of the collection referral.

**Answer)**

- a. A written paper document is not the only vehicle by which a customer can provide consent to a term service agreement. Electronic and verbal acceptance of agreements are equally valid methods. Verbal acceptance is verified via a third-party entity. As a policy, Frontier does not assess an ETF unless it believes the customer has agreed to the term service plan, and therefore is liable for an ETF in the case of premature termination of that agreement. The attached document identifies information regarding customers that were charged an ETF from January 2016 through September 2018. Regarding notice provided to customers regarding term plans, see previous response to Department of Commerce Information Request #58.
- b. See attached document.

Minnesota Department of Commerce  
Division of Energy Resources  
Information Request

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 9/26/18  
Citizens Telecommunications Response Due: 10/8/18  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson/Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us/diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880/651-539-1876

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Request Number: 61

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**Request:**

The September 11, 2018 issue of the *Pipestone Star* newspaper contains an article entitled "Public hearings taking comments on Frontier Communications." This article states that the "Jasper City Council Members lodged a complaint to Frontier in February after indicating at a council meeting that they'd heard complaints from residents and in some cases, had their own complaints. The council sent Frontier a letter detailing those complaints, which included 'severe interruptions with phone, cable and internet service' and indicated that support tickets were created but closed by Frontier without resolving the issue, 'leaving customers without service for days on end.'" The letter from the Jasper City Council also raised issues about Frontier's failure to maintain its pedestal boxes.

Please provide copies of all documents related to the subject of the complaint filed by the Jasper City Council. For purposes of this IR, "documents" includes, but is not limited to, transcripts of oral communications, information received from or provided to the Jasper City Council; all communications (other than payments) received by Frontier on or after January 1, 2016 from customers receiving service in the City of Jasper who had service concerns of the type referenced in the complaint filed by the Jasper City Council, together with all records of Frontier related to each such concern including, but not limited to, all repair tickets, notes recorded in customer records and any other record related to the handling or resolution of these customer service concerns. Also, include any record of Frontier's work to restore the service cabinets, pedestals, or outside plant referenced in the complaint.

Finally, confirm whether this complaint was recorded in Unisys.

Answer)

Frontier is unaware of any letter being sent by the Jasper City Council, and cannot locate any such letter in its files.

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To be completed by responder

Response Date: October 9, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534



**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 10/22/2018  
Citizens Telecommunications Response Due: 11/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number: 62**

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DOC IR Nos. 4, 16, 34, 42, 44 and 46 all relate to a "common cause event" that occurred in July of 2017 in the Wyoming exchange due to a lightning strike.

The Department reviewed, for the Wyoming exchange, for July 2017, the CTC Minnesota Summary Results, January 2017 – December 2017 Schedule 4 Out of Service Troubles within 24 hours Wyoming July 2017 (Wyoming 24 hour report). In the Wyoming 24 hour report, Frontier reported 22 troubles, with 20 of the 22 troubles cleared within 24 hours, for a percentage of 90.9%.

Frontier's Response to DOC IR No. 4 stated that although 45 people were impacted by the July of 2017 outage, only 24 opened tickets and the majority were for "internet access".

Frontier's Response to DOC IR No. 16 stated that 24 tickets were opened and 7 were for "broadband".

Frontier's Response to DOC IR No. 46 stated: "Upon further investigation, Frontier has determined that 43 customers did report trouble in that July event. 17 customers reported trouble related to voice service, the remainder reported trouble related to internet service. The actual number of lines impacted in the event was 43, not the 45 potentially impacted.

Frontier's Response to DOC IR No. 42 included bills for the 43 customers referenced in Frontier's Response to DOC IR No. 46.

*(Continued on next page)*

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To be completed by responder

Response Date: 11/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce**  
**Division of Energy Resources**  
**Information Request**

Docket Number: P405-P407/CI-18-122                       Nonpublic  Public  
Requested From: Scott Bohler                              Date of Request: 10/22/2018  
Citizens Telecommunications                              Response Due: 11/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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The Department has reviewed the records Frontier provided in its Response to DOC IR No. 42 and those records show that during the July 2017 outage, of the 43 customers: 5 customers had only internet access service, 31 customers had both telephone and internet access and 7 customers had only voice service. This shows that, because this was a complete outage, **38 customers had no voice service** from July 8, 2017 to July 21, 2017, when Frontier fixed the problem.

The following questions relate to the information above.

**Request:**

1. Does Frontier use the term "internet access" in response to DOC IR No. 4 and "broadband" in response to DOC IR No. 16 interchangeably? If the response is no, provide in detail the reasons the two different terms were used.
2. Using the same format, and including the same information, as Frontier provided in its Response to DOC IR No. 44 a, provide the information for all 43 tickets involved in the July 2017 common cause event.
3. Frontier's response to DOC IR No. 46 confirms that at least 17 of the 38 people reported an outage for voice service in the July 2017 event. Yet, Frontier stated, on its Wyoming 24 hour report, that only 2 repairs were not resolved within 24 hours. Explain this discrepancy in detail. Provide all documents relating to the 17 reports and subsequent repair. Provide all documents relating to Frontier's statement on its Wyoming 24 hour report, that only 2 repairs were not resolved within 24 hours.

*(Continued on next page)*

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To be completed by responder

Response Date: 11/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 10/22/2018  
Citizens Telecommunications Response Due: 11/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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4. Please state whether any of the 22 troubles reported on Wyoming 24 hour report for July of 2017 in the Wyoming exchange were related to the July 2017 common cause event, and, if so for each trouble, identify where the trouble appears in the response to 2. Above.
5. 38 Wyoming customers had no telephone service during the July 2017 outage. Frontier states only 17 voice tickets were open. For the remaining 21 customers with a voice service outage, did Frontier record and report on its Wyoming 24 hour report that the telephone service was not working from July 8, 2017 to July 21, 2017? If not:
  - a. Explain in detail why those 21 voice service outages were not reported on its Wyoming 24 hour report.
  - b. Provide all documents related to preparation of Wyoming 24 hour report, including, but not limited to: internal guidance documents showing how such reports are generally to be prepared, all communications regarding preparation of the Wyoming 24 hour report and all other documents regarding Frontier's analysis of data reported in the Wyoming 24 hour report.
  - c. Identify the individual(s) who generally prepares reports such as the Wyoming 24 hour reports, and who prepared the specific Wyoming 24 hour reports for July 2017 for the Wyoming exchange.
  - d. Please provide all information and documents that Frontier believes shows that the 38 customers who had no telephone service during the July 2017 Wyoming outage had access to emergency services such as 911, fire departments, ambulances, hospitals, and police departments.

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To be completed by responder

Response Date: 11/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

Minnesota Department of Commerce  
Division of Energy Resources  
Information Request

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 10/22/2018  
Citizens Telecommunications Response Due: 11/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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Answer)

1. In its responses, Frontier has used the terms "internet access" and "broadband" interchangeably.
2. See attached document, "*Response to IR #62(2).pdf*".
3. The customers that the Department points to in this question are a subset of the 43 customers included in the July 2017 common cause event. As Frontier has noted, the 43 tickets associated with the common cause event in July 2017 were initially understood as being the result of a customer-caused action. Pursuant to the provisions of Frontier's AFOR regarding service quality reporting, outages caused by customer activity are excluded from the monthly OOS reporting. See attached document "*Response to IR #62(2).pdf*" for information regarding the 43 common cause tickets. See attached document "*Response to IR #62(3).pdf*" for information on the 22 tickets included in the July 2017 reporting.
4. None of the 22 troubles reported in the Wyoming OOS report for July 2017 were related to the July 2017 common cause event.
5. Those customers were not included in the July 2017 Wyoming OOS report.
  - a. The customers that the Department points to in this question are a subset of the 43 customers included in the July 2017 common cause event. As Frontier has noted, the 43 tickets associated with the common cause event in July 2017 were initially understood as being the result of a customer-caused action. Pursuant to the provisions of Frontier's AFOR regarding service quality reporting, outages caused by customer activity are excluded from the monthly OOS reporting.

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To be completed by responder

Response Date: 11/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce**  
**Division of Energy Resources**  
**Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 10/22/2018  
Citizens Telecommunications Response Due: 11/1/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- b. There are no internal guidance documents that address the preparation of the service quality reporting related to the AFOR metrics. Beyond the material previously provided in response to DOC IR Nos. 4, 16, 34, 42, 44 and 46, no additional communications bearing on the preparation or analysis of the July 2017 Wyoming OOS results have been found.
- c. Cassandra Guinness.
- d. Frontier does not have information or documentation regarding which customers had access to emergency services during this period. Similarly, Frontier does not have information or documentation of which customers did not have access to emergency services during this period.

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To be completed by responder

Response Date: 11/9/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 11/2/2018  
Citizens Telecommunications Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number: 63**

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In response to DOC IR 33, Frontier provided a table with the number of outside network technicians employed who perform repair and installation duties from 2013 through 2018 to date. Frontier stated that Frontier technicians are trained and enabled to perform all types of outside plant work including repair, installation, and maintenance for all Frontier services.

At the Lakeville public hearing Frontier employee, Mr. Mark Doffing, provided testimony stating that some of the outside network technician duties are being assigned to outside network technician "contract workers". Specifically, Mr. Doffing states that "In the more rural areas of southern Minnesota, two outside technicians are now doing the job that used to be done by eight. That's one central office tech for the main central office down there and then one outside tech for the whole town of Fairmont. We have put in some contractors as a safety net just to help get service to people, but we're looking for CWA members, we're looking for front line employees to replace those positions." (See Lakeville 2 PM and 6 PM full size PDF, p. 30, lines 15-24)

**Request:**

- a. Using the table Frontier provided in its response to DOC IR 33, state the number of technicians identified that are outside network technician contract workers and the number of technicians that are Frontier employees, for each Reporting Center and Geographic Coverage area.
- b. In a separate table, provide the number of hours worked per month for each year by the Frontier network technicians and the outside network technician contract workers. If there are multiple contract workers, provide the information separately for each outside network technician contract worker.

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To be completed by responder

Response Date: 11/15/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122       Nonpublic    Public  
Requested From: Scott Bohler      Date of Request: 11/2/2018  
Citizens Telecommunications      Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- c. Describe in detail the resources, such as an employment agency, or other vendor that Frontier uses to obtain its outside network technician contract workers.
- d. Describe in detail the training Frontier provides for its outside network technician contract workers, or the training these workers receive elsewhere.
- e. Do outside network technician contract workers receive the same wages as Frontier outside network technician employees? If not, what is the average wage of CWA outside network technicians, and the average wage of outside network technician contract workers?

Answer)

- a. All the technicians identified in Frontier's response to DOC IR 33 are Frontier employees. Frontier began using contract workers in June 2018. Since that time, a total of 11 contract workers have been utilized. See attached file "*Response to Request 63a.pdf*".
- b. Due to a change in systems used to record hours, information regarding the hours worked by month by Frontier technicians is only available for 2017 and 2018. See attached file "*Response to Request 63b.pdf*". Frontier has a single source provider contract with Butler Telecommunications to provide skilled and trained contract workers. Contract workers are not paid directly by Frontier. Rather, Frontier compensates Butler Telecommunications based on the number and type of jobs completed. That compensation to Butler Telecommunications covers a number of costs that Butler incurs in completing jobs: employee wages, vehicles, equipment, overheads, etc. Frontier is not privy to the specific wages that Butler Telecommunications provides its employees.
- c. See response to (b) above.
- d. Frontier does not provide training to contract workers. Butler Telecommunications provides workers fit and ready to complete the jobs assigned, and provides those workers with the

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To be completed by responder

Response Date: 11/15/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/2/2018  
Citizens Telecommunications Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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necessary skills, tools and vehicles. Frontier is not aware of the specific training history of the contract workers.

- e. Frontier does not pay the contract workers directly and is not aware of the specific wages paid by Butler Telecommunications. Therefore, a comparison of employee versus contract wages is not possible.

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To be completed by responder

Response Date: 11/15/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534



Reporting Center	2013	2014	2015	2016	2017	2018	2018 contractors	Geographic Coverage
Atwater/Hector	3	3	3	3	3	2		Belgrade, Elrosa, Raymond, Prinsburg, Atwater, Hector, Cosmos, Lake Lillian, Kandyohi, Svea
Wheaton	1	1	1	1	1	1		Wheaton, Herman
Canby	3	3	3	3	3	3		Canby, Madison, Dawson, St Leo, Ivanhoe, Porter
Slayton	4	3	3	3	3	3		Balaton, Currie, Avoca, Iona, Leota, Edgerton, Lake Wilson, Chandler, Slayton
Clarkfield	3	3	3	3	3	2		Clarkfield, Boyd, Hazel Run, Hanley Falls, Cottonwood, Ghent, Lynd
Tyler	2	2	1	1	1	1		Tyler, Hardwick, Jasper, Arco
Worthington	5	5	5	6	6	4	1	Worthington, Ellsworth, Adrian, Bigelow, Okabena, Lakefield
Mt. Lake	3	2	1	2	2	1	1	Mountain Lake, Odin, Ormsby, Comfrey, Delft, Butterfield
Fairmont	8	6	7	7	7	4	3	Fairmont, East Chain, Ceylon, Welcome, Sherburn, Trimont, Truman, Northrop, Lewisville
Watertown	9	9	7	8	9	9		Watertown, Mound, Delano, Maple Plain, St Bonifacius, Mayer, New Germany
LeCenter	10	9	10	9	9	8		LeCenter, Janesville, Elysian, Waterville, Kilkenny, Montgomery, Jordan, Belle Plaine, Henderson, Arlington, Green Isle
Cannon Falls	12	11	11	10	9	9	1	Cannon Falls, Kenyon, Wanamingo, West Concord, Byron, Dodge Center, Claremont, Blooming Prairie, Ellendale, Clarks Grove, Hollandale, Hayfield, Brownsdale, Dexter, Kiester, Alden, Lyle, Adams, Leroy
Lakeville	29	27	25	25	25	24	1	Lakeville, Apple Valley, Burnsville, Farmington, Rosemount
Wyoming	10	9	9	9	9	8		Wyoming, Almelund, Taylor Falls, Lindstrom, Scandia
Milaca	9	8	8	8	8	7		Milaca, Clear Lake, Clearwater, Pease, Onamia, Garrison, Malmo, Isle, Wahkon
McGregor	10	9	9	8	8	5	1	McGregor, Kimberly, McGrath, Finlayson, Askov, Nickerson, Sturgeon Lake, Denham, Kettle River, Wright, Cromwell, Gateway, Palisade, Jacobson, Warba, Floodwood, Brookston, Alborn, Meadowlands
Warren	3	3	3	3	3	2		Warren, Alvarado, Oslo, Argyle, Stephen, Kennedy, Hallock
International Falls	5	5	5	5	5	5	1	International Falls, Big Falls, Little Fork, Ericsburg, Ranier, Kabetogama, Greaney, Bear River
Ely	12	12	13	11	11	10	2	Ely, Two Harbors, Crane Lake, Tower, Embarrass, Aurora, Hoyt Lake, Palo, Babbitt
Totals	141	130	127	125	125	108	11	

\* All technicians are Combo techs

Minnesota Department of Commerce  
Division of Energy Resources  
Information Request

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/2/2018  
Citizens Telecommunications Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number: 64**

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Frontier's May 7, 2018 response to DOC IR No. 16 stated: "Upon further investigation it was determined that those 17 tickets were closed out by the technician with an erroneous cause code which identified the troubles as being "customer caused". Frontier's July 18, 2018 response to DOC IR No. 44B stated in part, "However, our review of the treatment of the July troubles in the Wyoming exchange revealed a different error. A reference table in the data warehouse assigned the wrong description to fault code 8. The fault code was erroneously tagged as "customer action", thus excluding the ticket from receiving automated credit. **Frontier is reviewing all the codes in each clearing code reference table to ensure they are accurate and will also identify and grant credits for other tickets that were excluded from automated credits based on a fault code of 8.**" (Emphasis added)

Questions in DOC IR No. 49 included: (1) during what time period has the reference table in the data warehouse been assigning the wrong description to fault code 8, and (2) will Frontier review the tickets excluded for the same time period as when the error has occurred? Frontier responded that (1) It appears the changes occurred within the past two years, and (2) Yes, Frontier will endeavor to review excluded troubles back to the point when codes were changed.

**Request:**

- a. Confirm the exact date this change occurred and the exact date the error was corrected.
- b. Provide all documents showing the results of Frontier's review of the "excluded troubles back to the point when the codes were changed" referenced in Frontier's response to DOC IR No. 49 (2), including, but not limited to, the customer name, address, phone number, trouble ticket number and a copy of the bill confirming each customer received the credit owed to the customer, and a copy of the communications sent to affected customer explaining the error and the credit.

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To be completed by responder

Response Date: 11/20/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 11/2/2018  
Citizens Telecommunications Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

---

Answer)

- a. As of October 31, 2018, the corrections have been made to address the error. While an exact date has not been identified, it appears the errors began in the first half of 2017.
- b. See attached documents, "*Response to IR64b.pdf*" for details. Credits are authorized for all impacted customers back to January 1, 2017. Due to the volume of customers, it is not practical to provide copies of bills. No additional communications were sent to affected customers regarding the error or credits.

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To be completed by responder

Response Date: 11/20/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

Minnesota Department of Commerce  
Division of Energy Resources  
Information Request

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 11/2/2018  
Citizens Telecommunications Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

---

Request Number: 65

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Three customers testified at the hearing in Lakeville Minnesota that they had erroneous charges for three-way calling on their bill when they did not ask for or use the feature. Ms. Sharon Danley, Mr. Arindam Taran and Ms. Carolyn Curtin all testified that they received bills with three-way calling charges but had not used the service. (See 9/26/18 Lakeville 2 PM and 6 PM full size pdf at 75:18,20,21;76:10, 11,20;87:14,25;88:3, 10,22,25;89:2,3,6,14; 126:17)

Frontier provides a User Guide for its calling features, including three-way calling, on its website. The document is named "Instructions on Using Frontier Calling Features User Guide (User Guide)." The User Guide includes a description of the three-way calling feature, which is, "Three-Way Calling allows you to add a third person to your conversation, for example a friend or coworker. You can even connect long distance calls." In addition, the User Guide includes instructions on how to activate/use the feature, and a section titled "other important tips." Two of the tips included are (1) "Three-Way Calling is offered in some areas *on a "pay-per-use" basis*. Rates vary by state" and (2) a *warning* - "Warning: To avoid placing a three-way call accidentally, hang up your phone for at least three seconds between every call, whether it's a three-way call or not, to reset your phone line. If you have a fax machine or modem that allows simultaneous dialing, make sure you reprogram it to allow at least three seconds between transmissions." See <https://frontier.com/~media/HelpCenter/Documents/phone/calling-features/frontier-calling-features.ashx?la=en>.

**Request:**

- a. Does Frontier's default programming include the three-way calling per activation feature, where the customer may use three-way calling without specifically subscribing to the three-way calling service?

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To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122                      Nonpublic Public  
Requested From: Scott Bohler                              Date of Request: 11/2/2018  
Citizens Telecommunications                              Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- b. If the answer to a. is "no" describe in detail the circumstances under which Frontier adds the feature to a customer's line.
- c. If the answer to a. is "yes" what notification/disclosure does Frontier provide to its customer or prospective customer before the feature is programmed on the line?
- d. If the answer to a. is yes, does Frontier provide an option to block per call three-way calling?
- e. Has Frontier changed the functionality, billing process or policy of how the three-way calling feature is treated since February 1, 2018 in any way? For example, did it change from having to wait for two seconds to hang up your phone for at least three seconds between every call?
- f. Please explain why customers, such as Ms. Sharon Danley, Mr. Arindam Taran and Ms. Carolyn Curtin, are claiming Frontier is now charging for three-way calling (either per call or monthly), without explicitly subscribing to the service. Include in your explanation any changes initiated by Frontier that may have caused customers who had not previously been charged for three-way calling to begin to be charged for three-way calling in recent months.
- g. Please identify all customers that disputed three-way calling charges on their bills since January 1, 2017, whether verbally or in writing. Describe in detail how Frontier identified each of these customer's dispute in its records. For each dispute, state whether the dispute involved a monthly or per call charge, and whether or not Frontier credited the customer's account for the disputed three-way calling charges.

Answer)

- a. The three-way calling per activation feature is available in some Frontier exchanges and not in others. This is dependent upon the particular switch in each exchange; not all Frontier switches are capable of providing the three-way calling per activation feature. In exchanges served by a switch capable of providing the service, by default all lines will have access to the feature.
- b. N/A.

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To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122  Nonpublic  Public  
Requested From: Scott Bohler Date of Request: 11/2/2018  
Citizens Telecommunications Response Due: 11/12/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- c. No notification or disclosure specific to the three-way calling per activation feature is explicitly provided to the customer. The feature is one of many that are available to the customer. As noted above, information regarding all calling features, including three-way calling per activation, is available from the Frontier User Guide.
- d. Yes, upon customer request, Frontier can provide a block for the three-way calling per activation feature.
- e. Frontier has made no change in the functionality, billing process, or policy regarding the three-way calling per activation feature since February 1, 2018.
- f. Customers do not need to explicitly subscribe to use the three-way calling per activation feature. In exchanges where this feature is available, it is available to all customers without any need to subscribe on a monthly basis. Thus, customers (such as Ms. Sharon Danley, Mr. Arindam Taran and Ms. Carolyn Curtin) are able to use the three-way calling per activation feature without explicitly subscribing to the service. The monthly subscription version of three-way calling would be added to a customer's account in response to a specific order from the customer to add that feature. There have been no recent changes in Frontier policy or procedure that would impact the provision of the three-way calling per activation feature.
- g. Frontier cannot specifically identify three-way calling concerns without individually reviewing all customer records since January 1, 2017. Such an exhaustive review is not practical.

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To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/7/2018  
Citizens Telecommunications Response Due: 11/19/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number: 66**

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On September 17, 2018 the Department sent Frontier DOC IR No. 53a which requested:  
Provide all complaints Frontier tracked in Unisys or any other record keeping system since January 1, 2017 that were not previously provided to the Department. Include the original communication from the State or Federal agency, or any third party (e.g. The Better Business Bureau) from which the complaint originated, and the response sent to the State or Federal agency, third party or the customer. All documents provided should be in an unaltered form and not redacted. If not contained in the documents provided, state the customer name, address, telephone number, the date the complaint was received, the date the incident(s) took place, when the complaint was resolved, and whether the customer was a customer of Frontier Communications of Minnesota Inc. or Citizens Telecommunications of Minnesota, LLC.

**This request is ongoing and should be supplemented monthly until the proceeding has concluded.**  
The most recent response Frontier provided was on October 29, 2018 and stated: "See attached documents for recent activity since previous response."

**Request:**

- a. Has Frontier provided to the Department all of the complaints regarding service in Minnesota that were sent to Frontier on or after January 1, 2017 by the PUC (CAO), DOC, FCC, BBB and AG, to which Frontier responded to the PUC (CAO), DOC, FCC, BBB and AG on or before October 31, 2018. In answering this question, the complaints "provided to the Department" includes the complaints Frontier provided to the Department in response to Department IRs to Frontier in this docket.

---

To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/7/2018  
Citizens Telecommunications Response Due: 11/19/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- b. If the answer to part a. is "no", please state when Frontier will provide the remaining responsive documents.
- c. If the answer to part a. is "no", please state why Frontier has not previously provided the remaining responsive documents.

Answer)

- a. Frontier has provided to the Department all of the complaints regarding telephone service in Minnesota that were sent to Frontier on or after January 1, 2017 by the PUC (CAO), DOC, FCC, BBB and AG and to which Frontier responded to the PUC (CAO), DOC, FCC, BBB and AG on or before October 25, 2018.
- b. Frontier intends to provide monthly supplemental responses that will include complaints and responses more recent than October 25, 2018.
- c. As this docket is limited to investigation of Frontier's telephone service, complaints and responses regarding other services (such as internet service) have not been included in Frontier's prior submissions in response to IR #53a.

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To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534



**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/7/2018  
Citizens Telecommunications Company of MN, LLC Response Due: 11/19/2018  
Frontier Communications of Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number: 67**

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DOC IR No. 18 asked what process Frontier uses to create rehab reports.

Frontier responded: The Defective Cable Report (DCR) process is a formal on-line submission process to identify and report defective cable issues which was established by Frontier in 2010. When a local operations technician becomes aware of an area of cable trouble, they create an on-line DCR submission. The reporting form has required fields that the technician fills out including the exchange, cable size and gauge, type of cable, cable number and count, lead/grid number, location address, physical section length, electrical section length, shield fault, pairs in trouble, testing equipment used, etc. Once this required information is filled in, the technician submits the DCR and automatic emails regarding the submitted DCR are sent to the technician entering the submission, their manager, the local engineer, and the engineering manager. Once the DCR submission is received by network engineering, it is reviewed to ensure proper testing was completed on the cable in question. If improper or insufficient testing was performed, the submission is sent back to the local technician for the required testing to be performed. When the DCR submission has met all requirements, network engineering then begins the engineering review. This review includes reviewing trouble ticket history on the cable and looking for noted defective cable pairs in the cable. If the engineering review indicates that cable replacement is necessary, network engineering will then engineer the required capital project and request approval of the capital funds needed to complete the project.

**Request:**

Provide all DCR submissions created between January 1, 2014 and November 1, 2018. As to each DCR submission, also provide all original documents regarding:

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To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/7/2018  
Citizens Telecommunications Response Due: 11/19/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- (1) the outcome of each engineering review (if completed),
- (2) network engineering's requests for approval of the capital funds needed to complete each project,
- (3) the approval of the capital funds for each project,
- (4) completion of each project,
- (5) identify anywhere the same cable(s) appear in more the one DCR report. State why the same cable appears in more than one report, including whether the cable had not been repaired in the initial report or if the cable was repaired in such a manner that it required additional work, and
- (6) if it is not evident from the report, identify each local operations technician, their manager, the local engineer, and the engineering manager on each report by full name, and specify whether each technician, manager, engineer or engineering manager is presently employed by Frontier.

Answer)

Frontier is producing a file reflecting reports regarding defective plant issues input into the Defective Cable Report ("DCR") system ("*Response to IR67a.pdf*"). Frontier's management does not currently utilize the DCR system to monitor or respond defective facilities as it has determined that the system does not adequately track or distribute sufficient detailed information.

Instead, Frontier's technicians, managers, and engineering personnel directly review defective plant issues and communicate regarding needed repairs. This approach has been effective in monitoring and addressing plant repair and rehabilitation issues. Reflecting that, the attached file ("*Response to IR67b.pdf*") identifies certain plant repair and rehabilitation projects that have been completed since 2014.

---

To be completed by responder

Response Date: 11/26/18  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122      Nonpublic Public  
Requested From: Scott Bohler      Date of Request: 11/28/2018  
Citizens Telecommunications      Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number:** 68  
Topic: Click or tap here to enter text.  
Reference(s): Click or tap here to enter text.

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**Request:**

- Provide the status of any network investment in the Scandia exchange from federal CAF-II funds, including any delays that Frontier has experienced with deploying CAF II-funded network in this exchange.
- State whether any CAF II projects that were planned for 2016 were delayed to 2017 or later.
- Provide the locations where network investment from CAF II funds were made in the Scandia exchange, to help satisfy Frontier's obligations for the receipt of the funds.
- Provide any plans for further investment in the Scandia exchange.

Answer)

Attached file "*Response to IR #68a.pdf*" explains the status of Frontier's CAF-II projects in the Scandia exchange. Frontier experienced no construction delays related to these projects.

There were no CAF II projects that were planned for 2016 which were delayed to 2017 or later:

Attached file "*Response to IR #68c.pdf*" illustrates the locations of Frontier's CAF-II projects in the Scandia exchange.

At this time, there are no further investment projects planned for the Scandia exchange.

---

To be completed by responder

Response Date: December 7, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/28/2018  
Citizens Telecommunications Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

---

**Request Number:** 69  
Topic: Click or tap here to enter text.  
Reference(s): Click or tap here to enter text.

---

**Request:**

In response to DOC IR No. 64b, Frontier provided a list of customers whose tickets, due to a Frontier system error, had been "erroneously tagged as "customer action", thus excluding the ticket from receiving automated credit."

Provide, for all affected months and exchanges, corrected "Out of Service Troubles within 24 hour" (OST/24) reports, corrected to account for all of the tickets that Frontier previously excluded from its OST/24 reports. If any trouble ticket provided in Frontier's response to 64b is excluded from the corrected report, identify the trouble ticket and the reason for exclusion.

Answer)  
Corrected reports are attached.

---

To be completed by responder

Response Date: December 14, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/28/2018  
Citizens Telecommunications Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number:** 71  
Topic: Click or tap here to enter text.  
Reference(s): Click or tap here to enter text.

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**Request:**

Attached to this DOC Information Request No. 71 is a complaint from a Frontier customer that the Attorney General sent to Frontier on August 1, 2018, together with Frontier's response. The complaint states that the customer has been without phone service since July 8, 2018. Frontier's response stated that the customer's service was repaired on July 24, 2018, so the outage was 17 days in length. The customer is located in the Crane Lake exchange and does not appear in the list of customers Frontier identified in DOC IR No. 64b.

- a. In its "Out of Service Troubles within 24 hrs" report for Crane Lake for the month of July 2018, Frontier reported 21 tickets, with all 21 cleared within 24 hours. Explain in detail why this ticket was omitted.
- b. Confirm whether the \$60.19 credit Frontier provided the customer included the credit required by its AFOR in Section V, E (2) (\$5 X 15 days). If not, please explain.

**Answer)**

- a. This ticket was the result of widespread facility damage in the Crane Lake exchange which was caused by a series of significant lightning storms. These storms caused substantial damage to Frontier cable facilities. The AFOR excludes troubles caused by events outside Frontier's control, events such as the lightning storms, and therefore this ticket was excluded from the reporting.

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To be completed by responder

Response Date: December 17, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122                      Nonpublic Public  
Requested From: Scott Bohler                              Date of Request: 11/28/2018  
Citizens Telecommunications                              Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- b. The \$60.19 credit that Frontier provided the customer did not include the “\$5 per day” customer remedy identified in the AFOR. Rather, it was based on a pro-rata amount for the time that the customer was without service.  
This ticket was the result of widespread facility damage in the Crane Lake exchange which was caused by a series of significant lightning storms. These storms caused substantial damage to Frontier cable facilities. The AFOR excludes troubles caused by events outside Frontier’s control, events such as the lightning storms, and therefore this ticket was excluded from the credits under the AFOR.

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To be completed by responder

Response Date: December 17, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/28/2018  
Citizens Telecommunications Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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**Request Number:** 72  
Topic: Click or tap here to enter text.  
Reference(s): Click or tap here to enter text.

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**Request:**

Attached to this DOC Information Request No. 72 is a complaint from a Frontier customer that the Attorney General sent to Frontier on August 2, 2018, together with Frontier's response. The complaint stated that the customer had been without phone and internet service since June 29, 2018. Frontier's response stated that the customer's service was repaired on August 17, 2018, so the outage was 50 days in length. The customer is located in the Crane Lake exchange and does not appear in the list of customers Frontier identified in its response to DOC IR No. 64b. Frontier stated in its response to the Attorney General that the customer's repair ticket was closed before the service was working because Frontier created a "new project ticket."

- a) Identify any other customers with trouble tickets that were closed as a result of the "new project ticket" described in Frontier's response to the Attorney General.
- b) Describe in detail Frontier's policy as it relates to trouble tickets when a new construction project ticket is opened regarding needed repairs. Provide all internal documentation that explains Frontier's policy on this subject.
- c) Confirm whether the \$214.76 credit that Frontier provided the customer included the credit required by its AFOR in Section V, E (2) (\$5 X 48 days). If not, please explain.

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To be completed by responder

Response Date: December 17, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534

**Minnesota Department of Commerce  
Division of Energy Resources  
Information Request**

Docket Number: P405-P407/CI-18-122 Nonpublic Public  
Requested From: Scott Bohler Date of Request: 11/28/2018  
Citizens Telecommunications Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- d) Both this complaint and the Mr. and Ms. Donald and Carol Heim complaint identified in DOC IR No. 71 (served herewith) were caused by a lightning strike, were around the same time frame, and both complainants live in the area of Buyck, Minnesota. Confirm whether the same lightning strike impacted both customers.
- e) The Heims in DOC IR No. 71 stated that several homes in their area had been without service since June. Identify all other customers who were affected and/or were without service in the Buyck area in June, July and August and provide all communications, records, repair tickets and bills for those customers for the months of June to September 2018.
- f) Explain in detail why the dates on which services were restored for an outage caused by a lightning strike differ so greatly between the two complaints identified in DOC IRs Nos. 71 and 72. Explain why service for these subscribers was not restored in 24 hours.
- g) Provide all the trouble tickets included in the Out of Service Troubles within 24 hrs report for the Crane Lake exchange for June (11), July (21) and August (12).

Answer)

- a) As described in Frontier's response to the Attorney General complaint, the customer's trouble ticket was inadvertently closed. This inadvertent closure only impacted this customer.
- b) In situations where it is determined that the correction of the customer service trouble will require the replacement of facilities (as opposed to repair of facilities), the matter is transmitted to Frontier's engineering group to design a construction project, and then coordinate the approval and implementation of the project to place the required facilities. The open trouble tickets are removed from the active task load of the Operations group, as those tickets cannot be acted upon until the required new facilities are in place. The construction project for the new facilities would incorporate the information regarding the customers impacted by the project, and upon completion of the project Frontier will review those impacted customers to ensure that the service troubles that initiated the project have been corrected. There is no formal documentation that explains Frontier's policy on this subject.

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To be completed by responder

Response Date: December 17, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@fr.com  
Phone Number: (952) 491-5534



Minnesota Department of Commerce  
Division of Energy Resources  
Information Request

Docket Number: P405-P407/CI-18-122                       Nonpublic    Public  
Requested From: Scott Bohler                              Date of Request: 11/28/2018  
Citizens Telecommunications                              Response Due: 12/10/2018  
Company of MN, LLC  
Frontier Communications of  
Minnesota, Inc.  
Type of Inquiry: General  
Requested by: Bonnie Johnson; Diane Dietz  
Email Address(es): bonnie.johnson@state.mn.us; diane.dietz@state.mn.us  
Phone Number(s): 651-539-1880; 651-539-1876

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- c) The \$214.76 credit that Frontier provided the customer did not include the "\$5 per day" customer remedy identified in the AFOR. Rather, it was based on a pro-rata amount for the time that the customer was without service. This ticket was the result of widespread facility damage in the Crane Lake exchange which was caused by a series of significant lightning storms. These storms caused substantial damage to Frontier cable facilities. The AFOR excludes troubles caused by events outside Frontier's control, events such as the lightning storms, and therefore this ticket was excluded from the credits under the AFOR.
- d) The Buyck area was subject to a series of significant lightning storms. Frontier cannot confirm whether a single lightning strike impacted both customers. However, the lightning storms that triggered the lightning strikes that impacted both customers were from the same series of lightning storms.
- e) The Buyck area is within the Crane Lake exchange, and is not specifically delineated. See attached file "*Response to IR 72e.pdf*" for information on Crane Lake customers with troubles for the months of June to September 2018.
- f) As noted above, a large area of Frontier's service territory in Northern Minnesota was impacted by a series of lightning storms. These storms caused widespread damage to Frontier cable facilities. Repair of affected cable, and in some cases replacement of cable, was a time-consuming effort with work spread over a relatively large geographic area. In many cases, access to the impacted cable was difficult as much of the affected area is remote. Much of the impacted cable was submarine cable placed in lakes and other water bodies. Accessing, inspecting, and repairing that underwater cable required access by boat. Obtaining and coordinating suitable boats and repair equipment was difficult. Repair of the underwater facilities was dependent to some degree upon weather. Thus, Frontier could not repair all trouble immediately, but was required to engage in a repair effort over several weeks and over a widespread geographic area to address all the damaged cable.
- g) See attached file "*Response to IR 72g.pdf*".
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To be completed by responder

Response Date: December 17, 2018  
Response by: Scott Bohler  
Email Address: scott.bohler@ftr.com  
Phone Number: (952) 491-5534