

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

<i>In the Matter of the Complaint and Investigation of Staff of the Public Utilities Commission of Ohio,</i>  <b>Complainant,</b>  <b>v.</b>  <i>Frontier North, Inc.,</i>  <b>Respondent.</b>	<b>Case No. 19-1582-TP-COC</b>
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**COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO/CLC’S REPLY TO  
MEMORANDUM CONTRA OF FRONTIER NORTH INC. TO THE MOTION OF THE  
COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO/CLC TO INTERVENE**

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The Communications Workers of America, AFL-CIO/CLC (“CWA” or “Union”) now comes before the Commission pursuant to OAC 4901-1-12(B)(2) and hereby submits its Reply to Frontier North Inc.’s (“Frontier”) Memorandum Contra to CWA’s Motion for Leave to Intervene. As has been noted, CWA can provide the Commission with pertinent factual information as to the service issues identified by the Commission in the underlying Complaint. This includes the testimony of service and installation employees with direct knowledge of such issues. Moreover, CWA is in a position to better inform the Commission regarding whether any “plan and proposal” between the Parties is properly crafted, implemented and enforced. The testimony of the very employees who will be charged with the task of enforcing any such plan is crucial to the inquiry of the Commission.

CWA does not seek to burden this Commission with cumbersome legal positions and treatises. CWA merely seeks to provide the Commission with the first-hand knowledge of the

individuals who are charged with the task of physically remedying the issues identified by the Commission. The employees' input will put the Commission in a position to better assess whether Frontier is taking the appropriate remedial steps. Frankly, it should alarm the Commission that Frontier is attempting to stifle the proposed employee testimony by opposing the narrow scope of intervention sought by CWA.

As has been noted, the entire proposed testimony is not expected to last beyond half of a business day. Frontier's contentions that such intervention will cause undue delay are without merit.

In the event the Commission declines full intervention, the Union should be granted limited intervention pursuant to OAC 4901-1-11(D)(1), which imbues in the Commission the power to "[g]rant limited intervention, which permits a person to participate with respect to one or more specific issues . . ."

**Date:** February 19, 2020

Respectfully submitted,

/s/ Matthew R. Harris

MATTHEW R. HARRIS (0087653)  
CWA District 4 Counsel  
20525 Center Ridge Rd., Suite 700  
Cleveland, Ohio 44116  
T: 440-333-6363  
F: 440-333-1491  
E: [mrharris@cwa-union.org](mailto:mrharris@cwa-union.org)

## **CERTIFICATE OF SERVICE**

Pursuant to the Commission's Rules, the undersigned hereby certifies that a copy of the foregoing was filed electronically on February 19, 2020. A copy of the same was submitted to the following individuals via email the same day.

Robert Eubanks

Andrew Shaffer

[Robert.Eubanks@ohioattorneygeneral.gov](mailto:Robert.Eubanks@ohioattorneygeneral.gov)

[Andrew.shaffer@ohioattorneygeneral.gov](mailto:Andrew.shaffer@ohioattorneygeneral.gov)

Michele Noble

[Michele.noble@squirepm.com](mailto:Michele.noble@squirepm.com)

Angela O'Brien

[angela.obrien@occ.ohio.gov](mailto:angela.obrien@occ.ohio.gov)

Respectfully submitted,

/s/ Matthew R. Harris

MATTHEW R. HARRIS (0087653)

CWA District 4 Counsel

20525 Center Ridge Rd., Suite 700

Cleveland, Ohio 44116

T: 440-333-6363

F: 440-333-1491

E: [mrharris@cwa-union.org](mailto:mrharris@cwa-union.org)

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Summary: Reply CWA REPLY TO MEMORANDUM CONTRA OF FRONTIER NORTH INC.  
TO THE MOTION OF THE COMMUNICATIONS WORKERS OF AMERICA, AFL-CIO/CLC TO  
INTERVENE electronically filed by Mr. Matthew R Harris on behalf of CWA