

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

Edward Porter,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 18-1751-TP-CS
	)	
Frontier Communications, Inc.,	)	
	)	
Respondent.	)	

**PREPARED DIRECT TESTIMONY OF ROBERT STEWART  
ON BEHALF OF FRONTIER COMMUNICATIONS, INC.**

**July 7, 2019**

1.	Q.	Please state your name, title and business address.
2.	A.	My name is Robert Stewart. I am the State Director – Government Affairs at Frontier Communications. My business address is 224 W Exchange, Owosso, MI 48867.
3.	Q.	Have you reviewed the Formal Complaint of Mr. Porter?
4.	A.	Yes.
5.	Q.	Have you also reviewed monthly statements for Mr. Porter’s accounts with Frontier?
6.	A.	Yes
7.	Q.	What other documentation have you reviewed regarding Mr. Porter’s accounts with Frontier.
8.	A.	I reviewed account notes, payment history and service orders.
9.	Q.	Please describe for me Mr. Porter’s accounts with Frontier?
10.	A.	Mr. Porter has two accounts with Frontier. One of the accounts, account number 740-544-9999 is one residential phone line, at the flat rate of \$19.58/month.  The other account number 740-544-5842 is a bundled package of broadband ultimate internet and two residential flat rate, for a combined monthly charge of \$125.40/month. These amounts do not include taxes and other charges.
11.	Q.	Did you gather the monthly statements for both of these accounts.
12.	A.	Yes.
13.	Q.	If you would look at the Exhibit marked Frontier Exhibit 1. [Frontier Exhibit 1 has been provided via Federal Express and electronically to Complainant and electronically to PUCO staff.]  Does Exhibit 1 include all of the monthly statements from the past two years for account number 740-544-9999?
14.	A.	Yes.
15.	Q.	If you would look at the Exhibit marked Frontier Exhibit 3. [Frontier Exhibit 3 has been provided via Federal Express and electronically to Complainant and electronically to PUCO staff.]  Does Exhibit 3 include all of the monthly statements from the past two years for account number 740-544-5842?

16.	A.	Yes.
17.	Q.	<p>If you would look at the Exhibit marked Frontier Exhibit 2.</p> <p>[Frontier Exhibit 2 has been provided via Federal Express and electronically to Complainant and electronically to PUCO staff.]</p> <p>Does Exhibit 2 include documents that you reviewed regarding Mr. Porter's accounts?</p>
18.	A.	Yes.
19.	Q.	Are the records included in Frontier Exhibits 1, 2 and 3 made and kept in the regular course of Frontier's business?
20.	A.	Yes.
21.	Q.	Are the records included in Frontier Exhibits 1, 2 and 3 routinely kept and made for Frontier's customers?
22.	A.	Yes.
23.	Q.	Are the records included in Frontier Exhibits 1, 2 and 3 made at or near the time of the event that they record?
24.	A.	Yes.
25.	Q.	Are the records included in Frontier Exhibits 1, 2 and 3 made by a person with knowledge, or from information transmitted by a person with knowledge, and who reported such knowledge in the regular course of business?
26.	A.	Yes.
27.	Q.	<p>Mr. Porter's complaint was filed on or about November 2018.</p> <p>Could you describe Frontier's notes as to complaints of Mr. Porter, for Mr. Porter's larger account, and prior to November 2018?</p>
28.	A.	<p>On account number 740-544-5842, the account with two lines and internet, in May 2012, Mr. Porter called in with an issue with call forwarding.</p> <p>In September 2016, Mr. Porter called in about a technical IP address question.</p> <p>In October 2016, Mr. Porter called in for no a Dial tone.</p> <p>In September 2018, Mr. Porter called in and stated that he was having problem with his phone line every time it rains. In September 2018, Mr. Porter also reported a no dial tone.</p>

		In October 2018, Mr. Porter reports static on his phone line.
29.	Q.	What did Frontier determine as the cause for no the Dial tone and static in September and October, 2018?
30.	A.	Frontier's notes indicate that the technician located damage to wiring from Frontier's NID [Network Interface Device] to Mr. Porter's home. The technician found no trouble at the NID itself.
31.	Q.	Was Mr. Porter charged for the Frontier technician's trip to Mr. Porter's home?
32.	A.	Yes, on the bill dated October 25, 2018, Mr. Porter was charged \$267.12 for trip charges. The bill is included in Exhibit 3, bates numbered FR0107-109.
33.	Q.	Was Mr. Porter issued any credits to his account?
34.	A.	Yes, on the same monthly statement October 2018, Mr. Porter was issued a credit of \$132.32.
35.	Q.	Based on Frontier's notes, did Mr. Porter request additional credits at this time?
36.	A.	Yes, Mr. Porter requested a credit for all of the trip charges?
37.	Q.	Did Frontier agree to credit the \$267 for trip charges to Mr. Porter's residence?
38.	A.	No. The Frontier technician found no trouble at the NID. Because the trouble was inside wiring and Mr. Porter did not have inside Wire Maintenance coverage, Frontier billed Mr. Porter for the trip charges.
39.	Q.	Other than the \$267 for trip charges in October 2018, are there any other trip charges on Mr. Porter's two accounts for the past two years?
40.	A.	No.
41.	Q.	Did Mr. Porter also request to have a NID moved up due to his disability?
42.	A.	Yes.
43.	Q.	Did Frontier agree to move Mr. Porter's NID at his request?
44.	A.	Yes. Upon information and belief, Frontier moved one NID for Mr. Porter at no charge. Mr. Porter then called and requested the other NIDs relocated. Frontier indicated that it would do that work, but that Mr. Porter would be charged a trip charge. Mr. Porter then cancelled the order.
45.	Q.	Are you aware that Mr. Porter has requested that Frontier reimburse him for a test set /buttsett that he ordered to test his phone lines?

46.	A.	Yes.
47.	Q.	Has Frontier agreed to reimburse Mr. Porter for the equipment that he purchased?
48.	A.	No.
49.	Q.	Why has Frontier decided to not reimburse Mr. Porter for equipment that Mr. Porter purchased?
50.	A.	Mr. Porter purchased this equipment for his own use and without any contact with Frontier. There are other less expensive ways including purchasing a landline telephone and plugging into the NID.
51.	Q.	In your review of Frontier's notes, monthly invoices, payment and repair ticket history, are you aware of any instances where Mr. Porter's service was off line for more than 72 hours without compensation?
52.	A.	No.
53.	Q.	Does that conclude your testimony?
54.	A.	Yes.

Respectfully submitted,

/s/ Michele L. Noble  
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Attorney for Frontier

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically and provided to the person listed below by U.S. mail, postage prepaid, and electronically via an email address provided by Complainant to counsel, on this 7<sup>th</sup> day of June, 2019.

Edward Porter  
2853 Twp. Rd. 249  
Toronto, Ohio 43964

*Complainant*

/s/ Michele L. Noble  
Michele L. Noble