

**Communications
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October 21, 2019

Public Utilities Commission of Ohio
Chairman Sam Randazzo
180 East Broad Street
Columbus, Ohio 43215

RE: Frontier Communications Service Quality Issues in Ohio

Case No. 19-1582-TP-COC

Dear Chairman,

The undersigned Communications Workers of America (CWA) Local Presidents represent over 200 Frontier technicians and other titles in the state of Ohio.

As elected representatives and Frontier employees, we have day-to-day experience with the company's business decisions and how they impact our communities. Our members work with Ohio customers and the local network every day.

Since Frontier's acquisition of Ohio service from Verizon in 2010, Frontier has cut our represented workforce in the state by 70 percent, meaning fewer resources for maintenance, repairs and customer service.

We believe it is critical for the Public Utilities Commission of Ohio to ensure that Frontier meets its statutory obligation to ensure the adequacy and reliability of basic local exchange service and voice service.

We are aware that the Commission initiated a formal complaint and investigation proceeding against Frontier in response to customer complaints regarding Frontier service quality. To address service issues, Frontier has brought technicians to Ohio from other states to make temporary and inefficient fixes, and has refused to recall dozens of trained and experienced Ohio technicians, who are currently laid off, to make much-needed repairs. We believe paying to import technicians from outside the state to perform ineffectively, instead of employing local technicians who are already familiar with the network, shortchanges customers and Ohio communities and puts them at risk. We believe Frontier needs to invest in its local workforce to ensure the long-term viability of our network and connectedness of our community.

We are aware that Frontier has proposed negotiations with the Commission on a plan to improve service. We believe a concrete service improvement plan, including having a workforce comprised of a sufficient number of qualified Ohio technicians familiar with the network, is essential to address the issues customers have identified. We believe any plan must include specific benchmarks, timelines and public reporting.

We are available to provide the Commission with further information to facilitate a positive outcome for Ohio consumers.

Respectfully submitted,



Katie Gates
President, CWA Local 4371



Aaron Carpenter
President, CWA Local 4372



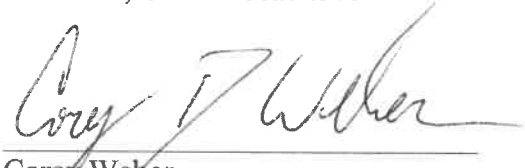
Charles Reetz
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cc: Commissioner M. Beth Trombold
Commissioner Lawrence K. Friedeman
Commissioner Dennis P. Deters
Commissioner Daniel R. Conway

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Summary: Public Comment from the Communication Workers of America electronically filed
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