



Office of the Ohio Consumers' Counsel

June 24, 2020

Hon. Anna Sanyal
Hon. Jay Agranoff
Attorney Examiners
Public Utilities Commission of Ohio
180 E. Broad St.
Columbus, OH 43215-3793

Re: *In the Matter of the Complaint and Investigation of Staff of the Public Utilities Commission of Ohio, Complainant v. Frontier North, Inc., Respondent*, Case No. 19-1582-TP-COC, Joint Stipulation and Recommendation filed June 24, 2020.

Dear Attorney Examiners Sanyal and Agranoff:

The Office of the Ohio Consumers' Counsel ("OCC") appreciates the recent process where it, on behalf of Ohio's residential customers of Frontier North, Inc. ("Frontier"), negotiated with Frontier and the Staff of the Public Utilities Commission of Ohio ("PUCO Staff") regarding a settlement for improvements in Frontier's telephone service quality for consumers. OCC neither supports nor opposes the settlement that is the outcome of that negotiation process, as filed in this case on June 24, 2020. OCC acknowledges and appreciates the efforts of Frontier and the PUCO Staff in the negotiation process.

Given continuing concerns regarding the service quality that Frontier provides to residential customers, the Consumers' Counsel is not signing the settlement. However, the terms of the settlement require Frontier to take ongoing corrective actions to address important customer service quality issues and, for this reason, the Consumers' Counsel is not opposing the settlement.

The settlement between Frontier and the PUCO Staff would, among other things, provide for a Frontier annual capital expenditure commitment of \$25 million, a portion of which will be dedicated to address customer service quality issues through 2023. The settlement also addresses upgrades to Frontier's 911 service, prioritization in restoring out of service repairs for customers, and improved metrics to monitor repair and restoration of customers' phone service.

OCC's non-opposition is not precedent for any future case or issue. OCC is not waiving rights to make any recommendations it considers appropriate in any other (including future) proceedings regarding Frontier's provision of basic local exchange service to Ohio consumers. OCC also is not

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waiving its right to file testimony in Case No. 19-1582-TP-COC explaining the Consumers' Counsel's reasons for non-opposition.

Again, the Consumers' Counsel appreciates the efforts of Frontier and the PUCO Staff to negotiate a result that enabled OCC's non-opposition.

Sincerely,

/s/ Angela D. O'Brien

Angela D. O'Brien

Assistant Consumers' Counsel

cc: Parties of record

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Case No(s). 19-1582-TP-COC

Summary: Correspondence Correspondence by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of O'Brien, Angela Ms.