

January 20, 2009

Mr. Jeff Goltz, Chairman  
Washington Utilities &  
Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

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MANAGEMENT

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Dear Mr. Goltz:

We are aware that the Commission staff is currently evaluating the proposal by Verizon to sell its land line telephone and fiber optic services to Frontier. This proposal raises concern with us due to what we have heard concerning the poor quality of service and reliability provided by Frontier in other markets in which it operates.

It appears that these concerns are not unfounded. I am enclosing a page from a recent (February 2010) Consumer Reports review and rating of Internet, phone and TV service by the major providers. As you can see, Frontier ranked low for both phone and Internet service, much lower than Verizon, especially for reliability (Frontier was not rated for TV service.) As consumers this concerns us greatly.

If we had a choice, we would prefer to either retain Verizon or have Qwest expand into our area from adjacent Bellevue. If the Commission is intent on approving the Frontier deal, we sincerely hope that appropriate safeguards will be mandated from Frontier to maintain at least the same level of service and reliability as we currently enjoy, at the same or lower cost. Thank you for your consideration.



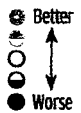
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cc: Mr. Patrick J. Oshie  
Mr. Phillip B. Jones

# Ratings Internet, phone, and TV service

In order of reader score, within services.



## Internet service

| Order | Service provider          | Type      | Reader score* | Survey results |             |       |         |
|-------|---------------------------|-----------|---------------|----------------|-------------|-------|---------|
|       |                           |           |               | Value          | Reliability | Speed | Support |
|       |                           |           | 0             |                |             |       |         |
|       |                           |           | 100           |                |             |       |         |
| 1     | Wow                       | cable     | 79            | ●              | ●           | ●     | ●       |
| 2     | Verizon FIOS              | fiber     | 77            | ●              | ●           | ●     | ○       |
| 3     | AT&T U-verse              | fiber     | 76            | ●              | ●           | ●     | ○       |
| 4     | Insight                   | cable     | 75            | ○              | ●           | ●     | ○       |
| 5     | Cincinnati Bell           | DSL       | 73            | ○              | ○           | ○     | -       |
| 6     | Bright House (2)          | cable     | 73            | ○              | ○           | ○     | ○       |
| 7     | EarthLink (1)             | cable     | 71            | ○              | ○           | ○     | -       |
| 8     | Cable One                 | cable     | 71            | ○              | ○           | ○     | -       |
| 9     | Cablevision/Optimum       | cable     | 70            | ○              | ○           | ○     | ○       |
| 10    | Cox                       | cable     | 70            | ○              | ○           | ○     | ○       |
| 11    | AT&T                      | DSL       | 70            | ○              | ○           | ○     | ○       |
| 12    | Embarq (3)                | DSL       | 69            | ○              | ○           | ○     | -       |
| 13    | Qwest                     | DSL       | 69            | ○              | ○           | ○     | ○       |
| 14    | Verizon                   | DSL       | 69            | ○              | ○           | ○     | ○       |
| 15    | SuddenLink Communications | cable     | 68            | ○              | ○           | ○     | -       |
| 16    | Windstream                | DSL       | 68            | ○              | ○           | ○     | -       |
| 17    | Time Warner (2)           | cable     | 67            | ○              | ○           | ○     | ○       |
| 18    | CenturyTel (4)            | DSL       | 67            | ○              | ○           | ○     | -       |
| 19    | Frontier                  | DSL       | 67            | ○              | ○           | ○     | -       |
| 20    | EarthLink                 | DSL       | 66            | ○              | ○           | ○     | -       |
| 21    | EarthLink (4)             | DSL       | 65            | ○              | ○           | ○     | -       |
| 22    | RCN                       | cable     | 64            | ○              | ○           | ○     | -       |
| 23    | Comcast                   | cable     | 62            | ○              | ○           | ○     | ○       |
| 24    | Mediacom                  | cable     | 60            | ○              | ○           | ○     | ●       |
| 25    | Charter                   | cable     | 59            | ○              | ○           | ○     | ○       |
| 26    | WildBlue                  | satellite | 57            | ○              | ●           | ●     | -       |
| 27    | HughesNet                 | satellite | 48            | ○              | ●           | ●     | -       |

\*Differences in reader score of less than five points are not meaningful. (1) On the Time Warner cable system. (2) Using Road Runner service. (3) Embarq and CenturyTel have merged since our survey and are now known as CenturyLink. (4) On AT&T phone system.

## Guide to the Ratings

Ratings are based on 56,080 respondents with a home Internet account, 57,846 with TV service, and 37,484 with phone service, all of whom completed the Consumer Reports Annual Telecom Survey online in spring 2009. Respondents were CONSUMER REPORTS subscribers and might not represent the general population. Providers are those for which we had sufficient data to score the service. **Type** is delivery technology including, for phone service, VoIP (Voice over Internet Protocol) and traditional landline service. **Reader score** reflects overall satisfaction and is not limited to the factors listed under survey results. A score of 100 would mean all respondents were completely satisfied; 80, very satisfied, on average; 60, fairly well satisfied. These **survey results** are relative compared with the average of all providers of each service: **value** for money, service **reliability**, and the other specific performance attributes for the various services. A "-" indicates there was insufficient data to provide a score. **Average reader score** averages the scores for Internet, TV, and phone service, as detailed in the charts on this page. The data in the **bundled telecom services** Ratings is based on 14,313 respondents who bundled all three services. Those who **would bundle again** reflects the proportion who indicated this willingness. High scores for **price after intro offer** indicates rates did not increase significantly following an initial promotional period. **Billing** problems refer to bills that were hard to understand or had errors; **support**, the need to contact different help lines or getting inconsistent help for different services in the bundle; **added fees**, any charges that raised bills unexpectedly; and **termination fee**, whether penalties were levied to discontinue service.

## Phone service

| Order | Service provider      | Type  | Reader score* | Survey results |             |              |         |
|-------|-----------------------|-------|---------------|----------------|-------------|--------------|---------|
|       |                       |       |               | Value          | Reliability | Call quality | Support |
|       |                       |       | 0             |                |             |              |         |
|       |                       |       | 100           |                |             |              |         |
| 1     | Wow                   | VoIP  | 81            | ●              | ●           | ●            | -       |
| 2     | Skype                 | VoIP  | 80            | ●              | ●           | ●            | -       |
| 3     | Vonage                | VoIP  | 79            | ●              | ○           | ○            | ○       |
| 4     | Verizon FIOS          | fiber | 79            | ●              | ●           | ●            | ○       |
| 5     | Bright House Networks | VoIP  | 77            | ○              | ○           | ○            | ○       |
| 6     | AT&T U-verse          | fiber | 76            | ○              | ○           | ○            | ○       |
| 7     | Cox                   | VoIP  | 76            | ○              | ○           | ○            | ○       |
| 8     | Cincinnati Bell       | land  | 76            | ○              | ○           | ○            | -       |
| 9     | Cablevision/Optimum   | VoIP  | 75            | ○              | ○           | ○            | ○       |
| 10    | Qwest                 | land  | 73            | ○              | ○           | ○            | ○       |
| 11    | AT&T                  | VoIP  | 73            | ○              | ○           | ○            | -       |
| 12    | Time Warner           | VoIP  | 72            | ○              | ○           | ○            | ○       |
| 13    | Verizon               | VoIP  | 72            | ○              | ○           | ○            | -       |
| 14    | RCN                   | VoIP  | 71            | ○              | ○           | ○            | -       |
| 15    | AT&T                  | land  | 70            | ○              | ○           | ○            | ○       |
| 16    | Windstream            | land  | 70            | ○              | ○           | ○            | -       |
| 17    | Embarq (3)            | land  | 69            | ○              | ○           | ○            | ○       |
| 18    | Verizon               | land  | 69            | ○              | ○           | ○            | ○       |
| 19    | Comcast               | VoIP  | 69            | ○              | ○           | ○            | ○       |
| 20    | Charter               | VoIP  | 69            | ○              | ○           | ○            | ●       |
| 21    | CenturyTel (4)        | land  | 69            | ○              | ○           | ○            | -       |
| 22    | Frontier              | land  | 68            | ○              | ○           | ○            | -       |
| 23    | Mediacom              | VoIP  | 63            | ○              | ○           | ○            | -       |

(1) Embarq and CenturyTel have merged since our survey and are now known as CenturyLink. \*Differences in reader score of less than six points are not meaningful.

## Television service

| Order | Service provider          | Type      | Reader score* | Survey results |             |                   |         |       |
|-------|---------------------------|-----------|---------------|----------------|-------------|-------------------|---------|-------|
|       |                           |           |               | Value          | Reliability | Channel selection | Picture | Sound |
|       |                           |           | 0             |                |             |                   |         |       |
|       |                           |           | 100           |                |             |                   |         |       |
| 1     | Wow                       | cable     | 78            | ●              | ●           | ●                 | ●       | -     |
| 2     | Verizon                   | fiber     | 78            | ●              | ●           | ●                 | ●       | ○     |
| 3     | AT&T U-verse              | fiber     | 76            | ●              | ○           | ○                 | ○       | ○     |
| 4     | DirectTV                  | satellite | 71            | ○              | ○           | ○                 | ○       | ○     |
| 5     | Bright House Networks     | cable     | 70            | ○              | ○           | ○                 | ○       | ○     |
| 6     | Insight                   | cable     | 70            | ○              | ○           | ○                 | ○       | -     |
| 7     | Dish Network              | satellite | 69            | ○              | ○           | ○                 | ○       | ○     |
| 8     | Cox                       | cable     | 68            | ○              | ○           | ○                 | ○       | ○     |
| 9     | Cable One                 | cable     | 67            | ○              | ○           | ○                 | ○       | -     |
| 10    | Cablevision/Optimum       | cable     | 66            | ○              | ○           | ○                 | ○       | ○     |
| 11    | SuddenLink Communications | cable     | 64            | ○              | ○           | ○                 | ○       | -     |
| 12    | RCN                       | cable     | 63            | ○              | ○           | ○                 | ○       | -     |
| 13    | Time Warner               | cable     | 62            | ○              | ○           | ○                 | ○       | ○     |
| 14    | Comcast                   | cable     | 60            | ○              | ○           | ○                 | ○       | ○     |
| 15    | Mediacom                  | cable     | 57            | ○              | ○           | ○                 | ○       | -     |
| 16    | Charter                   | cable     | 56            | ○              | ○           | ○                 | ○       | ○     |

\*Differences in reader score of less than four points are not meaningful.