



# ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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January 17, 2020

**SENT VIA WUTC WEB PORTAL**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: *Tariff Revision on behalf of Frontier Communications Northwest Inc.*  
Docket UE-191022  
Public Counsel Comments

Dear Mr. Johnson:

On December 16, 2019, Frontier Communications Northwest, Inc. (“Frontier”) filed a tariff revision to No. WN U-17 to increase certain Residence and Business nonrecurring Service Charge rates. The Public Counsel Unit of the Washington State Attorney General’s Office (“Public Counsel”) respectfully submits these comments in response to Frontier’s tariff revision.

Frontier proposes to raise certain nonrecurring charges, such as service charges and reconnection fees. Frontier states that it requires revenue from regulated service to maintain network equipment and facilities costs. Public Counsel does not believe this is an appropriate time to allow the change in this tariff due to the pending docket, UT-190574, concerning the sale of Frontier to Northwest Fiber. Parties reached a settlement agreement that has not yet been approved by the Commission.<sup>1</sup> Public Counsel believes a decision in docket UT-190574 should be made prior to increasing the nonrecurring service charge rates because the Company could be undergoing substantial change. While Public Counsel is aware of Frontier’s less than optimal financial situation, if the Settlement is approved, it may not be necessary to increase these charges with NW Fiber as the new owner.

If you have any questions about these comments, please contact me at (206) 389-3879 or via email at [sarah.laycock@atg.wa.gov](mailto:sarah.laycock@atg.wa.gov), or Lisa Gafken at (206)-464-6595 or via email at

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<sup>1</sup> Settlement Agreement, *In the Matter of the Joint Application of Northwest Fiber, LLC, Frontier Communications Corporation and Frontier Communications ILEC Holdings LLC for an Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Transfer of Control of Frontier Communications Northwest Inc. to Northwest Fiber, LLC* (Dec. 19, 2019) (Docket UT-190574).

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To: Mark L. Johnson, Executive Secretary  
Re: Tariff Revision on behalf of Frontier Communications Northwest, Inc., Docket UE-191022  
Date: January 17, 2020  
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[lisa.gafken@atg.wa.gov](mailto:lisa.gafken@atg.wa.gov). Additionally, Ms. Gafken will be present at the January 23, 2020, Open Meeting to answer any questions.

Sincerely,

*/S/ Sarah Laycock*

SARAH E. LAYCOCK  
Regulatory Analyst  
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