



Skyline Telecom, Inc.

PO Box 609
Mount Vernon, OR 97865-0609
1-888-383-4132

January 11, 2018

Mr. Roger Hahn | Regulatory Analyst
Utilities & Transportation Commission, Regulatory Services Division
Via email: roger.hahn@utc.wa.gov

Dear Roger:

I am writing in response for a request for a status update on the meet point arrangement between Skyline Telecom and Frontier.

As you are aware, we began another round of conversations with Frontier on September 7, 2017. I expressed Skyline's commitment to constructing an aerial fiber route to an agreed upon meet point location. I provided coordinates of a location that we felt was capable of a fiber meet point.

As I stated at the Open Meeting in November, we had just begun talks with an account manager and an engineer. I very clearly stated our intentions about construction and it was verified that the location we identified would be a viable option for a meet point. I reached out several times to ask for status updates regarding this conversation.

Finally on December 18, 2017 I received a build design along with pricing for the fiber build. Frontier estimated \$1,671,000 for special construction. This included 43,165 feet of contract boring making this a buried fiber route rather than the less expensive aerial route. I was out of the office on vacation when this was received. On December 20, 2017, Cathy Dalquist contacted Richard Finnigan advising that Frontier had submitted a construction bid but I had not yet responded.

When I returned from vacation, I reviewed the correspondence. I very quickly determined that what was provided to me, was simply not what was requested. Skyline had a bid to complete aerial construction to an identified meet point location. We were not interested in a construction quote from Frontier.

A response was sent to Ms. Cathy Dalquist on December 20, stating that the delayed response was not responsive on all points and that a pole attachment agreement and transport options from the meet point were the requested information. Ms. Dalquist was also concerned about two ILEC's operating in the same territory. Mr. Finnigan informed Ms. Dalquist that this is simply a transport route and that this is common practice in the industry. Ms. Dalquist also questioned Mr. Finnigan's involvement with Skyline and indicated potential conflict of interest issues. She referred further discussion to Frontier in-house legal counsel, George Thomson who was out until after the first of the year.

Not having heard from him, Mr. Finnigan reached out to Mr. Thomson on January 9, 2018. Mr. Thomson indicated that he had no substantial knowledge of this situation. Mr. Finnigan gave a brief overview and Mr. Thomson indicated he would look into things.

Earlier this morning, I received an email from Ms. Dalquist which stated:

“There seems to be a communication break down between Skyline and Frontier and I am hoping we can remedy the situation. I received multiple unwarranted and terse emails from Rick Finnigan in December, asking for information about your company. Frontier does not share any information regarding the status of, estimates, requests, communications between, etc. with outside individuals (including WITA’s attorney) unless we have a signed release of information document. Mr. Finnigan would not confirm nor deny that he was working on behalf of Skyline Telephone. Legally, Frontier will not share any information in regards to a potential/existing clients/customers.

You had worked with Joe and the engineering team and requested a construction estimate and also an estimate for Ethernet. The estimate was sent to you and no response from Skyline has been received. Mr. Finnigan stated on December 20, 2017, that Skyline will be doing all the construction and all your company is requesting, is to splice into our fiber at GPS of 48.109427, - 121.950412 and attach to any co-owned poles with SnoPUD that are required. This is a new request from Skyline, by way of Rick Finnigan. Again, please note that we will not respond to a request from a 3rd party with a signed release agreement.

Please respond if Mr. Finnigan is working on behalf of Skyline Telephone? If so, Joe, can forward an agreement to sign that would allow Frontier to share information with Skyline’s 3rd party?

Also, please confirm that you will not be moving forward with the project as requested and estimated by Frontier’s engineers.

In writing, detail exactly what Skyline requests from Frontier.

Please note that I am not the person (nor is George Thomson, Frontier’s counsel) that works these projects, all the folks that can best assist you have be copied into this email.

Hopefully, Frontier can fulfill your request and we can all move forward.”

I replied to her email today. “Please refer to your September 7, 2017 email. I believe this will answer your question regarding what exactly Skyline is requesting. It very clearly states we are committed to constructing a route to a meet point. It does not ask for a construction quote from Frontier. I very clearly explained myself several times to Joe Cummings as well. As I explained at the November meeting, an engineer from Frontier was included on the last call I had with Joe and very clearly stated where facilities were located and verified the location I had included in my original email. He was able to verify possible connectivity solutions.

Also at each Commission meeting for the last several years , it is very well explained that Skyline would be constructing a route and had secured a construction bid for aerial construction to a meet point. At

no time did we ever request a bid for construction from Frontier. I also inquired about a pole attachment agreement and have gotten the run around on this issue as well.

Joe has provided pricing on Ethernet service to two separate locations which I appreciate.

Rick Finnigan is our attorney and represents us on a normal, continuing basis. You can share any of our information with him.”

To make a long story short, I don't believe we are any further along today than we have been in the past few years with Frontier. Perhaps the events of the past couple of days will get things moving, but I am not optimistic. If I can provide any other information, please don't hesitate to ask.

Sincerely,



Delinda Kluser
General Manager