



December 30, 2011

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Mr. Dave Danner
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Subject: **DOCKET UT-090842 – 3Q11 REMEDIAL PLAN**

Dear Mr. Danner:

Pursuant to paragraph 1 in Appendix E, Attachment 1 in Order 06 in Docket UT-090842, Frontier Communications Northwest Inc. ("FC Northwest" or the "Company") submits a plan outlined below that identifies specific steps that were taken to correct the Business Office and Repair Answer Times and the Network Trouble per 100 quarterly metrics that were missed in 3Q11.

Business Office and Repair Answer Times

For the third quarter of 2011, FC Northwest provided an average speed of answer ("ASA") of 67.22 seconds for repair and an ASA of 76.93 for business office. As a result, the Company missed the required ASA of 60 seconds for both metrics. The corrective action taken by the Company was to increase call center staffing in order to meet the required ASA of 60 seconds for answering customer calls.

From July 2011 to August 2011, call center staffing was increased by 16%. The outcome of increased staffing was a significant improvement in answer time. The August average speed of answer dropped from 100.13 seconds to 63.05 seconds for repair and from 165.66 seconds to 53.47 for business office.

From August 2011 to September 2011, the Company increased its call center staffing by 13.5%. The outcome of increased staffing was another significant improvement in answer time. The September average speed of answer dropped to 18.62 seconds for repair and 32.99 seconds for business office.

FC Northwest continues to maintain current staffing levels, and the result is that the average speed of answer for October and November 2011 finished well below the standard of 60 seconds. The Company is currently performing at a 29 second ASA for both repair and business office for the fourth quarter of 2011.

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Network Trouble per 100

In August 2011, the network trouble per 100 in the Thornton central office was over 4 per 100 for the fourth time in a twelve (12) month period (Oct '10 – 4.05; Feb '11 – 4.05, Apr '11 – 7.89; Aug '11 – 4.23). As a result, FC Northwest missed the metric for 3Q11. Thornton is a very small central office with less than 100 access lines. If there are more than two (2) trouble tickets, the metric is missed. The corrective action taken by the Company was to replace cable in an area where trouble tickets were recurring.

In October 2011, FC Northwest replaced 1,300 feet of cable on Sunset Road that was bad and causing several problems with our carrier system. As a result, the Company has not received any trouble tickets in Thornton since the cable replacement.

If you have any questions concerning this plan, please call me at 972-908-4415.

Sincerely,

A handwritten signature in black ink that reads "Kim Douglass" with a long horizontal flourish extending to the right.

Kim Douglass
Manager - Regulatory Affairs