

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

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.

DOCKET UT-190574

OFFER OF PUBLIC COMMENT
EXHIBIT NO. PC-1

1. Public Counsel hereby offers this Public Comment Exhibit No. PC-1 for admission into the record of the proceeding.
2. Public Comment Exhibit No. PC-1. The exhibit consists of letters, e-mails, online submissions, and other written materials submitted by the public to comment on the sale of Frontier Communications (“Frontier”) to Northwest Fiber (“NW Fiber”). The Washington Utilities and Transportation Commission (“Commission”) and the Public Counsel Unit of the Washington Attorney General’s Office (“Public Counsel”) received and compiled these comments.
3. Frontier customers provided comments via telephone, e-mail, mail, and through the Commission’s online comment web portal, for which there are no original hard copies to submit. Commission Consumer Protection and Communications Staff documented these comments in a database matrix. The matrix references these attachments specifically. The output from this database is included in .pdf format as an attachment to this exhibit,¹ and this one file provides all comments submitted to the Commission. Public Counsel received one comment via e-mail,

¹ See Comment Matrix (‘UT-190574 UTC CommentMatrix.pdf’).

which was also delivered in hard copy to the Commission. This comment has also been included as an attachment.²

4. The submitted material has been counted as follows:

a. Comments received by WUTC

Opposing the transaction	3
Supporting the transaction	5
Undecided comments	13

b. Comments received by Public Counsel

Opposing the transaction	0
Supporting the transaction	0
Undecided Comments	1

5. Public Counsel submits 22 total public comments in the exhibit. Of these, 3 oppose the, 5 support, and 14 neither oppose nor support the sale of Frontier.

DATED this 3rd day of February 2020.

ROBERT W. FERGUSON
Attorney General

/s/ Nina Suetake
NINA M. SUETAKE, WSBA No. 53574
Assistant Attorney General
Public Counsel
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² See Comments of Todd Way, Northwest Telecommunications Association (Jan. 17, 2020) ('UT-190574 PC NwTA.pdf').



Via Electronic and Priority Delivery

January 17, 2020

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504

RE: *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, Docket UT-190574*

Dear Mr. Johnson:

The Northwest Telecommunications Association (“NWTA”), on behalf of its members - including major facilities-based competitive local exchange carriers that serve in the current Frontier Communications Northwest, Inc. (“Frontier”) service territory in Washington, and pursuant to the Washington Utilities and Transportation Commission’s (“Commission”) January 6, 2020 *Notice of Public Comment and Hearing* in the above-referenced matter, submits the following comments in lieu of an appearance during the January 27, 2020 Settlement Hearing.

The NWTA strongly urges the Commission to explicitly require Northwest Fiber, LLC (“Northwest Fiber”), the transferee in this matter, to honor Frontier’s existing interconnection and other commercial agreements with wholesale carrier subscribers (“Agreements”), as a prerequisite for approval of the proposed transaction.

In light of Frontier’s prominence in Washington and the Pacific Northwest generally, a majority of NWTA members depend on Frontier Agreements to serve a segment of their end-user subscribers. These Agreements have been carefully crafted and accord NWTA members *and* Frontier a stable framework for providing reliable telecommunications services to subscribers. In the interest of ensuring the continued, reliable provision of telecommunications services to the public, particularly in rural areas where NWTA members utilize Frontier’s network and services, it is vital that existing Agreements are honored and remain unchanged.

Northwest Fiber has previously stated its commitment to honor existing retail and wholesale obligations.¹ NWTa does not doubt Northwest Fiber's sincerity. Nevertheless, Northwest Fiber's commitment should be explicitly established as precondition for Commission approval of the transfer of control as further assurance that the Agreements will indeed be honored without amendment, as Northwest Fiber states.

The Federal Communications Commission's ("FCC") August 2, 2019 grant of USTelecom's unbundled network element ("UNE") and service resale forbearance request² underscores the need for an explicit requirement that Network Fiber honor Frontier's Agreement commitments. In granting USTelecom's request, the Commission established a three-year transition period for competitive local exchange carriers to pursue commercial agreements that replace current incumbent local exchange carrier agreements for UNEs and resold services. By extension, NWTa urges the Commission to explicitly require Northwest Fiber to honor Frontier's Agreements *for a minimum three-year period*, and to subsequently negotiate replacement agreements with carriers on a good faith basis, subject to Commission adjudication, if necessary.

Although Northwest Fiber will serve as a competitive local exchange carrier, by virtue of the proposed transfer of control the Company will be stepping into the shoes of a dominant incumbent local exchange carrier. NWTa does not oppose the proposed transfer of control. Yet NWTa members continued use of Frontier's né Northwest Fiber's incumbent carrier network and Agreements to reliably serve end-user subscribers remains paramount. Northwest Fiber should be explicitly held to a commitment it has already made to honor Frontier Agreements a precondition for transaction approval and maintain those Agreements without amendment for a minimum three-year period, consistent with the FCC's USTelecom forbearance request grant. This straightforward requirement will ensure a smooth transaction and the continuation of reliable telecommunications and competitive choice for rural Washingtonians.

¹ "Upon Closing, Northwest Fiber will continue to honor the Frontier Oregon Companies' retail and wholesale obligations, including all existing interconnection agreements and other commercial agreements with other carriers." See, *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. and Citizens Telecommunications Company of Oregon to Northwest Fiber, LLC*, Docket UM 2028, *Joint Application and Motion for Protective Order* (June 28, 2019), page 9. See also pages 16, 18.

² See, *In the Matter of Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks* WC Docket No. 18-141, *Memorandum Opinion and Order* (August 2, 2019).

Mr. Mark L. Johnson
September 6, 2019
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Thank you for your attention to this matter. An original and five copies of these comments are submitted via priority delivery. Questions may be directed to me.

Sincerely,

/s/ Todd Way

Todd Way
President
Telephone: (541) 673-4242 x1002
Email: tway@dfn.net

cc: Docket UT-190574 (via Email)

Total Comments: 21**In Favor: 5****Opposed: 3****Undecided: 13**

Filing Support	Commenter	Source	Comments
No			
	Daniel Heyer	Web	Do to many issues when dealing with Wave Network Operations Center and long response times for outages for business circuits that are owned by the State of Washington the State of Washington should block Wave's acquisition of Frontier.
	Randal Elder	Web	<p>To whom it may concern:</p> <p>Frontier Communications erred acquiring Verizon assets, overextended themselves, failed to realize industry changes, and failed to create goodwill and value for customers.</p> <p>https://www.economist.com/sites/default/files/okanagan_collegesubmissionfinal.pdf</p> <p>Both Frontier and Verizon offer FIOS, Verizon prices identical services for less, has introduced modern equipment i.e., voice search via remote, and maintains a superior customer model included a robust web-portal while Frontier has fallen behind.</p> <p>https://www.verizon.com/?lid=//global//residential https://www.verizon.com/home/mlp/fios-dvr/ https://frontier.com/#</p> <p>Frontier failed to make the changes required to meet the needs of customers which ultimately has caused Frontier to seek bankruptcy.</p> <p>https://www.fiercetelecom.com/telecom/frontier-spins-towards-a-mid-march-bankruptcy-filing-report</p> <p>In short --- Northwest Fiber seeks to acquire Frontier assets without a robust plan to aggressively right the listing hull Frontier has become. Northwest's small invest in upgrading infrastructure fails to provide evidence of a commitment to future sustainability and only offers an assurance of 3 years, barely enough time to build out this</p>

			<p>promised upgraded infrastructure. They offer no commitment to improve customer service aside from a verbal promise and fail to provide financial details of how they will improve the customer service relationship. They also fail to offer a glimpse of what services under a Northwest Fiber banner will be like or priced at.</p> <p>I believe they are seeking assets only to be sold, Northwest Fiber sees Frontier as a quick investment, not as a company to grow. I oppose the merger under the existing terms of the agreement and would require a more developed offer with a longer commitment before allowing the acquisition to proceed.</p> <p>Respectfully,</p> <p>Randal Elder</p>
	Robert Meyer	Web	<p>Frontier Communications is a poorly run company. I have dealt with Kirkland based Wavebroad band when I lived in Seattle. I ask the commission to deny the merger; just like Avista. Leave these two companies to stew in their own juices. Their customer services is poor and they aren't going to create anymore jobs.</p>
Undecided			
	Mike Dolan	Email	<p>Recently Frontier Communications has been in the news because it has agreed to sell its Pacific North West properties to a private venture capital firm. As former network operations manager in the Pacific Northwest (Washington, Idaho, Montana), I need to point out that currently Frontier has literally 100's of ESA and some CO's with failed, degraded, or removed battery plants. This makes the customer serving sites fail immediately during a commercial power outage (planned or unplanned) to compound the problem there is no capability to power these sites with any kind of standby or portable emergency generators.</p> <p>In Westport Washington Frontier is the only provider and the office battery plant is failed and leaking on the floor.</p> <p>Frontier also has a policy of responding with the next available tech during regular business hours to outages, if the outage affects less than 100 customers. This has resulted in customers being out of service for sometimes two weeks at a time.</p> <p>As a side note the newer CAF sites provide DSL only and are unregulated so there is no battery back power installed at these sites to begin with.</p> <p>My hope is that the WA state PUC takes a look at this major problem and does not let the issue get pawned off on an unsuspecting buyer without some sort of plan to bring these sites up to the minimum standards of protection customers think they are getting.</p>

			<p>I worked at Frontier Communications as a network operations manager for 9 years and left at the end of April 2019.</p> <p>Mike Dolan Spokane, WA</p>
	Douglas Slack	Email	<p>Mr Zawislak,</p> <p>We have become aware of a proposed change of ownership of a telephone exchange serving the Woodland area of Cowlitz County. The proposed transfer of property is from Frontier Communication to Northwest Fiber, LLC and the docket number is UT-190574.</p> <p>We live in a rural area with a Kalama mailing address and in Kalama school district that does not have access to high speed internet service excepting two companies that provide a microwave repeater link and, of course, satellite. The first option is limited by terrain and in many cases, trees that grow tall enough to block a viable signal after successfully subscribing. The second option is, well, we've subscribed to one before and didn't have a positive experience. We think this may be an opportunity to either have a condition of approval clause added that would require the new operators of this network to provide reasonable speed internet service or get a boundary changed so that we could get Kalama Telephone Company to be our "Phone company".</p> <p>Kalama Telephone does provide internet access to many of our neighbors with good service. Some of these neighbors also have Kalama addresses and live closer to Woodland. We believe it's ridiculous that this boundary is laid out the way it is. Even if the boundary does not get changed, we do not want to be in a situation where even with new management, service does not improve.</p> <p>We want to be included as Interested Parties in notifications of reviews, hearings, actions and activity on this docket. Several of our neighbors also want to be included because, after all, this is 2019 and you can't accomplish many vital tasks without internet access. The purpose of this email is to learn the proper procedure to be included in the interested parties list and be notified of actions on this matter.</p> <p>Thank you for your time and attention to this matter.</p> <p>Best Regards, Douglas and LaDonna Slack 4409 Green Mountain Road Kalama, WA 98625 360-823-8193 kb7pmu@gmail.com</p>

Additional comments Dec 5:

We, along with about 40 other neighbors, live in rural Cowlitz County. Our "Land line" infrastructure is all underground and served by Frontier, soon to be NW Fiber LLC. While many of us have struggled to get internet service using microwave, satellite, hotspot using cell phone technology, etc., there is already DSL service available from Kalama Telephone Company. Friends and neighbors living much closer to Woodland are subscribers of Kalama Telephone while our little "Pocket" is connected to what we locally refer to as "Woodland's phone service". Kalama Telephone installed a fiber optic trunk line right through the middle of our neighborhood but, due to boundary restrictions, we cannot subscribe to their service. We think this upcoming transfer is an opportunity to correct this problem. We would like a condition of approval to include either making sure that NW Fiber offers, in a timely manner, reasonable, reliable internet service or have the boundary changed so that Kalama Telephone could provide us with phone and internet DSL service. The boundary change is our preference since we already know that Kalama Telephone Company has the experience and expertise to do this effectively.

Additional comments, provided at the Jan. 27 public comment hearing:

Good morning. My name is Douglas Slack. My wife, LaDonna and I live at 4409 Green Mountain Road in rural Cowlitz County in Southwest Washington state. I have chosen to read this to you this morning. They are all my words, I just want to be sure to not leave anything out.

We understand that this hearing is for the purpose of approving transfer of service operations from Frontier Telecommunications to Northwest Fiber, LLC. We understand that the Washington Utilities and Transportation Commission regulates, among other things, telephone service, which we assume does not include cellular phone services since many of us use different cellular providers depending on cost, features and whether we can actually get a decent signal from where we live. We also understand that Internet service is not regulated excepting that many "Telephone companies" provide internet connections and therefore, if you live within a particular boundary, you can only have what your telephone company offers. It is this connection that makes our situation unique. This is 2020. We have entered another decade where telecommunications, Internet use and even the necessity of having internet access increases every minute. Public schools require access to Internet for students. Try paying a bill without online access. Advanced degree study, even Health care is more challenging without internet access. Technology changes at such a rapid rate that many of us find it a daunting task to try to keep up.

Interestingly enough, our home is in the Kalama School District, Kalama Voting District and our mailing address is Kalama, 98625 but, we are included within a boundary of telephone service that is loosely referred to as Woodland and is currently served by Frontier Telecommunications. This area is part of the proposed transfer of service from Frontier to Northwest Fiber LLC. described by WUTC Docket 190574. While this may seem somewhat Irrelevant since we, along with many of our neighbors have discontinued "land line".telephone service. We all know the advantages of having a mobile phone. Portability along with all the features and services offered

			<p>by cellular phone companies when combined with smart phone features that are common today, make it hard to justify paying for a phone on the wall if that is its only purpose. we know many of our neighbors are offered, as a part of their "Land line" subscription with competing telephone companies, the option to have access to "The Internet" through those companies using underground line technology such as DSL, Broadband, FTTP. Since these services were not available to us, we currently subscribe to a microwave service that uses a parabolic dish pointed toward a repeater dish in Columbia County in Oregon. Many of our neighbors also used that service but, trees do grow and block the signal and if they're not your trees, you can't just go cut them down.</p> <p>Over the last few years, we have received solicitation mailers from Frontier to add Internet service. But, when we call and inquire, the answer is always the same. "Not available at your address" But, we CAN offer satellite internet service. We have tried satellite Internet service before and have some neighbors who have subscribed to new generation service and found it to be inadequate, expensive and vulnerable to loss of service during inclement weather events. We have inquired about broadband service using either a bundle package that includes telephone, television and internet service from services such as Infinity, Comcast, Quest, Century Link .or Spectrum. Answer is always the same. 'We don't have any options available at your address. We understand that internet service is not regulated and we can subscribe to any of a number of Internet Service Providers. Just last week, I responded to an ad and inquired of wave Broadband if they could offer any service to our residence. I haven't heard back from them yet.</p> <p>However, we currently know of no broadband lines in our immediate area. We are in an area populated by homes that were built individually and not part of a large development that might attract broadband service companies. So, we are hereby putting in a request for current technology communication services as a condition of approval during this transfer of service.</p>
	LaDonna Slack	Email	<p>Mr Zawislak,</p> <p>We have become aware of a proposed change of ownership of a telephone exchange serving the Woodland area of Cowlitz County. The proposed transfer of property is from Frontier Communication to Northwest Fiber, LLC and the docket number is UT-190574.</p> <p>We live in a rural area with a Kalama mailing address and in Kalama school district that does not have access to high speed internet service excepting two companies that provide a microwave repeater link and, of course, satellite. The first option is limited by terrain and in many cases, trees that grow tall enough to block a viable signal after successfully subscribing. The second option is, well, we've subscribed to one before and didn't have a positive experience. We think this may be an opportunity to either have a condition of approval clause added that would require the new operators of this network to provide reasonable speed internet service or get a boundary changed so that we could get Kalama Telephone Company to be our "Phone company".</p>

			<p>Kalama Telephone does provide internet access to many of our neighbors with good service. Some of these neighbors also have Kalama addresses and live closer to Woodland. We believe it's ridiculous that this boundary is laid out the way it is. Even if the boundary does not get changed, we do not want to be in a situation where even with new management, service does not improve.</p> <p>We want to be included as Interested Parties in notifications of reviews, hearings, actions and activity on this docket. Several of our neighbors also want to be included because, after all, this is 2019 and you can't accomplish many vital tasks without internet access. The purpose of this email is to learn the proper procedure to be included in the interested parties list and be notified of actions on this matter.</p> <p>Thank you for your time and attention to this matter.</p> <p>Best Regards, Douglas and LaDonna Slack 4409 Green Mountain Road Kalama, WA 98625 360-823-8193 kb7pmu@gmail.com</p>
	Rumesh	Email	<p>Hi, I am Rumesh living at 19315 36th Ave SE Bothell WA 98012. I want to know whether buying entity Northwest Fiber is willing to service homes close to communities that are already serviced by Frontier. In the past I tried to get Frontier fiber connection multiple times without success even though homes which are 500 feet away have their service. Right now Comcast is the only internet provider available for me. Even though Frontier is servicing this area I am forced to stick with Comcast which is not a good thing. As per my knowledge, Frontier hasn't expanded to any new communities in a while. I just want to know whether the new company is willing to address this scenario that we are forced to have only one internet provider when my area is technically serviced by multiple providers.</p> <p>Thank you!</p> <p>Respectfully, Rumesh</p> <p><<staff note: Forwarded to Jessica Epley of Frontier/NW Fiber>></p>
	Dave Maness	Phone	This customer is okay with the sale as long as he does not have to change his frontier.com email address.

	Marie Larson	Web	I would have no objection as long as Wave's customer service and tech support contacts are in the US and not overseas. Although the Frontier customer service/sales folks were not always honest (the tech people were great), at least I could understand them. There is nothing more annoying than having to wait on the phone along time and then not being able to understand the person that finally answers. Thank you
	Fred Pleger	Web	We are presently in the Frontier utility service area, we have had many interactions with Frontier Communications and have received little or no response. We and others in our area have simply given up and gone to other services (cell phone, and internet providers) to meet our needs. We hope the proposed sale will provide us with a much needed services and not drop us in favor of areas with a higher density.
	Grant Farr	Web	<p>Frontier is currently not carrying CBS or local channel 7 in their cable listings. They did the same a few years ago when disagreeing with ABC and affiliates over rates. I don't like to see government dictate conditions to a private company, but do think that a communications company should provide all basic channels (channels that would be free with an antenna) as part of their cable lineup. If they don't provide all basic channels, they should be required to discount their monthly service fee by an amount that would enable the consumer to purchase an UHF antenna or a streaming adapter to enable connection via HULU, Netflix, Prime, or other streaming services.</p> <p>Approval of the sale of Frontier should be conditioned on resumption of CBS service, or reduction of current monthly service fees.</p>
	David Hingston	Web	<p>Dear WA UTC; 1/22/2020</p> <p>My name is David E. Hingston 13721 81 Ave NE Arlington, WA 98223 360-653-9790 hingston7@juno.com</p> <p>I retired happily from GTE NW nearly 50 years ago in 1992. I received generous retirement benefits and am grateful for them.</p> <p>I have continued to be a faithful customer of Frontier all these years after they purchased GTE NW.</p> <p>However, a few years ago, Frontier (who took over responsibility for GTE NW retirement benefits) refused to continue my Telephone Concession Benefit. They also have reduced the Long Distance Coverage on this same Monthly Plan which I now pay for....</p> <p>I hope this sale of Frontier will not continue to erode my retirement benefits.</p>

			<p>Please forward my complaint to Frontier in hopes they will offer new mercy to me and those who have retired so long ago.</p> <p>Trusting Your Authority; David E. Hingston</p>
James Pafundi	Web	<p>I am a resident in Frontier proposed sale region. I do not have access to reliable high speed internet. A lot of my neighbors are in the same boat, although there is more than enough fiber in the ground, it is serviced by other providers. We are a boundary area carved out due to a wealthy landowner not wanting to make long distance calls to his childhood home some 5 miles away. I would request that pursuant to any transaction my neighborhood be provided access to reliable high speed internet.</p> <p>Thank you.</p>	
Donald M Fanning	Web	<p>I would ask that the commission inquire that they ask the incoming owners if they will commit to expanding Fiber and Gigabit Internet services to NEW Residential zipcodes beyond the existing footprint and service area. I would ask the commission to ensure that growth of up to date technologies continue and not stagnate like it has with the past promises of other telecommunication companies in providing Gigabit and Fiber services. FTTN is not enough. FTTH is and always should be the goal.</p>	
Evelyn H Pickering	Web	<p>I am objecting to the current monthly service charge that I would be forced to accept if I requested my name to be removed (unpublished) from Frontier Communications residential directory.</p> <p>I have attempted several times over the past 15 years, via phone, for my name to be removed and/or unpublished from Frontier Communications residential directory and was told a monthly service charge would apply and appear on my statement in order for Frontier Communications to adhere to my request. According to Frontier phone representatives, this particular service charge is legal because it has been sanctioned and approved by the State of Washington.</p> <p>Why should the consumer be charged monies for having their name removed from a published directory from any company that is generating revenue in selling the consumer's name and phone number? This is something that should be addressed by the State of Washington and WaveDivision Capital and Frontier Communications. Selling a person's name and phone number for profit should be looked into carefully by the State of Washington. This is why we receive hundreds of Robo calls - advertisers working from purchased published residential phone directories!</p> <p>Please address this issue while reviewing the purchase proposal of Frontier Communications by WaveDivision Capital scheduled for January 27, 2020.</p> <p>Thank you in advance for addressing this problem.</p> <p>Evelyn H Pickering, Edmonds, WA 98026</p>	

	Deborah Wright	Web	If the company is sold. I want the same protections we now have by the UTC and FCC oversight. I found out that this is not so for cell phones and cable companies. The proposed sale is to Wave, a cable company. I oppose any sale that removes the protections citizens enjoy when subscribing to a traditional telephone company.
Yes			
	Gary Amato	Email	I am an unsecured creditor of frontier Communications and applaud the sale concerning Wave and Frontier. My concern is the outstanding debt that frontier has and would expect this deal would be contingent upon Wave honoring the bond debt or paying it off according to the indenture covenants. If those criteria are met than congratulations is in order. Thanks, Mr. Amato Sent from my iPhone
	Mary Pustay	Email	I think the sale of frontier to wave would be a welcome change. We have terrible service and unfortunately where I live it's the only game in town. Maybe things are looking up.
	Allan Foster	Email	My internet and TV are through Frontier. Internet fine, TV frustrating when remote is brain dead to buttons, friend in LA same problem. OK sale, I've more faith in a local company then Frontier. Allan Foster
	Rob Karlinsey, City of Kenmore	E-mail	Honorable Commissioners: The City of Kenmore submits the following comments in response to the January 6, 2020 Notice of Public Comment and Hearing: The City has been following the Commission's deliberations on the application to transfer control of Frontier Communications Northwest Inc. to Northwest Fiber LLC and appreciates the opportunity to comment on the Proposed Settlement Agreement between the WUTC Staff and the companies that you are now considering. We view the proposed transaction and transfer as a positive opportunity for the new owners to improve and expand broadband and other services to communities where Frontier has underinvested in its network, and to ensure customer service standards are met throughout the entire service area. We believe the underinvestment situation in the City of Kenmore is unique in the State of Washington and

		<p>deserves special attention in your deliberations. We offer the following background information:</p> <p>In 2008, Frontier’s predecessor, Verizon, advised the City that it was in the process of upgrading its telecommunications network by installing a fiber to the premise telecommunications network (“FTTP Network”) throughout the City. Because the expanded capacity of the FTTP Network would allow the company to broaden and improve its services offerings, the company sought and was granted a cable television franchise agreement by the City of Kenmore. The agreement which transferred to Frontier effective December 10, 2009 required the company to serve all residential areas within the City by August 29, 2011.</p> <p>When Frontier took control at the end of 2009, Verizon had installed the FTTP Network in most of the northern half of the City (north of the Sammamish River) and was providing expanded services, including cable services, through that platform. However, Verizon had not yet upgraded the southern half of the city (representing approximately half of the city’s households, Saint Edward State Park and our largest employer, Bastyr University) at the time of the transfer to Frontier.</p> <p>In the years since Frontier took over control, it has failed to complete the installation of a service platform and thus it failed to meet the Franchise Agreement requirement to offer cable services to all residential areas of the city by the August 2011 due date and since.</p> <p>While the City has taken various enforcement actions over the years due to this non-compliance, and is in ongoing discussions with Frontier and Northwest Fiber as the City reviews the companies’ request for consent to the latest transfer, the fact remains that Frontier never fulfilled its promise to build out a service platform and provide cable television service in the southern half of the City and as a result has created a pronounced consumer choice divide within our community. To our knowledge, no other city in the state has a comparable amount of territory in which Frontier has not met its basic service area obligations.</p> <p>We respectfully request that the Commission consider the special circumstances in the City of Kenmore as you deliberate on the adequacy of the broadband deployment obligations as outlined in the proposed Settlement Agreement.</p> <p>We are available to provide any additional information that you may need. Thank you. Sincerely,</p> <p>Rob Karlinsey, City Manager cc: Kenmore City Council Dawn Reitan, City Attorney</p>
	Tom Blikre Web	Just read about the sale of Frontier in WA/OR/ID/MT to WaveDivision Capital, announced May 2019. Odd that Frontier didn't make a greater effort to notify us about this but that's another matter. Since I can't conceive of

			<p>anyone offering worse customer service than Frontier has, while charging high prices for what is now slow (50mb) fiber broadband, I am in favor of this proposal. Give someone else a chance. If WaveDivision turns out to be worse than Frontier, there's always Comcast (*cough* *cough*).</p> <p>Thank you!</p>
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