



August 1, 2012

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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 – 2012 ANNUAL REPORT CARD

Dear Mr. Danner:

Pursuant to paragraph 21 in Appendix A, Attachment 1 in Order 06 in Docket UT-090842, enclosed is the Frontier Communications Northwest Inc. ("FC Northwest" or the "Company") Annual Report Card for 2012. The Company also submits a plan outlined below that identifies specific steps that were taken to correct the missed metrics.

FC Northwest met a majority of the benchmarks every month for the six service quality metrics. The business office answer time metric was missed four times, the repair office answer time metric was missed six times, the average out of service interval greater than 24 hours metric was slightly above the benchmark in November 2011 and the trouble per 100 metric was missed one time in August 2011.

Business Office and Repair Answer Times

In the last year, FC Northwest has been persistently working on an action plan to improve our customer service and performance. The action plan includes hiring new representatives, moving towards a universal service representative approach, standardizing our billing system, converting to a new telephony system, optimizing schedules to meet call volume distributions and revising our call routing strategy which allows for movement of customer call traffic across platforms.

In late November 2011, FC Northwest began preparing for the conversion from Verizon systems to FC Northwest systems. Representatives were taken offline for training of the FC Northwest systems, including ordering, billing and telephony systems. Each representative received over 120 hours of training for the conversion that occurred on March 1, 2012. Prior to March 1st, calls to our business office could not be shared between our offices on the East and West Coasts due to the different ordering and billing systems used. We now have a standardized billing system with user-friendly desktop applications across all of our states, which allows us the capability to route calls when we experience high traffic volumes. Effective with the March 1st conversion, the Everett and Fort Wayne call centers were moved to a new telephony system that will enhance queue efficiencies.

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FC Northwest made a strategic decision to insource our calls back from our vendor. We believe we can offer better customer service if the customer is dealing with our own FC Northwest employees. Insourcing began in December 2011 and continued into January 2012. With this project, as well as conversion training, it was difficult to staff and manage to fluctuating call volumes that occurred during these two months. As a result, our average speed of answer to our business office and repair was jeopardized.

In sum, the Company's action plan implemented in the last year has put us in a position to move forward with providing exceptional quality service to meet our customers' and this Commission's expectations.

Average Out of Service Interval Greater than 24 hours

In November 2011, the average out of service interval greater than 24 hours was missed by four minutes. The Company did not anticipate the increase in repair tickets from the previous month. Workforce adjustments were made, and the metric has been met for the last eight months.

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). Thornton is a very small central office. If there are more than two 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, the Company replaced 1,300 feet of cable that was bad and causing several problems with our carrier system. As a result, the Company has not received any trouble tickets in that area and has met the metric every month.

As required by Condition No. 20 in the above referenced order, the Company will be issuing a bill credit to all retail customers totaling \$92,000 in the next ninety (90) days for the missed metrics noted above. Those customers will receive an annual report card of the service metrics, which includes an explanation of the credit.

The Network Trouble per 100 Report is marked "Confidential per Protective Order in Docket UT-090842" as it includes data by central office. Therefore, a confidential version and a redacted version of the report are included for filing.

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If you have any questions concerning this report, please call me at 972-908-4415 or email me at kimberly.a.douglass@ftr.com.

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

Enclosures