

Exhibit No. ____ (JL-12)
Docket UT-121994
Witness: Jing Liu

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**In the Matter of Frontier
Communications Northwest, Inc.'s
Petition to be Regulated as a Competitive
Telecommunications Company Pursuant
to RCW 80.26.320**

DOCKET UT-121994

**EXHIBIT TO
TESTIMONY OF**

Jing Liu

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Frontier's Responses to Public Counsel Data Request Nos. 7 and 8:
Impediments for Broadband Performance and Deployment*

April 25, 2013

Frontier Responses to Public Counsel Data Requests Nos. 1-18
Date: March 15, 2013
Page 10 of 22

- PC-7
- (a) For all areas of Frontier's service territory where broadband is available, but broadband performance does not meet the FCC's benchmark of 4 Mbps downstream and 1 Mbps upstream, please discuss the general impediments to achieving the FCC's benchmark speeds.
 - (b) Please indicate whether Frontier is planning on improving broadband in the areas that fail to meet the FCC's benchmark speeds, and provide a timeline for the upgrades.

Response:

In addition to the general objections, Frontier objects to this request and irrelevant and beyond the scope of this proceeding and the jurisdiction of the Commission in that the Commission does not regulate broadband service. Subject to and without waiving its objections:

- a. The general impediment to upgrading terrestrial, wireline speed is long loop lengths in rural areas. Increasing data speed also requires augmentation of the transport backbone network.
- b. Frontier has attained 88.6% household availability of 4Mbps/1Mbps service with wireline broadband service in Washington. Additionally it supplements its offering to reach unserved households with a satellite-based broadband at speeds of up to 15Mbps (down). The FCC's 4Mbps downstream/1Mbps upstream is a minimum public policy goal set by the FCC for national availability of broadband. This public policy goal includes federal programs that will help achieve that goal, both by incumbent carriers such as Frontier and other service providers, including wireline, wireless and satellite providers. Frontier intends to continue capital investment to meet customer demands for both availability and speed. Frontier also intends to avail itself to federal funding to supplement its expansion and data speeds, based on customer demand, economic feasibility and availability of capital. These plans are dynamic and based on many variables including customer demand, availability of competitive offerings and regulatory climate.

Prepared by: Carl Gipson
Date prepared: March 14, 2013
Witness: To be determined

Frontier Responses to Public Counsel Data Requests Nos. 1-18
Date: March 15, 2013
Page 11 of 22

- PC-8
- (a) To the extent that there are areas in Frontier's service territory where no Frontier broadband is available, please discuss the general impediments to broadband deployment.
 - (b) Please indicate whether Frontier is planning on extending broadband in the unserved areas, and provide a timeline for deployment.

Response: In addition to the general objections, Frontier objects to this request and irrelevant and beyond the scope of this proceeding and the jurisdiction of the Commission in that the Commission does not regulate broadband service. Subject to and without waiving its objections:

- a. Technological limitations for customers served by long-loops in rural areas are the general impediment to deployment of wireline broadband. Also, availability of back-bone transport facilities and capacity is a general impediment.
- b. Frontier plans its capital expenditures one year at a time and has not developed specific broadband deployment plan beyond 2013. However, Frontier anticipates that it will continue to invest in the expansion of broadband availability and that on-going technical innovation will help facilitate that expansion. Additionally, Frontier began offering satellite-based broadband service as of October 2012, and now offers broadband satellite service in virtually every area in which Frontier operates in Washington. Customers in many places that were previously unserved by traditional wireline broadband now have the availability of broadband at speeds up to 15Mbps download and 2Mbps upload speeds.

Prepared by: Jack Phillips
Date prepared: March 14, 2013
Witness: To be determined