



June 28, 2019

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Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
P.O. Box 47250
Lacey, WA 98503

**Re: Frontier Communications Northwest Inc. - Eligible Telecommunications Carriers'
Annual Recertification on High Cost Fund Pursuant to WAC 480-123-060, 070 and
080**

Dear Mr. Johnson:

Enclosed for filing is Frontier Communications Northwest Inc.'s 2019 ETC Annual Recertification on High Cost Fund pursuant to WAC 480-123-060, 070 and 080. The Company considers financial information submitted with this filing confidential and protected under the provisions of WAC 480-07-160. These items are marked "Confidential per WAC 480-07-160". The Company, for commercial reasons, may be harmed if this information is not treated by the Commission as confidential. A confidential and redacted copy of the filing is enclosed.

Pursuant to WAC 480-123-060, Frontier provides a certification that it will use all federal high-cost support received for the provision, maintenance, and upgrading of facilities and services for which the support is intended. With this filing, Frontier requests the Washington Utilities and Transportation Commission provide appropriate certification to the Federal Communications Commission ("FCC") of Frontier's use of federal high cost support in accordance with applicable federal law.

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

Sincerely,

A handwritten signature in black ink that reads "Kim Douglass". The signature is written in a cursive, flowing style.

Kim Douglass
Manager - Regulatory Affairs

Enclosures

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

Frontier Communications Northwest Inc. (“Frontier” or the “Company”) submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

WAC 480-123-070(1) – Report on Use of Federal Funds and Benefits to Customers:

(a) The report must provide a substantive description of investments made and expenses paid with support from the federal high-cost fund. The report must include the company's gross capital expenditures and operating expenses made with federal high-cost support received by the ETC in the preceding calendar year along with a description of major projects and affected exchanges. A rate of return wireline ETC must also include a copy of its NECA-1 report for the preceding calendar year.

ANSWER:

In 2018 Frontier in Washington received \$9,086,920 in federal high cost and Connect America Fund support. These funds, along with other revenues, enabled the Company to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. Examples of the amount of investments made and expenses incurred by the Company in 2018 are:

- 1) Property, Plant & Equipment - [REDACTED]
- 2) Plant Specific Expense - [REDACTED]
- 3) Depreciation Expense - [REDACTED]

See Attachment A for a list of major projects and affected exchanges.

(b) Every ETC must provide a substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to (a) of this subsection.

ANSWER:

These investments and expenditures generally benefit all customers receiving the federal high cost supported services from the Company within its designated service area.

REDACTED

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

WAC 480-123-070(2) - Local service outage report.

(a) The report must include detailed information on any outage in the service area (during the prior calendar year) of at least thirty minutes in duration in which the ETC owns, operates, leases, or otherwise utilizes facilities, that potentially affect:

- (i) At least ten percent of the end users; or
- (ii) A 911 special facility, as defined in 47 C.F.R. Sec. 4.5(e).

(b) Specifically, the eligible telecommunications carrier's annual report must include information detailing:

- (i) The date and time of onset and duration of the outage;
- (ii) A brief description of the outage and its resolution;
- (iii) The particular services affected;
- (iv) The geographic areas affected by the outage;
- (v) Steps taken to prevent a similar situation in the future; and
- (vi) The number of customers affected.

ANSWER:

There were no reportable outages in 2018.

WAC 480-123-070(3) – Report on failure to provide service.

The report must include the number of requests for service from potential customers within its designated service area that were unfulfilled during the prior calendar year. The ETC must also detail how it attempted to provide service to those potential customers.

ANSWER:

There were no unfulfilled service orders in 2018.

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

WAC 480-123-070(4) – Report on complaints per one thousand connections (fixed or mobile).

The report must provide separate totals for the number of complaints that the ETC's customers made to the Federal Communications Commission and the consumer protection division of the office of the attorney general of Washington. The ETC must also report the number of consumer complaints in each general category (for example, billing disputes, service quality).

ANSWER:

Frontier reports that it is aware of 212 complaints made during 2018 to the Federal Communications Commission (“FCC”) and 262 complaints to the Washington Attorney General (“AG”). This corresponds to a number of complaints per 1,000 lines of approximately 0.23.

See Attachment B for a summary of complaints.

WAC 480-123-070(5) – Certification of compliance with applicable service quality standards and consumer protection rules.

Certify that it met substantially the applicable service quality standards and consumer protection rules found in WAC 480-123-030 (1)(h).

ANSWER:

See attached affidavits.

WAC 480-123-070(6) – Certification of ability to function in emergency situations.

Certify that it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

ANSWER:

See attached affidavits.

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

WAC 480-123-070(7) – Advertising certification, including advertisement on Indian reservations.

Certify it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service area.

ANSWER:

See attached affidavits.

WAC 480-123-080(1) – Annual Plan for Universal Service Support Expenditures.

(1) Not later than July 1st of each year, every ETC that receives federal support from any category in the federal high-cost fund must report the planned use of federal support related to Washington state that will be received during the coming calendar year. The report must include the company's planned gross capital expenditures and operating expenses made with federal high-cost support received by the ETC for the coming calendar year along with a description of major projects and affected exchanges.

ANSWER:

For 2020, the Company will use any federal high-cost support and other revenues to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. The nature and magnitude of its investments and expenditures are anticipated to be similar to those for the prior period. They are expected to benefit customers generally by helping enable the Company to continue to provide good quality supported services.

(2) The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.

ANSWER:

The investments and expenditures to be made with federal support are expected to benefit customers generally by helping enable the Company to continue to provide good quality supported services.

Frontier Communications Northwest Inc.
WAC 480-123-070 (1) - Attachment A
WA - List of Major Projects - 2018

Exchange	Project Description	Capital \$\$
Various		
Various		
Various		
Various		
Various		
Various		
Various		
Various		
Various		
Various		
WA - Everett, Bothell, Juanita		
Various		
Various		
Grand Total		

Frontier Communications Northwest Inc.
WAC 480-123-070 (4) - Attachment B
WA - Complaints - 2018

Complaint Source	Complaint Reason	Total
Attorney General	Billing	168
	Repair Issue	27
	Representative Quality	18
	General Inquiry about Products/Services	13
	Refund/Deposit Delay	7
	Collections	6
	Adjustment	5
	Porting Issues	4
	Marketing	4
	Service Order/Trouble Ticket Status	3
	Payment Processing Issues	3
	Service/Feature not Available	2
	Difficulty reaching a Company Rep	1
	Long Distance Issues	1
Attorney General Total		262
FCC	Billing	115
	Repair Issue	35
	Service/Feature not Available	19
	General Inquiry about Products/Services	7
	Representative Quality	6
	Collections	6
	Adjustment	6
	Payment Processing Issues	4
	Refund/Deposit Delay	3
	Missed Commitment	3
	Difficulty reaching a Company Rep	2
	Porting Issues	2
	Lifeline	1
	Service Order/Trouble Ticket Status	1
	Long Distance Issues	1
Marketing	1	
FCC Total		212
Grand Total		474

**CERTIFICATION OF APPLICABLE SERVICE QUALITY STANDARDS AND
CONSUMER PROTECTION RULES AND EMERGENCY FUNCTIONALITY AS
REQUIRED BY WAC 480-123-070 (5) AND (6)**

In compliance with Washington Administrative Code (WAC) 480-123-070 (5) and (6) I certify the following:

- 1) That during the 2018 calendar year, the Company met substantially the applicable service quality standards and consumer protection rules found in WAC 480-123-030 (1)(h); and
- 2) That during the 2018 calendar year, the Company maintained the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g)

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

June 25, 2019 Chapel Hill, NC
(Date and Place)

Allison M. Ellis
(Signature)

Allison M. Ellis
(Printed Name)

Senior Vice President - Regulatory Affairs
(Title)

CERTIFICATION OF TELEPHONE ASSISTANCE PROGRAM & INDIAN RESERVATION ADVERTISING AS REQUIRED BY WAC 480-123-070 (7)

In compliance with Washington Administrative Code (WAC) 480-123-070 (7) I certify the following:

- 1) That during the 2018 calendar year, the Company publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

June 25, 2019 Chapel Hill, NC
(Date and Place)


(Signature)

Allison M. Ellis
(Printed Name)

Senior Vice President - Regulatory Affairs
(Title)

CERTIFICATION OF ELIGIBLE TELECOMMUNICATIONS CARRIER
REQUIRED BY WAC 480-123-060 (1)

In compliance with Washington Administrative Code (WAC) 480-123-060 (1), I certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and the Universal Service Administrative Company required by 47 C.F.R. §54.314 as follows:

- 1) That all federal high-cost support received by Frontier Communications Northwest Inc. was used in 2018 and will be used in 2020 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

June 25, 2019 Chapel Hill, NC
(Date and Place)

Allison M. Ellis
(Signature)

Allison M. Ellis
(Printed Name)

Senior Vice President - Regulatory Affairs
(Title)