

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

| | |
|---|-------------------------------|
| In the Matter of Frontier Communications) | Docket No. UT-121994 |
| Northwest Inc.'s Petition to be Regulated) | FRONTIER COMMUNICATIONS |
| as a Competitive Telecommunications) | NORTHWEST INC.'S PETITION FOR |
| Company Pursuant to RCW 80.36.320) | APPROVAL OF MINIMAL |
|) | REGULATION IN ACCORDANCE |
|) | WITH RCW 80.36.320 |

Declaration of Carl Gipson

I, Carl Gipson, hereby declare as follows:

1. Unless indicated otherwise below, the following facts are of my own personal knowledge, and if called as a witness I could and would testify competently as to their truth.

2. I am employed as a manager for Governmental and External Affairs for Frontier Communications Corporation ("Frontier").

3. This declaration sets forth the Exhibits and outside resources used in preparing Frontier's Petition for minimal regulation in accordance with RCW 80.36.320.

4. The Federal Communications Commission publication by the Industry and Technology Division of the Wireline Competition Bureau, "Local Telephone Competition: Status as of June 30, 2011," (June 2012) referenced in Paragraphs 8 and 9 of the Petition is available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-314631A1.pdf.

5. Information regarding the access line counts in Chart 3 and Paragraphs 10 and 11 of the Petition were derived from company Annual Reports submitted to the Washington Utilities and Transportation Commission for years 2000 through 2011. This line count information does not include public coin, mobile, cyber port, FGA, or WATS lines.

6. Frontier used Census Bureau statistics available for years 2011 ("Annual Population Estimates, <https://www.census.gov/popest/data/state/totals/2011/index.html>) and

2000 (“Time Series of State Population Estimates,” https://www.census.gov/popest/data/historical/2000s/vintage_2001/state.html) for census data found in Paragraph 11 of the Petition. This census data shows that the Washington population was 5,908,372 as of July 1, 2001 and 6,830,038 as of July 1, 2011.

7. Information regarding CLECs registered with the Commission in Paragraph 16 of the Petition was found at www.wutc.wa.gov, gathered October 2, 2012 from the web page, “Competitive Local Exchange Carriers” reported by WUTC.

8. Exhibit 1 is a list of the 101 CLECs with interconnection agreements with Frontier, derived from internal Frontier data.

9. Exhibit 2 is a list of cable providers in Frontier’s Washington wire centers. Using FCC data obtained at <http://transition.fcc.gov/mb/engineering/liststate.html> as well as industry-provided information located at <http://cablemover.com/Home>. Frontier reviewed FCC data as well as other public information to cross reference and identify the cable TV provider that operates in each Frontier exchange. The eleven Frontier exchanges where cable company presence could not be determined account for approximately 4,258 access lines or less than 2% of Frontier’s access lines in Washington.

10. Exhibit 3 is a list of the fourteen wireless carriers with interconnection agreements with Frontier, derived from internal Frontier data.

11. Exhibit 4 is a list of alternative service wireless providers providing service in each Frontier exchange. To gather this information, Frontier used public information available at the Emergency Management Division of the Washington Military Department (website: http://www.emd.wa.gov/e911/e911_wirelesscarriercontacts.shtml) provided by the wireless carriers and cross referenced counties with Frontier exchanges.

12. VOIP Interconnection and its calling ability and accompanying features referenced in Paragraph 19 of the Petition were taken from publicly available provider websites and marketing material posted on the websites such as www.vonage.com and www.magicjack.com.

13. Exhibit 5 is a summary of the publicly available data for several of the alternative service providers operating in Frontier's service area in Washington and the companies' parent company annual revenues and number of employees. This public data was collected from InsideView.com, Manta.com, and the websites of the alternative service provider and/or its parent company.

14. Exhibit 6 is a summary of access lines per Frontier Washington exchanges for the years 2009-2011 derived from internal data. Data shows decreases in access lines in every exchange but one in Washington over a three-year period, consistent with a decade long decrease in access lines. The Molson-Chesaw exchange experienced a net gain of seven access lines in that time period.

15. Exhibit 7 is a summary breakdown of the number of alternative providers (CLEC and Interconnected Non-ILEC VoIP providers) in the 151 ZIP codes in which Frontier operates in Washington. Frontier used the source data to create the table, "Percentage of ZIP Codes with CLECs or Non-ILEC VoIP Providers by State as of June 30, 2011," in the Local Telephone Competition report published by the FCC and cross referenced the data with Frontier-served ZIP codes. Frontier serves 152 ZIP codes in Washington, with one ZIP code qualifying as a "unique" ZIP code – a ZIP Code with no residents and assigned to a major state university. Therefore, Frontier's analysis uses 151 ZIP codes as its serving base and the source data, "Reporting Non-

ILEC Interconnected VoIP Providers and CLECs by ZIP Code as of June 30, 2011,” available at http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/IAD/czip0611.pdf.

16. Exhibit 8 is a listing of Frontier exchanges and a summary of Frontier port out data for March 1, 2012 through September 30, 2012. Provider names have not been identified in Exhibit 8 in order to protect the confidentiality of the service providers. I have reviewed the data and it shows that over 5000 port outs during the period were attributable to cable providers and over 1000 port outs during the period were attributable to wireless providers.

17. Information in Paragraph 28 of the Petition, regarding CTIA – The Wireless Association was gathered from the website, http://www.ctia.org/consumer_info/service/index.cfm/AID/10323.

18. Center for Disease Control data in Paragraph 28 of the Petition was found in Stephen J. Blumberg, Ph.D. and Julian V. Luke’s article “Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2011,” released by the Centers of Disease Control and Prevention in June 2012, available at <http://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201206.pdf>.

19. Exhibit 9 includes maps from the Washington State Department of Commerce Broadband Program, Verizon Wireless, AT&T Wireless, T-Mobile, and Sprint. The Washington State Department of Commerce Broadband Program’s map is overlaid with Frontier exchanges and was gathered by the state’s Broadband Program (a division of the Department of Commerce). The map was published at <http://wabroadbandmapping.org/MapGallery.aspx>. The Verizon Wireless, AT&T Wireless, T-Mobile, and Sprint maps were found on their respective websites to demonstrate the multiple choices consumers have in wireless provider availability.

20. CLECs activity in Frontier exchanges in Paragraph 31 of the Petition was derived from Frontier internal data and show that fifty CLECs or other carriers purchase over 4,300 resold lines, approximately 15,000 UNE loops, and over 10,000 UNE-P lines.
21. Information regarding Frontier's basic exchange service rates available to resellers referenced in Paragraph 33 of the Petition is available in Frontier Communications NW Inc.'s WN U-22 Resale Local Exchange Services tariff on file with the Commission.
22. Exhibit 10 is a recent announcement from Integra Telecom of the launch of their hosted-PBX integrated voice and data service, which competes directly with Frontier's traditionally-regulated Centrex (Versaline) and PBX services.
23. A press release from Infonetics Research on October 4, 2012 proclaimed "\$377 billion to be spent on VoIP and UC services over next 5 years," as referred to in Paragraph 35 of the Petition and found at <http://www.infonetics.com>.
24. Exhibit 11 is pricing information for Washington customers in Frontier exchanges from the Comcast/XFINITY website.
25. Exhibit 12 is Comcast/XFINITY bundling options found on the Comcast/XFINITY website.
26. Exhibit 13 is pricing information for Washington customers in Frontier exchanges from the Wave Broadband website.
27. Exhibit 14 is pricing information for Washington customers in Frontier exchanges from the Charter website.
28. Exhibit 15 is information and pricing for potential customers found on the Vonage website.

29. Exhibit 16 is information and pricing for potential customers found on the MagicJack website.

30. Exhibit 17 is information and pricing for potential users of Skype, found on its website.

31. Exhibit 18 is information and pricing for potential customers found on the AT&T Wireless website.

32. Exhibit 19 is information and pricing for potential customers found on the T-Mobile website.

33. Exhibit 20 is information and pricing for potential customers found on the Verizon Wireless website.

34. Exhibit 21 is information and pricing for potential customers found on the Sprint website.

35. Exhibit 22 is a summary of other residential and small business competitive offerings in Frontier's service area, taken from company websites and other public information regarding competitor offerings.

36. As an example of available free Wi-Fi in Paragraph 48 of the Petition, Starbucks offers free Wi-Fi in all of its stores, as explained at <http://www.starbucks.com/coffeehouse/wireless-internet>.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 23 day of January 2013, at Everett, Washington.



Carl Gipson
Manager, Government & External Affairs
Frontier Communications Corporation
1800 41st Street
Everett, Washington 98201
Tel: 425-261-6380
Carl.Gipson@FTR.com