



# ATTORNEY GENERAL OF WASHINGTON

800 Fifth Avenue #2000 • Seattle WA 98104-3188

June 17, 2013

**VIA ELECTRONIC FILING & ABC LMI**

Steven V. King  
Executive Director  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
P. O. Box 47250  
Olympia, WA 98504-7250

Re: WUTC v Frontier Competitive Classification  
Docket No. UT-121994

Dear Mr. King:

Enclosed please find the originals and six (6) copies of Offer of Public Comment Exhibit No. PC-1 and Certificate of Service for filing in the above entitled docket.

Sincerely,

LISA W. GAFKEN  
Assistant Attorney General  
Public Counsel Division  
(206) 464-6595

LWG:cb

Enclosures

cc: Service List (E-mail and U.S. Mail)

**Docket UT-121994**  
**FRONTIER COMPETITIVE CLASSIFICATION**

I hereby certify that a true and correct copy of the Offer of Public Comment Exhibit No. PC-1 was sent to each of the parties of record shown below in sealed envelopes, via: First class mail, and Email.

**SERVICE LIST**

**\*\* = Receive Highly Confidential; \* = Receive Confidential; NC = Receive Non-Confidential**

**SERVICE LIST**

**FRONTIER COMMUNICATIONS**

**NW, INC.:**

Timothy J. O'Connell  
Stoel Rives, LLP  
One Union Square  
600 University St., 36<sup>th</sup> Fl.  
Seattle, WA 98101

**FRONTIER**

**COMMUNICATIONS NW, INC.:**

1800 41<sup>st</sup> Street  
Everett, WA 982011

**UTC STAFF:**

Jennifer Cameron-Rulkowski  
Assistant Attorney General  
1400 S. Evergreen Park  
Drive S.W.  
P.O. Box 40128  
Olympia, WA 98504-0128

**LEVEL 3**

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Regulatory Counsel  
1505 5<sup>th</sup> Avenue Suite 501  
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**CBEYOND**

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320 Interstate North Parkway  
Atlanta, GA 30339

**CBeyond COMMUNICATIONS  
LLC :**

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**CHARTER FIBERLINK:**

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**UNITED STATES DEPT OF  
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1300 SW Fifth Ave Suite 2400  
Portland, OR 97201-5630

DATED: June 17, 2013.



CAROL BAKER

Legal Assistant

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of  
  
FRONTIER COMMUNICATIONS  
NORTHWEST INC.,  
  
To be Regulated as a Competitive  
Telecommunications Company  
Pursuant to RCW 80.36.320

DOCKET UT-121994  
  
OFFER OF PUBLIC COMMENT  
EXHIBIT NO. PC-1

1. Public Counsel hereby offers this Public Comment Exhibit for admission into the record of the proceeding.
2. Public Comment Exhibit No. PC-1. The exhibit consists of letters, e-mails, and other written materials submitted by the public commenting on the request of Frontier Communications Northwest for competitive classification. These letters and materials were submitted to the Commission. The comments are submitted in paper and electronic form.
3. All e-mail and internet comments received by the Commission were input into a database by Commission Consumer Protection and Communications Staff. Output from this database has been included in one document labeled "Frontier Comments Report UT-121994." Additionally, the Commission received three letters, which have been scanned into one .pdf file labeled "Comments Received by UTC." These two (2) files provide all comments submitted in the case.

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4. The submitted materials have been counted as follows:

<u>Comments received by Commission</u>	16
Opposing the request	14
Supporting the request	1
Undecided comments	1

5. DATED this 10<sup>th</sup> day of June, 2013.

ROBERT W. FERGUSON  
Attorney General



LISA W. GAFKEN  
Assistant Attorney General  
Public Counsel Division

**FROINTIER COMMENTS REPORT**  
**UT-121994**  
**(4 Pages)**

March 18, 2013

Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Re: Docket # UT-121994

Dear WUTC Commission,

I write in opposition to granting Frontier Communications Northwest Inc Competitive Classification, thus releasing them from your Commission's oversight. In contrast to their claims that its customers are not a captive customer base, they are the only land line telephone choice available to residents in the areas of Washington they serve.

As it stands now, their billing and handling of payments leaves much to be desired in comparison to the company they bought out. Should you release them from WUTC oversight, I doubt the quality of their service will improve.

Since they switched to their billing system, nowhere on my bill does it list the actual phone services or numbers of lines I have, let alone what charges might attach to which phone lines. There is no explanation nor break out of charges; if I didn't know exactly what services I had under Verizon Northwest and the total cost of them and the various federal fees, I would be at a loss to know which services I am billed for. This information has been clearly stated on every phone company bill I have received in my adult life, in three different large metropolitan areas of the United States.

Frontier consistently does not cash checks for over two calendar weeks after the date I send them. Payments go to Rochester, New York. The USPS does not take two weeks to deliver mail from Seattle to Rochester; this I know for a fact since I have relatives in Rochester. Clearly, they are either holding checks or they are very slow to open and process their mail. I am aware of local residents who have been charged late fees because of their slow processing. If I don't turn my bill around the day it arrives, it is virtually impossible to meet the due date deadline.

Their notice of their request to you tells their customers to mail, fax or email comments to the WUTC without specifically giving the address, fax number or email address to send said comments to. While the postal address is the same address as the one they give for "questions about the competitive classification process," that is not the case for the email address nor did they provide the WUTC web address. This fits with the general poor quality of communication outlined above in their billing practices.

I do not equate phone service from a cellular, broadband or VoIP carriers with a traditional land line. In the event of downed lines, as happened in in 2006 here in the Seattle area, my land line was the only consistent phone service I could rely upon.

Additionally, the practices of the competitive class Frontier wishes to join are notoriously consumer unfriendly. For those who rely on the tried and true land line as their only source of communication, this change in status would have negative consequences.

I urge you to maintain Frontier's status as a regulated utility for the above reasons.

Sincerely,



Michelle McBeath  
14114 NE 27th St.  
Bellevue, WA 98007

STATE OF WASHINGTON  
UTILITY AND TRANSPORTATION COMMISSION  
2013 MAR 20 AM 10:56  
COMMUNICATIONS MANAGEMENT

2/20/2013

Secretary, Wash. Utilities &  
Transportation Commission  
P.O. Box 42750  
Olympia, Wa 98504

RECEIVED

FEB 21 2013

Re: Frontier Communications  
Competitive Telecommunications Co.

WASH. UT. & TP. COMM

The enclosed contains information regarding  
the above and enclosed issues. I'm deeply.

Frontier has the absolute worst customer service  
I ever experienced and with passing of the  
new measures will get rewarded. In the  
City of Edmonds there are not many alternatives  
to choose from for phone service. Their charges  
are already very significant for basic landline  
service for someone living on Social Security.

I hope you will seriously consider the extra  
costs senior citizens will have to carry  
as everyone else struggling to make a living.  
Thank you for listening.

Sincerely,

Karin Gilmore

- 533 4<sup>th</sup> Ave S # 4  
Edmonds, Wa 98020



## IMPORTANT CUSTOMER INFORMATION

If your bill shows a Previous amount, Current Charges remain due by the Date Due shown. All of your bill charges must be paid each month to keep your account current and avoid collection activities, including a notice of possible disconnection of service. To avoid disconnection of local service, the Previous Basic Charges should be paid immediately.

Description	Current	Previous
* Basic Charges	\$28.38	\$0.00
Access Recovery C	\$0.64	\$0.00
Federal Subscriber	\$8.27	\$0.00
Residence Line - U	\$18.52	\$0.00
Washington Local	\$0.70	\$0.00
Washington State	\$0.25	\$0.00
Optional Services	\$0.32	\$0.00
<b>Total</b>	<b>\$28.70</b>	<b>\$0.00</b>

Frontier Communications Northwest Inc. Files for Competitive Classification. Frontier Communications Northwest Inc. ("Frontier") has asked the Washington Utilities and Transportation Commission ("WUTC") to classify it as a "Competitive Telecommunications Company." A telecommunications carrier and the services it provides can be classified as competitive when customers have reasonably available alternatives and the company does not have a significant captive customer base. Frontier's request recognizes the highly competitive communications market in which it operates and, if granted, would provide the Company greater pricing and service flexibility. The Company does not propose any rate change in the initial filing and, if approved, it could change the rates, terms, and conditions of its services without the Commission's approval. The proposed effective date is May 1, 2013. If you have questions or would like more information, you can write Frontier Government Affairs at 1800 41st Street, Everett, WA 98201, call 425-261-6380, or visit [www.Frontier.com/wacompetition](http://www.Frontier.com/wacompetition). For questions about the competitive classification process, contact the Washington Utilities and Transportation Commission at the following address: Secretary, Washington Utilities & Transportation Commission, P.O. Box 47250, Olympia, Washington 98504-7250 or call 1-800-562-6150 (toll free) or fax 1-360-586-1150 or by email at: [Records@utc.wa.gov](mailto:Records@utc.wa.gov). If you would like to comment to the WUTC on this proposal, in Docket UT-121994, it is important for you to do so now. Comments to the WUTC must be mailed, faxed, submitted by e-mail or presented at the WUTC's Open Meeting to be considered part of the formal record. The WUTC encourages your written comments, either in favor or opposition, and has final authority regarding this proposal. All Open Meetings are held in Olympia. If you would like to be added to the WUTC's mailing list to be notified of scheduling updates to this proceeding, please call the WUTC's toll-free number listed above and leave your name and complete mailing address.

RECEIVED

MAR 13 2013

WASH. UT. & TP COMM

March 7, 2013

Dear Secretary:

In regards to the matter of Docket UT 121994 about Frontier Communications filing for a competitive classification as a telecommunications company, I have grave problems with such a change.

1. There is no other provider in this area.
2. I know that if they provide service along with other providers in the general area and the other providers do not, it still counts as being competitive.
3. It is not competitive if I have no other choice plain and simple.
4. In so doing they may charge whatever they so desire without redress.
5. The WUTC is charged with protecting the public from price gouging in a non-competitive market.
6. In addition I have been without usable internet service for 26 days already this year while they supposedly updated their lines.

I would ask that you consider this matter of competitive competition in the area of Snohomish Washington and deny the request of Frontier Communications.

Thank you for taking the time to read and consider my request.

Respectfully,

Glen and Sandra Scalf

6109 157<sup>th</sup> Ave. S.E.

Snohomish Wa. 98290-9338

(360) 568-4606

RECEIVED  
REGULATORY MANAGEMENT  
2013 MAR 13 AM 8:02  
STATE OF WA  
UTIL. AND TRAFFIC  
COMMISSION

**COMMENTS RECEIVED BY UTC**  
**UT-121994**  
**(9 Pages)**

# Public Comments by Case

Total Comments: 16

In Favor: 1

Opposed: 14

Undecided: 1

Filing Support	Commenter	Source	Comments
No	Ann Radoslovich	E-mail	<p>I am writing you (the FCC) re: Frontier's request to be a competitive telecommunications company.</p> <p>Frontier has terrible customer service. When I call in to customer service they have outsourced their to a third party vendor who just reads information. My internet is consistently unavailable whenever it rains at my house, yet when I call, they have never offered to give me a credit and consistently say "It will be up in a short while. We are sorry for the inconvenience."</p> <p>Recently they raised my rates 20% saying they were eliminating my old Verizon Dynamic plan and have 'updated' their services, therefore their rates went up 20%. My cost of living keeps going up yet my hourly wage does not.</p> <p>I favor whatever efforts you can to regulate their rates, services and practices. What does 'minimum regulation' mean? Will you really provide oversight for their rates? I urge you to regulate costs for us 'basic internet' users. If people want really fast service or special features, let them pay for it.</p> <p>Sincerely,</p> <p>Ann Radoslovich RN BSN ACM                      (509) 782-1370                      Cashmere, WA 98815</p>

	Susan Paschke	E-mail	<p>Hello,</p> <p>I am a resident of South Snohomish County and have lived here for 21 years. During that time we have had a minimum of three telephone company transitions. We depend on the WUTC to maintain a sense of fairness for our telephone service (landline) which we depend on. We are served by only one provider.....and at this time, it is Frontier. They bought out Verizon and made promises when they came in that nothing would change. I don't know about you, but this sounds like a leap towards lack of oversight that the public depends on, and a monumental change. If I was provided with the option to choose between two or more providers I may feel differently. But really? Giving Frontier as the sole providers of telephone service in my area a free pass to do what they want is NOT a public service! Please do not allow them to operate outside of your regulation and oversight.</p> <p>Thank you..... Susan Paschke 13621 26th Ave SE Mill Creek, WA 98012</p>
	Donald E. Parchen	E-mail	<p>concerning Frontiers classification request. In August 2009 when the company serving this area was Verizon, I responded to a mini-flyer in my billing statement that offered verizon internet for \$17.99 a month. the offer clearly stated the rate would not change. Since Frontier took over Verizon service for this area the rate remained the same until several months ago when Frontier raised the monthly rate by \$1.00 a month. I didn't notice the change on my statements until recently. Now Frontier is raising the rate for internet service about \$5.00 a month more. Telephone calls to Frontier and Verizon have provided no help as one claims the other has no records of such an offer of \$17.99 a month for internet. I am very much against granting minimal regulation to Frontier or Verizon for anything.</p> <p>Donald E. Parchen sr. 1111 Acacia Avenue Richland, Wa. 99354</p>
	Michelle McBeath	Mail	<p>Customer letter saved as attachment</p> <p>Customer is opposed to Frontiers petition. Says Frontier is the only landline choice for the areas it serves.</p>

			<p>Customer does not consider cellular, VoIP or broadband services to be adequate substitutes for landline service.</p> <p>Customer lists examples of how Frontier provides poor service, and says, "Should you release them from UTC oversight, I doubt the quality of their service would improve."</p> <p>Customer is very concerned about Frontier becoming a competitive company. Says customer service is the worst she has ever experienced. Not many alternatives for service in Edmonds. Charges are already high for someone living on Social Security. Worried about costs to seniors.</p> <p>Docket UT-121994: Frontier informed their customers of their proposal in the fine print on the back of their bills. I am vehemently opposed to it. They state their case for being in a competitive market. However, from the perspective of their customers, they are a monopoly, and have behaved as such since they bought out Verizon. We have no choice of land-line phone carrier. We have no choice of internet provider. And as long as we have no land-line choice, we have no options for access to other services. We are locked. They have no competition and have been completely inflexible. For most of a year, with every statement, they tacked on extra charges that were erroneous, with an initial refusal to correct every one of them. Until we have the option of choosing another carrier, this proposal should not be allowed. Thank you.</p> <p>Ms. is on a very limited income and can barely afford to pay her phone bill now. With a rate increase it will force her to disconnect her phone.</p> <p>To whom it may concern:</p> <p>Regarding docket UT-121994, I do not feel Frontier should have the unregulated authority to set rates without the WA Utilities &amp; Transportation Commission approval and oversight. They have already raised rates on consumers through backdoor "surcharges" without UTC approval, so I'd be very concerned to think what they would do without needed UTC affirmation.</p> <p>Regards, GJ Donahue</p> <p>Mr says the company is poorly run, and stock is down to \$4 per share. He is aware of a company in NH that Frontier bought, which soon went bankrupt.</p>
Karin F Gilmore	Mail		
J. L. McGourty	Web		
Beverly Smith	Web		
GJ Donahue	Email		
Bill Allison	Phone		

			Mr believes seniors like himself depend on reasonable rates that are most likely provided by a company that is regulated by the commission. There are already too many fees on bills, and bundles are very confusing.
Glen and Sandra Scalf	Mail		Customer letter saved as attachment. Customer says there is not competition in the area where they live. Not in favor of the company's proposal.
Rita A. Miller	Web		In regards to Frontier Communications' request to be classified a "Competitive Telecommunications Company" Docket UT-121994  As I understand it, their basic claim is that we (customers in my area of Eastern Wa.) have "reasonably available alternatives". Unfortunately that is not the case in my area. Frontier is the only available basic carrier.  I strongly urge you to maintain Frontier Communications' status as a more closely-regulated, non-competitive communications company.  Thank you for your time and consideration.
Judy Dawson	E-mail		Rita A. Miller  I am completely opposed to this "deregulation". Any time a company wishes to change the rules of the game, you can bet it isn't being done with the consumers best interests in mind. I am old enough to strongly remember Ma Bell. We do not need to return to that business model.
Diane Freethy	E-mail		Judy Dawson Everett, WA  re: UT-121994 - Frontier Communications  As to Frontier's request for "more pricing flexibility in setting phone rates and services" ... our residential phone bills increased another dollar this month!!  We are rural customers in Skagit County and we disagree with the utility's contention that we have "available alternatives."

		<p>Moreover, the company DOES have a "significant captive customer base" for land line service in our area. Some rural residents don't have any other choice.</p> <p>We note that "Commission staff does not support competitive classification of single-line residential and business service." We hope staff will reconsider and recommend that the Commission deny Frontier's request for reclassification altogether ... at least in Skagit County.</p> <p>We appreciate the opportunity to comment on this matter.</p> <p>Diane Freethy, President</p> <p>SKAGIT CITIZENS ALLIANCE for RURAL PRESERVATION</p> <p>PO Box 762, Sedro-Woolley WA 98284</p> <p>360-856-2290</p>
	<p>Michael Brunson</p>	<p>Note (jc): Mr. Brunson attended the public comment hearing in Everett on May 23. He arrived after the hearing was adjourned, and shared comments with Chairman Danner and staff. His comments were the same as those below, which he provided the same day via the UTC online comment form.</p> <p>Need to correct deficiencies, in the way they treat consumers. If they do not correct their deficiencies they need more regulations. They are using some sort technology that enables the company to detect when a customer make a three way call and then bills 75 cents for the call. The problem is the technology is giving a false positive, sometimes it tells the company that the customer has made a three way call and the customer has not. I have never made a three way call in my life but every month it shows that I have made three way calls. A service representative told me that if I make two consecutive calls then it that the system preceives that I made a three way call. Frontier needs to stop using this technology, they told me that they would put a block on three way calls but I am still continued to be billed for three way calling. They said they would give me</p>



			<p>a credit but was only for only the more recent months. I should not have to pay for any services that I have not used.</p>
<p><b>Undecided</b></p>		<p>Steve Walcker</p>	
	<p>Email</p>		<p>My name is Steve Walcker. I have concerns about the petition that Frontier Communications Northwest has recently submitted to the Washington Utilities and Transportation Commission, UT-121994. I live in Everett, WA, and am a consumer of Frontier products and services, a stockholder and an employee. As such, I realize that in one way or another I will be affected by the decision of the WUTC and your representation of Frontier subscribers here in Washington. Respectfully, my concerns center around various aspects of the idea that Frontier, as an ILEC, would like “minimal regulation” applied in regards to landline pricing flexibility, rates and terms of service due to “effective market competition.” I’m also concerned about the statistical information that was cited in their petition; they went back to year 2000. Frontier Communications didn’t operate as an ILEC in this state until July 1, 2010 (UT-090842). None of those statistics were used to determine Frontier’s financial, managerial or technical fitness in transferring ownership of Verizon properties to Frontier Communications (UT-09082). Frontier’s current President and COO, Dan McCarthy, testified before the WUTC that, (July 6, 2009 UT-090842) “Frontier feels the proposed transaction will ensure that the Company is large enough and has the financial wherewithal to weather challenges from competitors as well as economic uncertainty. As I will explain more fully below, acquiring the Verizon exchanges that are the subject of this transaction will increase the number of Frontier customers, the company’s revenue, improve its balance sheet and free up additional cash to bring more services to Verizon’s exchanges in Washington.” Apparently that didn’t work out, otherwise why would Frontier petition the WUTC for “minimal regulation” ?</p> <p>As well, the Commission recently experienced Frontier’s failure to meet a December 31, 2011 deadline to its Broadband Plan (UT-090842 Final Order 06 Commitment 14) that resulted in Order 08 to extend the deadline in which the Commission was “troubled and disappointed with Frontier” and “Finally, we disapprove of Frontier’s cavalier approach to our procedural rules and requirements.” Further, Order 09 once again extended another deadline to allow Frontier to meet its voluntary commitment where the Commission expressed its on-going concerns about Frontier’s inability to meet deadlines. Can Frontier be trusted with “minimal regulation” if they have trouble meeting deadlines?</p>

		<p>I'm concerned about what affect minimal regulation will have in regards to service order delivery (WAC 480-120-105), repair standards (WAC 480-120-440 and UT-090842 Final Order 06 attachment 1 "Retail Service Quality") and retail service rates ( UT-090842 attachment 1 "Retail Service Rates"). I believe that it is Frontier's goal to become as regulated-free as possible. In the competitive environment here in Washington, I would generally agree with that stance except for the fact that in order to accomplish that goal I have witnessed that Frontier is more interested in serving the interest of its stockholders at the expense of its subscribers. I believe the WUTC commissioners may have had the same concerns when they placed 30 conditions on the sale of Verizon properties to Frontier Communications (UT-090842).</p> <p>As a 20 year telephone company employee (GTE 1993-2000, Verizon 2000- 2010 and Frontier 2010 to the present) and 23 year telephone subscriber, I have witnessed how GTE and Verizon conducted business here in Washington in comparison to Frontier Communications. I am awestruck at what has transpired during these 2 ½ years under Frontier's ownership, here in Washington, from service order due dates that are currently out 2 ½ to 3 weeks in Lynnwood, WA. to CEO (Maggie Wilderrotter) statements, in regards to raising rates 46%, that caused the company to lose 23,000 Fiber Optic Service (FIOS) TV subscribers in the first quarter of 2011(The Oregonian March 4, 2011). In fact, it wasn't until a recent (2/6/2013) all employees meeting at 1800 41st St, Everett, WA. that Mrs. Wilderrotter was aware that our due dates were out that far!</p> <p>I have so much more to say about this subject but, at this point, need you to understand that I believe there are other solutions that may be more appropriate to the dilemma faced by Frontier. Please understand that I want Frontier to succeed and thrive in the market, not just get by.</p> <p>While I make no claims of having all the answers, I have noticed that West Virginia has an Incentive Regulation Plan (Case No. 05-0040-T-PC) concerning Frontier that allows for price flexibility. What about the possibility of "fast-tracking" tariff requests? I also need for you to know that Frontier Communications has partnered with AT&amp;T wireless as a reseller of cellular service in order to mitigate revenue losses from Frontier subscribers who decide to "cut the cord." I believe an article from <a href="http://www.stopthecap.com">www.stopthecap.com</a> may shed more light on the idea that other Telcos, besides Frontier, would like to enjoy "minimal regulation." Tom Fitzgerald of the Kentucky Resources Council explains "AT&amp;T's long term agenda is deregulation and eventual abdication of its basic responsibility to provide affordable, essential basic telephone service to every resident in the state who wants it." (Don't Let AT&amp;T Abandon Rural Landlines, Appeals Kentucky Resource</p>
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		<p>Council, Feb. 6, 2013). My concern is that Frontier Communications may attempt to do the same. Please don't let that happen. Please adjudicate this issue with the utmost care!</p> <p>Respectfully</p> <p>Steve Walcker 13031 27th Pl W Everett, WA 425.381.1984 pfoneguy@hotmail.com</p>
Yes		<p>I am an employee of Frontier Communications, and I am also a customer.</p> <p>As a customer I would like to say that I appreciate Frontier's business model of providing top-notch communications services to rural communities such as the one I live in. They are one of several high speed internet providers in the area. I can name at least five other providers that I can choose from if I decide their pricing or service is better (and I know more are coming). Frontier's landline business is also facing pressure from cellular and other clec companies.</p> <p>As an employee, I want Frontier to succeed for reasons that are obvious. As a customer, I want Frontier to have competitive pricing and service.</p> <p>I believe Frontier should be allowed to compete on a level playing field with all the other providers in the area. I hope that you will reclassify Frontier as a "competitive communications company"</p> <p>Thank you for taking the time to read this.</p> <p>Sincerely,</p> <p>Gary D Raines 521 N Custer St</p>

