

Docket UT-090842  
Appendix FWL-1  
November 19, 2009

**Appendix FWL – 1**

**CURRICULUM VITAE  
OF  
F. WAYNE LAFFERTY**

Mr. Lafferty is a twenty year veteran the telecommunications industry in the United States. He has participated in the operation and evolution of that industry including the analysis and implementation of the 1996 Telecommunications Act and many of the acquisitions which have brought about significant change for that industry. His experiences have touched many areas of the industry including incumbent local exchange (“ILEC”), competitive local exchange (“CLEC”), long distance and broadband operations. He has first hand experience with the technological, product and regulatory changes driving the evolution of the telecommunications industry in recent years. In addition, Mr. Lafferty has played a leadership role in the operation of a diversified telecommunications enterprise developing and implementing strategies and programs to acquire properties, provide quality customer and community service, develop employees, grow revenues, build and maintain facilities and operate efficiently. He has first hand experience managing regulatory affairs, industry relations, product management, public relations, strategic planning, transaction analysis and implementation and other administrative responsibilities.

One of his specific professional focuses over the years has been in the area of state and federal regulatory and public policy development and implementation. His experiences over the years ranged from developing and managing state rate case proceedings to early (pre 1996) efforts to develop the policies to implement competition and deregulation to help shape the rules and regulations guiding the unfolding competitive environment in the telecommunications industry. Throughout his entire career, he has focused on the importance of seeking realistic balanced

solutions to regulatory, operational and financial challenges using the most effective processes and effective communication.

Mr. Lafferty has participated in a variety of telecommunications' activities including:

- Development and implementation of balanced public policy advocacy programs for the benefit of a diversified telecommunications enterprise.
- Implementation of regulatory and operational requirements stemming from the 1996 Act and subsequent regulatory rulings.
- Development of requirements, processes and procedures to negotiate and implement interconnection arrangements.
- Development and analysis of cost studies for products, unbundled elements and interconnection services.
- Negotiation of interconnection matters and disputes on behalf of competitive and incumbent telecommunications entities.
- Analysis and implementation of incentive regulatory programs.
- Analysis of federal and state cost recovery mechanisms including access charges and universal service programs.
- Development of processes to implement the FCC's cost allocation rules (Part 64).
- Development and management of state rate and other major regulatory proceedings during time of significant telecommunications network and product expansion.
- Development of state and federal legislation to implement competition, and revise regulatory rules.
- Development of portions of the 1996 Telecommunications Act.
- Implementation of a start up telecommunications operation to provide diversified services to over 400,000 customers.
- Divestiture and/or acquisition of telecommunications properties covering over 2,000,000 customers.
- Raising equity investment and performing due diligence for the acquisition of rural telephone properties.
- Development and implementation of credit and collection policies for deregulated businesses as premises equipment and other services became deregulated.
- Mr. Lafferty has testified on telecommunications public policy matters before state regulators in Arizona, Arkansas, California, Connecticut, Idaho, Illinois, Iowa, Kansas, Montana, Nebraska, New York, North Dakota, Oregon, Oklahoma, Rhode Island,

Vermont, Virginia and Wyoming and before the United States Congress. His testimony experience is as follows.

Venue	Party - Topic	Date <sup>1</sup>
Arizona Corporation Commission	Citizens Communications - Telecommunications Asset Acquisition	2000-01
	Cox Communications – Qwest Incentive Regulation	2004-05
Arkansas Public Service Commission	TelCove – SBC Interconnection Arbitration	2005
Connecticut Department of Public Utility Control	Cox Communications – Transit Traffic	2002
	Cox Communications - Access Charge Reform	2003
California Public Utility Commission	Citizens Communications / Electric Lightwave - Local Competition	1997-98
	Citizens Communications / Electric Lightwave - Universal Service	1997-98
	Cox Communications – SBC Regulatory Reform	2006
Idaho Public Utility Commission	Citizens Communications - Telecommunications Asset Acquisition	2000-01
	Idaho Telecommunications Association and several small local carriers - Qwest Interconnection Contract Dispute (SS7)	2002
Illinois Commerce Commission	Citizens Communications Company - Telecommunications Asset Acquisition	1999-2000
Iowa Utilities Board	Citizens Communications Company - Telecommunications Asset Acquisition	2000-01
	Cox Communications – Qwest Interconnection Contract Dispute (SS7)	2002
	Cox Communications - Regulatory Reform/Deregulation	2004
Kansas Corporation Commission	TelCove – SBC Interconnection Arbitration	2005
Montana Public Service Commission	Citizens Communications - Telecommunications Asset Acquisition	2000-01

<sup>1</sup> Some of the earlier dates are estimates.

Nebraska Public Service Commission	Citizens Communications - Telecommunications Asset Acquisition	1999-2000
	Citizens Communications - Telecommunications Asset Acquisition	2000-01
	Cox Communications – Qwest Interconnection Contract Dispute (SS7)	2002
New York State Public Service Commission	Citizens Communications - Interconnection Arbitration	1998-9
North Dakota Public Service Commission	Citizens Communications - Telecommunications Asset Acquisition	2000-01
Public Utilities Commission of Oregon	TelCove – SBC Interconnection Arbitration	2005
Oklahoma Corporation Commission	Cox Communications – SBC Interconnection Arbitration	2003
Rhode Island Public Utilities Commission	Cox Communications – Verizon Incentive Regulation	2005
Vermont Public Service Board	Vermont Department of Public Service - FairPoint Acquisition of Verizon Telecommunications properties	2007
Virginia State Corporation Commission	Cox Communications - Regulatory Reform	2004
Wyoming Public Service Commission	Citizens Communications - Telecommunications Asset Acquisition	2000-01
Superior Court for the State of California, County of Orange (Case No. 02CC16869)	RLH Industries - RLH Industries, a California Corporation (plaintiff) vs SBC Communications Inc., et. al. (defendants)	2006-07
United States House of Representatives (Commerce Committee)	Citizens Communications / US Telecom Association - Regulatory Reform	2000

Over his career Mr. Lafferty has held positions of increasing responsibility with GTE Corporation (now part of Verizon Communications) and Citizens Communications (now Frontier). Most of his responsibilities have been in regulatory and government affairs area. However, leadership positions have provided experience with all aspects of managing a diversified telecommunications operation.

In 2001 he founded LKAM Consulting Services to provide regulatory, economic and public policy consulting services to telecommunications entities (incumbents and new entrants) and other industry players on a variety of industry matters. In 2003, Mr. Lafferty joined the Barrington-Wellesley Group (BWG) to continue his telecommunications consulting activities in the areas of interconnection, economic analysis and regulatory policy and adding the full scope of telecommunications and utility management consulting to his potential responsibilities. He became a Director/Partner in the firm. Effective April 1, 2007 BWG was acquired by Huron Consulting Group, LLC (Huron) and became Huron's utilities practice. Mr. Lafferty's recent consulting projects have been on behalf of both competitive and incumbent telecommunications interests, regulatory agencies and other utility firms.

Mr. Lafferty is a native of Baltimore, Maryland and a graduate of Duke University with an undergraduate degree in economics and an MBA. He has participated in industry trade associations and has spoken at seminars over the years on a variety of technical and public policy issues. He currently lives in McKinney, Texas (a Dallas suburb).

Docket UT-090842  
Appendix FWL-2  
November 19, 2009

**Appendix FWL – 2**

**FRONTIER COMMUNICATIONS  
SERVICE QUALITY REPORT (NEW YORK)  
THIRD QUARTER 2008**

Filed Session of November 12, 2008

**STATE OF NEW YORK  
DEPARTMENT OF PUBLIC SERVICE**

November 6, 2008

TO: THE COMMISSION

FROM: OFFICE OF TELECOMMUNICATIONS

SUBJECT: CASE 08-C-0405 - In the Matter of Quality of Service provided by Local Exchange Companies in New York State.

This memorandum is for informational purposes. No action is required.

**FRONTIER COMMUNICATIONS<sup>1</sup>**  
**Third Quarter 2008 Service Quality Report**

**SUMMARY**

The quality of telephone service provided by the local exchange subsidiaries of Frontier Communications during the third quarter of 2008:

- Met Commission-established performance thresholds for the local exchange subsidiaries of Frontier Communications, 97.8% of the time;
- Met all merger-related and other service requirements for Frontier's subsidiaries; and,
- Experienced an increase in service-related consumer complaints to the Commission.

**BACKGROUND**

Frontier Communications is a holding company that serves over 2.4 million access lines in 24 states. In New York State, it owns the incumbent local exchange

---

<sup>1</sup> Citizens Communications announced a name change to Frontier Communications, effective July 31, 2008.



CASE 08-C-0405

companies of Citizens Telecommunications Company of New York, Inc. (Citizens of NY), Frontier Telephone of Rochester, Inc. (FTR), Frontier Communications of New York, Inc. (Frontier of NY), Frontier Communications of Ausable Valley, Inc. (Ausable), Frontier Communications of Seneca-Gorham, Inc. (Seneca-Gorham), Frontier Communications of Sylvan Lake, Inc. (Sylvan Lake), and Ogden Telephone Company (Ogden). Through these subsidiaries, Frontier Communications serves about 634,739<sup>2</sup> access lines in New York State through 210 central offices. Overall, Frontier Communications serves a significant portion – about 8.7% – of the total traditional access lines in the State, but has lost approximately 21,600 access lines since the previous quarter. More than 13,300 of these line losses were in FTR.

The geographic areas and lines (as of September 30, 2008) served by each subsidiary are shown in the following table:

<b>Frontier Communications' Local Exchange Subsidiaries in New York</b>		
<b>Subsidiary</b>	<b>Access Lines</b>	<b>Geographic Area Served</b>
Citizens of NY	230,888	Parts of 31 Counties Statewide
FTR	313,714	Parts of Genesee, Livingston, Monroe, Ontario, Steuben, Wyoming and Yates Counties
Frontier of NY	50,539	Parts of Orange and Ulster Counties
Ausable	5,934	Parts of Clinton, Essex and Franklin Counties
Seneca-Gorham	7,365	Parts of Ontario and Yates Counties
Sylvan Lake	11,297	Part of Dutchess County
Ogden	15,002	Part of Monroe County
NYS Corporate Total	634,739	

Under the Commission's Service Standards, 16 NYCRR 603, local exchange carriers serving 500,000 or fewer access lines are only required to report Customer Trouble Report Rate (CTRR), and each subsidiary of Frontier Communications currently serves fewer than 500,000 lines. FTR had reported on additional metrics as part

---

<sup>2</sup> Of these lines, about 899 are on a resale basis.

CASE 08-C-0405

of a permanent condition of its now expired incentive plan, the Open Market Plan (OMP).<sup>3</sup> Appendix A contains a summary of the Commission's Telephone Service Standards as well as the other metrics applicable to FTR through the third quarter. Appendix B is a glossary of terms used in this memorandum.

### **DISCUSSION**

This report groups and summarizes performance results for the third quarter of 2008. Detailed results by metric and entity are being measured as required by the standards and tracked by Staff, but are not presented in detail unless it is necessary to explain a significant service problem. The Service Standards contain four groups of metrics measuring maintenance, installation, network, and answer time performance. Of these four, only maintenance is addressed below. As previously mentioned, Frontiers' local exchange subsidiaries are required to report only CTRR on a routine basis. Other regulatory requirements related to service quality are also discussed.

Overall and as shown in the following table, the Frontier local exchange subsidiaries met Commission established thresholds of performance 97.8% of the time during the third quarter on those metrics they are required to report. The chart has been updated through September. These overall results are discussed in more detail in this report.

---

<sup>3</sup> In October 2008 in Case 08-C-1140, the Commission eliminated the duplicate service quality reporting requirements required by the OMP.

CASE 08-C-0405

**Frontiers' ILEC Companies  
Frequency of Meeting CTRR Threshold Performance Levels  
3<sup>rd</sup> Quarter and Year-to-Date**

Metric	2008					
	3 <sup>rd</sup> Quarter			Year-to-Date		
	Opportunities	% Met	% Missed	Opportunities	% Met	% Missed
CTRR Combined	639	97.8%	2.2%	1,917	98.9%	1.1%
a) CTRR < 5.5	630	97.9%	2.1%	1,890	98.9%	1.1%
b) 85% CTRR < 3.3	9	88.9%	11.1%	27	92.6%	7.4%

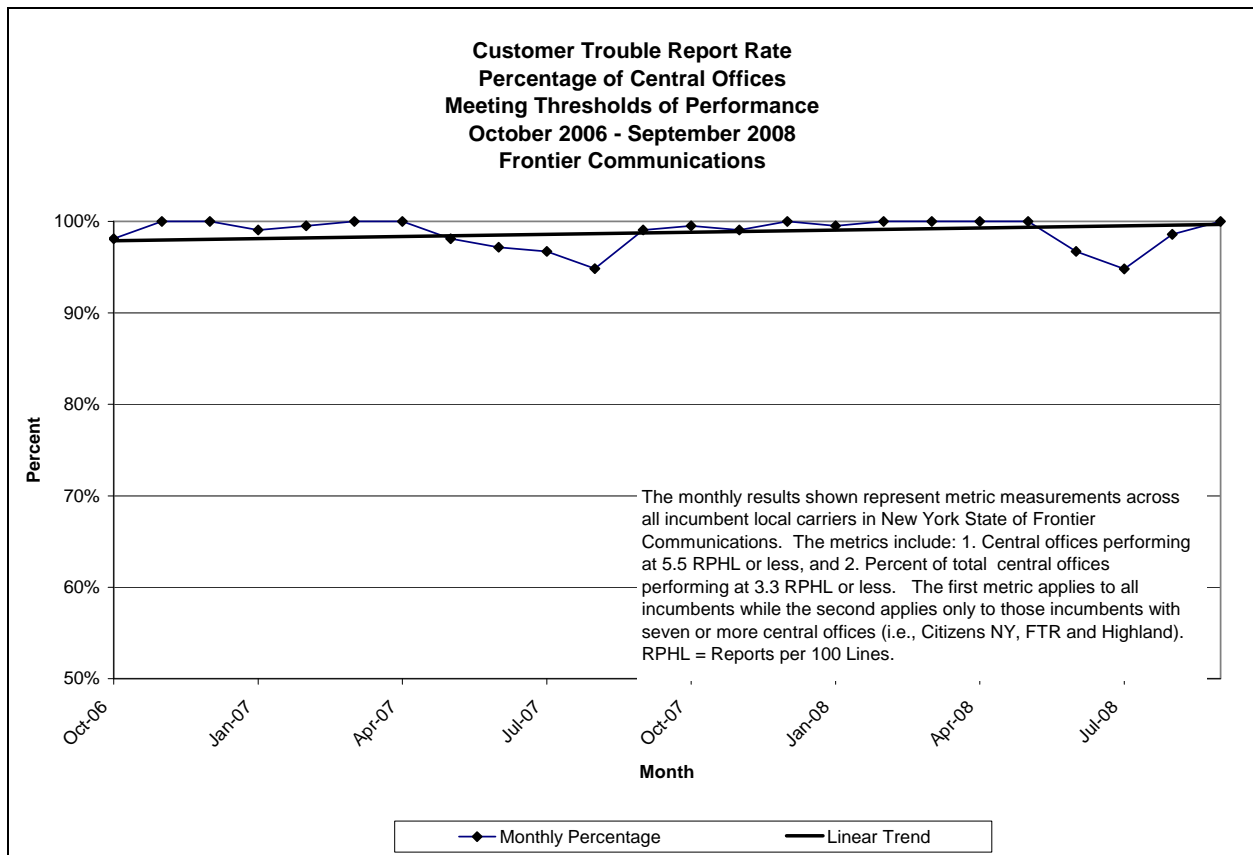
Maintenance Service

The subsidiaries' central offices generally met the Commission's established levels of CTRR performance.<sup>4</sup> The following chart shows that during the third quarter 625 (97.8%) of the 639 central office measurement opportunities met or exceeded the monthly CTRR performance thresholds of the standards.

---

<sup>4</sup> Performance for two CTRR metrics of the standards are combined in the chart: 1) A threshold level of 5.5 reports per hundred lines (RPHL) or less per central office per month for all seven subsidiaries, and 2) a threshold level of 85% or more central offices at 3.3 RPHL or less per month for those three subsidiaries serving seven or more central offices (Citizens NY, FTR and Frontier Communications of NY).

CASE 08-C-0405



This performance is slightly below the third quarter results for 2007. Staff notes that most central offices overall were well below 3.3 reports per 100 lines.

### Service Inquiry Reports

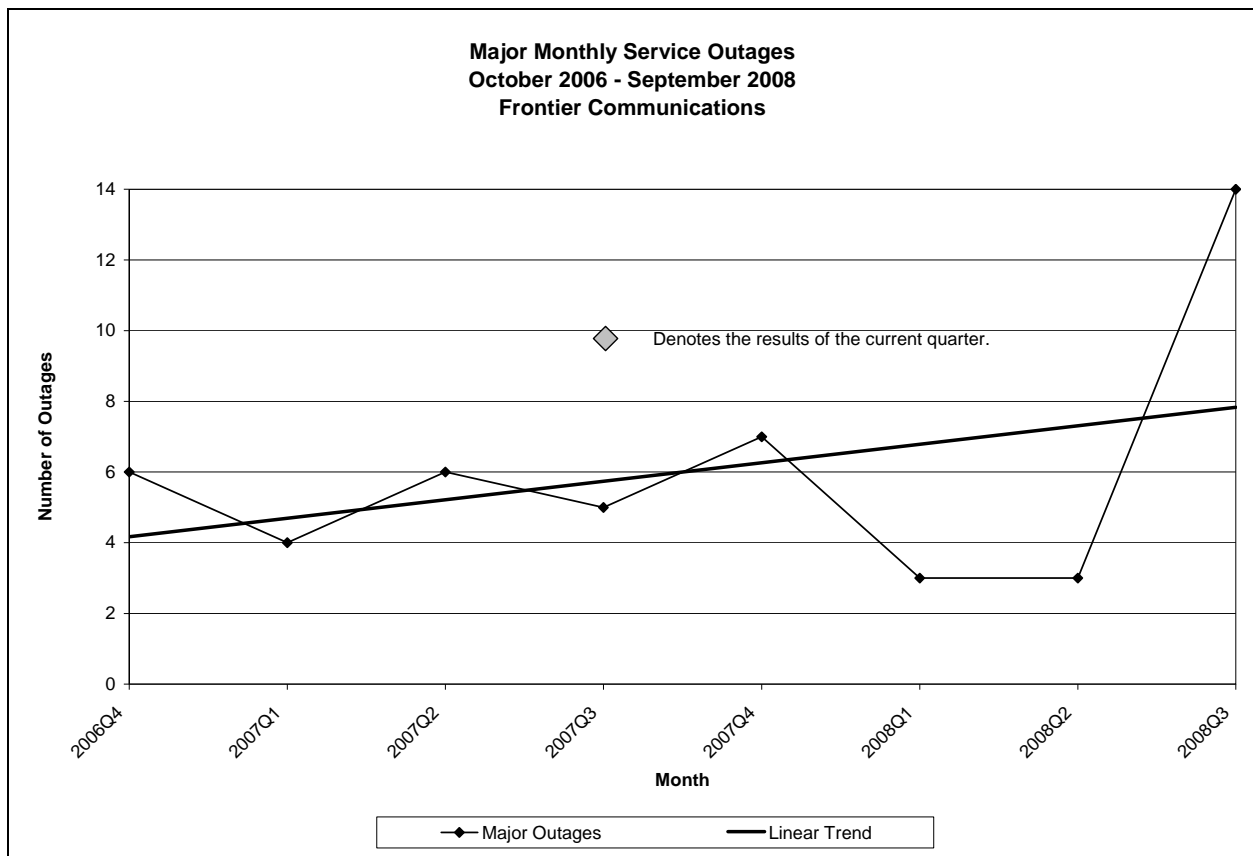
When service results in a measured entity (e.g., central office) consistently fail to meet the threshold performance level of a given metric, the appropriate subsidiary must submit a Service Inquiry Report<sup>5</sup> detailing the reasons for the poor performance as well as the corrective action taken. There were no such situations in the third quarter of 2008.

<sup>5</sup> Service Inquiry Reports (SIRs) are required under 16 NYCRR 603.4 whenever a Service Standards' metric is not at or better than the threshold for the current month and any two of the previous four months. These reports identify specific regions where improvements are required, detail the reasons for poor performance, describe the corrective action being taken, and identify an expected improvement date.

## CASE 08-C-0405

Major Service Outages

The standards also enjoin carriers to minimize major service outages, and to report such events to Staff when they occur. There were fourteen such outages during the third quarter of 2008, up from five during the third quarter of 2007. Frontier of New York had 10 outages while FTR had four. Four of the Frontier of New York outages were related to central office equipment problems, three were related to contractor damage to underground cable, two were storm-related, with one of those a direct lightning strike, and one was related to a technicians error. Three of the FTR outages were central office equipment problems, while one was storm-related. Staff closely monitors outages and, where appropriate, performs a root cause analysis of the failure for reliability purposes. The overall trend remains good as shown in the following chart.

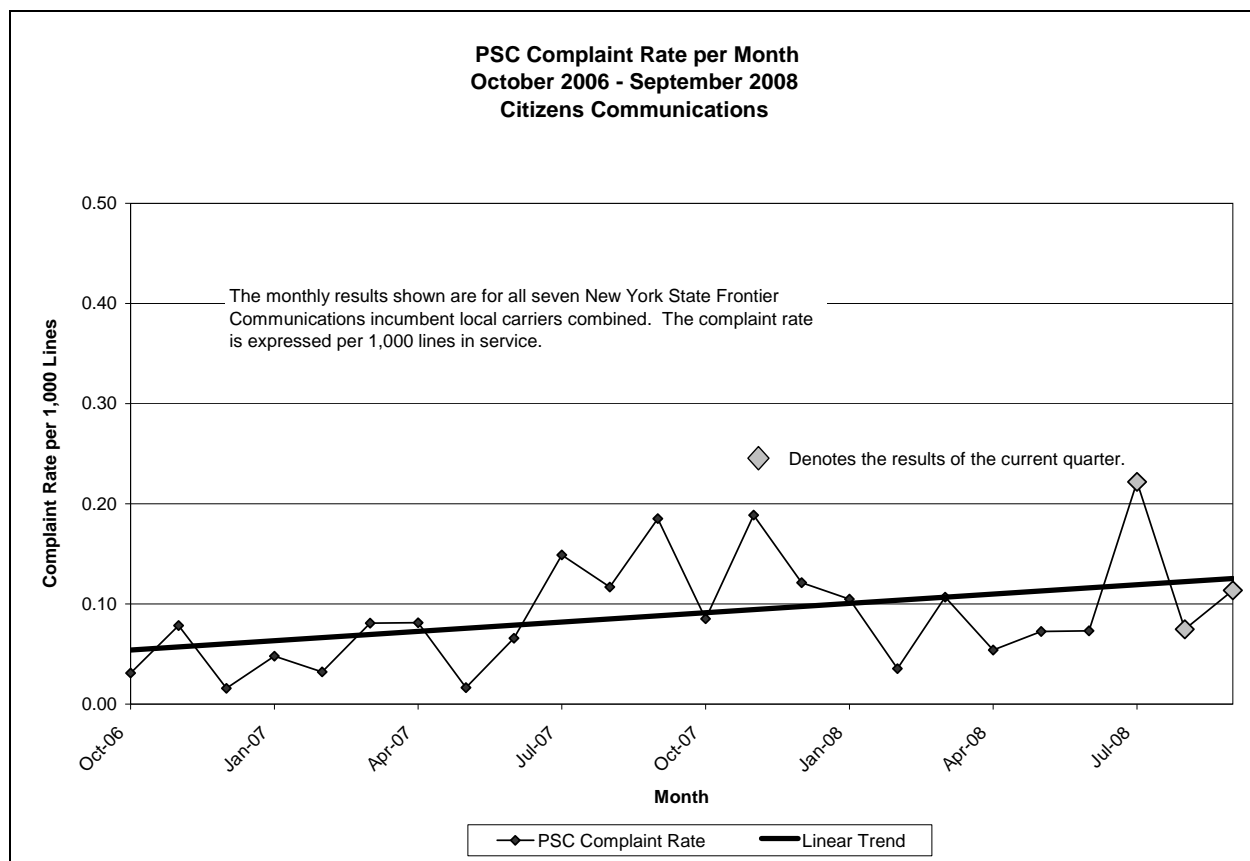


CASE 08-C-0405

Complaints to the Commission

Complaints are not a part of the Commission's Service Standards, but serve as an independent measure of service quality apart from performance reported by the carriers under the standards. The following chart shows an increase in complaints during the third quarter of 2008. There were a total of 22 complaints for the third quarter of 2008, up from 11 during the second quarter. This compares to 27 complaints for the third quarter of 2007. Nine of the 22 complaints for this quarter were Citizens of NY complaints, and 4 of those were service-related. FTR recorded 8 complaints for the quarter, of which 4 were service-related. In addition, Ausable had 2 complaints, Frontier of NY had 2 complaints and Ogden recorded 1 complaint. Staff had addressed complaint issues with the company last year, and had seen a decreased complaint level during the first half of 2008. Staff will continue to monitor the complaint level for the remainder of 2008, to see if the third quarter was an anomaly. It does not appear to staff that this is a serious concern at this point.

## CASE 08-C-0405

Merger-Related and Other Service Quality Performance

Merger requirements relating to service quality were established for most subsidiaries, and continued for FTR, when Citizens Communications acquired the former Frontier local exchange subsidiaries on July 2, 2001. All subsidiaries except FTR, which was covered by permanent conditions of the OMP until October 15, 2008<sup>6</sup> were required to maintain a performance level of 90% or more of a given subsidiary's central offices at or below a CTRR level of 3.3 reports per 100 access lines in any 12-month period ending each calendar quarter. All subsidiaries met this quarterly goal.

FTR achieved all necessary requirements in order to avoid a dividend suspension for calendar year 2007, and was meeting the requirements in 2008 up to the

<sup>6</sup> On October 15, 2008, the Commission adopted the Joint Stipulation and Agreement, modifying the remaining OMP conditions. The 4<sup>th</sup> Quarter 2008 report will reflect these changes.

CASE 08-C-0405

modification of the OMP provisions. Details on its performance in this regard are shown in Appendix A.

### Service Quality Reporting Under the Joint Stipulation and Agreement

As noted, the Commission adopted the Joint Stipulation and Agreement at its October 15, 2008 session. This Agreement considers the overall service quality of the combined Frontier ILECs, and includes a dividend suspension and customer rebates should service quality fall below an acceptable level. Under the agreement, no Frontier incumbent local exchange carrier would be able to make dividend payments to the parent holding company if service quality fell below a certain level.

For purposes of the Agreement<sup>7</sup>, service quality will now be measured and reported monthly on a combined company basis and the customer rebate system will be based on the total number of “measurement opportunities” on a 12-month rolling basis. A measurement opportunity is the monthly CTRR performance of each central office. A customer rebate equal to 25% of the flat monthly basic service charge will be applied to bills when the companies fail to achieve 90% of its offices at or lower than 3.3 reports per 100 access lines over a 12-month average. During periods when performance thresholds are missed, the rebate will double to 50% of the monthly service charge for each office where the CTRR measurement exceeds the higher threshold of 5.5 CTRR per 100 access lines. The 50% rebate is payable when the 25% rebate would have been payable. Dividends will be suspended if service quality fails, such that Frontier’s CTRR level falls below the performance threshold for three consecutive months. The suspension will end when the carriers meet the performance threshold for three consecutive months.

---

<sup>7</sup> While the Agreement provides that the CTRR thresholds for rebates and dividend restrictions be calculated on a company wide basis, Frontier will continue to report CTRR to Staff on a company by company basis.



CASE 08-C-0405

**CONCLUSION**

The local exchange subsidiaries of Frontier Communications operating in New York State met or exceeded the Commission's Service Standards for the third quarter of 2008. FTR also met its service requirements relating to dividend payments.

All merger-related service performance targets of the other subsidiaries have been met during this quarter. This report will be modified to reflect the new reporting requirements that took effect on October 15, 2008, as of the next quarterly report. This memorandum is for informational purposes and no action is required.

Respectfully submitted,

**BRUCE J. MILLER**  
Utility Engineer 3

Reviewed by,

**GREGORY C. PATTENAUDE**  
Chief, Carrier Performance  
Office of Telecommunications

**SAUL M. ABRAMS**  
Assistant Counsel

Approved by,

**CHAD G. HUME**  
Director  
Office of Telecommunications

Attachments

## **OVERVIEW OF SERVICE QUALITY MEASUREMENT**

The primary criteria for measuring telephone service quality are the Telephone Service Standards, which were adopted by the Commission in 1973 (Opinion No. 73-40, Case 26158) and revised in 1989, 1991, and 2000. The Service Standards appear as Part 603 of 16 NYCRR and require measurement of service quality in four separate categories: 1) Maintenance Service, 2) Installation Service, 3) Network Service, and 4) Answer Time Performance. Within these categories there are 10 metrics, each with its own threshold level of expected performance. There are also a number other requirements in the standards which are not expressed in terms of a metric such as minimizing service interruptions and maintaining procedures for operating under emergency conditions. These are grouped into a category called "Other" in this appendix. Staff receives monthly reports of service measurements in these categories that are analyzed to evaluate the level of service quality delivered to consumers.

### **Maintenance Service**

Maintenance Service measures the reliability of the telephone network, and how quickly it is repaired when a customer experiences a problem. There are three metrics as follows: (1) Customer Trouble Report Rate (CTRR), measured by the number of customer reported troubles per 100 lines in service; (2) Percent Out-of-Service Trouble Reports Not Cleared within 24 Hours (OOS >24); and (3) Percent Service Affecting Trouble Reports Not Cleared within 48 Hours (SA>48).

CTRR is measured in two ways. First, performance in each of Citizens' 210 central offices should meet an expected performance level or threshold of 5.5 or less Reports per 100 Lines (RPHL). Second, for each of those Citizens subsidiaries that serve more than seven central offices, 85% of each subsidiary's offices should perform in a threshold range of 3.3 or less RPHL. All subsidiaries of Citizens are not required to report OOS>24 and SA>48. For OOS>24, the threshold is that no more than 20% of all out-of-service conditions take longer than 24 hours to be repaired. For non-out-of-service conditions or SA>48, the threshold is that no more than 20% of all such troubles take longer than 48 hours to be repaired. Taken together, these two metrics ensure that every customer reported trouble condition has an expected repair interval of either 24 or 48 hours.

### Installation Service

Installation Service measures the utility's ability to provide basic service to a new customer.<sup>8</sup> There are two metrics for installation service as follows: (1) Percent Basic Service Installations Completed Within 5 Days (% Installed in 5 days), and (2) Percent Missed Basic Installation Appointments (% Missed Installations). The thresholds for these are 80% or higher, and 10% or less, respectively. No subsidiaries of Citizens are required to report Installation Service.

### Network Service

Network Service measures the ability of the telephone network to complete interoffice calls by measuring the percentage of total calls that are blocked on final trunk groups, the last available route to complete an interoffice call. The threshold for this metric is the identification of each final trunk group that consistently (i.e., for three consecutive months) has calls blocked in excess of 3% of total calls within the busy hour. The intent is to be sure that unusual levels of call blocking during the typical busy hour do not occur. No subsidiaries of Citizens are required to report on this metric.

### Answer Time Performance

Answer Time Performance measures how quickly the company answers the telephone in each call center when customers call for service. There are three metrics for answer time performance that are specific to the type of call center including repair, business office and local operator assistance.<sup>9</sup> The thresholds are 80-100% of calls answered within 30 seconds for each repair and business office, and an average speed of answer of 0-3 seconds for each local operator assistance call center. No subsidiaries of Citizens are required to report Answer Time Performance.

The following chart summarizes the metrics and associated thresholds of expected performance of the previously discussed groupings of metrics in the standards.

---

<sup>8</sup> Basic service is defined as the first residence line or the first 5 business lines to a customer, excluding other types of service orders for such things as additional features (e.g., Call Waiting, Caller ID), or additional lines beyond these minimums.

<sup>9</sup> Companies may report Local Operator Assistance either as a percentage of calls answered within 10 seconds, or as an average speed of answer time.

<b>SERVICE QUALITY MEASURES</b>		
<b>Effective October 2000</b>		
<b>SERVICE ELEMENT</b>	<b>REPORT NOMENCLATURE</b>	<b>PERFORMANCE THRESHOLD (Monthly)</b>
<b>MAINTENANCE SERVICE:</b> <sup>(1)</sup>		
Customer Trouble Report Rate (Initial Reports) Per individual central office entity	Reports per 100 access lines	5.5 or less
Percentage of total entities (for those providers with 7 or more offices) at 3.3 or less	Reports per 100 access lines	85.0 or more
Out-Of-Service Clearing Time	Percentage of OOS over 24 hours	20.0 or less
Service Affecting Clearing Time	Percentage of S. A. over 48 hours	20.0 or less
<b>INSTALLATION SERVICE:</b> <sup>(2)</sup>		
Basic Service Installations	Percentage installed within 5 days	80.0 or greater
Missed Basic Service Installation Appointments	Percentage missed	10.0 or less
<b>NETWORK SERVICE:</b>		
Final Trunk Group Blockages	Percentage of calls blocked	3.0 or less
<b>ANSWERING TIME PERFORMANCE:</b> <sup>(3)</sup>		
Business Office	Percentage answered within 30 seconds	80.0 or greater
Repair Service Bureau	Percentage answered within 30 seconds	80.0 or greater
Local Operator Assistance <sup>(4)</sup>	Percentage answered within 10 seconds	90.0 or greater
Local Operator Assistance <sup>(4)</sup>	Average answer time (seconds)	3.0 or less
<sup>1.</sup> Overall Customer Trouble Report Rate results shall be reported at the central office entity level. All other Maintenance Service results shall be reported at the appropriate maintenance administrative entity level. <sup>2.</sup> All Installation Performance results shall be reported at the appropriate installation administrative level and shall exclude those instances where the subscriber requests a later date or where substantial construction is required. <sup>3.</sup> All Answering Time Performance results shall be reported at the appropriate administrative entity levels. <sup>4.</sup> Measured either as a percent of answered calls or as an average answer time, but not both.		

## OTHER

### Service Inquiry Reports

The standards define localized situations that might require corrective action by the utility. In general, any consistent, non-threshold performance in a measurement entity (central office, bureau, district, call center or final trunk group) for any of the previously discussed metrics requires the company to file a Service Inquiry Report, a report identifying the cause of the performance and any corrective action being taken.

### Major Service Outages

The standards also enjoin carriers to minimize major service outages, and to report such events to Staff when they occur. Such interruptions can occur for any number of reasons including damage to cables by contractors, fire, floods and terrorists activities. Such interruptions include both physical and cyber incidents that affect a company's network, facilities, services or operations.

### Special Services

The Commission also has Special Service Guidelines addressing the quality of service utilities are expected to provide on Special Services<sup>10</sup> in the areas of ordering, maintenance and installation quality. These guidelines are not part of the Commission's Rules and Regulations, but have been established via Commission order. Staff receives monthly service quality reports on these types of services only from Verizon, as it is the only carrier currently meeting the reporting criteria as defined in the Special Services Guidelines.

### Complaints to the Commission

While not a service standard, the number of complaints against a utility is a measure of service quality. Traditionally, such complaints are stated as a rate per 1,000 lines per year so that comparisons between companies can be made. The threshold used to indicate good performance is set at 0.074 or lower per year.

## **SERVICE REQUIREMENTS OF THE OMP**

The Open Market Plan<sup>11</sup> (or, the Plan) is based on service performance standards as stated in the rules prior to the substantial revisions adopted in October 2000. While the Plan expired on December 31, 2004, some requirements relating to holding company arrangements were permanent and did not expire. One of those requirements links annual service quality performance to the potential to withhold dividend payments to FTR's parent company, Citizens Communications. Essentially, FTR must achieve the annual service quality targets of the OMP in order to continue to make dividend payments.

---

<sup>10</sup> Special Services are non-basic services, most of which are non-switched, and require engineering design review before being installed. Some may require construction of fiber facilities. They include alarm, video, foreign exchange and other services, but the majority demanded are high speed data circuits of 1.5 megabits and higher transmission rates.

<sup>11</sup> Case 93-C-0103 – Petition of Rochester Telephone Corporation for Approval of Proposed Restructuring Plan.

The following chart shows the service measurements of the standards prior to modification in October 2000 that are used for determining if FTR can continue to make dividend payments, and do not apply to other companies.

<b>SERVICE QUALITY MEASURES</b>				
<b>Prior to October 2000</b>				
SERVICE ELEMENT	REPORT NOMENCLATURE	SERVICE RATINGS		
		OBJECTIVE	WEAKSPOT	
<b>MAINTENANCE SERVICE: (1)</b>				
Customer Trouble Report Rate	Report per 100 access lines	0.0 - 4.2	Over	7.0
Missed Repair Appointments	Percentage of missed appointments	0.0 - 10.0	Over	15.0
Out-Of-Service Clearing Time	Percentage of OOS over 24 hours	0.0 - 20.0	Over	30.0
<b>INSTALLATION PERFORMANCE: (2)</b>				
Regular Installations	Percentage installed within 5 days	85.0 - 100.0	Below	70.0
Installation Appointments	Percentage missed	0.0 - 3.0	Over	10.0
<b>ANSWERING TIME PERFORMANCE: (3)</b>				
Business Office	Percentage answered within 20 seconds	90.0 - 100.0	Below	85.0
Business Office	Percentage all positions busy	0.0 - 10.0	Over	15.0
Repair Service Bureau	Percentage answered within 20 seconds	90.0 - 100.0	Below	85.0
Repair Service Bureau	Average answer time (seconds)	12.0 - 16.0	Over	27.0
Directory Assistance	Percentage answered within 10 seconds	86.0 - 100.0	Below	83.7
Directory Assistance	Average answer time (seconds)	0.0 - 6.3	Over	6.9
Intercept	Percentage answered within 10 seconds	86.0 - 100.0	Below	83.7
Intercept	Average answer time (seconds)	0.0 - 6.3	Over	6.9
Toll & Assistance	Percentage answered within 10 seconds	90.8 - 100.0	Below	87.5
Toll & Assistance	Average answer time (seconds)	0.0 - 2.8	Over	4.1
<p>1. Overall Customer Trouble Report Rate results shall be reported at the central office entity level. All other Maintenance Service results shall be reported at the appropriate maintenance administrative entity level.</p> <p>2. All Installation Performance results shall be reported at the appropriate installation administrative level and shall exclude those instances where the subscriber requests a later date or where substantial construction is required.</p> <p>3. All Answering Time Performance results shall be reported at the appropriate administrative entity levels. Utilities can report either the percent answered within the specified time, or the average, but not both.</p>				

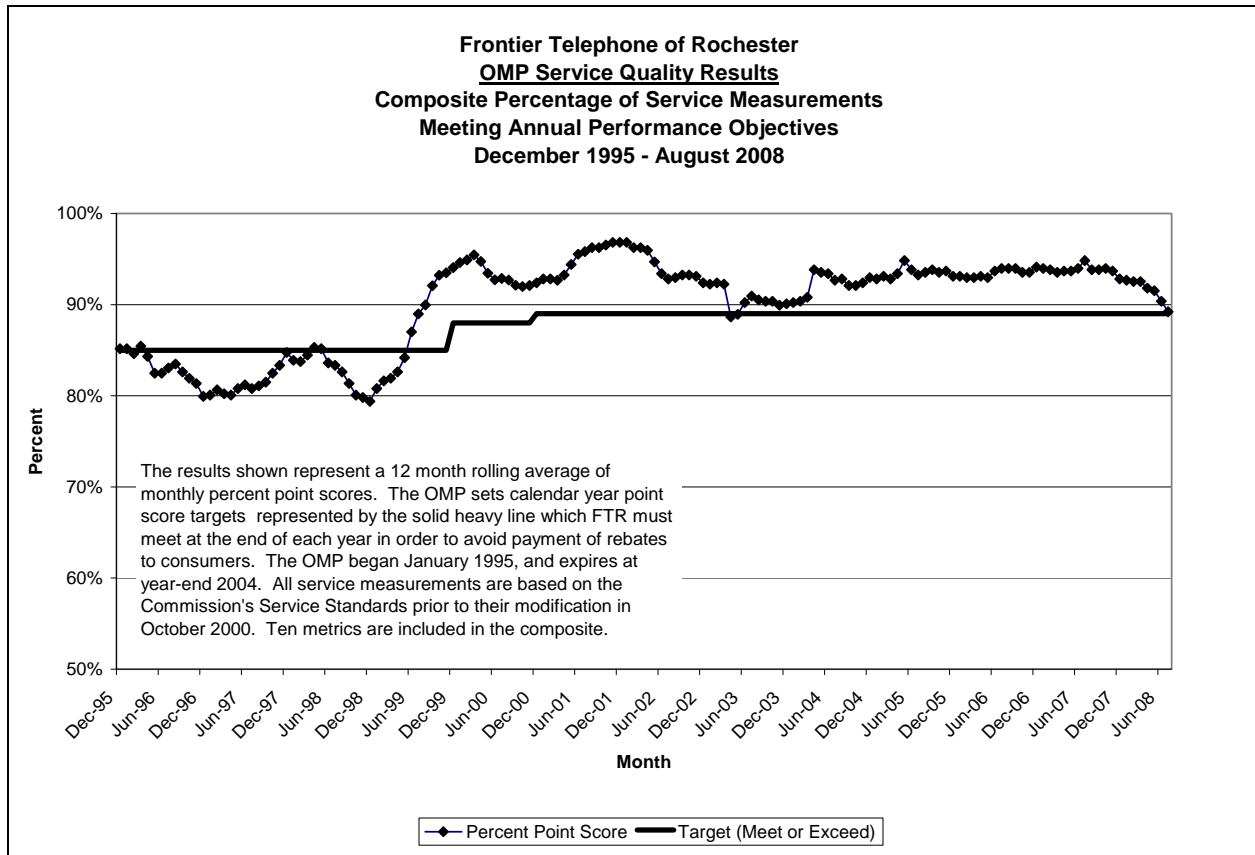
FTR must provide Objective Level service at least 89% of the time on all metrics in the Service Standards each year. It also can experience no more than one Surveillance Level Failure (three consecutive months or more of poor service performance for any metric) in any calendar year, and meet defined limits for customer complaints to the Commission.

### Open Market Plan Service Quality Status

FTR met its year-end 2007 service performance targets in order to continue to make dividend payments to Citizens Communications, and was on target to do so again in 2008. This is shown in the following table. This chart will be modified in the next quarterly report, in order to reflect the new criteria adopted in the October 15, 2008 Joint Stipulation and Agreement.

<b>FTR's OMP Service Performance</b>			
<i>OMP Measurement Category</i>	<i>12 Months-to-Date Sept. 2008</i>	<i>Calendar Year 2008 OMP Goal</i>	<i>Comment</i>
% Objective Level Measures – All Metrics	90.2%	=>89%	On Target
PSC Complaint Rate – 12 month average per 100,000 lines	0.55	=<4.7	On Target
PSC Complaint Rate - 24 month average per 100,000 lines	0.53	=<7.4	On Target
Number of Surveillance Level Failures	0	=<1	On Target

The following chart illustrates the company's performance over the past twelve years of the OMP, in terms of a 12-month rolling average of the Percent Objective Level Measure. That is, the chart depicts the frequency that FTR met or exceeded the expected level of performance on a group of ten metrics and 58 measured entities, or a total of 696 measurements per year.





### Glossary

CLEC	Competing Local Exchange Carrier – Any one of many local exchange carriers (LEC) competing with an incumbent LEC. It may be reselling the incumbent carrier's services or be providing service via its own facilities.
ILEC	Incumbent local exchange carrier – Any one of the 40 traditional, full service, facilities-based, wireline telephone carriers providing local exchange telephone service as of February, 1996.
Incentive Rate Plan	A method of regulation that substitutes for rate base regulation wherein the carrier agreeing to such a plan is generally allowed the ability to earn a higher rate of return than would normally be allowed under rate base regulation in exchange for certain guarantees to the regulator such as no change in rates over a given period of time, and a level of service quality that, if not met, would result in rebates to consumers.
Intercept	The process of redirecting a telephone call to an operator or to a recording to another telephone number or message.
LEC	Local Exchange Carrier - A term designating the group of carriers providing local exchange telephone service consistent with the Commission's requirements for such carriers. It includes all ILECs and CLECs.
Objective Level	A level of telephone service quality performance representing good service to consumers that local exchange carriers are to strive to consistently attain as defined in Title 16 NYCRR, Part 603.12(b) prior to October 2000.
OMP	Open Market Plan – An incentive rate plan specific to Frontier Telephone of Rochester, the former Rochester Telephone Company.
PSC Complaints	Consumer complaints filed directly with the Public Service Commission against telephone companies.
Rate Base Regulation	A method of regulation that determines the allowed rate of return for a carrier based on its level of investment and expenses.
Reseller	A certified carrier that uses the facilities of another carrier to provide services to consumers.

Service Inquiry Report	Consistent telephone service quality performance outside of the Threshold range for three out of five months (including the current month) requiring the local exchange carrier to submit a corrective action plan to Commission Staff as defined in Title 16 NYCRR, part 603.
Surveillance Level Failure	Consistent telephone service quality performance at the Weakspot Level for three or more months in a row requiring the local exchange carrier to submit a corrective action plan to Commission staff as defined in Title 16 NYCRR, Part 603.13 prior to October 2000
Target	A set level of expected performance used to characterize performance as established in an incentive rate plan (e.g., VIP and PRP) for various aspects of service quality.
Threshold Level	A level of telephone service quality performance which separates good service from less than desirable service as defined in Title 16 NYCRR, Part 603.
Weakspot Level	A level of telephone service quality performance below which immediate analysis and corrective action may be required as defined in Title 16 NYCRR, Part 603.12(c) prior to October 2000

Docket UT-090842  
Appendix FWL-3  
November 19, 2009

**Appendix FWL – 3**

**FRONTIER COMMUNICATIONS  
ACCESS LINES PRE-VERIZON ACQUISTION**

Docket UT-090842  
 Appendix FWL-3  
 November 19, 2009  
 Page 1

<b>Frontier Communications; Pre-acquisition</b>	
State	Access Lines
New York	683,880
Pennsylvania	427,489
Minnesota	210,983
Arizona	145,241
West Virginia	143,982
California	143,871
Illinois	97,461
Tennessee	79,014
Wisconsin	62,007
Iowa	44,891
Nebraska	43,106
Alabama	25,980
Nevada	23,701
Utah	21,718
Idaho	20,035
Georgia	19,167
Michigan	19,102
Oregon	12,626
New Mexico	8,001
Montana	7,659
Mississippi	5,474
Indiana	4,647
Florida	3,746
Ohio	552
<b>Total</b>	<b>2,254,333</b>

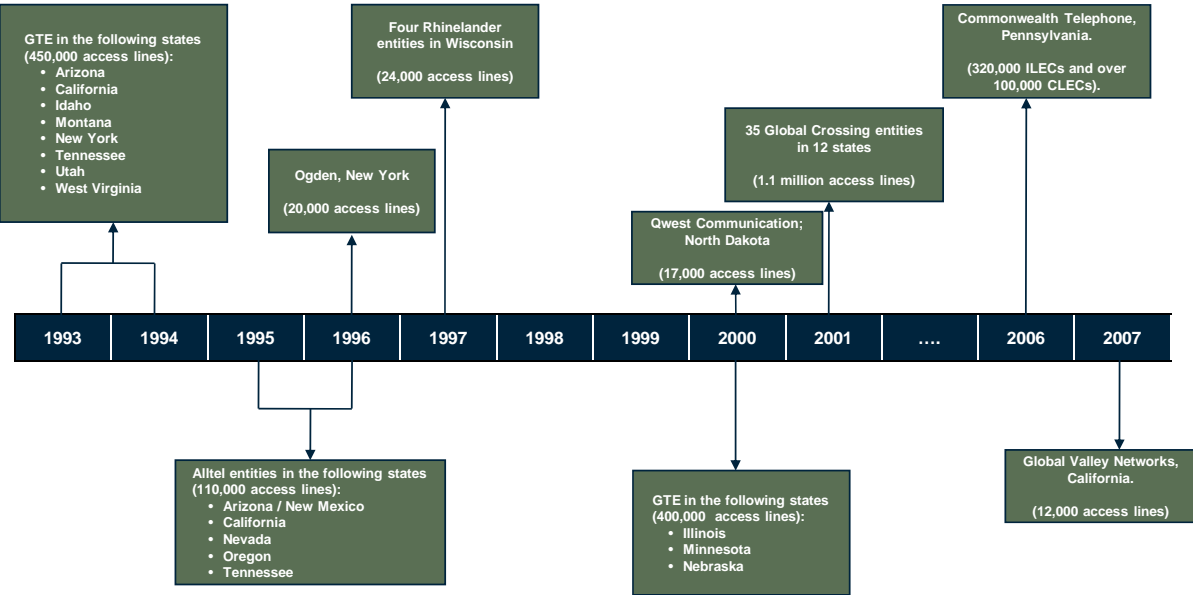
Source: Frontier Investor Presentation; May 13, 2009

Docket UT-090842  
Appendix FWL-4  
November 19, 2009

**Appendix FWL – 4**

**FRONTIER COMMUNICATIONS  
ACQUISITION HISTORY (1993 – 2007)**

## Frontier Communications Acquisition History



Source: Frontier Communications

Docket UT-090842  
Appendix FWL-5  
November 19, 2009

**Appendix FWL – 5**

**FRONTIER AND VERIZON COMMUNICATIONS**

**ACCESS LINES BY STATE**

States with Frontier and Verizon operations	12/31/2008	Frontier	Verizon	Combined
	Indiana	4,647	718,251	722,898
	Ohio	552	634,153	634,705
	West Virginia	143,982	617,036	761,018
	Illinois	97,461	573,321	670,782
	Michigan	19,102	507,462	526,564
	Oregon	12,626	309,904	322,530
	Wisconsin	62,007	281,350	343,357
	Idaho	20,035	113,002	133,037
	Nevada	23,701	35,989	59,690
	California	143,871	24,205	168,076
	Arizona	145,241	6,297	151,538
		673,225	3,820,970	4,494,195

States with Frontier operations	12/31/2008	Frontier	Verizon	Combined
	New York	683,880		683,880
	Pennsylvania	427,489		427,489
	Minnesota	210,983		210,983
	Tennessee	79,014		79,014
	Iowa	44,891		44,891
	Nebraska	43,106		43,106
	Alabama	25,980		25,980
	Utah	21,718		21,718
	Georgia	19,167		19,167
	New Mexico	8,001		8,001
	Montana	7,659		7,659
	Mississippi	5,474		5,474
Florida	3,746		3,746	
	1,581,108		1,581,108	

Verizon operations	12/31/2008	Frontier	Verizon	Combined
	Washington		578,506	578,506
	North Carolina		263,479	263,479
	South Carolina		127,718	127,718
			969,703	969,703

<b>Total</b>	<b>2,254,333</b>	<b>4,790,673</b>	<b>7,045,006</b>
--------------	------------------	------------------	------------------

Source: Frontier Investor Presentation; May 13, 2009



Docket UT-090842  
Appendix FWL-6  
November 19, 2009

**Appendix FWL – 6**

**FAIRPOINT AND VERIZON COMMUNICATIONS**

**ACCESS LINES BY STATE**

Docket UT-090842  
 Appendix FWL-6  
 November 19, 2009  
 Page 1

States with FairPoint and Verizon operations	<b>12/31/2007</b>	<b>FairPoint</b>	<b>Verizon</b>	<b>Combined</b>
	Maine	65,947	526,294	592,241
	Vermont	8,025	295,419	303,444
	New Hampshire (1)		528,110	528,110
		73,972	1,349,823	1,423,795

States with FairPoint operations	<b>12/31/2007</b>	<b>FairPoint</b>	<b>Verizon</b>	<b>Combined</b>
	Florida	54,919		54,919
	New York	51,652		51,652
	Washington	46,788		46,788
	Ohio	14,928		14,928
	Missouri	14,783		14,783
	Illinois	7,256		7,256
	Virginia	8,538		8,538
	Idaho	6,884		6,884
	Kansas	7,287		7,287
	Pennsylvania	6,515		6,515
	Oklahoma	4,289		4,289
	Colorado	3,899		3,899
	Other States (2)	4,067		4,067
		231,805		231,805

<b>Total</b>	<b>305,777</b>	<b>1,349,823</b>	<b>1,655,600</b>
--------------	----------------	------------------	------------------

(1) FairPoint had some existing lines in New Hampshire but as shown in Footnote (2) the number is negligible

(2) Includes Massachusetts, New Hampshire, Georgia and Alabama.

Source: FairPoint 10-K 2007

Source: FCC Report 43-08, the ARMIS Operating Data Report for Verizon

Docket UT-090842  
Appendix FWL-7  
November 19, 2009

**Appendix FWL – 7**

**CENTURYTEL AND EMBARQ COMMUNICATIONS**

**ACCESS LINES BY STATE**

States with CenturyTel and Embarq operations	<b>12/31/2007</b>	<b>Embarq</b>	<b>CenturyTel</b>	<b>Combined</b>
	North Carolina (2)	1,188,651	14,000	1,202,651
	Ohio	420,854	64,000	484,854
	Texas	311,121	33,000	344,121
	Indiana	214,397	5,000	219,397
	Missouri	200,321	408,000	608,321
	Tennessee	185,356	23,000	208,356
	Iowa	59	2,000	2,059
		<b>2,520,759</b>	<b>549,000</b>	<b>3,069,759</b>

States with Embarq operations	<b>12/31/2007</b>	<b>Embarq</b>	<b>CenturyTel</b>	<b>Combined</b>
	Florida	1,711,185		1,711,185
	Nevada	716,348		716,348
	Virginia	369,211		369,211
	Pennsylvania	319,798		319,798
	New Jersey	174,306		174,306
	Kansas	4,784		4,784
		<b>3,295,632</b>		<b>3,295,632</b>

CenturyTel operations	<b>12/31/2007</b>	<b>Embarq</b>	<b>CenturyTel</b>	<b>Combined</b>
	Wisconsin (1)		387,000	387,000
	Alabama (2)		290,000	290,000
	Arkansas		211,000	211,000
	Washington		157,000	157,000
	Michigan		91,000	91,000
	Colorado		86,000	86,000
	Louisiana		84,000	84,000
	Oregon		66,000	66,000
	Illinois (2)		57,000	57,000
	Montana		57,000	57,000
	Georgia (2)		34,000	34,000
	Minnesota		27,000	27,000
	Mississippi		22,000	22,000
	Wyoming		6,000	6,000
	New Mexico		6,000	6,000
	Idaho		5,000	5,000
			<b>1,586,000</b>	<b>1,586,000</b>

<b>Total</b>	<b>5,816,391</b>	<b>2,135,000</b>	<b>7,951,391</b>
--------------	------------------	------------------	------------------

(1) As of December 31, 2008 and 2007, approximately 48,000 and 51,000, respectively, of these lines were owned and operated by our 89%-owned affiliate.

(2) In connection with our acquisition of Madison River in April 2007, we acquired an aggregate of approximately 164,000 access lines in Illinois, Alabama, Georgia and North Carolina.

Source: CenturyTel 10-K 2008

Source: FCC Report 43-08, the ARMIS Operating Data Report for Embarq

Docket UT-090842  
Appendix FWL-8  
November 19, 2009

**Appendix FWL – 8**

**Transaction Comparison**

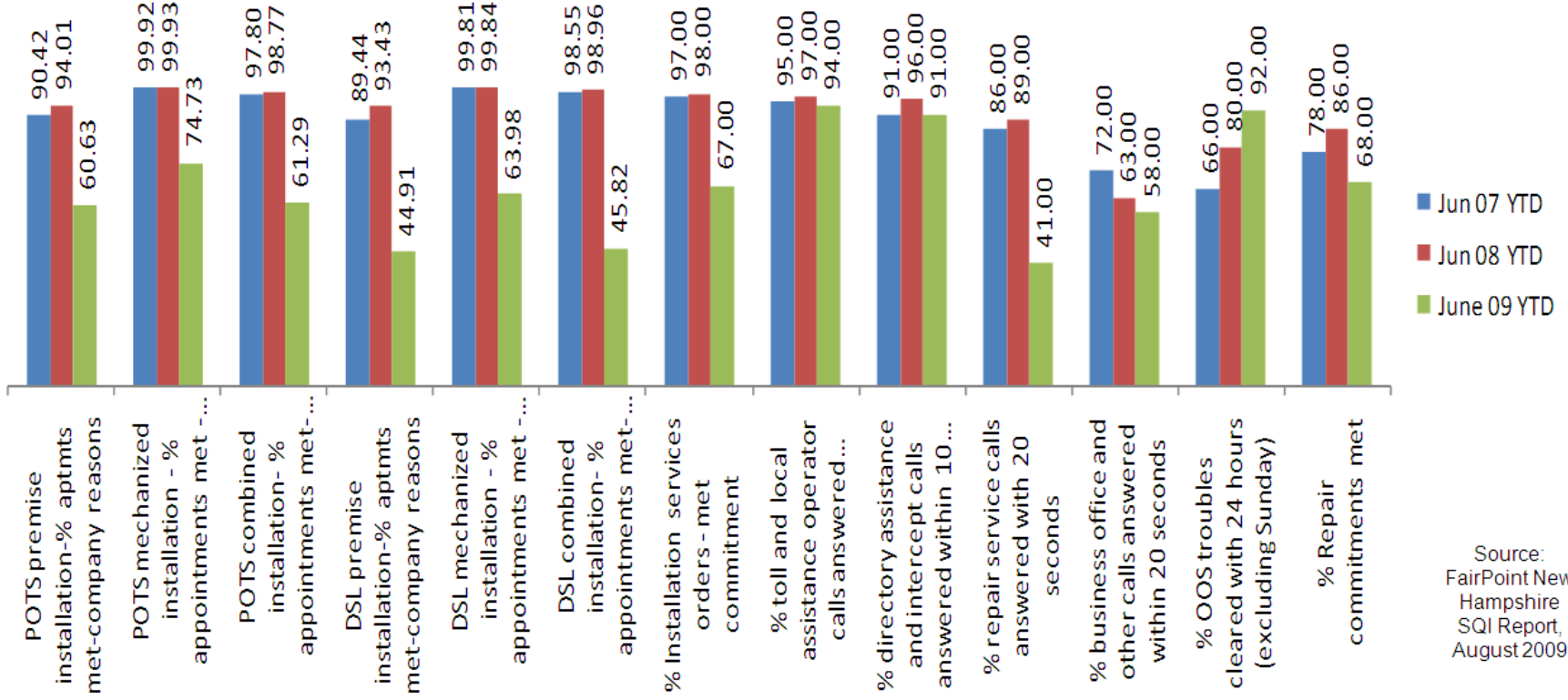
<i>(\$s in millions)</i>	<b>CTL-EQ</b>	<b>FTR-VZ</b>	<b>FRP-VZ</b>
<b>Transaction Size</b>			
Dollar Value	\$ 11,600	\$ 8,583	\$ 2,715
Target Access Lines	5,853	4,791	1,531
Target States Involved	18	14	3
<b>Relative Size (Target:Acquirer Ratio)</b>			
Access Lines	2.87	2.13	6.14
Revenues	2.38	1.92	4.59
EBITDA	2.09	1.58	3.19
<b>Pro forma Leverage</b>			
Excluding Synergies	2.3x	2.6x	4.1x
Including Synergies	2.1x	2.2x	3.7x
<b>Pro forma Payout Ratio</b>	50%	43%	60.0%-70.0%
<b>PF Investment Grade Ratings</b>	Yes	Near	No
<b>Dual Systems Capabilities</b>	Yes	Yes	No

Source: Company press releases and presentations; New Frontier Presentation.

Docket UT-090842  
Appendix FWL-9  
November 19, 2009

**Appendix FWL – 9**

**FAIRPOINT COMMUNICATIONS**  
**QUALITY OF SERVICE SUMMARY (NEW HAMPSHIRE)**  
**2007 – 2009**



Source:  
 FairPoint New  
 Hampshire  
 SQI Report,  
 August 2009



Docket UT-090842  
Appendix FWL-10  
November 19, 2009

**Appendix FWL – 10**

**FAIRPOINT COMMUNICATIONS**  
**QUALITY OF SERVICE REPORT (NEW HAMPSHIRE)**  
**AUGUST 2009**



Kevin M. Shea  
Vice President  
Government Relations - NH  
900 Elm Street, Suite 1922  
Manchester, NH 03101

September 21, 2009

Kathryn M. Bailey, PE  
Telecommunications Division Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, New Hampshire 03301



Dear Kate:

In accordance with the Commission's Electronic Report Filing (ERF) program, FairPoint Communications - NNE has electronically filed the Quality of Service report for August 2009 and is also filing the attached paper copy.

There were three (3) exchanges that met/exceeded a 2.5 customer troubles report rate for three consecutive months ending with the August 2009 report.

Please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin M. Shea".

Kevin M. Shea  
Attachments

cc: Meredith Hatfield  
Karen Mead  
Michael Morrissey  
Brian Lippold

FairPoint Communications - NNE														
New Hampshire SQI Results														
August 2009														
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	AVG
POTs Pre	2007	90.04	90.26	90.18	90.24	90.53	90.91	91.28	91.52	91.81	92.10	92.03	92.25	
% Appointr	YTD	90.04	90.26	90.22	90.23	90.30	90.42	90.57	90.70	90.84	90.98	91.09	91.19	91.10
	2008	92.23	93.33	94.06	95.10	94.69	92.86	90.56	90.10	93.55	93.19	91.11	84.76	
	YTD	92.23	93.33	93.70	94.16	94.30	94.01	93.43	92.96	93.03	93.05	92.86	92.12	92.13
	2009	n/a	34.88	39.79	54.01	70.80	77.93	72.69	69.11					
	YTD	n/a	34.88	39.79	46.90	54.87	60.63	63.04	64.06					64.06
<b>Baseline</b>	<b>TBD</b>													
POTs Mec	2007	99.91	99.92	99.92	99.92	99.92	99.93	99.93	99.93	99.94	99.94	99.94	99.94	
% Appointr	YTD	99.91	99.92	99.92	99.92	99.92	99.92	99.92	99.92	99.93	99.93	99.93	99.93	99.93
	2008	99.94	99.93	99.92	99.95	99.94	99.93	99.93	99.81	99.77	99.90	99.73	99.83	
	YTD	99.94	99.93	99.93	99.93	99.94	99.93	99.93	99.92	99.90	99.90	99.88	99.88	99.88
	2009	n/a	61.24	63.19	81.38	88.28	79.58	76.05	88.50					
	YTD	n/a	61.24	62.22	68.60	73.52	74.73	74.95	76.89					76.89
<b>Baseline</b>	<b>TBD</b>													
POTs Com	2007	97.77	97.80	97.76	97.76	97.81	97.88	98.05	98.11	98.19	98.26	98.24	98.29	
% Appointr	YTD	97.77	97.80	97.78	97.77	97.78	97.80	97.84	97.88	97.92	97.96	97.99	98.01	97.99
	2008	98.30	98.58	98.76	99.03	99.02	98.44	97.90	97.54	98.25	98.53	97.98	97.39	
	YTD	98.30	98.58	98.67	98.79	98.85	98.77	98.62	98.47	98.44	98.45	98.40	98.31	98.31
	2009	n/a	45.04	45.67	62.08	75.33	78.34	73.87	75.48					
	YTD	n/a	45.04	45.36	50.93	57.03	61.29	63.39	65.12					65.12
<b>Baseline</b>	<b>TBD</b>													
DSL Premi	2007	93.09	91.54	91.72	86.06	89.74	88.13	88.36	88.99	91.56	91.65	89.41	92.56	
% Appointr	YTD	93.09	91.54	91.63	89.77	89.77	89.44	89.26	89.22	89.51	89.75	89.72	89.97	90.23
	2008	92.13	88.24	93.50	93.55	95.80	96.05	94.01	87.86	95.41	93.78	94.44	82.69	
	YTD	92.13	88.24	90.87	91.76	92.77	93.43	93.53	92.72	93.05	93.13	93.26	92.30	92.29
	2009	n/a	40.00	39.86	33.25	44.22	67.24	63.49	51.39					
	YTD	n/a	40.00	39.93	37.70	39.33	44.91	48.01	48.49					48.49
<b>Baseline</b>	<b>TBD</b>													
DSL Mech	2007	99.86	99.58	99.87	99.92	99.83	99.86	99.77	99.73	99.84	99.91	99.69	99.74	
% Appointr	YTD	99.86	99.58	99.73	99.79	99.80	99.81	99.81	99.79	99.80	99.81	99.80	99.79	99.80
	2008	99.87	99.66	99.89	99.80	99.92	99.94	99.87	99.79	99.76	99.71	99.81	99.90	
	YTD	99.87	99.66	99.78	99.78	99.82	99.84	99.85	99.84	99.83	99.82	99.82	99.82	99.83
	2009	n/a	100.00	37.50	31.88	71.98	78.53	71.95	92.12					
	YTD	n/a	100.00	68.75	56.46	60.34	63.98	65.31	69.14					69.14

<b>Baseline</b>	<b>TBD</b>													
DSL Comb	2007	98.47	98.51	99.01	98.25	98.73	98.25	98.25	98.10	98.65	98.66	98.22	98.73	
% Appointr	YTD	98.47	98.51	98.76	98.59	98.63	98.55	98.50	98.44	98.47	98.49	98.46	98.49	<b>98.49</b>
	2008	98.74	98.07	98.98	98.93	99.42	99.39	98.96	98.08	99.12	98.89	99.13	98.19	
	YTD	98.74	98.07	98.53	98.66	98.85	98.96	98.96	98.83	98.87	98.87	98.90	98.83	<b>98.83</b>
	2009	n/a	41.79	39.79	33.10	46.12	68.32	66.12	65.91					
	YTD	n/a	41.79	40.79	38.23	40.20	45.82	49.21	51.59					<b>51.59</b>
<b>Baseline</b>	<b>TBD</b>													
% Installat	2007	97	98	97	97	97	97	97	97	97	98	98	98	
Met Comm	YTD	97	98	98	97	97	97	97	97	97	97	97	97	<b>97</b>
	2008	97	97	98	99	99	99	98	97	98	99	98	97	
	YTD	97	97	98	98	98	98	98	98	98	98	98	98	<b>98</b>
	2009	98	45	44	62	75	78	74	75					
	YTD	98	72	63	62	65	67	68	69					<b>69</b>
<b>Basline</b>	<b>90</b>													
% Installat	2007	0	0	0	0	0	0	0	0	0	0	0	0	
Met - w/in	YTD	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>
	2008	0	0	0	0	0	0	0	0	0	0	0	0	
	YTD	0	0	0	0	0	0	0	0	0	0	0	0	<b>0</b>
	2009	n/a	0	0	0	0	0	0	0					
	YTD	n/a	0	0	0	0	0	0	0					<b>0</b>
<b>Baseline</b>	<b>95</b>													
% Toll and	2007	97	96	94	96	94	95	95	94	96	94	94	95	
Operator C	YTD	97	96	95	95	95	95	95	95	95	95	95	95	<b>95</b>
10 seconds	2008	97	97	95	98	98	97	96	97	98	99	98	96	
	YTD	97	97	96	97	97	97	97	97	97	97	97	97	<b>97</b>
	2009	97	93	95	96	92	90	91	92					
	YTD	97	95	95	95	95	94	93	93					<b>93</b>
<b>Baseline</b>	<b>90</b>													
% Director	2007	93	94	90	91	90	88	92	96	95	95	95	93	
Calls answ	YTD	93	94	92	92	91	91	91	92	92	92	93	93	<b>93</b>
10 seconds	2008	92	93	95	96	98	98	97	100	100	100	100	99	
	YTD	92	93	94	95	96	96	96	97	97	97	98	98	<b>97</b>
	2009	100	82	92	92	91	86	85	89					
	YTD	100	91	91	92	91	91	90	90					<b>90</b>
<b>Baseline</b>	<b>85</b>													
% Repair S	2007	86	87	88	85	86	86	86	87	87	86	90	89	
20 seconds	YTD	86	87	88	87	87	86	86	86	87	86	87	87	<b>87</b>
	2008	88	87	89	93	92	85	80	85	94	92	91	57	
	YTD	88	87	88	90	90	89	88	87	88	89	89	86	<b>82</b>
	2009	81	25	30	26	31	51	30	68					



	2009	n/a	n/a	n/a	98.13	97.23	98.00	97.70	97.50					
	YTD	n/a	n/a	n/a	98.13	97.68	97.79	97.77	97.71					97.71
	<b>97</b>													
Held Order	2007	12.40	7.79	10.43	6.67	5.53	6.02	3.83	5.54	13.18	6.15	10.00	10.30	
Average T	YTD	12.40	7.79	9.11	8.30	7.61	7.29	6.71	6.54	7.37	7.24	7.51	7.77	8.15
	2008	8.78	8.36	13.66	4.05	8.07	9.54	5.80	6.78	11.88	8.15	6.46	2.90	
	YTD	8.78	8.36	11.01	8.69	8.54	8.74	8.25	8.04	8.52	8.48	8.28	7.79	7.87
	2009	n/a	2.73	4.74	7.99	14.60	0.00	0.00	0.00					
	YTD	n/a	2.73	3.74	5.15	7.52	7.52	7.52	7.52					7.52
<b>Baseline</b>	<b>7.82</b>													
														2009 Penalty
<b>Tracking Only</b>														
Total Held	2007	41	19	22	18	30	24	19	37	29	25	32	27	
Month End	YTD	41	19	21	20	22	23	22	24	25	25	26	26	27
	2008	17	15	12	14	11	14	14	13	25	11	8	19	
	YTD	17	15	14	14	13	13	13	13	15	14	14	14	14
	2009	9	424	6,511	9,620	3,060	0	0	0					
	YTD	9	217	2,315	4,141	3,925	3,925	3,925	3,925					3,925
Average D	2007	12.99	8.53	8.74	14.92	8.50	5.48	5.54	13.45	23.04	20.63	13.41	10.34	
of Service	YTD	12.99	8.53	8.64	10.73	10.17	9.23	8.62	9.31	11.03	12.09	12.22	12.05	12.13
	2008	8.69	10.55	12.63	6.54	11.78	10.38	6.28	10.84	14.73	15.92	8.42	6.04	
	YTD	8.69	10.55	11.59	9.91	10.38	10.38	9.69	9.86	10.47	11.07	10.81	10.37	10.23
	2009	6.97	2.71	4.69	7.61	13.00	11.40	9.30	7.10					
	YTD	6.97	4.84	4.79	5.50	7.00	7.73	7.95	7.85					7.85
Number of	2007	20,603	16,221	16,617	17,348	21,925	17,922	15,933	14,847	13,358	18,282	13,756	10,376	
	YTD	20,603	36,824	53,441	70,789	92,714	110,636	126,569	141,416	154,774	173,056	186,812	197,188	197,188
	2008	12,721	9,451	9,426	12,868	16,676	13,722	11,628	10,561	12,549	16,137	12,068	11,274	
	YTD	12,721	22,172	31,598	44,466	61,142	74,864	86,492	97,053	109,602	125,739	137,807	149,081	149,081
	2009	10,944	400	21,470	21,685	20,471	21,274	18,381	22,019					
	YTD	10,944	11,344	32,814	54,499	74,970	96,244	114,625	136,644					136,644
Number of	2007	6,400	5,501	5,719	5,604	6,838	8,331	6,114	6,776	5,020	5,510	4,691	4,145	
	YTD	6,400	11,901	17,620	23,224	30,062	38,393	44,507	51,283	56,303	61,813	66,504	70,649	70,649
	2008	4,805	3,960	3,896	3,967	3,882	4,370	4,287	4,344	4,691	4,426	4,067	2,991	
	YTD	4,805	8,765	12,661	16,628	20,510	24,880	29,167	33,511	38,202	42,628	46,695	49,686	49,686
	2009	3,482	380	15,190	19,749	4,483	2,167	2,052	2,541					
	YTD	3,482	3,862	19,052	38,801	43,284	45,451	47,503	50,044					50,044
% Abandon	2007	1.8	1.7	1.8	1.5	1.2	1.3	1.4	1.3	1.3	1.4	1.2	1.2	
	YTD	1.8	#DIV/0!	1.8	1.7	1.5	1.5	1.4	1.4	1.4	1.4	1.4	1.4	1.4
	2008	1.2	1.4	1.1	1.4	1.3	1.6	1.4	1.5	1.6	1.1	1.2	1.6	



Central Offices with  
Customer Trouble Reports > 2.5

Part 2009 & Remaining of 2008 report

Attachment 1  
Item 12a

Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-08	Oct-08	Nov-08	Dec-08
Fitzwilliam		Candia	Barrington	Candia	Alstead	Bartlett	Belmont	Deerfield	Deerfield	Atkinson	Alstead
		Canaan	Candia	Epping	Atkinson	Belmont	Center Ossipee	New Boston	Epsom	Belmont	Atkinson
		Raymond	Fitzwilliam	Errol	Bristol	Canaan	Center Sandwich	Hampstead	Errol	Canterbury	Barrington
		Rumney	Newmarket	Fitzwilliam	Danbury	Center Harbor	Danbury	Pelham	Goffstown	Danbury	Bedford
		Waterville Valley	Rindge	Marlow	Deerfield	Center Sandwich	Dublin	Epping	Hampstead	Enfield	Belmont
			Sanbornville		Epsom	Colebrook	Errol	Kingston	Hampton	Fitzwilliam	Bristol
					Fitzwilliam	Deerfield	Fitzwilliam	Westmoreland	Marlow	Franconia	Candia
					Kingston	Dublin	Franconia	Harrisville	Pelham	Lyme	Canaan
					Littleton	Durham	Hancock	Pittsfield	Pittsburg	Milton Mills	Canterbury
					Lyme	Fitzwilliam	Hanover	Suncook	Plymouth	Penacook	Center Sandwich
					Marlow	Goffstown	Harrisville	Epsom	Raymond	Rumney	Charlestown
					North Stratford	Jefferson	Lyme	Franklin	Suncook	Twin Mountain	Danbury
					Raymond	Kingston	Marlow	Center Harbor			Deerfield
					Sunapee	Lyme	Merrimack	Rumney			Derry
					West Stewartstown	Madison	Milan	Tamworth			Dover
						Marlow	Milton	Colebrook			Dublin
						Milton Mills	Newport	Errol			Durham
						Newmarket	North Haverhill	Pittsburg	Watch List-Aug.		Epping
						Northwood	Pittsburg		Canaan		Epsom
						Rindge	Rye Beach		Center Sandwich		Exeter
						Rye Beach	Sanbornville		Danbury		Farmington
						Sanbornville	Sunapee		Franconia		Fitzwilliam
						Spofford	Whitefield		Lisbon		Franklin
						Warren			Lyme		Goffstown
						Winchester			Milton Mills		Greenfield
									Seabrook		Greenville
											Hampstead
											Hampton
											Hancock
											Hanover
											Harrisville
											Hinsdale
											Jaffrey
											Jefferson
											Kingston
											Lebanon
											Lisbon
											Lyme
											Marlow
											Marlboro
											Merrimack
											Milford
											Milton
											Milton Mills
											Nashua



											New Boston
											Newmarket
											Newport
											Northwood
											Pelham
											Peterborough
											Pike
											Pittsfield
											Plaistow
											Portsmouth
											Raymond
											Rindge
											Rochester
											Rye Beach
											Salem
											Sanbornville
											Somersworth
											So Nashua
											Spofford



Docket UT-090842  
Appendix FWL-11  
November 19, 2009

**Appendix FWL – 11**

**FRONTIER COMMUNICATIONS  
INTEGRATION HISTORY (2000 – 2008)**

## Frontier Communications Integration History

