PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division **RESOLUTION T-17631**
Carrier Oversight and Program Branch **November 08, 2018**

R E S O L U T I O N

Resolution T-17631. Approval of Frontier California, Inc. (U-1002-C) Advice Letter setting forth its annual fine and alternative proposal for mandatory corrective action for failing to meet required service quality performance standards in Year 2017 pursuant to General Order 133-D.

SUMMARY

This Resolution approves Frontier California, Inc.'s (U-1002-C) Advice Letter 12772 for annual fines totaling $759,833 as a result of substandard service quality performance in Year 2017, pursuant to California Public Utilities Commission General Order 133-D Section 9.6. Frontier California, Inc. failed to meet specific minimum levels for the *Out of Service Repair Interval* and *Answer Time* measures under Sections 3.4 and 3.5, respectively. Frontier California, Inc. requests approval to implement the alternative proposal for mandatory corrective action under Section 9.7, which permits a carrier to invest no less than twice the amount of its annual fine in a project(s) that will improve service quality in a measurable way within two years.

BACKGROUND

In General Order (GO) 133-D, *Rules Governing Telecommunications Services*, the California Public Utilities Commission (Commission) established uniform minimum standards of service for facilities-based wireline telephone carriers to achieve in their operations as public utility telephone corporations serving California customers. These minimum standards of service include quarterly reporting by some wireline carriers of five measures and near real-time reporting by all carriers of major outages.[1]

[1] See the annual data in *Quarterly Service Quality Reports* posted at http://www.cpuc.ca.gov/General.aspx?id=1107 on the Communications Division *Telecommunications Carriers' Service Quality Reports* webpage. (Site last visited June 19, 2018.)

1. Procedural History of the General Order

In March 2011, Staff issued a report detailing substandard levels of service quality reported by carriers for 2010. In response, the Commission opened Rulemaking (R.)11-12-001 to review carriers' performance, to assess the relevancy and effectiveness of GO 133-C[2] measures, and to determine the need for penalties for substandard performance.

On August 29, 2016, the Commission issued Decision (D.)16-08-021 which adopted GO 133-D. GO 133-D revised portions of GO 133-C by modifying and expanding on a number of its provisions, and prescribing monetary penalties for violating the five service quality standards.[3] The fines apply only to traditional voice telephone service.[4] GO 133-D became effective on August 18, 2016, with the exception of Section (§) 9 (*Fines*), which became effective January 1, 2017.

2. Service Quality Reporting and Standards of Performance

General Order 133-D stipulates five telephone service quality measures with minimum standards that operators of public utility telephone corporations must meet: *Installation Interval*, *Installation Commitments*, *Customer Trouble Report*, *Out of Service Repair Interval*, and *Answer Time*. Each measure has an assigned Minimum Standard Reporting Level. When a carrier's performance falls below any of the minimum standards, the carrier is out of compliance and must report this information to the Commission.[5]

Under GO 133-D § 9.3, a carrier is subject to fines upon reaching "chronic failure status," which is defined as a failure to meet a Minimum Standard Reporting Level for three (3) consecutive months. Fines begin to accrue in the third month. A carrier exits "chronic failure status" when it meets the standard for two consecutive months. Until then, the carrier incurs fines for succeeding months it fails to meet the standard.

General Order 133-D § 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually by February 15 of the following year a Tier II Advice Letter that shows by month each service quality measurement that it did not meet the minimum standard and the applicable fine. The Communications Division will then prepare a resolution that if adopted by the Commission, instructs a telephone corporation to pay the fine to the Commission for deposit into the California General Fund.

GO 133-D § 9.7 allows a carrier to submit an alternative proposal for mandatory corrective action to suspend a fine and instead invest no less than twice the fine amount in projects that will improve service quality in a measurable way within two years. Such an investment proposal must demonstrate that 1) twice the amount of the fine is spent, 2) the project(s) is an incremental expenditure, 3) the project(s) designs address service quality deficiencies, and 4) upon completion, the carrier will demonstrate the project results for the purpose proposed.

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[2] The Commission approved GO 133-C in Decision 09-07-019 (July 9, 2009).
[3] Fines apply to facilities-based telephone corporations regulated under the Uniform Regulatory Framework that possess a franchise or a Certificate of Public Convenience and Necessity.
[4] GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."
[5] See *Appendix A-1* for a list of all carriers' annualized service quality data from 2014-2017.

ADVICE LETTER

Frontier Communications (Frontier) is the parent company of the three Frontier-branded entities operating under separate Certificates of Public Convenience and Necessity (CPCN) in California. Each of the entities has a distinct service territory and reports its respective service quality data separately to the Commission.[6] According to GO 133-D § 9.1, fines are applicable to facilities-based telephone corporations that offer TDM-based voice service and have been granted either a franchise or CPCN. In compliance with the GO 133-D fine requirements, Frontier filed separate ALs for Frontier California, Citizens Telecommunications Company of California, Inc., and Frontier Communications of the Southwest. Therefore, because the three Frontier companies have separate CPCNs, Staff directed Frontier to file supplements for each AL containing separate and specific investment plans to address each entity's 2017 service quality deficiencies and fine calculations within their respective territories.[7&8]

Frontier California, Inc. (Frontier California), doing business as Frontier Communications of California, submitted its Advice Letter (AL) 12772 on February 16, 2018, summarizing its total year 2017 reporting targets with the fine calculations for standards not met. In AL 12772, Frontier California correctly calculated a total fine amount of $759,833. In lieu of paying this fine into the state General Fund, Frontier California requested approval of its alternative proposal for corrective action under § 9.7 to invest no less than twice the amount of its calculated fine in projects to improve its customers' service quality in measurable ways. However, AL 12772 did not include specific project information.

The Commission's Office of Ratepayer Advocates (ORA) filed a protest on March 7, 2018. The protest stated that the company's investment proposal did not satisfy the requirements of GO 133-D § 9.7. The proposal specifically failed to show Frontier California's incremental expenditure investment. In addition, Frontier California did not provide supporting financial documentation and failed to identify the specific locations where it would direct the funds.

Frontier California did not formally respond to ORA's protest, but filed AL Supplement 12772A on April 04, 2018. AL Supplement 12772A contained a list of specific service quality improvement projects with a total estimated investment of $1,949,000. However, the AL Supplement proposed to invest the entire amount within the network of Frontier California, with no investments made in the networks of Citizens Telecommunications Company of California, Inc. (U-1024-C) and Frontier Communications of the Southwest (U-1026-C).

On April 24, 2018, Frontier California filed AL Supplement 12772B, in which it proposed to invest $1,949,000 in twenty-five projects spread across seventeen wire center areas of its network that had demonstrated poor service quality. Frontier California stated the proposed projects are incremental because they could be completed within the required two-year time

[6] Frontier Communications of the Southwest (U-1006-C) filed AL 109 and AL Supplement 109A, in which it chose to request approval of its alternative proposal for mandatory corrective action.
[7] Frontier Communications of the Southwest filed AL Supplement 109B on April 24, 2018, in which it reversed its original proposal and instead agreed to pay its 2017 fine of $3,636 into the state's General Fund. [The Commission addressed this Resolution, T-17607, on the July 12, 2018 agenda.]
[8] Citizens Telecommunications Company of California (U-1024-C) filed AL #1239, as well as AL Supplements 1239A and 1239B, in which it requested approval of its alternative proposal for mandatory corrective action to invest $128,555 in five service quality improvement projects.

frame, are in-addition to the company's normal level of funding, and would not otherwise be addressed.

Frontier California has committed to hold regular meetings with Staff to review the progress of all twenty-five projects and ensure they remain on schedule. In addition, upon completion of the projects, Frontier California will demonstrate improved service quality results through a Tier II advice letter filing.

DISCUSSION

Throughout 2017, Frontier California submitted its quarterly service quality reports for the *Out of Service Repair Interval, Customer Trouble Reports, and Answer Time* standards in accordance with GO 133-D, § 3.[9] The monthly reported service quality data, compared to the Minimum Standard Reporting Levels, determines whether Frontier California is subject to fine penalties. Those monthly performance results and Frontier California's unique scaling factor determine the fines, which is described as follows:

1. 2017 Scaling Factor

GO 133-D calculates fine amounts using base values specified in §§ 9.3, 9.4, and 9.5, adjusted through a formula based on the relative size of the carrier within the California market.[10] The scaling factor formula is as follows:

> (Carrier's Access Lines / Total CA Access Lines) = **Carrier's Scaling Factor**
>
> (Carrier's Scaling Factor) x (Monthly Base Fine per Measure) x (Number of Months Measure Was Not Met) = **Fine**

Frontier California reported 959,538 working lines, so its 2017 Scaling Factor is 14.35%.

2. GO-133-D Standards

A. Installation Interval

The standard for *Installation Interval*, defined in § 3.1, applies only to the GRC ILECs. Frontier California is an URF ILEC.

B. Installation Commitments

The standard for *Installation Commitments*, defined in § 3.2, applies only to the GRC ILECs. Frontier California is an URF ILEC.

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[9] Only GRC ILECs are required to report data for the *Installation Interval* and *Installation Commitment* standards, §§ 3.1 and 3.2, respectively.

[10] Annually, the Communications Division prepares a list of the total number of working telephone access lines in California from the carriers' subject to GO 133-D requirements. Based on carrier size relative to the number of access lines it serves at the end of June in the reporting year, a carrier receives its unique Scaling Factor, the percentage of its customers relative to all California telephone customers. The table of carriers, working lines, and the percentage of working lines served by each carrier appears as a PDF document titled *Total Number of Access Lines in California for June 2017 from Carriers Reporting Under G.O. 133-D* found under *Reference Information* at http://www.cpuc.ca.gov/General.aspx?id=1107. (Site last visited May 31, 2018.)

C. Customer Trouble Reports

The *Customer Trouble Reports* standard, as defined in § 3.3, measures the number of reports a carrier receives from its customers regarding their dissatisfaction with telephone company services. The Minimum Standard Reporting Level for the *Customer Trouble Reports* standard varies based on the number of working lines per reporting unit.[11]

Frontier California met the *Customer Trouble Reports* standard in all twelve months of 2017.

	2017 Reporting for *Customer Trouble Reports*, GO 133-D, § 3.3 – Reports per 100 Working Lines											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Frontier California	1.5%	1.4%	1.1%	0.7%	0.7%	0.6%	0.6%	0.7%	0.7%	0.7%	0.6%	0.5%

D. Out of Service Repair Interval

The *Out of Service Repair Interval* standard, defined in § 3.4, measures the average interval between the time a carrier responds to an out of service trouble report and the restoration of the customer's service. A carrier measures its average interval by taking the sum of the total number of out of service repair tickets restored within 24 hours and dividing by the total number of reports received. The Minimum Standard Reporting Level for the *Out of Service Repair Interval* standard is 90% of outages restored within 24 hours or less.

The fine structure is as follows:

Base *Out of Service Repair Interval* Fine, GO 133-D, § 9.3		
	1 or 2 Consecutive Months Standard Not Met	3 or more Consecutive Months Standard Not Met
Fine Per Day	$0 per day	$25,000 per day
Days in a Month (for all months)	30 days	30 days
Base Fine per Month	$0	$750,000 per month

[11] According to GO 133-D § 3.3(c), the Minimum Standard Reporting Levels for the *Customer Trouble Reports* standard are as follows: Six trouble reports per 100 working lines (6%) for reporting units with 3,000 or more working lines, eight reports per 100 working lines (8%) for reporting units with 1,001-2,999 working lines, and 10 reports per 100 working lines (10%) for reporting units with 1,000 or fewer working lines.

Frontier California failed to meet the *Out of Service Repair Interval* standard for the following months in 2017:

	2017 Reporting for *Out of Service Repair Interval*, GO 133-D, § 3.4 – 90% minimum											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Frontier California	22.2%	43.0%	64.2%	*73.0%*	*77.7%*	**80.5%**	**75.0%**	**77.0%**	**80.9%**	**79.3%**	**80.8%**	**87.3%**

Frontier California explained that due to severe winter storms in January and February, Governor Edmund G. Brown Jr. issued State of Emergency Proclamations. As a result, under GO 133-D § 3.4(b), Frontier California excluded the months of January through March when calculating its fine.[12] In the first quarter of 2017, Frontier California reported an average *Out of Service Repair Interval* of 41.2%, far below the standard 90% of tickets restored within 24 hours or less. In the 2nd quarter, Frontier California missed achieving the minimum performance standard for all three months. Missing the *Out of Service Repair Interval* the third consecutive month in June put Frontier California in "chronic failure status." Frontier California failed to achieve the minimum 90% standard for the 3rd and 4th Quarters and as a result, remained in "chronic failure status" for the remainder of 2017.

Consequently, Frontier California calculated its fine based on the seven months it was in "chronic failure status" for failure to meet the *Out of Service Repair Interval* standard from June through December in 2017. Staff agrees with Frontier California's fine calculation for its substandard performance, which is as follows:

(Scaling Factor 14.35%) X (Monthly Base Fine per Measure $750,000)

X (Number of Months Measure Was Not Met 7) = **Fine of $753,375**

E. Answer Time for Trouble Reports and Billing and Non-Billing Inquiries

The *Answer Time* standard, defined in § 3.5, measures the amount of time it takes for an operator to answer the phone when customers call a business office for billing and non-billing inquiries or a repair office for trouble reports. The value is calculated as an average answer time of a sample of the answering interval of calls to business and repair offices that is representative of the reported period.

The Minimum Standard Reporting Level for the *Answer Time* is 80% of calls answered by an operator within 60 seconds when speaking to a live agent, or 80% of calls answered within 60 seconds when speaking to a live agent after completing an interactive voice response or automatic response unit system.

[12] Under § 3.4(b), a carrier may exclude months when a catastrophic event occurs, such as a declared state of emergency, which affects its ability to achieve the minimum standard(s). A catastrophic event ends when the trouble ticket level returns to the average level three months prior to the catastrophic event. The Governor issued two Emergency Proclamations on January 23, 2017, and another on March 19, 2017, due to the severe winter storms and significant rainfall.

The fine structure is as follows:

Base *Answer Time* Fine, GO 133-D, § 9.5					
	1 or 2 Consecutive Months	3 to 5 Consecutive Months	6 to 8 Consecutive Months	9 to 11 Consecutive Months	12 or More Consecutive Months
Fine Per Day	$0 per day	$500 per day	$1,000 per day	$1,500 per day	$2,000 per day
Days in a Month (for all months)	30 days	30 days	30 days	30 days	30 days
Base Fine per Month	$0	$15,000	$30,000	$45,000	$60,000

Frontier California's results follow:

	2017 Reporting for *Answer Time*, GO 133-D § 3.5 – 80% minimum											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Frontier California	71.6%	55.5%	73.2%	85.5%	90.7%	90.3%	81.1%	*68.5%*	*62.5%*	**45.0%**	**53.1%**	**70.9%**

Frontier California failed to meet the standard from January through March and August through December. The company excluded January through March from its reported *Answer Time* results per § 3.4(b) for catastrophic events due to the severe winter storms and subsequent Governor's Emergency Proclamations. The company entered "chronic failure status" beginning in October and incurred fines for its substandard performance during the last three months of the year. Staff agrees with the fine calculated as:

(Scaling Factor 14.35%) x (Monthly Base Fine $15,000)
x (Number of Months Measure Was Not Met 3) = **Fine of $6,458**

3. Alternative Proposal for Mandatory Corrective Action, § 9.7

Frontier California filed AL Supplement 12772B on April 24, 2018, which included a list of twenty-five defined projects designed to improve the quality of service within seventeen wire center areas across its network, primarily in Southern California. Frontier California included the projects' technical and location descriptions, the number of out of service reports and access lines served in 2017, as well as the estimated engineering and construction costs for each of the twenty-five proposed projects. The total proposed investment for the projects is $1,949,000.[13]

Frontier California explained that the twenty-five proposed projects are incremental expenditures because they are all above and beyond the company's normal business as usual funding levels

[13] Under D.16-08-024, GO 66-D, and P.U. Code § 583, regarding the treatment of confidential treatment, Frontier California properly filed an Attestation to the sensitive nature of the Supplement's project information related to the network facilities, the specific investment improvements, and the financial information for the construction. Staff accepted the Attestation and, therefore, specific project information is excluded from this Resolution. *Appendix A-2* shows Frontier California's service area within which the company has planned its investment projects.

and would not otherwise be addressed. In addition, the estimated total investment is more than twice the minimum fine amount, or $1,519,666. After reviewing the submitted information, Staff accepts Frontier California's explanation regarding these projects being incremental expenditures.

On May 29, 2018, Staff sent Frontier California a data request asking for a schedule of the projected start and completion dates for the twenty-five proposed service quality improvement projects. Frontier California responded that it will begin permit approval processes within three months of Commission approval of this Resolution, with each project then taking approximately six months to complete. Staff accepts Frontier California's data request response and its commitment to complete all projects within two years.

Frontier California has committed to hold regular meetings with Staff to review the progress of the twenty-five projects and help ensure they remain on schedule.[14] Additionally, Frontier California will be able to demonstrate to the Commission the improved results from each project area through its quarterly GO 133-D service quality reports.

In two years, Frontier California will file a Tier II advice letter demonstrating the results of their twenty-five proposed projects to measurably improve service quality in its network.

If any proposed project(s) approved by the Commission are not addressed, or otherwise fail to improve Frontier California's service quality in a measurable way, the Commission may consider further penalties or other enforcement actions.

SAFETY CONSIDERATIONS

Failure to meet the GO 133-D service quality standards limits customers' ability to contact E9-1-1 services and restricts public safety personnel from communicating with each other in daily emergencies or major disasters.

[14] And, although we do not require it at this time, we strongly encourage—and may take future steps to require—Frontier California to ensure that it has an adequately-sized workforce of experienced employees with the appropriate training and skills to provide uninterrupted telecommunications service. The California Legislature recently required as much of electric and gas utilities (see Sen. Bill No. 901 (2017-2018 Reg. Sess.) § 34), and we see no reason why the conclusions reached there would not hold for communications utilities too. Thus, we encourage Frontier California to limit its use of outside contractors to situations where Frontier California technicians are unavailable, or where they lack the necessary skills or equipment to do the work.

We also encourage Frontier California to report its use of outside contractors to Communications Division staff. It would be most useful if those reports contained information such as (1) which projects used outside contractors; (2) the name of the contracting companies; (3) the type of work performed; (3) the dollar amount spent by Frontier California on contracted work; (4) the number of contracted employees performing the work; (5) the total contracted work hours performed; (6) the wages paid to contracted employees; and (7) the cost and terms of employee benefit plans (e.g. medical, savings, pension) offered to contracted employees. Communications Division staff may issue data requests if these reports are not forthcoming, or to supplement the information these reports contain.

CONCLUSIONS

Staff recommends Commission approval of Frontier California's AL 12772 for Year 2017 GO 133-D fines according to

> …its submitted plan of an alternative proposal for mandatory correction action. Frontier will commence projects worth no less than twice the fine amount, or $1,519,666, to be completed within 2 years.

COMMENTS

In compliance with Public Utility Code § 311(g), the Commission emailed a notice letter on July 20, 2018, informing all parties on the carrier service list of the availability of this Resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at this same website. Communications Division did not receive any comments or reply comments on this resolution.

FINDINGS

1. General Order 133-D, § 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually by February 15 of the following year a Tier II Advice Letter that shows by month each service quality measurement that it did not meet the minimum standard and the applicable fine.
2. On February 16, 2018, Frontier California, Inc. (U-1002-C) filed Advice Letter 12772, which calculated total fine of $759,833 and included its plan for an alternative proposal for mandatory corrective action under General Order 133-D § 9.7.
3. The total calculated fines for each of the service quality standards are as follows:

Service Quality Standard	Frontier California, Inc. (U-1002-C)
Installation Interval	$0
Installation Commitments	$0
Customer Trouble Reports	$0
Out of Service Repair Interval	$753,375
Answer Time	$6,458
TOTAL	$759,833

4. On March 7, 2018, the Office of Ratepayer Advocates filed a protest stating the alternative proposal for mandatory corrective action did not satisfy the requirements of GO 133-D § 9.7.

5. On April 4, 2018, Frontier California, Inc. filed Advice Letter Supplement 12772A seeking an alternative proposal for mandatory corrective action. Advice Letter Supplement 12772A included a list of projects, with a total estimated investment of $1,949,000, planned solely within the network of Frontier California, Inc. The investment total included the fine calculations of Citizens Telecommunications Company of California, Inc. (U-1024-C) and Frontier Communications of the Southwest (U-1026-C).
6. Staff directed Frontier California, Inc. to file a supplement containing the fine calculation and specific investment plan to address its respective 2017 service quality deficiencies within its territory.
7. On April 24, 2018, Frontier California, Inc. filed Advice Letter Supplement 12772B, which proposed to invest $1,949,000 in twenty-five specific projects within seventeen wire center areas of its network experiencing poor service quality.
8. In Advice Letter 12772B, Frontier California, Inc. stated the proposed projects could be completed within two years, will improve service quality in a measurable way, are incremental to the company's normal level of funding, and would not otherwise be addressed.
9. Frontier California, Inc. agrees to have regular meetings with Staff every six months in order to review the progress of all twenty-five projects and ensure they remain on schedule.
10. Frontier California, Inc. will demonstrate improved service quality results upon completion of the projects through a Tier II advice letter filing.
11. On July 20, 2018, the Commission emailed a draft of this Resolution to all parties in the carrier service list for public comments. Communications Division did not receive any comments or reply comments on this resolution.

THERFORE, IT IS ORDERED that:

1. The California Public Utilities Commission approves Frontier California, Inc.'s (U-1002-C) Advice Letter 12772 which calculates its respective service quality fines and proposed investment in projects under General Order 133-D for Year 2017:

Service Quality Standard	Frontier California, Inc. (U-1002-C)
Out of Service Repair Interval	$753,375
Answer Time	$6,458
TOTAL	**$759,833**

2. Under General Order 133-D § 9.7, Frontier California, Inc. shall invest no less than twice the amount of its annual fine, or $1,519,666 in the twenty-five projects specified in Advice Letter 12772B, that will improve service quality in a measurable way within its service territory.
3. The twenty-five service quality improvement projects, with a total estimated investment of $1,949,000, shall be completed within two years of the adoption of this Resolution.
4. Frontier California, Inc. shall hold regular meetings with Staff every six months in order to review the progress of all twenty-five projects and ensure they remain on schedule.
5. Frontier California, Inc. shall file a Tier II advice letter upon completion of all projects to demonstrate improved service quality results.
6. If any proposed project(s) approved by the Commission are not completed, or otherwise fail to improve Frontier California's service quality in a measurable way, the Commission Staff shall consider proposing further penalties or other enforcement actions.

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission adopted this Resolution at its regular meeting on November 08, 2018. The following Commissioners approved it:

/s/ ALICE STEBBINS
Alice Stebbins
Executive Director

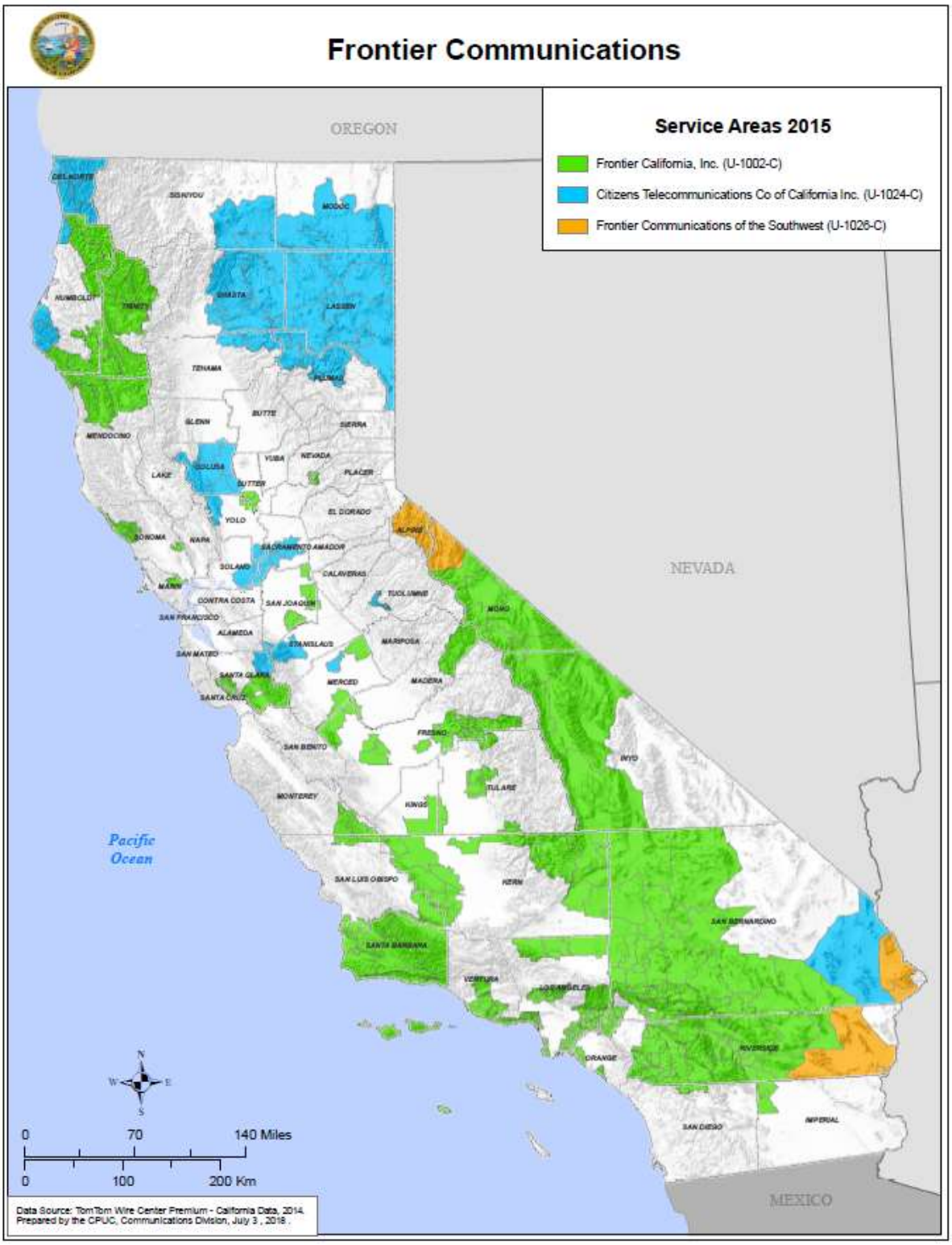
MICHAEL PICKER
President
CARLA J. PETERMAN
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
Commissioners

APPENDIX

Annualized GO 133-C and GO 133-D Reported Service Quality Results, 2014 - 2017

Type	Company Name	Utility Number	2014					2015					2016					2017				
			Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Answer Time	Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Answer Time	Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Answer Time	Installation Interval (days)	Installation Commitment	Customer Trouble Reports	Out of Service Repair Interval	Answer Time
URF ILEC	AT&T California	U-1001-C	Exempt		1.45%	60%	79%	Exempt		1.39%	65%	88%	Exempt		1.50%	56%	82%	Exempt		1.72%	48%	81.5%
URF ILEC	Frontier Citizens	U-1024-C			0.88%	82%	74%			0.86%	77%	71%			0.78%	83%	70%			0.82%	65%	71%
URF ILEC	Frontier Southwest	U-1026-C			1.15%	83%	74%			0.97%	88%	71%			1%	84%	70%			1.1%	75%	71%
URF ILEC	Surewest/Consolidated	U-1015-C			1.28%	93%	89%			0.77%	86%	53%			0.85%	87%	71%			0.79%	93%	77%
URF ILEC	Verizon/Frontier California	U-1002-C			0.98%	68%	64%			0.90%	73%	72%			0.77%	57%	56%			0.82%	63%	71%
URF CLEC	ACN Communications	U-6342-C			1.08%	5%	63%			0.72%	3%	60%			1.12%	5%	64%			1.17%	5%	58%
URF CLEC	Advanced Telecom	U-6083-C			0.65%	70%	--			--	--	--			--	--	--			--	--	--
URF CLEC	Astound	U-6184-C			2.27%	94%	48%			--	--	--			--	--	--			--	--	--
URF CLEC	AT&T Corporation	U-5002-C			1.52%	76%	80%			1.60%	72%	71%			2.45%	75%	--			1.65%	52%	91%
URF CLEC	Time Warner Cable	U-6674-C			--	--	--			--	--	--			0.51%	91%	94%	8.10	99%	.70%	85%	93%
URF CLEC	Charter Fiberlink	U-6878-C			--	--	--			--	--	--			--	--	--	5.58	98%	4.19%	72%	73%
URF CLEC	Bright House	U-6995-C			--	--	--			--	--	--			--	--	--	2.73	95%	.25%	64%	80%
URF CLEC	Cox California	U-5684-C			2.30%	92%	--			1.70%	89%	86%			1.70%	88%	--	Exempt		1.46%	95%	93%
URF CLEC	Electric Lightwave	U-5377-C			0.92%	73%	--			--	--	--			--	--	--			--	--	--
URF CLEC	Paetec Communications	U-6097-C			0.94%	94%	64%			0.96%	95%	56%			0.98%	94%	--			.04%	94%	62%
URF CLEC	Sonic Telecom	U-7002-C			0.93%	59%	62%			0.13%	43%	78%			0.34%	56%	82%			.42%	48%	94%
URF CLEC	Telscape Communications	U-6589-C			4.40%	40%	61%			3.19%	25%	60%			--	--	--			--	--	--
GRC ILEC	Calaveras Telephone	U-1004-C	1.18	100%	0.43%	100%	--	2.21	100%	0.29%	100%	--	1.46	100%	0.19%	100%	--	1.37	100%	.12%	98%	--
GRC ILEC	Cal-Ore Telephone	U-1006-C	2.39	97%	1.67%	95%	--	2.15	99%	1.94%	95%	--	1.96	98%	1.82%	98%	--	2.11	97%	1.33%	100%	--
GRC ILEC	Frontier West Coast	U-1020-C	2.22	98%	0.72%	83%	74%	2.31	98%	0.68%	84%	--	--	--	--	--	--	--	--	--	--	--
GRC ILEC	Ducor Telephone	U-1007-C	1.93	100%	0.86%	95%	--	0.22	100%	0.89%	98%	--	2.4	100%	0.13%	99%	--	0.14	100%	.92%	99%	--
GRC ILEC	Foresthill Telephone	U-1009-C	1.49	100%	0.99%	98%	--	1.5	100%	1.06%	99%	--	1.54	100%	1.14%	95%	98%	1.83	97%	1.44%	93%	--
GRC ILEC	Happy Valley Telephone	U-1010-C	2.66	99%	1.33%	94%	75%	2.74	100%	3.05%	95%	85%	2.8	100%	1.11%	92%	--	3.0	100%	1.60%	94%	--
GRC ILEC	Hornitos Telephone	U-1011-C	4.07	96%	2.53%	95%	75%	2.89	99%	4.82%	94%	85%	2.72	100%	3.39%	92%	--	3.32	100%	.2.7%	94%	--
GRC ILEC	Kerman Telephone	U-1012-C	3.52	99%	0.90%	99%	--	2.86	100%	0.76%	97%	--	1.95	98%	1.54%	97%	99%	1.60	98%	1.03%	93%	--
GRC ILEC	Pinnacles Telephone	U-1013-C	0.52	100%	0.16%	100%	--	0.71	100%	0.50%	100%	--	0.45	100%	0.24%	100%	--	1.14	100%	.80%	100%	95%
GRC ILEC	Ponderosa Telephone	U-1014-C	2.36	100%	0.79%	93%	--	2.51	100%	0.68%	97%	--	2.27	100%	1.28%	91%	--	2.32	99%	1.47%	98%	--
GRC ILEC	Sierra Telephone	U-1016-C	1.08	100%	0.58%	98%	91%	1	100%	0.65%	98%	--	0.96	99%	0.82%	98%	88%	2.16	99%	.99%	99%	93%
GRC ILEC	Siskiyou Telephone	U-1017-C	0.93	100%	0.31%	98%	--	0.91	100%	0.26%	100%	--	0.74	100%	0.25%	100%	--	0.70	100%	.004%	98%	--
GRC ILEC	Volcano Telephone	U-1019-C	1.02	100%	0.54%	95%	92%	1.3	100%	0.30%	89%	90%	1.44	100%	0.29%	76%	83%	1.20	100%	.88%	71%	85%
GRC ILEC	Winterhaven Telephone	U-1021-C	1.96	100%	1.99%	96%	76%	2.18	100%	1.89%	98%	89%	3.17	100%	1.82%	98%	--	3.29	98%	2.52%	98%	--

Reported data is **In Compliance** or **Out of Compliance**



(End of Appendices)