

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Communications Division  
Carrier Oversight and Programs Branch**

**RESOLUTION T-17652  
May 30, 2019**

**R E S O L U T I O N**

**Resolution T-17652. 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 2018 pursuant to General Order 133-D.**

**SUMMARY**

This Resolution approves Frontier California, Inc.'s (Frontier California) (U-1002-C) Advice Letter 12804 for annual fines totaling \$1,310,310 as a result of substandard service quality performance in Year 2018, pursuant to California Public Utilities Commission General Order 133-D Section 9.6. Frontier California 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. Through this Resolution and General Order 133-D Section 9.7, Frontier California will implement its alternative proposal for mandatory corrective action and 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 include quarterly reporting by some wireline carriers of five service quality measures and near real-time reporting by all carriers of major outages.<sup>1</sup>

**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

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<sup>1</sup> 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 March 11, 2019.)

carriers' performance, assess the relevancy and effectiveness of GO 133-C<sup>2</sup> 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, as well as prescribing monetary penalties for violating the five service quality standards.<sup>3</sup> The fines apply only to traditional voice telephone service.<sup>4</sup> 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.<sup>5</sup>

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, by February 15 of the following year, a Tier II Advice Letter (AL). The AL must show by month each service quality measurement for which the carrier 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. In addition, upon completion, the carrier will demonstrate the project results for the proposal.

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<sup>2</sup> The Commission approved GO 133-C in Decision 09-07-019 (July 9, 2009).

<sup>3</sup> 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.

<sup>4</sup> GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."

<sup>5</sup> 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.<sup>6</sup> 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<sup>7</sup> of California, Inc., and Frontier Communications of the Southwest.<sup>8</sup>

Frontier California, Inc. (Frontier California), doing business as Frontier Communications of California, submitted its Advice Letter (AL) 12804 on February 15, 2019, which summarizes its total year 2018 reporting targets and includes fine calculations for the minimum standards it failed to meet. In AL 12804, Frontier California correctly calculated a total fine amount of \$1,310,310. 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.

In AL 12804, Frontier California proposed to invest \$2,900,913 in thirty-six projects spread across twenty-eight wire center areas of its network that had demonstrated poor service quality. Frontier California stated the proposed projects are incremental because they 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 thirty-six projects and ensure they remain on schedule. In addition, upon completion of the projects, Frontier California is required to demonstrate improved service quality results through a Tier II advice letter filing.

### **NOTICE/PROTESTS**

Frontier California served its AL 12804 filing via email to all parties on the general service list and the AL appeared in the Commission's Daily Calendar on February 22, 2019.

On March 6, 2019, The Utility Reform Network (TURN) filed a protest against AL 12804. The protest stated that 1) the GO 133-D penalty mechanism is insufficient to ensure carriers meet the Commission's service quality standards and thus GO 133-D should be revised, 2) AL 12804 does not explain why Frontier California is in chronic failure status for this metric, 3) stakeholders are unable to determine the effectiveness of Frontier California's prior investment

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<sup>6</sup> The three Frontier entities operating in California are: 1) Frontier California (U-1001-C), 2) Frontier Citizens Telecommunications Company of California (U-1024-C), and 3) Frontier Communications of the Southwest (U-1006-C).

<sup>7</sup> Citizens Telecommunications Company of California (U-1024-C) filed AL #1254 on February 15, 2019, in which it agreed to pay its assessed fine of \$71,238 into the state's General Fund. The Commission will address this AL in Resolution T-17651, which is on the May 30, 2019 agenda.

<sup>8</sup> Frontier Communications of the Southwest filed AL 128 on February 15, 2019, in which it agreed to pay its 2018 fine of \$3,821 into the state's General Fund. The Commission will address this AL in Resolution, T-17651, which is on the May 30, 2019 agenda.

commitments, 4) the Commission should consider requiring a larger investment from Frontier California to ensure compliance with GO 133-D service quality standards.

Upon review of the protest, Staff determined that TURN did not identify any of the valid grounds for protest an advice letter, as specified in GO 96-B Rule 7.4.2. Additionally, Staff finds that Frontier California's AL 12804 complies with the rules and requirements of GO 133-D.

## **DISCUSSION**

Throughout 2018, 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.<sup>9</sup> 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 amount of the fines, which is described as follows:

### **1. 2018 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.<sup>10</sup>

The scaling factor formula is as follows:

$$(\text{Carrier's Reported GO 133-D Access Lines} / \text{Total Reported Access Lines in CA}) = \text{Carrier's Scaling Factor}$$
$$(\text{Carrier's Scaling Factor}) \times (\text{Monthly Base Fine per Measure}) \times (\text{Number of Months in Chronic Failure}) = \text{Fine}$$

Frontier California reported 814,980 working lines for June 2018 according to GO 133-D, so its 2018 Scaling Factor is 13.80%.

### **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 and this the standard is not applicable.

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<sup>9</sup> Only GRC ILECs are required to report data for the *Installation Interval* and *Installation Commitment* standards, §§ 3.1 and 3.2, respectively.

<sup>10</sup> 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 2018 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 March 28, 2019.)

### **B. Installation Commitments**

The standard for *Installation Commitments*, defined in § 3.2, applies only to the GRC ILECs. Frontier California is an URF ILEC and thus the standard is not applicable.

### **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.<sup>11</sup>

Frontier California met the *Customer Trouble Reports* standard in all twelve months of 2018.

	<b>2018 Reporting for <i>Customer Trouble Reports</i>, GO 133-D, § 3.3 – Reports per 100 Working Lines</b>											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Frontier California	1.1%	0.62%	0.90%	0.61%	0.61%	0.54%	0.56%	0.63%	0.49%	0.83%	0.71%	1.06%

### **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:

<b>Base <i>Out of Service Repair Interval</i> Fine, GO 133-D, § 9.3</b>		
	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

<sup>11</sup> 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 2018:

	<b>2018 Reporting for <i>Out of Service Repair Interval</i>, GO 133-D, § 3.4 – 90% minimum</b>											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Frontier California	64.0%	75.9%	73.0%	75.9%	86.6%	84.1%	79.8%	83.0%	85.1%	72.1%	88.8%	71.9%

Frontier California did not meet the minimum standard of restoring 90% of tickets within 24 hours or less in any month or quarter of 2018. However, despite improved performance since the beginning of GO 133-D, Frontier California has been in “chronic failure status” for the *Out of Service Repair Interval* standard since June 2017.<sup>12</sup>

Frontier California calculated its fine based on it being in “chronic failure status” for failure to meet the *Out of Service Repair Interval* standard from June 2017 through December in 2018. Staff agrees with Frontier California’s fine calculation for its substandard performance, which is as follows:

(Scaling Factor 13.80%) X (Monthly Base Fine per Measure \$750,000)

X (12 Months in Chronic Failure in 2018) = **Fine of \$1,242,000**

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

The *Answer Time* standard, as 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.

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<sup>12</sup> See pages 5-6 of [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. According to GO 133-D § 9.1, “A carrier will begin incurring a fine for these measures when it reaches a “chronic failure status,” which is failure to meet the minimum standard for three consecutive months. No fines will be assessed for missing the first two months... The fine does not end and restart when the calendar reporting year ends, and a new year begins. A carrier exits chronic failure status after it meets the standard for two consecutive months.”

The fine structure is as follows:

<b>Base Answer Time Fine, GO 133-D, § 9.5</b>					
	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 Answer Time results are as follows:

	<b>2018 Reporting for Answer Time, GO 133-D § 3.5 – 80% minimum</b>											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Frontier California	33.2%	49.0%	56.4%	67.1%	79.8%	77.6%	66.4%	63.4%	61.0%	61.3%	65.1%	63.3%

Frontier California failed to meet the minimum Answer Time standard from August 2017 through December 2018. As a result, Frontier California has been in “chronic failure status” and incurring fines for its substandard performance since October 2017. Staff agrees with the fine calculated as:

$$\begin{aligned}
 &\text{Scaling Factor} \times \text{Base Fine} \times \text{Number of Months} \\
 &(13.8\%) \times (\$15,000) \times (2 \text{ months}) = \text{Fine } \$4,140 \\
 &(13.8\%) \times (\$30,000) \times (3 \text{ months}) = \text{Fine } \$12,420 \\
 &(13.8\%) \times (\$45,000) \times (3 \text{ months}) = \text{Fine } \$18,630 \\
 &(13.8\%) \times (\$60,000) \times (4 \text{ months}) = \text{Fine } \$33,120 \\
 &\text{Total} = \text{Fine } \$68,310
 \end{aligned}$$

### 3. Alternative Proposal for Mandatory Corrective Action, § 9.7

Frontier California filed AL 12804 on February 15, 2019, which includes a list of thirty-six defined projects designed to improve the quality of service within twenty-eight wire center areas across its network, primarily in Southern California. Frontier California includes the projects' technical and location descriptions, the number of out of service reports in 2018, as well as the estimated engineering and construction costs for each of the thirty-six proposed projects. While

Frontier California's fine amount is \$1,310,310, their total investment for the proposed projects is \$2,900,913.<sup>13</sup>

Frontier California explained that the thirty-six proposed projects are incremental expenditures because they are all above and beyond the company's normal "business as usual funding" levels and would not otherwise be addressed. In addition, the proposed total investment is more than twice the minimum fine amount of \$2,620,620. After reviewing the submitted information, Staff accepts Frontier California's explanation regarding these projects being incremental expenditures.

On May 08, 2019, Staff sent Frontier California a data request asking for an updated schedule for the thirty-six proposed service quality improvement projects. Frontier California responded by submitting a revised list containing more detailed cost estimates and work plans. The revised list increased the number of projects to fifty-one. Staff accepts Frontier California's updated investment plan because it still proposes to invest the same amount and address the same wire center areas as originally described in AL 12804.

Frontier California has committed to beginning the engineering and permit approval processes for the fifty-one proposed projects within three months of the Commission's approval of this Resolution, with each project then taking approximately six months to complete. Staff accepts Frontier California's commitment to complete all projects within two years.

Frontier California will hold regular quarterly meetings with Staff to review the progress of the fifty-one projects and help ensure they remain on schedule.<sup>14</sup> 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 from the date of approval of this Resolution, Frontier California will file a Tier II Advice Letter demonstrating the results of their fifty-one proposed projects to measurably improve service quality in its network.

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<sup>13</sup> 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 therefore excluded specific project information from this Resolution. *Appendix A-2* shows Frontier California's service area within which the company has planned its investment projects.

<sup>14</sup> 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.



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.

#### **4. 2017 Investment Proposal**

On November 08, 2018, the Commission adopted Resolution T-17631, which approved Frontier California's annual fine and alternative investment plan for the year 2017. In their investment plan, Frontier California committed to investing \$1,949,000 in twenty-five projects in seventeen wire center areas of its network with substandard service quality. Staff, however, is unable to determine if the company's investment has improved service quality in a measurable way for their customers because the projects are not yet complete.

Under GO 133-D § 9.7, Frontier California has two years from the date the resolution was adopted to complete the twenty-five investment projects, all of which are underway. Staff is holding regular meetings with Frontier California in order to evaluate the progress of the projects and ensure they remain on schedule for completion on or before November 08, 2020.

#### **SAFETY CONSIDERATIONS**

Failure to meet the GO 133-D service quality standards limits customers' ability to contact 9-1-1 and emergency services and restricts public safety personnel from communicating with each other in daily emergencies or major disasters.

#### **CONCLUSIONS**

Staff recommends Commission approval of Frontier California's AL 12804 for Year 2018 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 \$2,620,620, to be completed within 2 years.

#### **COMMENTS**

In compliance with Public Utility Code § 311(g), the Commission emailed a notice letter on April 30, 2019, 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](http://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.

Comments were file by The Utility Reform Network (TURN) on May 20, 2019. TURN recommends the Commission require Frontier to demonstrate that its proposed investment projects are incremental expenditures. Staff supports TURN's recommendation that Frontier provide documentation asserting to the incremental nature of their proposed investment projects.

#### **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 15, 2019, Frontier California, Inc. (U-1002-C) filed Advice Letter 12804, which calculated total fine of \$1,310,310 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	\$1,242,000
Answer Time	\$68,310
<b>TOTAL</b>	<b>\$1,310,310</b>

4. On March 6, 2019, The Utility Reform Network (TURN) filed a protest against Frontier California's AL 12804.
5. Frontier California alternative proposal for mandatory corrective action in Advice Letter 12804 proposed to invest \$2,900,913 in thirty-six specific projects within twenty-eight wire center areas of its network experiencing poor service quality.
6. In Advice Letter 12804, Frontier California stated their thirty-six 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.
7. On May 08, 2019, Staff sent Frontier California a data request asking for an updated schedule for the thirty-six service quality improvement projects proposed in Advice Letter 12804.
8. Frontier California replied to Staff's data request by submitting a revised schedule that contains more detailed cost estimates, work plans, and expands the number of proposed projects to fifty-one.
9. Staff accepted the data request response because Frontier California will still invest \$2,900,913 and cover the same wire center areas as described in Advice Letter 12804.
10. Frontier California agrees to have regular quarterly meetings with Staff in order to review the progress of all fifty-one projects and ensure they remain on schedule.
11. Frontier California is required to demonstrate improved service quality results through a Tier II advice letter filing.
12. On April 30, 2019, the Commission emailed a draft of this Resolution to all parties in the carrier service list for public comments. The Commission received comments on this resolution from The Utility Reform Network.

**THEREFORE, IT IS ORDERED that:**

1. The California Public Utilities Commission approves Frontier California, Inc.'s (U-1002-C) Advice Letter 12804 which calculates its respective service quality fines under General Order 133-D for Year 2018:

<b>Service Quality Standard</b>	<b>Frontier California, Inc. (U-1002-C)</b>
Out of Service Repair Interval	\$1,242,000
Answer Time	\$68,310
<b>TOTAL</b>	<b>\$1,310,310</b>

2. Under General Order 133-D § 9.7, Frontier California shall implement its alternative proposal for mandatory corrective action and invest no less than twice the amount of its annual fine, or \$2,620,620, in the fifty-one projects specified in Advice Letter 12804 that are expected to improve service quality in a measurable way within its service territory.
3. The fifty-one service quality improvement projects, with a total estimated investment of \$2,900,913, shall be completed within two years of the adoption of this Resolution.
4. Frontier California shall hold regular meetings with Staff every six months in order to review the progress of all fifty-one projects and ensure they remain on schedule.
5. Frontier California 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 May 30, 2019. The following Commissioners approved it:

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Alice Stebbins  
Executive Director

MICHAEL PICKER  
President  
LIANE M. RANDOLPH  
MARTHA GUZMAN ACEVES  
CLIFFORD RECHTSCHAFFEN  
GENEVIEVE SHIROMA  
Commissioners

# APPENDIX

Carrier Average Annual GO 133-C and GO 133-D Reported Service Quality Results, 2015 - 2018

Y	X	Company or Org.	SMB	2015			2016			2017			2018		
				Investment Amount	ROI Return	Market Share	Revenue Growth	Profit Margin	Customer Satisfaction	Market Share	Revenue Growth	Profit Margin	Customer Satisfaction	Market Share	Revenue Growth
2015	100	AT&T California	U-1001-C	1.20%	65%	85%	1.50%	50%	82%	1.32%	48%	81%	1.40%	50%	80%
		Everest Chicago	U-1024-C	0.80%	77%	71%	0.70%	83%	70%	0.82%	65%	71%	0.65%	83%	62%
		Procter Southern	U-1056-C	0.07%	88%	71%	1%	84%	70%	1.1%	75%	71%	2.0%	80%	62%
		Sony/Am	U-1015-C	0.77%	80%	53%	0.65%	87%	71%	0.70%	93%	77%	0.85%	91%	60%
		Verizon Wireless California	U-1003-C	0.09%	73%	72%	0.77%	87%	56%	0.62%	63%	71%	2.2%	77%	62%
2016	100	ACN	U-0426-C	0.77%	71%	60%	1.17%	8%	66%	1.17%	8%	66%	—	—	—
		Ally Bank California	U-0603-C	1.60%	72%	71%	2.45%	75%	—	1.65%	82%	91%	—	—	—
		Chrysler Financial	U-0678-C	—	—	—	0.51%	93%	94%	—	20%	93%	4.4%	94%	91%
		Religio Home	U-0699-C	—	—	—	—	—	—	4.10%	72%	77%	4.3%	94%	91%
		Cox California	U-0604-C	1.70%	80%	86%	1.70%	88%	—	2.2%	95%	—	3.50%	94%	80%
2017	100	Religio Communications	U-0697-C	0.90%	90%	86%	0.00%	94%	—	0.4%	94%	62%	—	—	—
		Bank of America	U-0603-C	0.17%	40%	70%	0.34%	50%	82%	0.27%	48%	94%	2.0%	37%	81%
		Colson Inc.	U-1004-C	2.21%	100%	—	1.4%	100%	—	1.37%	100%	—	1.15%	100%	100%
		Caltrans	U-1006-C	2.15%	99%	—	1.56%	98%	—	2.11%	97%	—	2.20%	98%	95%
		Dacor Inc/phase	U-1007-C	0.22%	100%	—	2.4%	100%	—	0.14%	100%	—	0.23%	100%	100%
2018	100	Formalid Td.	U-1009-C	1.00%	99%	—	1.14%	95%	96%	1.14%	93%	—	1.43%	100%	100%
		Happy Valley Td.	U-1010-C	3.05%	95%	85%	1.11%	92%	—	3.0%	100%	94%	4.33%	99%	85%
		Harmon Inc/phase	U-1011-C	4.82%	94%	85%	3.30%	93%	—	3.32%	100%	94%	4.64%	91%	60%
		Pharmacia Td.	U-1013-C	0.70%	97%	—	1.54%	97%	99%	1.60%	98%	93%	1.30%	100%	90%
		Proctor's Td.	U-1015-C	0.59%	100%	—	0.24%	100%	—	1.14%	100%	100%	1.08%	100%	100%
2019	100	Proctor's Td.	U-1014-C	0.68%	97%	—	1.20%	91%	—	2.32%	99%	95%	1.82%	100%	90%
		Inc/phase	U-1016-C	0.65%	98%	—	0.85%	98%	80%	2.16%	99%	99%	1.51%	100%	100%
		Medison Inc/phase	U-1017-C	0.20%	100%	—	0.29%	100%	—	0.70%	100%	100%	1.23%	100%	99%
		Adv.com Inc/phase	U-1019-C	0.30%	80%	90%	0.29%	70%	83%	1.20%	100%	89%	1.15%	100%	80%
		Wisevision	U-1014-C	2.10%	100%	80%	1.62%	98%	—	3.29%	98%	95%	4.95%	100%	80%

