PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division **RESOLUTION T-17731**
Carrier Oversight and Program Branch **March 4, 2021**

R E S O L U T I O N

RESOLUTION T-17731 Denying Frontier California (U-1002-C) Advice Letter 12828 Requesting Suspension of General Order 133-D Fines Totaling $1,277,856 for Failure to Meet Service Quality Performance Standards in the Year 2019.

SUMMARY

This Resolution denies Frontier California's (U-1002-C) penalty suspension request in its Tier II Advice Letter 12828, submitted February 13, 2020. Advice Letter 12828 calculates a fine of $1,277,856 applicable to Frontier California for its failure to meet General Order 133-D service quality performance standards in the year 2019. In lieu of paying the fine, Advice Letter 12828 includes a request for approval of an Alternative Proposal for Mandatory Corrective Action pursuant to General Order 133-D, Section 9.7, which permits the suspension of a fine in exchange for an investment by a carrier of no less than twice the amount of its annual fine in a project(s) to improve service quality in a measurable way within two years.

This Resolution finds that Frontier California's investment proposal fails to satisfy the requirements of Section 9.7, and approving it would not be in the public interest. Therefore, the Commission orders Frontier California to pay the applicable fine of $1,277,856 for 2019. The fine amount was calculated using the prescribed method in General Order 133-D for each month the carrier failed to meet the Commission-adopted minimum standard reporting level for the *Out of Service Repair Interval* and *Answer Time* standards. Frontier California shall pay the $1,277,856 fine to the Commission within 30 days of the Commission adopting this resolution.

BACKGROUND

Since 1972, the Commission has ordered public utility telephone corporations to provide service that meets minimum service quality standards set forth in the General Order 133 series.[1] General Order 133-C established a minimum set of service quality standards and measures for installation, maintenance, and operator services for local exchange telephone service in California.

On August 29, 2016, in D.16-08-021, the Commission adopted the current General Order (GO) 133-D.[2] While GO 133-D maintained the five service quality measurements adopted in GO 133-C,[3] it expanded upon a number of GO 133-C's provisions and established an automatic fine mechanism applicable when a carrier fails to meet any of the five service quality measures for three consecutive months.[4]

The five service measures are as follows:

Service Measure	**Type of Service**
Installation Interval	Installation
Installation Commitments	Installation
Customer Trouble Reports	Maintenance
Out of Service (OOS) Repair Interval	Maintenance
Answer Time	Operator Services

GO 133-D requires telephone corporations to report, on a quarterly basis, their monthly performance results for each of the five service quality metrics[5] using a standardized form developed by Commission staff (known as a "Service Quality Standards Report Card").[6] These quarterly reports are published on the Commission's website.[7]

[1] *See* Pub. Util. Code § 2896 ("The [C]omission shall require telephone corporations to provide customer service to telecommunication customers that includes, but is not limited to,…(c) Reasonable statewide service quality standards, including but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing. …"); *see* also GO 133-D, § 1.1(a).

[2] D.16-10-019 corrects minor errors in the original version of GO 133-D.

[3] GO 133-D, § 2.1.

[4] GO 133-D, § 9.1.

[5] *See* §§ 3.1(e), 3.2(e),3.3(e), 3.4(e), and 3.5(e) in both GO 133-C and GO 133-D.

[6] *See* GO 133-C, Rule 8 ("8. FORM The attached form is a template for reporting GO 133-C Service Quality Standards. The staff may change this form as necessary."; *see* also GO 133-D, Rule 10 ("10. FORM The attached form is a template for reporting GO 133-D Service Quality Standards. The staff may change this form as necessary. Additional information can be found on the Commission's website.") The form can be found at https://www.cpuc.ca.gov/General.aspx?id=1011.

[7] *See* https://www.cpuc.ca.gov/General.aspx?id=1107. The Commission's Communications Division posts on its webpage all reporting carriers' Quarterly Service Quality Reports (*i.e.*, service quality report cards) from 2010 to present.

GENERAL ORDER 133-D FINES

Carrier performance, carrier size, and duration of noncompliance determines a GO 133-D fine amount. GO 133-D, Section 9, sets forth the service quality fines, which apply only to carriers of traditional voice telephone service.[8] A carrier will begin incurring a fine for these service quality measures when it reaches "chronic failure status," which means a failure to meet the minimum standard for three consecutive months.[9] A carrier in chronic failure status will be fined a specific amount, as detailed in Sections 9.3 to 9.5, for each day that it failed to meet the minimum monthly standard.[10] A carrier exits chronic failure status after it meets the standard for two consecutive months.[11] However, until the carrier exits chronic failure status, the carrier will continue to incur fines for any succeeding months that it failed to meet the standard.[12]

Section 9.6, Advice Letter Tabulating Fine, requires a telephone corporation that fails to meet the minimum standards to calculate and report the applicable fine imposed by GO 133-D on an annual basis, stating:

> The performance of any telephone corporation that does not meet the minimum standards shall 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 standards and the applicable fine.
>
> The advice letter shall contain detailed calculations using MS Excel spreadsheets (or a format specified by the Communications Division) with explanations of how each fine was calculated and assumptions used in the calculation. Communications Division (CD) will prepare a resolution for the Commission annually, and if the resolution is adopted, then fines shall be payable to the California Public Utilities Commission for deposit to the California General Fund.[13]

Each of the five service quality metrics has an assigned "Minimum Standard Reporting Level" that must be met in order to be in compliance with GO 133-D. When a carrier's performance falls below any of the minimum standards, the carrier is deemed to be out of compliance and must report this information to the Commission.

[8] GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."
[9] GO 133-D, § 9.1.
[10] *Ibid.*
[11] *Ibid.*
[12] *Ibid.*
[13] GO 133-D, § 9.6. Section 9.6 became effective January 1, 2017.

GO 133-D, SECTION 9.7 ALTERNATIVE PROPOSAL FOR MANDATORY CORRECTIVE ACTION TO SUSPEND A FINE

GO 133-D, Section 9.7, Alternative Proposal for Mandatory Corrective Action, allows carriers subject to an annual fine to request to suspend the fine by proposing "in their annual fine filing, to invest no less than twice the amount of their annual fine in a project(s) which improves service quality in a measurable way within two years."[14] Section 9.7 sets forth specific requirements for what must be included in a carrier's proposal:

> In support of a request to suspend the fine, carriers may propose, in their annual fine filing, to invest no less than twice the amount of their annual fine in a project(s) which improves service quality in a measurable way within 2 years. The proposal must demonstrate that 1) twice the amount of the fine is being spent, 2) the project(s) is an incremental expenditure with supporting financials (e.g., expenditure is in excess of the existing construction budget and/or staffing base, 3) the project(s) is designed to address a service quality deficiency and 4) upon project(s) completion, the carrier shall demonstrate the results for the purpose proposed.
>
> Carriers are encouraged to review their service quality results to find appropriate target projects to invest funds.[15]

The Commission added this fine suspension option in D.16-08-021, believing at the time that it "better aligns carriers' expenditures with improving actual customer service."[16] The Commission explained that the purpose of this option was to allow carriers to propose investments that would target the deficiencies that led to the fine, stating:

> In their annual filings, carriers that incur a fine may propose for the Commission's consideration an alternative set of expenditures *to address the service quality standard resulting in the fine, provided that the carrier demonstrates that the expenditures are incremental, directed at the service quality deficiencies leading to the fine*, and in an amount that is twice the amount of the tabulated fine."[17]

[14] GO 133-D, § 9.7.
[15] *Ibid*.
[16] *Decision Adopting General Order 133-D*, D.16-08-021, Issued August 29, 2016, at 24.
[17] *Id*., at 23-24 (emphasis added).

The Commission concluded that the public interest requires telephone corporations subject to penalties should be authorized to propose alternative means to expend twice the amount of the fine to improve service quality for customers.[18] But, the request must be "based on an expenditure proposal for incremental actions directed at improving compliance with the service quality standard that led to the fine."[19]

While carriers have the option of requesting the Commission suspend the automatic service quality fines per Section 9.7, nothing requires the Commission or staff reviewing an advice letter to issue a pro forma approval of every fine suspension request. The burden is on the carrier to demonstrate with specificity that the proposed investment(s) will remedy – in a "measurable way" – the deficiencies that led to the fine. This includes providing supporting documentation to show that the money redirected from fines be specifically used to improve the carrier's service quality performance.[20]

Given that the Commission authorized carriers to request this alternative option in lieu of a penalty on public interest grounds, we find it reasonable to apply a public interest standard in reviewing Frontier's Section 9.7 request. This review must also be done within the context of the telephone corporation's responsibility under state law and Commission rules to maintain its facilities and provide safe and reliable service by meeting "reasonable statewide service quality standards."[21] Reliable telecommunications services are critical to many aspects of society, including public health and safety, business and commerce, and education, and thus, a telephone corporation's investments in service quality should already be sufficient to meet those needs. Therefore, it would not be in the public interest for the Commission to approve a carrier's Section 9.7 fine suspension/investment plan if the proposal includes projects that are not truly in addition to the carrier's normal costs and expenditures for maintenance, repair, and other operations.

FRONTIER CALIFORNIA ADVICE LETTER 12828 CALCULATING APPLICABLE FINE FOR 2019 AND REQUESTING SUSPENSION OF FINE

Frontier California (Frontier) submitted Advice Letter (AL) 12828 on February 13, 2020. In AL 12828, Frontier summarized its total year 2019 service quality performance results and

[18] D.16-08-021, at 33 (Conclusion of Law 7).
[19] *Id*., at 33 (Conclusion of Law 8).
[20] See e.g., GO 133-D, § 9.7 (requiring that "the project(s) is an incremental expenditure with supporting financials (e.g., expenditure is in excess of the existing construction budget and/or staffing base").
[21] See e.g., Pub. Util. Code §§ 451 and 2896(c).

included fine calculations for the minimum standards that the company failed to meet, as GO 133-D, Section 9.6 requires.

Frontier calculated a total fine amount of $1,277,856. In lieu of paying this fine, Frontier requested in AL 12828 that the Commission suspend the fine and approve its proposed investment projects pursuant to GO 133-D, Section 9.7. Specifically, Frontier proposes to invest $2,600,370 in 25 projects at certain wire centers in the following 10 counties: Humboldt, Kern, Los Angeles, Orange, Riverside, San Bernardino, Santa Barbara, Santa Clara, Trinity, and Ventura and to complete the projects within two years.[22] "Confidential Attachment B" to AL 12828 contains a "listing of priority wire centers Frontier proposes for the investment."[23] According to Frontier, these wire centers are "targeted towards improvements to Frontier's copper network."[24] Frontier also states that the projects in these wire centers are "all above and beyond Frontier's business as usual (BAU) budget for the state"[25] and "would not otherwise be addressed at this time."[26]

Frontier claims that the identity of the wire centers that would receive these investments is confidential, as well as the number of annualized OOS tickets each of them received in 2019.[27] We disagree. It is in the interest of the public to know which wire centers are Frontier's priority and require or already received penalty money redirected to them. It is in the public interest for stakeholders to have this information in order to comment on this proposal, and for the Commission to openly assess whether penalty funds diverted to these wire centers would indeed address the failures that led to Frontier's 2019 fine. Moreover, wire center information is publicly available.[28] Therefore, by this Resolution, the Commission finds that the columns containing the wire center identities and annualized OOS tickets information in "Confidential Attachment B" do not warrant confidential treatment. We will, however, allow the "location description" (i.e., the

[22] Frontier AL 12828 (2/13/20), Confidential Attachment B.
[23] *Id.*, at 1.
[24] *Ibid.*
[25] *Ibid.*
[26] *Ibid.*
[27] Frontier states in AL 12828 that the annualized number of out of service tickets for 2020 is based on three quarters of actual data.
[28] See e.g., D.20-12-021, *Decision Addressing Carriers' Confidentiality Claims Related to Network Study Ordered in Decision 13-02-023, as Affirmed in Decision 15-08-041*, at 133 (FOF 49: "Many internet sites provide information regarding the locations of central offices, the common language locator codes associated with central offices, the types of switches installed at central offices, the identities of exchanges served by central offices, the types of broadband and other services available through central offices, and other details regarding telecommunications networks."); see also e.g.: http://www.thedirectory.org/pref/cosearch.htm; http://www.thecentraloffice.com/; http://www.co-buildings.com/; https://www.geo-tel.com/central-office-locations/; https://www.telcodata.us/search-area-code-exchange-detail; and https://www.sandman.com/cosearch.

information in the second column in Attachment B) to remain confidential, as revealing the specific location could pose a security risk.

Aside from providing the 25 wire center names, location descriptions, and annualized OOS tickets received by each wire center, Attachment B to AL 12828 contains two other columns providing the "Project Description" and "High Level Estimate" of the cost for each of the 25 projects. Frontier described the project work for these wire centers as primarily consisting of replacing and/or rehabilitating copper cable that was wet, defective, or deteriorated.[29] Other than this Attachment B and the general statements cited above in AL 12828, Frontier did not provide further information concerning its proposed investments, which must be "based on an expenditure proposal for incremental actions directed at improving compliance with the service quality standard that led to the fine."[30]

CD rejected AL 12828 on December 29, 2020, on the basis that Frontier's two previous investment plans did not demonstrate measurable improvement in Frontier's service quality performance and therefore it was not reasonable for the Commission to allow Frontier to suspend its fine a third time. Frontier disagreed with staff and argued that it should not be required to pay the 2019 fine because it had some improvement in 2020. Frontier would not withdraw its AL 12828, as staff had requested.

FRONTIER CA'S PREVIOUS TWO INVESTMENT PLANS IN LIEU OF PAYING FINES FOR YEARS 2017 AND 2018

This is the third consecutive Section 9.7 fine suspension/investment plan request that Frontier CA has made in the past three years.

A. Frontier's First Fine Suspension/Investment Plan Arising from 2017 Violations

For the year 2017, Frontier CA was subject to $759,833 in fines for its failure to meet the minimum *Out of Service Repair Interval* and *Answer Time* standards during that year. In lieu of paying that fine, Frontier CA requested approval of its Section 9.7 investment plan in Advice Letter 12772. In the first investment plan, Frontier originally proposed to invest $1,949,000 in 25 projects across 17 wire centers in the following counties: Los Angeles, Mono, Orange, Riverside, San Bernardino, Santa Barbara, Santa Clara, and Ventura. Frontier committed to completing these projects in the two-year period following Commission approval of its investment plan, from November 2018 to November 2020.

[29] Frontier AL 12828, Confidential Attachment B.
[30] D.16-08-021, at 33 (Conclusion of Law 8).

This was the first year that this fine suspension/investment option was available. The Commission approved the investment plan on November 8, 2018 in Resolution T-17631.[31]

In November 2020, Frontier notified CD that it had completed all projects approved in Resolution T-17631. In this notification, Frontier CA included a spreadsheet providing the general description of the project work, the number of outage tickets, wire center name, and cost estimates for all the projects it originally proposed. This spreadsheet also shows that Frontier CA performed projects in 26 wire centers, as opposed to the 17 wire centers specified in the original proposal. Additionally, it included post-investment project information such as the exact type and number of feet of cables that were replaced, as well as final costs for the projects. As with the project plan in AL 12828, Frontier failed to include any *Out of Service (OOS) Repair Interval* standard performance data showing any measurable or incremental service quality improvement for the wire centers while the projects were ongoing.

Therefore, staff attempted to determine the success of these projects by looking at whether Frontier's *Out of Service Repair Interval* results for the investment wire centers showed continuous improvement from 2017 (when the fines were incurred) through the 3rd Quarter of 2020. Staff used this standard to measure success because Frontier's chronic failure to meet the *OOS Repair Interval s*tandard for all of 2017 is primarily what led to its 2017 fine. Staff analyzed both the pre- and post-investment *OOS Repair Interval* results for all 26 wire centers included in the first investment plan for the period from 2017 through 3rd Quarter 2020, using Frontier CA's quarterly GO 133-D data. Attachment A of this Resolution includes this data and calculations on an annual basis. The data and calculations show the following:

- Even after the completion of the projects, 12 of the 26[32] (46%) wire centers experienced either no improvement or a net decline in their annual *OOS Repair Interval* results from 2017 through 2020 3rd Quarter. These declines in performance range from 0% to 18% over this period.
- None of the 26 investment wire centers met the GO 133-D minimum *OOS Repair Interval* of repairing 90% of outages within 24 hours on an annualized basis, when the projects were completed in November 2018.
- Nine wire centers and those projects that were listed in Frontier's post-investment plan spreadsheet were not included in their original proposed project plan in AL 12772. Two of those nine wire centers are not included in Frontier's GO 133-D

[31] Frontier CA Advice letter 12772, Approved in Res. T-17631, November 8, 2018.
[32] The original proposal for the first investment plan identified 17 wire centers for investment. Frontier later added nine more investment wire centers.

quarterly service quality raw data.[33] Therefore, staff cannot determine the *OOS Repair Interval* percentages for those wire centers.

- Eight projects in Frontier's post-investment plan spreadsheet are actually listed as having been completed before the Commission even approved the plan in November 2018.

As with Frontier's AL 12828, Confidential Attachment B, we intend to make publicly available all of the information in this Resolution's Attachments A, B, and C. As explained, this information is important to our review of Frontier's third proposed investment plan to determine whether these investments at specific wire centers are truly incremental expenditures specifically targeted at remedying Frontier's 2019 service quality deficiencies, as Section 9.7 requires. Additionally, wire center information is already publicly available.[34]

Given the aforementioned findings, especially the decline in the investment wire centers' *OOS Repair Interval* performances, staff concluded that Frontier CA's investment plan projects approved in Res. T-17631 failed to improve service quality in a measurable way. The lack of supporting financial documentation and performance data showing an incremental service quality improvement for the wire centers while the projects were ongoing made it difficult for staff to verify Frontier's claim in AL 12772 that the projects were in fact incremental or targeted deficiencies that led to the 2018 fine.

Indeed, Frontier had already completed eight projects before the Commission even approved the first investment plan in Res. T-17631 on November 2018. This suggests that the eight projects were never intended to be part of an investment plan, as required by D.16-08-021. This also calls into question whether those projects were in fact incremental, as it appears Frontier was already planning to perform those projects irrespective of the fine suspension/investment plan it had proposed in AL 12772. If Frontier was already planning on doing these projects, and had actually completed the projects, it is not possible for them to be an incremental cost or in addition to the company's business-as-usual budget and construction plans.

B. Frontier's Second Fine Suspension/Investment Plan Arising from 2018 Violations

For the year 2018, Frontier was subject to $1,310,310 in fines for its failure to meet the minimum *OOS Repair Interval* and *Answer Time* standards during that year. In lieu of

[33] Carriers are not required to provide data on wire centers where there are no reportable trouble tickets.
[34] See fn. 28, *supra*.

paying that fine, Frontier again requested approval of a Section 9.7 investment plan in Advice Letter 12804. At the time of this 2018 request, Frontier's first investment plan was not yet complete. In this second investment plan, Frontier CA proposed to invest $2,900,913 in 51 projects across approximately 32 wire centers in the following seven counties: Fresno, Los Angeles, Mono, Orange, Riverside, San Bernardino, and Santa Barbara. Notably, this second plan included eight of the same wire centers that were included in the first investment plan, which were located in the following six counties: Los Angeles, Mono, Orange, Riverside, San Bernardino, and Santa Barbara. Attachment C shows all of the wire centers in the three investment plans, including cost information for each. Frontier committed to completing these projects within two years, from May 2019 to May 2021, following Commission approval of this second investment plan.[35] The Commission approved this plan in Resolution T-17652 on May 30, 2019.

As with the first investment plan, Frontier's proposed investment plan in AL 12804 consisted of the same general information: general descriptions of replacing and/or rehabilitating various lengths of damaged or defective cable, the projects' approximate geographic locations, wire center name, the number of annual 2018 outage tickets for each investment wire center, and the high-level estimated project costs.

Because this second investment plan (approved in Resolution T-17652) lacked specificity, including the absence of supporting financial documentation and *OOS Repair Interval* data, the staff utilized the same methodology as it had applied in reviewing the effectiveness of Frontier's first investment plan. Staff analyzed Frontier's 2017 through 2020 3rd Quarter *OOS Repair Interval* results for the 32 wire centers that were supposed to receive the redirected 2018 penalty funding. Attachment B of this Resolution shows the data and associated calculations on an annual basis. The data and calculations show the following:

- 16 of the approximately 32 (50%) investment wire centers experienced either a net decline or no improvement in their annual *OOS Repair Interval* rate from 2017 through 2020 3rd Quarter. These declines ranged from 0% to 57%.[36]
- The other 16 wire centers have shown some improvement during the same time period, with the increases ranging from 2% to 19%, but none met the 90% *OOS Repair Interval* standard on an annual basis from 2017 through 2020 3rd Quarter.
- Only 9 of the approximately 32 wire centers had an annualized *OOS Repair Interval* rate of 70% or greater from the 1st through 3rd Quarter of 2020.

[35] Frontier CA Advice Letter 12804, Approved in Res. T-17652, May 30, 2019.
[36] According to Frontier CA's GO 133-D service quality data, the wire center with a 57% decline showed 0% because it experienced zero outages from 1st-3rd Quarter 2020.

- None of the investment wire centers in the second investment plan met the GO 133-D minimum *OOS Service Repair Interval* standard of repairing a minimum of 90% of outages within 24 hours in 2020 1st through 3rd Quarter on an annual basis.
- The second investment plan targeted eight of the same wire centers in the Los Angeles, Mono, Orange, Riverside, San Bernardino, and Santa Barbara Counties, which had already received investments from the first plan approved in Res. T-17631.

The final costs and results of these projects will not be known until the end of the two-year investment period, which is scheduled for May 2021. However, the overlap in wire center investments and the lack of supporting financial documentation raise concerns that projects in the second investment plan were not incremental to Frontier's business as usual budgetary processes and were not designed to address any specific service quality deficiencies stemming from Frontier's 2018 violations, as required by Section 9.7. While the projects are not yet complete, the lack of improvement in the *OOS Repair Interval* performance in more than 16 of the 32 wire centers thus far (with only four months left) suggests that the investment plan approved in Resolution T-17652 will not have the required result of improving Frontier's service quality in a measurable way.

NOTICES/PROTESTS

On March 4, 2020, The Utility Reform Network (TURN) filed a protest against Frontier CA's AL 12828. TURN argued that GO 133-D is not sufficient to ensure that carriers meet the current service quality standards and provide customers with safe and reliable service.[37] TURN cited the Commission's network study of AT&T and Frontier's networks in saying that Frontier's quality of voice services declined steadily over eight years from 2010 through 2017.[38]

TURN further stated that the company's first two corrective action plans failed to generate improvement in its performance with the *OOS Repair Interval* standard in 2018 and 2019.[39] TURN also stated that poor service quality degrades the provision crucial services that customers rely on to communicate with employers, doctors, family, as well as 911 and emergency services during disasters.[40] TURN's protest urges the Commission to address the serious issue that Frontier customers are continuing to experience with a substandard quality of service and that they remain vulnerable to service failures during emergencies.[41]

37 Protest of The Utility Reform Network of Frontier Advice Letter 12828, at 1 (March 4, 2020).
38 *Id*., at 3.
39 *Id*., at 5.
40 *Id*., at 1-2.
41 TURN Protest, at 5.

TURN contended that AL 12828 did not contain an adequate analysis into the causes of Frontier CA's poor service quality and the resulting impact upon its customers.

DISCUSSION

A. Frontier CA GO 133-D Fine for 2019 Totals $1,277,856

For 2019, Frontier CA submitted quarterly G.O. 133-D service quality reports for the *Customer Trouble Reports*, *OOS Repair Intervals*, and *Answer Time* standards in accordance with GO 133-D, Section 3.[42] A carrier's monthly service quality data compared to the minimum performance standards determines whether a carrier is subject to fines.[43] These results and a unique scaling factor determine how a carrier's fines are calculated, as described below.

1. 2019 Scaling Factor

General Order 133-D assigns fine amounts using base values specified in Sections 9.3, 9.4, and 9.5, adjusted through a formula expressing the relative size of the carrier within California market.[44] The scaling factor formula is expressed below, with results shown in the table:

(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 in Chronic Failure) = **Fine**

[42] Only General Rate Case (GRC) Incumbent Local Exchange Carriers (ILECs) are required to report data for the *Installation Interval* and *Installation Commitment* standards, §§ 3.1 and 3.2, respectively.
[43] GO 133-D, Section 9.1.
[44] Annually, the Communications Division prepares a list of the total number of working telephone access lines in California from 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 2019 from Carriers Reporting Under GO 133-D* found under *Reference Information* at http://www.cpuc.ca.gov/General.aspx?id=1107.

2019 Working Lines and Scaling Factor for Carriers Paying Fines, Under GO 133-D		
Carrier	**2019 Lines**	**Scaling Factor**
Frontier CA	700,108	13.92%

2. Specific Fines for Each GO 133-D Standard

GO 133-D sets forth specific fines applicable for each of the five service quality standards.

a. Out of Service Repair Interval

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

The fine structure for this standard is calculated using the following criteria:

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

Frontier CA failed to meet the *OOS Repair Interval* standard for all twelve months in 2019[45]:

Frontier CA 2019 Reporting for Out of Service Repair Interval GO 133-D, Section 3.4 – 90% minimum												
Month	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**July**	**Aug**	**Sept**	**Oct**	**Nov**	**Dec**
Out of Service	47.5%	14.9%	52.9%	46.2%	58.4%	61.0%	56.5%	57.8%	54.0%	78.6%	79.2%	37.6%

[45] For the month(s) the carrier did not meet the minimum standard, the percentage is represented in red. For the month(s) that incurred a fine, the percentage is represented in red with an underline.

Frontier CA did not meet the standard from January through December 2019. Prior to this, the carrier also failed to meet the *OOS Repair Interval* standard every month since April 2016, when the Commission approved Frontier's acquisition of Verizon CA.[46] As a result, Frontier CA has been in "chronic failure status" and incurring fines for each month of its substandard service quality performance in the year 2019.[47]

Frontier CA calculated its fine based on being in "chronic failure status" while not meeting the *OOS Repair Interval* standard for all the twelve months from January through December 2019.

Staff, therefore, agrees with Frontier CA's fine calculations in AL 12828, as shown below.

> **Fine** = (Carrier's Scaling Factor 13.92%) X (Monthly Base Fine per Measure $750,000) X (Number of Months in Chronic Failure 12) = **$1,252,800**

b. Customer Trouble Reports

The *Customer Trouble Reports* standard, defined in Section 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* measurement varies based on the number of working lines per reporting unit.

Frontier CA met the *Customer Trouble Reports* standard from January through December of the year 2019.

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

The *Answer Time* standard, defined in Section 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.[48] 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 *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

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[46] Frontier Acquistion of Verizon D.15-12-005.

[47] 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."

[48] § 3.5 for the *Answer Time* standard applies to Time Division Multiplexing-based voice services provided by GRC ILECs, facilities-based URF carriers with 5,000 or more customers, and any URF carrier with fewer than 5,000 customers that is a carrier of last resort.

60 seconds when speaking to a live agent after completing an interactive voice response or automatic response unit system.

Base Answer Time Fine, GO 133-D, Section 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	$1,000	$1,500	$2,000
Days in a Month	30 days	30 days	30 days	30 days	30 days
Fine (per month)	$0	$15,000	$30,000	$45,000	$60,000

Frontier CA failed to meet the *Answer Time* minimum standard for all twelve months in the year 2019.

The *Answer Time* results for Frontier CA are as follows:

Frontier CA 2019 Reporting for *Answer Time*, GO 133-D Section 3.4 – 80% minimum												
Month	**Jan**	**Feb**	**Mar**	**Apr**	**May**	**Jun**	**July**	**Aug**	**Sept**	**Oct**	**Nov**	**Dec**
Answer Time	27.2%	7.1%	14.9%	22.3%	32.9%	30.7%	31.3%	27.7%	23.4%	48.7%	44.7%	21.5%

Prior to 2019, Frontier CA also failed to meet the *Answer Time* standard every month since August 2017. As a result, Frontier CA has been in "chronic failure status" and incurring fines for this measure for each month of its substandard service quality performance in the year 2019.

d. ***Installation Interval and Commitments***

The standards for *Installation Interval* and *Installation Commitments*, as defined in Section 3.1, apply only to the GRC ILECs. As a result, Frontier CA is not subject to these standards and thus did not submit data for them.

3. Total Fine Amount per Carrier

Based on the scaling factors and the number of months Frontier CA failed to meet the minimum service quality performance standards, Frontier CA is subject to the following fine for the year 2019:

Service Quality Standard	Frontier CA (U-1002-C)
Out of Service Repair Interval	$1,252,800
Answer Time	$25,056
Total	**$1,277,856**

B. Frontier CA's Investment Proposal in Lieu of Fines for 2019 Fails to Satisfy GO 133-D, Section 9.7 Requirements

As discussed, the carrier bears the burden to demonstrate that its Section 9.7 investment proposal will remedy the deficiencies that led to the fine. Frontier's AL 12828 fails to satisfy Section 9.7's requirements. AL 12828 does not include the "supporting financial documents" required to substantiate Frontier's claim that the 25 proposed projects are incremental and in addition to Frontier's business as usual construction budgets or plans. Without credible documentation, the Commission cannot be certain that the investment will be incremental as opposed to already planned because the large ILECs are not subject to cost-of-service regulation. Accordingly, it would not be reasonable for the Commission to approve the fine suspension on the basis of Frontier's general statements in AL 12828.

AL 12828 also lacks any explanation or evidence demonstrating how replacing or repairing copper cables at the proposed 25 wire centers would address Frontier's 2019 service quality failures. Frontier offers the annualized number of outage tickets in 2019 for each wire center listed in the investment proposal, but that number is not what the Commission uses to measure service quality. Service quality is measured by the five metrics in GO 133-D. In Frontier's case, its automatic fine for 2019 resulted largely from its chronic failure status concerning the *OOS Repair Interval* standard. But, Frontier did not provide any information regarding the 25 proposed investment wire centers' *OOS Repair Interval* results, thereby failing to demonstrate a nexus between proposed projects at these wire centers and the service quality deficiencies leading to its 2019 fine.

As Frontier's AL 12828 failed to satisfy GO 133-D, Section 9.7's specific requirements, staff was correct to reject it.

C. Frontier CA's Investment Proposal in Lieu of Fines for 2019 is not in the Public Interest

Staff recommends the Commission also deny Frontier's request to suspend its fine for 2019. We find that it would not be in the public interest to allow Frontier to take advantage of this option for a third consecutive time. Staff's analysis reveals an alarming pattern with Frontier and its reliance on this fine suspension option to avoid paying a penalty, despite its chronic failure status for three consecutive years, as discussed. The purpose of a penalty or fine is to deter future violations. Deterrence, however, cannot be achieved here if we continue to allow Frontier to avoid paying yet another substantial fine.

It is reasonable to look at Frontier's past performance to determine whether its proposal for future action is reasonable and in the public interest. Nothing in D.16-08-021 or Section 9.7 forbids this type of analysis. Indeed, Frontier's past performance and past investment proposals are relevant information in determining how successful this third investment proposal would be.

For example, as explained *supra*, Frontier completed its first investment plan in November 2020. However, the wire centers that received the redirected penalty funds from the 2017 fine did not show measurable improvement in service quality with regard to the *Out of Service Repair* Interval standard for which Frontier incurred the 2017 fine. None of those wire centers reached the minimum *OOS Repair Interval* standard to repair 90% of outages within 24 hours during the period from 2018 through the 3rd Quarter 2020, thereby demonstrating that the investments in the first plan did not work. See discussion *supra* and Attachment A.

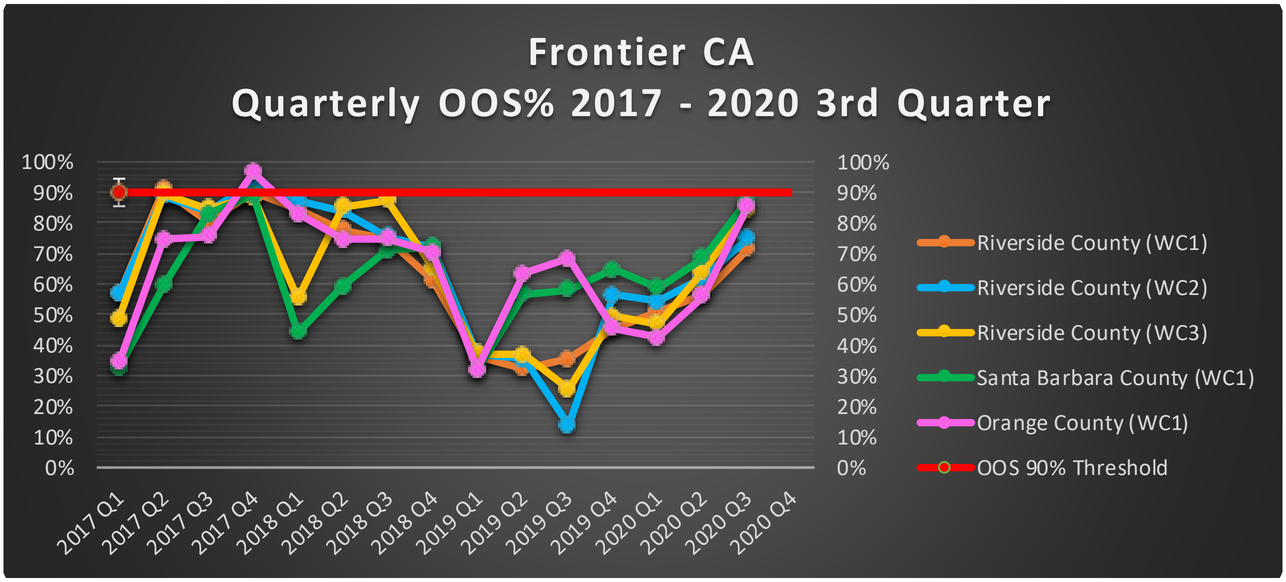
Frontier's second investment plan has only four months left; it should be completed in May 2021. Because the investment plan is near completion, we have substantial data available now to review its effectiveness. As explained further below, the staff analyzed data regarding Frontier's *OOS Repair Interval* rates for the investment wire centers from 2017 through the 3rd Quarter 2020. The data shows that this plan has also not worked to measurably improve Frontier's ability to meet the 90% *OOS* standard, though these wire centers purportedly received redirected penalty funds from the 2018 fine. See discussion *supra* and Attachment B.

Prior to acquiring Verizon CA in 2016, Frontier CA's monthly results in the *OOS Repair Interval* standard were frequently above 75%, and in some cases above the minimum 90% standard. However, Frontier's service quality results declined significantly after the Commission approved the acquisition in April 2016, in that Frontier failed to meet the

OOS Repair Interval standard every month from April 2016 through December 2019. Frontier's overall extremely poor performance following its transaction with Verizon CA is alarming. As a result, staff has serious concerns that Frontier's service quality results will not consistently improve to and stay at the 90% *OOS* standard, but instead continue to decline or "roller coaster," as seen in the chart below.

In the third proposed network investment plan here, Frontier purports to invest in projects that may have already been covered by Frontier's previous two service quality investment plans. For instance, in comparing the proposed projects and wire centers (WCs) from Frontier's previous two investment plans to those listed in AL 12828, staff found that five of the same wire centers in Orange, Riverside, and Santa Barbara counties were included in all three plans. An analysis of these five wire centers' *OOS Repair Interval* standard performance (one WC in Orange County, three WCs in Riverside County, and one WC in Santa Barbara County) during the period from 2017 through 3rd Quarter 2020 reveals that these wire centers did not experience a steady improvement as would be expected with incremental investments from Frontier's first and second investment plans. Instead, these wire centers experienced inconsistent results that never reached the requisite 90% minimum *OOS Repair Interval* standard, as discussed further below.

The chart below shows the quarterly service quality results for these five overlapping wire centers. Given the significant financial resources devoted to the projects in these five wire centers in Frontier's last two investment plans, it is reasonable to expect its *OOS Repair Interval* results to maintain an upward trend towards the 90% OOS rate from the plans' inception. That is not the case. Instead, the chart shows an unpredictable and inconsistent "roller coaster" trend for these wire centers that calls into question the effectiveness of Frontier's investment plans. While the *OOS Repair Interval* performance for these wire centers did begin to show some improvement after the 1st Quarter 2020, these results were still below the minimum 90% standard. But, Frontier's historical performance at these wire centers shows that this trend may not last.



Every other wire center Frontier included in its three investment plans also remained below the 90% mark.[49] At the company level, Frontier still has not met the *OOS Repair Interval* standard for the three consecutive months in order to exit "chronic failure status," and thus continues to accrue fines for this standard.

For the foregoing reasons, we find that it would not be in the public interest to approve Frontier's third request for a GO 133-D fine suspension and proposed investment plan.[50] Therefore, we affirm CD's rejection of AL 12828 and deny Frontier's request for relief.

SAFETY CONSIDERATIONS

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

[49] See Attachments A and B.

[50] The concerns raised here about Frontier's poor service quality performance and the insufficient tracking mechanisms to determine whether the reinvestments are truly incremental costs or duplicative may also be relevant to similar compliance mechanisms being considered in other Commission proceedings, including Application (A).20-05-101 (filed May 22, 2020) Frontier Transfer of Control Proceeding and Investigation (I.)19-12-009, *Order Instituting Investigation on the Commission's Own Motion into the Operations, Practices, and Conduct of Frontier Communications Corporation, Frontier of America, Inc., (U5429C), and Frontier California, Inc., (U1002C) to Determine Whether Frontier Violated the Laws, Rules, and Regulations of this State through Service Outages and Interruptions and Disclosing and Publishing Customer Addresses.*

CONCLUSIONS

Staff recommends that the Commission reject Frontier CA's request for approval of its Section 9.7 investment plan in lieu of paying fines for the year 2019, as set forth in AL 12828. Staff recommends the Commission order Frontier CA to pay the GO 133-D fines in accordance with the calculations in this Resolution. The total amount of fines for the year 2019 payable from Frontier CA is **$1,277,856**. For the reasons discussed herein, the Commission agrees with this recommendation and orders Frontier to pay the $1,277,856 fine within 30 days of the adoption of this Resolution.

Given that Frontier CA, one of California's two largest wireline carriers consistently fails to improve its service quality in a measurable or sustained way, staff recommends that the Commission initiate a rulemaking to consider whether the current GO 133-D standards, penalty mechanisms, and investment option in lieu of fines are sufficient to ensure and incentivize carrier compliance in accordance with California law.

COMMENTS

In compliance with Public Utilities Code § 311(g), the Commission emailed a notice letter on February 2, 2021, informing all parties on the general 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 on the same website.

FINDINGS

1. General Order 133-D, Section 9.6 directs any telephone corporation whose service quality 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 standards and the applicable fine.

2. Frontier California continually failed to meet the General Order 133 *Out of Service Repair Interval* standard every month from April 2016 through December 2019.

3. Frontier California did not meet the General Order 133 *Answer Time* standard during the months from January through March and December 2019.

4. On February 13, 2020, Frontier California (U-1002-C) filed Advice Letter 12828, which calculated fines applicable to Frontier California for missing the *Out of Service Interval* and *Answer Time* standards for the year 2019 pursuant to GO 133-D, Section 9.6.

5. Frontier California's total calculated fine is as follows:

Service Quality Standard	Frontier CA (U-1002-C)
Out of Service Repair Interval	$1,252,800
Answer Time	$25,056
Total	**$1,277,856**

6. Communications Division reviewed Frontier California's Advice Letter 12828 and found the proposed fines to have been calculated based on the methodology set forth in General Order 133-D, Section 9.

7. Frontier California Advice Letter 12828 included a request to suspend the $1,277,856 fine applicable to Frontier California for 2019 based on Frontier California's proposal to invest no less than twice the fine amounts in service quality improvement projects, pursuant to GO 133-D, Section 9.7.

8. The burden is on the telephone corporation requesting a fine suspension pursuant to GO 133-D, Section 9.7 to demonstrate with supporting documentation that the proposed expenditures are incremental and directed at the service quality deficiencies leading to the fine, in an amount that is twice the amount of the tabulated fine.

9. While carriers have the option of requesting the Commission suspend the automatic service quality fines pursuant to GO 133-D, Section 9.7, the Commission is not required to issue a pro forma approval of every fine suspension request.

10. In reviewing a telephone corporation's GO 133-D, Section 9.7 fine suspension request and investment proposal, staff is not prohibited from considering the results or effectiveness of the company's past Section 9.7 requests.

11. A telephone corporation's historical performance with previously approved investment proposals could be useful in reviewing a company's current investment proposal, especially if the company proposes similar types of investments in the same areas.

12. California law, including Public Utilities Code sections 451 and 2896, and Commission rules and orders, including GO 133-D, require telephone corporations to maintain their

facilities and provide safe and reliable service by meeting "reasonable statewide service quality standards."

13. Reliable telecommunications services are critical to many aspects of society, including public health and safety, business and commerce, and education, and thus, a telephone corporation's' investments in service quality should already be sufficient to meet those needs.

14. The public interest requires the Commission to ensure that a GO 133-D, Section 9.7 investment proposal will remedy, in a measurable way, the deficiencies that led to the fine sought to be suspended.

15. Frontier California's Advice Letter 12828 did not include details demonstrating that the proposed investments targeted deficiencies that led to the 2019 service quality fines applicable to Frontier California.

16. Frontier California's Advice Letter 12828 did not include supporting documentation demonstrating that the investments proposed were incremental or additional to Frontier California's business-as-usual costs and operations.

17. Frontier's Advice Letter 12828 did not satisfy GO 133-D, Section 9.7's requirements.

18. Despite proposing to spend over $4,849,913 in two previously approved GO 133-D, Section 9.7 Alternative Proposal for Mandatory Corrective Action investment plans, Frontier California repeatedly failed to meet the minimum *Out of Service Repair Interval* standard during most of the investment periods.

19. Frontier California's past two corrective action plans, which were supposed to be directed at its failure to meet GO 133-D service quality standards in years 2017 and 2018, have not improved its *Out of Service Repair Interval* standard compliance in a measurable way.

20. Frontier California continues to be in chronic failure status and continues to incur fines for its failure to meet service quality standards.

21. Advice Letter 12828 reflects the fines Frontier California is assessed for its service quality performance failures for only the Year 2019.

22. In rejecting Advice Letter 12828, staff evaluated Frontier California's service quality results from January 2017 through the 3rd Quarter 2020.

23. It is not reasonable to approve Advice Letter 12828, given Frontier California's lack of measurable and sustained improvement in its service quality performance, notwithstanding the Commission's approval of two prior consecutive GO 133-D, Section 9.7 Alternative Proposal for Mandatory Corrective Action requests.

24. Frontier California's lack of measurable and sustained improvement in its service quality performance underscores the Commission's need to investigate concerns about the efficacy of the current GO 133-D standards, penalty mechanism, and fine suspension mechanism.

25. It is reasonable to require Frontier California to pay the $1,277,856 fine to the Commission within 30 days of the Commission's approval of this Resolution. The Commission will deposit the fine payment into the California General Fund.

26. It is in the interest of the public to know which wire centers are Frontier's priority and require penalty money redirected to them.

27. It is in the public interest for stakeholders to have wire center information in order to comment on Frontier's investment proposal in Advice Letter 12828.

28. It is in the public interest for the Commission to openly assess whether penalty funds diverted to specific wire centers would indeed address the failures that led to a service quality fine.

29. Wire center information is publicly available.

30. We will, however, allow the "location description" (i.e., the information in the second column in Attachment B) to remain confidential, as revealing the specific location could pose a security risk.

31. The columns containing the wire center identities and annualized OOS tickets information in Frontier's Advice Letter 12828, "Confidential Attachment B" do not warrant confidential treatment.

32. All information contained in Attachments A, B and C in this Resolution should be made available to the public because this information is important to our review of

Frontier's third proposed investment plan to determine whether these investments at specific wire centers are truly incremental expenditures specifically targeted at remedying Frontier's 2019 service quality deficiencies, as Section 9.7 requires.

33. On February 2, 2021, the Commission emailed a draft of this Resolution to all parties on the general service list for public comments.

CONCLUSIONS OF LAW

1. It is reasonable to accept the calculation of fines set forth in this Resolution, which apply to Frontier California (U-1002-C) for the year 2019, in the amount of $1,277,856.

2. It is reasonable to review a telephone corporation's request to suspend a fine pursuant to GO 133-D, Section 9.7 within the context of the telephone corporation's responsibilities under state law and Commission rules and orders, including, but not limited to, the obligation to maintain its facilities and provide safe and reliable service that meets "reasonable statewide service quality standards."

3. It is reasonable to require a telephone corporation requesting a fine suspension pursuant to GO 133-D, Section 9.7 to demonstrate that it is in the public interest for the Commission to approve the request.

4. The public interest in disclosing the columns containing the wire center names or identities and annualized OOS tickets information in Frontier's Advice Letter 12828, "Confidential Attachment B" outweigh withholding this information.

5. The public interest in disclosing the information contained in this Resolution's Attachments A, B and C outweigh withholding this information.

THEREFORE, IT IS ORDERED that:

1. The California Public Utilities Commission denies the request in Frontier California (U-1002-C) Advice Letter 12828, in which Frontier California requests approval of a GO 133-D, Section 9.7 Alternative Proposal for Mandatory Corrective Action plan in lieu of paying the applicable GO 133-D fines for its failure to comply with the GO 133-D service quality standards for the Year 2019, as set forth in this Resolution.

2. Frontier California shall pay the General Order 133-D fine applicable to Frontier California for the Year 2019 in the total amount of $1,277,856.

3. Frontier California shall pay the fine of $1,277,856 to the California Public Utilities Commission in accordance with this Resolution within 30 days of Commission approval of this Resolution. The Commission shall deposit the fine payment into the California General Fund.

4. Fines shall be paid within 30 days from the effective date of this Resolution by a check or money order, payable to the California Public Utilities Commission, and mailed or delivered to:

   California Public Utilities Commission
   Fiscal Office
   505 Van Ness Avenue, Room 3000
   San Francisco, CA 94102

   The telephone corporation should write on the face of the check or money order: "**For deposit to the State of California General Fund, per Resolution T-17731**."

5. Frontier's Advice Letter 12828, "Confidential Attachment B" shall be made available to the public.

6. All information contained in this Resolution's Attachments A, B and C shall be made available to the public herein.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the California Public Utilities Commission at its regular meeting on ____________. The following Commissioners approved it:

____

Rachel Petersen
Executive Director

ATTACHMENTS

ATTACHMENT A
2017 - 2020 3RD QUARTER OOS% PERFORMANCE
WIRE CENTERS IN INVESTMENT PLAN # 1 - RESOLUTION T-17631

Wire Center	County	Proposed in AL 12772/ Approved in ResolutionT-17631	Project Cost Estimate	Project Actual Cost	2017 OOS %	2018 OOS%	2019 OOS%	2020 1st-3rd QTR OOS%	Meets GO 133D Minimum 90% OOS Standard
[redacted]	MONTEREY	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	MONO	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	VENTURA	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	MENDOCINO	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	VENTURA	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA CLARA	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	ORANGE	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	KERN	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA CLARA	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	MONO	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA CLARA	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	VENTURA	No	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	Yes	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	NO

* Wire Center does not appear in Frontier's quarterly G.O. 133-D raw data

ATTACHMENT B
2017 - 2020 3RD QUARTER OOS% PERFORMANCE
WIRE CENTERS IN INVESTMENT PLAN # 2 - RESOLUTION T-17652

Wire Center	County	Proposed in AL 12804/ Approved in Resolution T- 17652	Project Cost Estimate	Project Actual Cost*	2017 OOS %	2018 OOS%	2019 OOS%	2020 1st-3rd QTR OOS%	Meets GO 133D Minimum 90% OOS Standard
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	MONO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	ORANGE	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	ORANGE	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	RIVERSIDE	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	FRESNO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SANTA BARBARA	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	SAN BERNARDINO	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	ORANGE	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO
[redacted]	LOS ANGELES	YES	[redacted]	na	[redacted]	[redacted]	[redacted]	[redacted]	NO

*Actual costs will be known after May 2019, which is the end of the two year investment period.

ATTACHMENT C
Actual and Proposed Project Costs
All Wire Centers in Investment Plans # 1-3

Wire Center	County	Plan # 1 Project Actuals	Plan # 2 Proposed	Plan # 3 Proposed	Total Actual & Proposed Investment Amounts
[redacted]	Riverside	[redacted]	[redacted]	$106,735	[redacted]
[redacted]	Santa Clara	[redacted]	[redacted]	$71,073	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$87,086	[redacted]
[redacted]	Riverside	[redacted]	[redacted]	$106,735	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$315,415	[redacted]
[redacted]	Riverside	[redacted]	[redacted]	$106,735	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$80,636	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$128,288	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	Ventura	[redacted]	[redacted]	$166,780	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$0	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$152,633	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$111,465	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$129,731	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$73,015	[redacted]
[redacted]	Kern	[redacted]	[redacted]	$126,070	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$58,583	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$58,583	[redacted]
[redacted]	Orange	[redacted]	[redacted]	$55,670	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$111,465	[redacted]
[redacted]	Orange	[redacted]	[redacted]	$58,000	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Mono	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	Ventura	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Orange	[redacted]	[redacted]	$58,000	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$73,015	[redacted]
[redacted]	Fresno	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$67,966	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$67,396	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$55,670	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$55,670	[redacted]
[redacted]	Riverside	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$58,583	[redacted]
[redacted]	Kern	[redacted]	[redacted]	$0	[redacted]
[redacted]	Santa Clara	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	Mendocino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Ventura	[redacted]	[redacted]	$0	[redacted]
[redacted]	Monterey	[redacted]	[redacted]	$0	[redacted]
[redacted]	Ventura	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$0	[redacted]
[redacted]	Los Angeles	[redacted]	[redacted]	$0	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$21,375	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$0	[redacted]
[redacted]	Santa Clara	[redacted]	[redacted]	$0	[redacted]
[redacted]	Riverside	[redacted]	[redacted]	$0	[redacted]
[redacted]	Humboldt	[redacted]	[redacted]	$7,749	[redacted]
[redacted]	Humboldt	[redacted]	[redacted]	$7,749	[redacted]
[redacted]	Humboldt	[redacted]	[redacted]	$7,749	[redacted]
[redacted]	Trinity	[redacted]	[redacted]	$7,749	[redacted]
[redacted]	Trinity	[redacted]	[redacted]	$7,749	[redacted]
[redacted]	Santa Barbara	[redacted]	[redacted]	$0	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	San Bernardino	[redacted]	[redacted]	$0	[redacted]
[redacted]	Mono	[redacted]	[redacted]	$0	[redacted]