

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

HB 3065

**FRONTIER COMMUNICATION NORTHWEST, LLC AND CITIZENS
TELECOMMUNICATIONS COMPANY, LLC DBA ZIPLY FIBER'S RESPONSES TO
WORKSHOP #4 WRITTEN QUESTIONS**

1. If COLR relief were granted, what measures could be employed to protect customers whose individual circumstances and needs may impact their access to and usage of telecommunications services, including low-income customers? For example, what measures could be used to protect new and existing customers in areas where there are no service alternatives, or more costly service alternatives?

The issue of vulnerable customers is largely addressed through the Oregon Lifeline program. As a starting place, we recommend the Commission conduct a study to identify the prevalence of Oregon Lifeline customers seeking services from COLR obligated telecommunications carriers. Based upon these findings, the Commission would be able to adequately understand the actual circumstances where customers may become vulnerable absent a COLR obligation. As a second step, we recommend the Commission determine each exchange in which only one eligible telecommunications carrier – irrespective of technology – exists. Where there is only one option, the Commission should consider retention of a COLR requirement with a prioritized subsidy through the OUSF.

2. If COLR relief were granted, what measures could be employed to protect customers whose geographic location may impact their access to and need for various telecommunications services? Please include examples of how to ensure that customers living in low population density areas will have access to high quality, reliable telecommunications services, even if those services may differ from those provided in high population density areas.

This question is predicated on an assumption that is no longer relevant in today's marketplace. Customers have choices, between five and 13 other choices in each of our Oregon exchanges. See attached exhibit 1 to Frontier Communications Corporation's Petition in UM 1895. The need for regulatory mandates to create and foster competition, insofar as our exchanges are concerned, is no longer relevant in today's marketplace.

3. Provide citations, links, and references to third-party research or data sources and studies indicating the incidence of residential customers with access at their domicile to fewer than two of the following terrestrial-based service alternatives:
 - a. Telecommunications services provided by a facilities-based competitive local exchange carrier;
 - b. Voice service offered via interconnected Voice over Internet Protocol; or

- c. Voice service offered by a cellular communications service.

See the NRRI Study previously provided in this docket, and reattached here. Also, see the petition and testimony in Docket UM 1677, as well as Docket UM 1895.

4. Provide citations, links, and references to third-party research or data sources and studies indicating the incidence of residential customers with access at their domicile to two or more of the following terrestrial-based service alternatives:
 1. Telecommunications services provided by a facilities-based competitive local exchange carrier;
 2. Voice service offered via interconnected Voice over Internet Protocol; or
 3. Voice service offered by a cellular communications service.

Beyond previous materials submitted in Frontier's two price plan dockets and publicly available materials submitted in other carriers' similar proceedings, Zply Fiber is unaware of the existence of any such research or studies, but see our answer to data request one above.

5. Provide citations, links, and references to third-party research or data sources and studies indicating the relative comparability of voice service offered by wireless Internet service providers and satellite providers.

We are unaware of any such research or study related to these entities beyond those cited above.

6. Provide citations, links, and references to third-party research or data sources and studies providing information regarding the urban-rural and urban-urban divide and/or documentation of coverage holes in cellular coverage.

We are unaware of any such research or study related to this issue beyond those cited above.

7. Provide citations, links, and references to third-party research or data sources and studies relating to landline dependency in low population density areas.

We are unaware of any such research or study related to this issue beyond those cited above.

8. Provide citations, links, and references to third-party research or data sources and studies covering drivers for adoption of services other than ILEC wireline telecommunication services.

Other than the previously cited price plans' testimony related to access line loss, Zply Fiber is unaware of any such studies related to drivers for adoption of services.

9. Provide citations, links, and references to third-party research or data sources and studies covering the adoption of services other than ILEC wireline telecommunication services by low income households and senior citizens.

We are unaware of any such research or study related to adoption of wireline telecommunication by low income households and senior citizens. Ziplly Fiber's experience shows that for the period of April 2019 through March 2020, voice lifeline customers declined at a slightly faster rate than unsubsidized voice customer access line declines, both of which were in excess of 10%. Ziplly Fiber has no study or analysis showing how many lifeline customers are using their discount to purchase wireless services versus wireline services provided by a LEC, but assumes that the percentage would at least mirror these results .

RESPECTFULLY SUBMITTED this 2nd day of July, 2020

Frontier Communications Northwest, LLC
and Citizens Telecommunications Company
of Oregon, LLC dba Ziplly Fiber

Name of Party

Signature on Behalf of Party

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We are unaware of any such research or study related to adoption of wireline telecommunication by low income households and senior citizens. Ziplly Fiber's experience shows that for the period of April 2019 through March 2020, voice lifeline customers declined at a slightly faster rate than unsubsidized voice customer access line declines, both of which were in excess of 10%. Ziplly Fiber has no study or analysis showing how many lifeline customers are using their discount to purchase wireless services versus wireline services provided by a LEC, but assumes that the percentage would at least mirror these results .

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