# PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division
Carrier Oversight and Program Branch

RESOLUTION T-17629 November 8, 2018

# <u>RESOLUTION</u>

Resolution T-17629. Approval of Citizens Telecommunications Company of California, Inc.'s (U-1024-C), dba Frontier Communications of California, Advice Letter setting forth its annual fine and alternative proposal for mandatory corrective action for failing to meet required service quality performance standards in Year 2017 pursuant to General Order 133-D.

# **SUMMARY**

This Resolution approves Citizens Telecommunications Company of California, Inc.'s (U-1024-C), dba Frontier Communications of California, Advice Letter 1239 for annual fines totaling \$63,540 as a result of substandard service quality performance in Year 2017, pursuant to California Public Utilities Commission General Order 133-D Section 9.6. Citizens Telecommunications Company of California, Inc. failed to meet specific minimum levels for the *Out of Service Repair Interval* and *Answer Time* measures under Sections 3.4 and 3.5, respectively. Citizens Telecommunications Company of California, Inc., requests approval to implement the alternative proposal for mandatory corrective action under Section 9.7, which permits a carrier to invest no less than twice the amount of its annual fine in a project(s) that will improve service quality in a measurable way within two years.

# **BACKGROUND**

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

# 1. Procedural History of the General Order

<sup>&</sup>lt;sup>1</sup> See the annual data in *Quarterly Service Quality Reports* posted at <a href="http://www.cpuc.ca.gov/General.aspx?id=1107">http://www.cpuc.ca.gov/General.aspx?id=1107</a> on the Communications Division *Telecommunications Carriers' Service Quality Reports* webpage. (Site last visited June 19, 2018.)

In March 2011, Staff issued a report detailing substandard levels of service quality reported by carriers for 2010. In response, the Commission opened Rulemaking (R.)11-12-001 to review carriers' performance, to assess the relevancy and effectiveness of GO 133-C<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, and prescribing monetary penalties for violating the five service quality standards.<sup>3</sup> The fines apply only to traditional voice telephone service. 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 annually by February 15 of the following year a Tier II Advice Letter that shows by month each service quality measurement that it did not meet the minimum standard and the applicable fine. The Communications Division will then prepare a resolution that if adopted by the Commission, instructs a telephone corporation to pay the fine to the Commission for deposit into the California General Fund.

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

# ADVICE LETTER

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

<sup>&</sup>lt;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.

GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."

<sup>&</sup>lt;sup>5</sup> See Appendix A for a list of all carriers' annualized service quality data from 2014-2017.

Frontier Communications (Frontier) is the parent company of three Frontier-branded entities operating under separate Certificates of Public Convenience and Necessity (CPCN) in California: 1) Citizens Telecommunications Company of California, Inc. (U-1024-C), 2) Frontier California, Inc. (U-1002-C), and 3) Frontier Communications of the Southwest (U-1026-C). Each of the entities has a distinct service territory and reports its respective service quality data separately to the Commission. 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 Citizens Frontier, Frontier California, Inc. and Frontier Communications of the Southwest. Therefore, because the three Frontier companies have separate CPCNs, Staff directed Frontier to file supplements for each AL containing separate and specific investment plans to address each entity's 2017 service quality deficiencies and fine calculations within their respective service territories. Takes

Citizens Telecommunications Company of California, Inc. (Citizens Frontier), doing business as Frontier Communications of California, submitted its Advice Letter (AL) 1239 on February 16, 2018, summarizing its total year 2017 reporting targets with the fine calculations for standards not met. In AL 1239, Citizens Frontier correctly calculated a total fine amount of \$63,540. In lieu of paying this fine into the state General Fund, Citizens Frontier requested approval of its alternative proposal for corrective action under § 9.7 and to invest no less than twice the amount of its calculated fine in projects to improve its customers' service quality in measurable ways. However, AL 1239 did not include specific project information.

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

Citizens Frontier did not respond to ORA's protest, but filed AL Supplement 1239A on April 04, 2018. AL Supplement 1239A contained a list of specific service quality improvement projects with a total estimated investment of \$128,555. However, the AL Supplement proposed to invest the entire amount within the network of Frontier California, Inc., a separate affiliate, with no investments made in the networks of Citizens Frontier and Frontier Communications of the Southwest.

On April 24, 2018, Citizens Frontier filed AL Supplement 1239B, in which it proposed to invest \$128,555 in five projects spread across three wire center areas of its network that had demonstrated poor service quality. Citizens Frontier stated the proposed projects are incremental

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<sup>&</sup>lt;sup>6</sup> Frontier Communications of the Southwest (U-1006-C) filed AL 109 and AL Supplement 109A, in which it chose to request approval of its alternative proposal for mandatory corrective action.

<sup>&</sup>lt;sup>7</sup> Frontier Communications of the Southwest filed AL Supplement 109B on April 24, 2018, in which it reversed its original proposal and instead agreed to pay its 2017 fine of \$3,636 into the state's General Fund. [The Commission addressed this Resolution, T-17607, on the July 12, 2018 agenda.]

<sup>&</sup>lt;sup>8</sup> Frontier California (U-1002-C) filed AL 12772, as well as AL Supplements 12772A and 12772B, in which it requested approval of its alternative proposal for mandatory corrective action to invest \$1,949,000 in twenty-five service quality improvement projects.

because they could be completed within the required two-year time frame, are in-addition to the company's normal level of funding, and would not otherwise be addressed.

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

# **DISCUSSION**

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

# 1. 2017 Scaling Factor

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

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

Citizens Frontier reported 80,305 working lines, so its 2017 Scaling Factor is 1.20%.

## 2. GO-133-D Standards

## A. Installation Interval

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

# B. Installation Commitments

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

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<sup>&</sup>lt;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.

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

# C. Customer Trouble Reports

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

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

	201	2017 Reporting for Customer Trouble Reports, GO 133-D, § 3.3 – Reports per 100 Working Lines														
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec				
Citizens Frontier	1.2%	1.2%	1.0%	0.8%	0.7%	0.6%	0.8%	0.7%	07%	0.7%	0.8%	0.5%				

# D. Out of Service Repair Interval

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

The fine structure is as follows:

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

<sup>&</sup>lt;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.

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

	2	2017 Rep	orting f	or <i>Out o</i>	f Service	e Repair	Interval,	, GO 133	-D, § 3.4	– 90% n	ninimun	l
			Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec	
Citizens Frontier	49.5%	36.8%	71.8%	75.8%	69.8%	60.3%	58.8%	61.5%	81.7%	<u>75.9%</u>	85.0%	84.0%

Citizens Frontier explained that due to severe winter storms in January and February, Governor Edmund G. Brown Jr. issued State of Emergency Proclamations. As a result, under GO 133-D § 3.4(b), Citizens Frontier excluded the months of January through March when calculating its fine. In the first quarter of 2017, Citizens Frontier reported an average *Out of Service Repair Interval* of 52.7%, far below the standard 90% of tickets restored within 24 hours or less. In the 2<sup>nd</sup> quarter, Citizens Frontier missed achieving the minimum performance standard for all three months. Missing the *Out of Service Repair Interval* the third consecutive month in June put Citizens Frontier in "chronic failure status." Citizens Frontier failed to achieve the minimum 90% standard for the 3<sup>rd</sup> and 4<sup>th</sup> Quarters and as a result, remained in "chronic failure status" for the remainder of 2017.

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

(Scaling Factor <u>1.20%</u>) X (Monthly Base Fine per Measure <u>\$750,000</u>)

X (Number of Months Measure Was Not Met  $\underline{7}$ ) = Fine of \$63,000

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

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

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

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

The fine structure is as follows:

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

#### Citizens Frontier's results follow:

		20	)17 Rep	orting f	or <i>Answ</i>	er Time	GO 13	3-D § 3.5	5 – 80%	minimu	ım	
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
Citizens Frontier	71.6%	55.5%	73.2%	85.5%	90.7%	90.3%	81.1%	68.5%	62.5%	45.0%	53.1%	70.9%

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

(Scaling Factor  $\underline{1.20\%}$ ) x (Monthly Base Fine  $\underline{\$15,000}$ ) x (Number of Months Measure Was Not Met 3) = **Fine of \\$540** 

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

Citizens Frontier filed AL Supplement 1239B on April 24, 2018, which included a list of five defined projects designed to improve the quality of service within three wire center areas across its network in Northern California. Citizens Frontier included the projects' technical and location descriptions, the number of out of service reports and access lines served in 2017, as well as the estimated engineering and construction costs for each of the five proposed projects. The total proposed investment for the projects is \$128,555.<sup>13</sup>

Citizens Frontier explained that the five 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 estimated total investment is more than twice the

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

minimum fine owed of \$127,080. Staff accepts Citizens Frontier's explanation regarding these projects being incremental expenditures.

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

Citizens Frontier has committed to hold regular meetings with Staff every six months to review the progress of the five projects and help ensure they remain on schedule. Additionally, Citizens Frontier 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, Citizens Frontier will file a Tier II advice letter demonstrating the results of their five proposed projects to measurably improve service quality in its network.

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

# SAFETY CONSIDERATIONS

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

# **CONCLUSIONS**

Staff recommends Commission approval of Citizens Frontier's AL 1239 for Year 2017 GO 133-D fines according to

...its submitted plan of an alternative proposal for mandatory correction action. Frontier will commence projects worth no less than twice the fine amount, or \$128,555, to be completed within 2 years.

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We also encourage Citizens Frontier 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; (4) the dollar amount spent by Citizens Frontier on contracted work; (5) the number of contracted employees performing the work; (6) the total contracted work hours performed; (7) the wages paid to contracted employees; and (8) 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.

<sup>&</sup>lt;sup>14</sup> And, although we do not require it at this time, we strongly encourage—and may take future steps to require—Citizens Frontier 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 Citizens Frontier to limit its use of outside contractors to situations where Citizens Frontier technicians are unavailable, or where they lack the necessary skills or equipment to do the work.

# **COMMENTS**

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

# **FINDINGS**

- 1. General Order 133-D, § 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually by February 15 of the following year a Tier II Advice Letter that shows by month each service quality measurement that it did not meet the minimum standard and the applicable fine.
- 2. On February 16, 2018, Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, filed Advice Letter 1239, which calculated total fine of \$63,540 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	Citizens Telecommunications Company of California (U-1024-C)
Installation Interval	\$0
Installation Commitments	\$0
Customer Trouble Reports	\$0
Out of Service Repair Interval	\$63,000
Answer Time	\$540
TOTAL	\$63,540

- 4. On March 7, 2018, the Office of Ratepayer Advocates filed a protest stating the alternative proposal for mandatory corrective action did not satisfy the requirements of GO 133-D § 9.7.
- 5. On April 4, 2018, Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, filed Advice Letter Supplement 1239A seeking an alternative proposal for mandatory corrective action. Advice Letter Supplement 1239A included a list of projects, with a total estimated investment of \$128,555, planned solely within the network of parent company Frontier California.

- 6. Staff directed Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, to file a supplement containing the fine calculation and specific investment plan to address its respective 2017 service quality deficiencies within its territory.
- 7. On April 24, 2018, Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, filed Advice Letter Supplement 1239B, which proposed to invest \$128,555 in five specific projects within three wire center areas of its network experiencing poor service quality.
- 8. In Advice Letter 1239B, Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, states the proposed projects could be completed within two years, will improve service quality in a measureable way, are incremental to the company's normal level of funding, and would not otherwise be addressed.
- 9. Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, agrees to have regular meetings with Staff every six months in order to review the progress of all five projects and ensure they remain on schedule.
- 10. Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, will demonstrate improved service quality results upon completion of the projects through a Tier II advice letter filing
- 11. On July 20, 2018, the Commission emailed a draft of this Resolution to all parties in the carrier service list for public comments. Communications Division did not receive any comments or reply comments on this resolution.

## THERFORE, IT IS ORDERED that:

1. The California Public Utilities Commission approves Citizens Telecommunications Company of California, Inc.'s (U-1024-C), dba Frontier Communications of California, Advice Letter 1239 which calculates its respective service quality fines and proposed investment projects under General Order 133-D for Year 2017:

Service Quality Standard	Citizens Telecommunications Company of California, Inc. (U-1024-C)
Out of Service Repair Interval	\$63,000
Answer Time	\$540
TOTAL	\$63,540

- 2. Under General Order 133-D § 9.7, Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, shall invest no less than twice the amount of its annual fine, or \$127,080, in the five projects specified in Advice Letter 1239B that will improve service quality in a measurable way within its service territory.
- 3. The five service quality improvement projects, with a total estimated investment of \$128,555, shall be completed within two years of the adoption of this Resolution.
- 4. Citizens Telecommunications Company of California, Inc., dba Frontier Communications of California, shall hold regular meetings with Staff every six months in order to review the progress of all five projects and ensure they remain on schedule.
- 5. Citizens Telecommunications Company of California, Inc., dba Frontier Communications of 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 addressed, or otherwise fail to improve Citizens Frontier's service quality in a measurable way, the Commission Staff shall consider proposing further penalties or other enforcement actions.

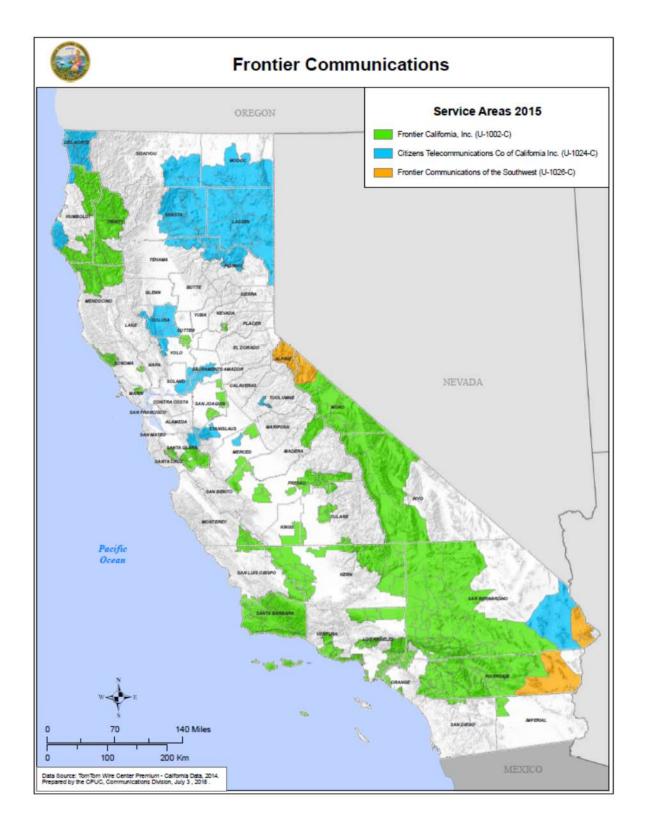
This Resolution is effective today.	
5 5	lities Commission adopted this Resolution at its following Commissioners approved it:
	Alice Stebbins Executive Director

# **APPENDIX**

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

	Asmur	81.5%	71%	71%	77%	71%	58%	,	,	91%	93%	73%	80%	93%		62%	94%		,				ı	1			9596	,	93%	,	8536	,
	Out of Sarrica A Regair Interval	48%	96299	75%					,	52%		72%	64%	92%	,	94%	48%	,	9896	100%	-	9668	93%	94%	94%	93%	100%	98%	96%	98%	71%	98%
2017	Customer Trouble Reports	1.72%	0.82%	1.1%	0.79%	0.82%	1.17%	,	,	1.65%	70%	4.19%	25%	1.46%	,	9690	.42%		.12%	1.33%		92%	1.44%	1.60%	2.7%	1.03%	9608.	1.47%	%66	.004%	9836	2.52%
2(	Commitment										9666	98%	929%						100%	97%		96001	977%	96001	100%	%86	100%	9666	9666	100%	100%	98%
	Internitation Inc Internal Con (days)					Exampt					8.10	Exampt					1.37	2.11		0.14	1.83	3.0	3.32	1.60	1.14	2.32	16	0.70	1.20	3.29		
	Anewer Into	82%	70%	70%	71%	36%	64%	,	,	,	94% B.	- 3	- 3	-	,	,	82%		- 1	- 2	-	- 0	98% 1	-	- 3	99%	- 1	- 2	88% 2	0	83%	
	Garnica Am Regate Ti Interval	56% 82	83% 70	84% 70	87% 7.1	57% 56	5% 64			75%	9186 94			88%		9486	365% 82		100%	9896	_	. %66	96% 96	92%	92%	97% 99	10056	91%	98% 88	100%	76% 83	. 98%
9	Curismae Sa Trouble Ru Raparti Int	1.50% 5	0.78% 8	196 8	0.85% 8	0.77%	1.12%	,	,	2.45% 7	0.51% 9	-	-	1.70% 8		6 %86:0	0.34% 5		0.19% 10	1.82% 9	-	0.13% 9	1.14%	6 %11.1	3.39% 9	1.54% 9	0.24% 10	1.28% 9	0.82% 9	0.25% 10	0.29% 7	1.82% 9
2016		71	0.		0.8	.0	11			-24	0.0			17		0.9	50											100%	$\dashv$			
	len Installation									Exampt									100%	%86	-	100%	100%	100%	100%	9686	96001		9666	100%	100%	100%
	Installation Interval (days)																		1.46	1.96	'	2.4	1.54	2.8	2.72	1.95	0.45	2.27	96'0	97.0	1.44	3.17
	Thes	88%	71%	71%	33%	72%	9609	'	'	71%	١	'	1	8698	'	9695	78%	9609	-	-	-	'	'	822%	8228	-	-	'	'	1	9098	899%
	de Sarrica te Regair te Inderval	65%	4 77%	9888	9998 9	4 73%	396	'	'	5 72%	'	'	'	9668 9	'	9656 5	43%	255%	5 100%	966 5	84%	9886 9	9666 9	9886 9	9486 9	9226 9	5 1005s	97%	9886 9	\$ 100%	968 9	988%
2015	Curtomar Tromble Reports	1.39%	0.86%	0.97%	0.77%	0.90%	0.72%	'	'	1.60%	'	'	'	1.70%	'	0.96%	0.13%	3.19%	0.29%	1.94%	0.68%	0.89%	1.06%	3.05%	4.82%	0.76%	9605'0	0.68%	0.65%	0.26%	0.30%	1.89%
	Installation Commitment									Exempt									96001	%66	%86	100%	100%	100%	%66	100%	96001	100%	100%	100%	100%	100%
	Interaliation Interval (days)									iii									2.21	2.15	2.31	0.22	ม	2.74	2.89	2.86	0.71	2.51		16:0	13	2.18
	Asmer	79%	74%	74%	899%	64%	63%	٠	48%	80%				-	,	64%	62%	61%	-	-	74%	٠	ı	75%	75%	-	-	,	91%	,	92%	76%
	Out of Sarrica Regair Interval	60%	82%	83%	9386	9689	596	70%	94%	76%	-	-	-	92%	73%	94%	29%	40%	100%	%56	83%	92%	9886	949%	9286	9666	100%	93%	98%	98%	9286	9696
2014	Curionar Trouble Reports	1.45%	0.88%	1.15%	1.28%	968670	1.08%	0.65%	2.27%	1.52%	٠	٠	٠	2.30%	0.92%	0.94%	0.93%	4.40%	0.43%	1.67%	0.72%	0.86%	0.99%	1.33%	2.53%	0.90%	0.16%	0.79%	0.58%	0.31%	0.54%	1.99%
	Installation Commitment									ij.									100%	%16	9686	100%	100%	%66	9696	%66	100%	100%	100%	100%	100%	100%
	Installation Interval (days)									Exempt									1.18	2.39	2.22	1.93	1.49	2.66	4.07	3.52	0.52	2.36	1.08	0.93	1.02	1.96
	Utility Number	T-1001-C	U-1024-C	U-1026-C	U-1015-C	U-1002-C	U-6342-C	T-6083-C	U-6184-C	U-5002-C	U-6674-C	D-878-C	D-5669-D	U-5684-C	U-5377.C	D-2609-D	U-7002-C	D-6859-D	U-1004-C	D-1006-C	U-1020-C	U-1001-C	D-1009-C	U-1010-C	U-1011-C	U-1012-C	U-1013-C	U-1014-C	T-1016-C	U-1017-C	T-1019-C	D-1021-C
	Company Name	AT&T California U	Frontier Citizens L	Frontier Southwest	Surement/Consolidated	Verizon/Frontier California	ACN Communications	-	Astound	AT&T Corporation L	Time Warner Cable U	Charter Eiberliuß	Bright House L	Cox California L	Electric Lightwave U	Paetec Communications	Souic Telecom U	Telscape Communications	Calaveras Telephone L	Cal-Ore Telephone U	Frontier West Coast L	Ducor Telephone U	Foresthill Telephone U	Happy Valley Telephone	Hornitos Telephone U	Kerman Telephone	9200	Pouderosa Telephone	Sierra Telephone U	Sirkiyon Telephone U	9	Winterhaven Telephone
	Com	AT&		DESCRIPTION OF THE PROPERTY OF											Cal-Orner  Tourist  T																	

Reported data is In Compliance or Out of Compliance



(End of Appendices)