

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



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Order Instituting Rulemaking to Evaluate
Telecommunications Corporations Service
Quality Performance and Consider
Modification to Service Quality Rules.

R. 11-12-001

**REPLY COMMENTS BY CITIZENS TELECOMMUNICATIONS COMPANY OF
CALIFORNIA INC. (U 1024 C) AND FRONTIER COMMUNICATIONS OF THE
SOUTHWEST INC. (U 1026 C) TO ASSIGNED ADMINISTRATIVE LAW JUDGE'S
RULING FOR COMMENTS ON STAFF PROPOSAL FOR MODIFICATIONS TO
GENERAL ORDER 133-C**

Charlie Born
Manager, Government & External Affairs
9260 E. Stockton Blvd.
Elk Grove, California 95624
Telephone: 916-686-3570
Facsimile: 916-691-5199
Charlie.Born@ftr.com

April 17, 2015

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Citizens Telecommunications Company of California Inc., d/b/a Frontier Communications Company of California, and Frontier Communications of the Southwest Inc. (collectively ‘Frontier’) provide these reply comments on the Report of the Commission’s Communications Division on Proposed Modification to General Order 133-C including Service Quality Fines Refunds and Fines Proposal (“Staff Proposal”) included as Attachments A & B to the Assigned Administrative Law Judge’s Ruling filed February 2, 2015 (“Ruling”).

Based on Frontier’s review of all the initial comments filed March 30, 2015, it is even more evident to Frontier that the Commission should take a much broader and holistic view of this proceeding and insure that it is following the path of determining relevant and appropriate service quality rules for California telecommunications providers operating in a competitive marketplace. As Frontier and other parties suggested, any changes to service quality rules in this proceeding must not only consider today’s competitive telecommunications market but also the future marketplace over the next five to ten years. It is important that the Commission be clear on a

prospective objective of fostering a healthy competitive environment while insuring that any standards, measurements and reporting is in line with that mission. It is Frontier's belief, and reiterated by other parties, that workshops and healthy discussions surrounding service quality measurements take place prior to any further action by the Commission in this docket. Such a process will guarantee administrative due process for all the parties, as well as Staff. Workshops provide an opportunity for proposals and discussion on this topic and will be in line with the original mandate for this proceeding. As Frontier mentioned, many states do not have service quality reporting requirements, while other states have updated the standards to be more relevant for today's environment.

In summary, the Commission should take this opportunity to evaluate and implement a balanced approach to service quality in this proceeding. Frontier is open to some form of trouble report monitoring and complaints, but these two measurements must be applied to all providers and not just a select segment of the industry. If other changes are to occur then a workshop is recommended to fully arrive at agreed-upon criteria that are relevant before any changes in General Order 133-C. Frontier encourages the Commission to be proactive and open to updating its service quality rules to be in line with the future of this industry, and not to retain or regress to rules that are no longer relevant, thereby creating competitive disadvantages, increased costs and ultimately harming consumers and the limited subset of voice communications service providers that are and will remain subject to this regulatory oversight.

April 17, 2015

Respectfully submitted,

CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC.
D/B/A FRONTIER COMMUNICATIONS OF CALIFORNIA AND
FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC.

A handwritten signature in cursive script that reads "Charlie Born".

Charlie Born
Manager, Government & External Affairs
9260 E. Stockton Blvd.
Elk Grove, California 95624
Telephone: 916-686-3570
Facsimile: 916-691-5199
Charlie.Born@ftr.com