

These were the comments that I made at the Public Participation Hearings that the California Public Utilities Commission held to hear public opinion about the proposed transfer of Verizon Landline assets to Frontier. I didn't follow this verbatim, but fairly close...all the 10 points were covered. This hearing was held at Benbow Inn in Humboldt County.

Broadband Alliance Comments by Chair Trish Steel At the Benbow Public Participation Hearing
July 7th, 2015

Hello. I would like to thank the CPUC for holding these hearings and for listening to concerns about this transfer, as it will have a very real impact on our lives.

My name is Trish Steel, and I am the Chair of the Broadband Alliance of Mendocino County. The mission of the Broadband Alliance is to ensure that the county's population has affordable, universal broadband access in their homes, businesses, and public places. The Alliance is also the lead grassroots group for Mendocino County working with the North Bay-North Coast Broadband consortium.

The concern of the Alliance is to make sure that quality of service does not decline with this transfer, and instead must improve.

Our rural areas are being left behind in the digital economy. We generally have few options for Internet, and almost always these options are expensive. This transfer must improve our situation, and safe-guards must be maintained so that we don't lose services and quality

I have 10 specific comments:

1. Frontier must remain solvent. I don't understand how a company can buy an asset that has high maintenance costs, and decreasing revenues and yet maintain business. Where are the "high-profit" areas of Frontier's business that will support their "high-cost" areas? However, this is not my expertise, and so I ask the CPUC to utilize experts who will make sure that the terms of this transfer make it probable that Frontier will remain viable for years to come. We would like to see Frontier buy at "market value" so that it will not take on unreasonable debt.

Verizon sold off its landline business in New England to FairPoint Communications in 2008, and by 2009 FairPoint was in bankruptcy. Online, I found residents telling a troubling story: although at the time they were told that “everything is fine”, a multitude of problems and violations emerged with FairPoint. Obviously these issues were not adequately addressed *before* the sale. These problems ranged from landline problems, delays in 911 services, serious and recurring billing errors, poor customer service, inadequate response to complaints and service issues. I would like to make sure that a similar negative legacy does not follow this sale of assets to Frontier.

2. Frontier must continue to support the resale of DSL local loops to our local ISP's, such as Willitsonline. When I received my notice of this hearing with a Frontier telephone number, I called and asked that question, and was told the answer was “yes”. This would be an important safeguard.
3. Does Frontier promise any deployment of broadband ? Again, a question I asked when I called. I was told that whatever services are currently offered, they will be maintained. This is good, but it would be even better if we could actually move forward and expand services, as our communities are in need.
4. What are the specifics that will ensure that Frontier's network will be completely reliable? If copper is replaced with fiber, we would like to see back-up power required since fiber cannot carry electricity as the copper wires can. We often get winter storms that bring high winds, lots of rain, and potentially mudslides that block roads. And of course earthquakes and forest fires are a real threat too. In these situations back-up power that is on-site, and does not have to be brought in from elsewhere (a problem in the case of road closures) is important.
5. It is imperative that Frontier preserve lifeline phone service, and maintain the copper plant so that residents can have Enhanced, or E911 access. Will Frontier maintain the Automatic Location Identification and Master Street Address Guide database that is used for location information? I understand that these databases are generally maintained by the Incumbent Local Exchange Carrier (ILEC) under contract by the Public Safety Answering Point.

6. What are Frontier's plans for the Connect America Money that they have said they will accept? I have heard that they will use this money for broadband, but we would like to see specifics of their plans and have a collaborative relationship with Frontier. It is important for communities to know whether networks are reliable, and redundant, and whether there are plans for expansion in order for communities to plan for their future. Will they upgrade their backbone? I have heard from residents in the Vancouver Washington areas that Frontier has a waiting list for DSL customers because they are not upgrading the backbones. Will that happen in California ?
7. Will Frontier be a partner in the Teleconnect Fund program? Currently, Verizon is a partner and local anchor institutions and community organizations rely on it and can receive significant reductions of telecommunications costs.. We would like to make sure that Frontier makes it available to our community organizations.
8. What is Frontier's plan for communication in the event of an outage? The county and residents have been frustrated for years by AT&T complete lack of communication during times of outages. During the recent outage, our Public Safety Answering Points were not even notified and the only source of information was from repair crews along the road. People were so frustrated that in Fort Bragg a woman blocked the ATT parking lot with her car to force ATT to talk to her. Contrast this with PG&E's communication system - during a power outage information is communicated about what areas are out, when repair crews are expected to arrive and how long before service is restored. We would like to see an enforceable communication process with local residents in place before this transfer is approved.
9. What are Frontier's plans for repairs crews for our areas? The CPUC found in 2013 that ATT and VZ didn't meet required service standards for years, and so ordered an infrastructure review to determine the state of the telephone equipment and whether an aging network was prompting too many outages. Our county has seen numerous outages, with residents having prolonged repair times, sometimes for many weeks. According to CPUC information, providers are to restore service within 24 hours 90% of the time, but VZ's average was only 73% and ATT 62%. We would like to see Frontier meet the 90% standard, and ask the CPUC to enforce these standards.

10. And finally, and this question is directed to the CPUC. We were disappointed that CPUC President Picker proposed to cancel the independent, infrastructure review that was ordered in 2013 by the CPUC, especially as it was considered “critical to ensuring reliable customer service”. We feel that these service quality metrics is an important part of the checks and balances to ensure network reliability. We would like to see approval of the “Alternate Proposed Decision of Commissioners Florio and Sandoval” that came out on July 3rd, that affirms and renews the commissions commitment to conducting that review.