

February 25, 2016

IOWA UTILITIES BOARD

STATE OF IOWA
DEPARTMENT OF COMMERCE
BEFORE THE IOWA UTILITIES BOARD

IN RE: COMPLAINT OF HORN MEMORIAL HOSPITAL	DOCKET NO. FCU-2014-0014 (C-2014-0072)
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**RESPONSE TO ORDER REGARDING SECOND PREHEARING
CONFERENCE AND REQUIRING FILINGS**

The January 7, 2016 Order (“Order”) issued by the Iowa Utilities Board’s Administrative Law Judge required Frontier Communications of Iowa, Inc. (“Frontier”¹) to file a report explaining the call completion reports it is filing with the Federal Communications Commission and the actions it is taking to address and prevent call completion issues. In response to that Order, Frontier reports as follows:

Federal Communications Commission Call Completion Reports

The Federal Communications Commission (“FCC”) implemented reporting requirements for covered providers regarding call completion, which reporting requirements commenced in August, 2015. Those requirements are set forth in 47 C.F.R. Section 64.2105. Frontier is a covered provider within the meaning of Section 64.2105 and has complied with all reporting requirements since the Rule took effect. Consistent with those requirements, Frontier filed certified reports on a quarterly basis via FCC Form 480, reflecting monthly data in the following format:

¹ Frontier Communications of Iowa, Inc. is a local exchange carrier that operates only in Iowa. Frontier Communications of America, Inc. is an affiliate company and was the long distance provider for the complainant involved in this docket proceeding. The term “Frontier” as used in this Response refers to the long distance carrier Frontier Communications of America, Inc.

(1) For each rural OCN:

- (i) The OCN;
- (ii) The State;
- (iii) The number of interstate call attempts;
- (iv) The number of interstate call attempts that were answered;
- (v) The number of interstate call attempts that were not answered, reported separately for call attempts signaled as busy, ring no answer, or unassigned number;
- (vi) The number of intrastate call attempts;
- (vii) The number of intrastate call attempts that were answered; and
- (viii) The number of intrastate call attempts that were not answered, reported separately for call attempts signaled as busy, ring no answer, or unassigned number.

(2) For nonrural OCNs in the aggregate:

- (i) The number of interstate call attempts;
- (ii) The number of interstate call attempts that were answered;
- (iii) The number of interstate call attempts that were not answered, reported separately for call attempts signaled as busy, ring no answer, or unassigned number;
- (iv) The number of intrastate call attempts;
- (v) The number of intrastate call attempts that were answered; and
- (vi) The number of intrastate call attempts that were not answered, reported separately for call attempts signaled as busy, ring no answer, or unassigned number.

Frontier filed certified quarterly reports as mandated by the FCC in Section 64.2105 on August 1, 2015 (reflecting monthly data from April through June), November 1, 2015 (reflecting monthly data from July through September), and February 1, 2016 (reflecting monthly data from October through December). Frontier commits to complying with all future applicable FCC requirements for call completion reporting.

Actions Taken to Address and Prevent Call Completion Issues

A. Downstream Carriers, Monitoring and Testing: Frontier takes great care in both initially selecting wholesale providers used to complete its originating long distance calls and ensuring quality performance after a downstream carrier has been placed into service.

Frontier has a number of requirements that prospective carriers must satisfy before Frontier will include them in its call completion network, some of which are detailed below. In evaluating potential downstream carriers for acceptance, Frontier investigates whether the carrier's equipment is properly designed and functioning correctly, including whether they have sufficient capacity in their switches and call paths to carry the traffic to the intended destinations. Carriers are required to provide information regarding their system and any possible limitations including capacity constraints that could cause problems completing calls to particular destinations at busy times.

Before placing a downstream carrier in service, Frontier performs a number of tests. Frontier personnel make test calls, both domestic and international, to evaluate the carrier's network performance. The carrier is asked to manually "busy out" a trunk group (simulating a network outage) to ensure that the carrier's network will provide the appropriate notification to Frontier's network so that the calls can be directed to a working path.

Frontier also monitors the ongoing performance of downstream carriers to ensure continued quality of service. Trouble ticket histories are reviewed on a weekly basis to uncover any potential routing concerns. Frontier monitors its capacity with the carrier and requests augments as needed. Whenever a ticket or trouble is reported, Frontier does extensive testing with the carrier to ensure successful routing. If the testing indicates that the failures are limited to calls terminating to a particular local exchange carrier or area, then the carrier would be

excluded from handling any calls destined for that local exchange carrier or area. If the testing reveals more widespread failures, then Frontier may cease using that carrier entirely.

Frontier sets a standard of only one trouble ticket per 1 million minutes of use. If a carrier is in violation of that standard, Frontier meets with the carrier to discuss the reported cases to ensure prompt correction and require on-going efforts of the carrier to maintain quality of service. The carrier is allowed 24 hours to make the necessary routing changes. If the carrier fails to meet Frontier's expectation, it is removed from routing. The removal can be specific to a local exchange carrier or area or, if the carrier has more than three occurrences, a general removal from Frontier's entire network.

Additionally, Frontier meets with its downstream carriers on a periodic (generally, bi-weekly) basis to discuss the carriers' performance, as well as pending changes in either the carrier's or Frontier's network.

B. Customer Information. Frontier provides information to its customers regarding service concerns, including call completion issues, through bill messages and material included in telephone directories. This information details how to report all service problems. On the rare occasion that a call completion issue is reported, Frontier promptly communicates with its customer to timely identify the cause of the call completion issue and resolve it. Frontier's timely response and successful efforts in resolution of call completion problems are evidenced by the facts involved in this docket proceeding, where its customer was given a direct telephone number to call, as well as the long distance repair toll free number to report any further long distance issues.

Frontier timely addressed the June, 2014 rural call completion issues at issue in this docket proceeding and is pleased that no additional call completion problems of the type

complained of have been reported by the Horn Memorial Hospital since that time. It is notable that Frontier is the subject of only a single complaint of rural call completion problems in the State of Iowa (the one involved in this docket proceeding). Frontier takes its service quality very seriously and has always been and will continue to be committed to adopting best practices in the industry that are applicable to its network.

Respectfully submitted,

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