

1 renames, repackages, or is a variation of an existing service, or if it is reintroduced in
2 substantially the same form after having been provided for free, withdrawn or abandoned.” The
3 effective date of the prior plan was August 18, 2014.

4 Currently, Section 4 of the new price plan, which was adopted in Order No. 18-303,
5 provides that any “new service” introduced by Frontier NW or Citizens after the effective date of
6 the new price plan will not be subject to price caps. Unless a different pricing rule for a service
7 is expressly listed in the new plan adopted in Order No. 18-303, price increases for other services
8 are capped at the greater of 25 percent or \$0.50 per year. Under this plan, a new service is
9 defined as “a retail telecommunications service that is offered by Frontier in Oregon for the first
10 time following the effective date of this price plan.” This definition of new service excludes any
11 service “if it merely renames, repackages, or is a variation of an existing service, or if it is
12 reintroduced in substantially the same form after having been grandfathered, withdrawn, or
13 abandoned.” The effective date of this plan is August 17, 2018.

14 As a result of these provisions, services introduced as new after August 18, 2014, but
15 before August 17, 2018, do not qualify as new services under Order No. 18-303. Frontier NW
16 therefore had more pricing flexibility for such services under its previous plan than it now does
17 now under its new plan. As a result of Order No. 15-383, in which the Commission subjected
18 Citizens to the same price caps specified in Frontier NW’s prior price plan, Citizens also had
19 more pricing flexibility for such services prior to the effective date of the new price plan.

20 Frontier recently proposed to increase the price of its Convenience Fee Charge, which is
21 charged when customers make a payment using a company representative. Frontier NW¹ and
22 Citizens² initially introduced this tariffed service in 2017, during the pendency of the prior plan.
23 Frontier seeks to increase the rate for this service from \$4.50 to \$10.00 per occurrence, which is
24 more than the 25 percent or \$0.50 per year increase permitted by Order No. 18-303. After

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26 ¹ Docket No. ADV 464/Advice No. 1053 (acknowledged Jan. 11, 2017).

² Docket No. ADV 463/Advice No. OR-16-09 (acknowledged Jan.19, 2017).

1 discussions with the parties in this docket Staff agreed to move to amend Order No. 18-303 to
2 remove price caps for the limited category of services identified in the paragraph above.

3 **B. Request for Modification**

4 Staff requests that the Commission amend Order No. 18-303 to revise Section 4.p of the
5 price plan to remove price caps for any service that was introduced by Frontier during the
6 pendency of its prior price plan that (1) qualified as a new service under that plan when it was
7 introduced and (2) is not otherwise explicitly addressed by the terms of the new price plan. For
8 these purposes, a service introduced by Citizens or Frontier NW during the term of the prior plan
9 that was already offered by the other company will not be understood to have qualified as a new
10 service. Attached to this motion is an amended price plan showing a revised Section 4.p in
11 italics.

12 It is consistent with the objectives of Frontier's price plans to maintain the pricing
13 flexibility previously afforded to the services in this narrow category under the new plan. These
14 objectives include the promotion of new services and the reduction of regulatory burdens on
15 Frontier and the Commission. Additionally, Staff has reviewed Frontier's past filings and
16 believes that the Convenience Fee Charge is likely to be the only service that is affected by this
17 amendment. While Frontier NW also introduced Multiple Simultaneous Call Forward³ during
18 this period, that service is now explicitly addressed by Section 4.j of the plan, under which it is
19 not subject to a price cap. And, while Citizens introduced a set of Operator Assisted Services⁴
20 during this period, those services were already offered by Frontier NW when they were
21 introduced by Citizens. Staff concludes that the proposed amendment will have minimal impact
22 on customers.

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26 ³ Docket No. PL 27/Advice No. 040SPL (acknowledged Jan. 11, 2016).

⁴ Docket No. ADV 387/Advice No. OR-16-07 (acknowledged Oct. 12, 2016).

1 **C. Conclusion**

2 Staff requests that the Commission amend Order No. 18-303 by adopting the price plan
3 as modified in the attached Amended Exhibit A.

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5 DATED this 10th day of January, 2019.

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Respectfully submitted,

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Attorney General

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Commission of Oregon

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Frontier Communications Northwest, Inc.
("Frontier NW")
Citizens Telecommunications Company Oregon
("Citizens")
Joint Price Plan Pursuant to ORS 759.255

Docket No. UM 1895

Amended Exhibit A

1. Definitions:

- a) "Frontier" refers to both of the petitioning companies (Frontier NW and Citizens).
- b) "New Service" means a retail telecommunications service that is offered by Frontier in Oregon for the first time following the effective date of this price plan. A service is not a New Service if it merely renames, repackages, or is a variation of an existing service, or if it is reintroduced in substantially the same form after having been grandfathered, withdrawn, or abandoned.
- c) "Other Services" means any other residential or business services contained in Frontier's Rate Schedules that are not expressly listed in this Price Plan and does not include Packages and Bundles.
- d) "Packages and Bundles" means any combination of services, which may include residential or business basic local exchange service as well as other services at a combined price.
- e) "Pre-Plan" means the rates, terms, and conditions in Frontier's approved Rate Schedules immediately prior to the effective date of the Plan.
- f) "Price List" and "Price Lists" mean Frontier's Oregon intrastate retail price lists as of May 9, 2018, the Citizens price list that will be established pursuant to Section 8 of this Price Plan, and any subsequent revisions to these Price Lists.
- g) "Primary Line Basic Service" means the first line only of basic local exchange service for an individual residential or business customer account at a single location that is not sold as part of a package. For the purposes of this definition, "basic local exchange service" means residential single party flat rate local exchange service; residential single party measured local exchange service, including local exchange usage; business single party flat rate local exchange service, including Frontier NW's Rate Groups 1, 2, and 3; and business single party measured local exchange service, including local exchange usage in Frontier NW's Rate Groups 1, 2, and 3.
- h) "Privilege Tax" has the same meaning as in OAR 860-022-0042(2)(c).
- i) "Rate Schedules" means Frontier's Tariffs and Price Lists.
- j) "Tariff" and "Tariffs" mean Frontier's Oregon intrastate retail tariffs as of May 9, 2018, and any subsequent revisions to these Tariffs. As of May 9, 2018, these consist of Frontier NW's PUC OR No. 18 Tariff and Citizens' PUC OR No. 3 Tariff.

2. General Objectives:

- a) Frontier's Price Plan ("Price Plan" or "Plan") will achieve the following objectives:
 - i) Ensure a framework for offering telecommunications service that is in the public interest.
 - ii) Ensure high quality of existing telecommunications services and make new services available.
 - iii) Produce prices for Frontier's retail telecommunications services that are just and reasonable.

Amended Exhibit A

- iv) Maintain the availability of Primary Line Basic Service at affordable rates throughout Frontier's service territory.
- v) Maintain the appropriate balance between the need for regulation and existing competition in Oregon for voice communication services.
- vi) Simplify and reduce the burden of regulation for Frontier and the Commission.

3. Term of Plan and Company Report:

- a) Term: The Plan will become effective upon Commission approval with an initial term of four years. The Plan will automatically renew for successive four-year terms, unless suspended or modified by a change in applicable law or an order of the Oregon Public Utilities Commission.
- b) Petitions to Modify or for Other Forms of Regulation: Frontier may file a petition, pursuant to ORS 759.255, proposing modifications to the Plan not sooner than the third anniversary of each four-year Plan term. Frontier may, at any time during the Plan, file a petition pursuant to ORS 759.052 or for any other form of regulation or relief permitted under Oregon law.
- c) Performance Report: Frontier shall submit a report detailing its performance and progress toward meeting the Plan objectives by the end of year three of each four-year Plan term. The report shall separately address the performance and progress of Frontier NW and Citizens and shall address how Frontier NW and Citizens are meeting the objectives of the Plan, including the following information, at a minimum:
 - i) An analysis of current Oregon market conditions for the various categories of Frontier's regulated retail intrastate telecommunications services to the extent such information is publicly available.
 - ii) Data regarding the gain or loss of access lines by wire center.
 - iii) Identification of any new services Frontier has introduced.
 - iv) Identification of any ways in which the burden of regulation for both Frontier and the Commission has been simplified or reduced during the current Plan period.
 - v) A list of all price increases performed during the current Plan term, including the remaining amount of pricing flexibility available for each service.
- d) Commission Review:
 - i) The Commission shall review Frontier's performance under the Plan every four years on the basis of the Performance Report described in Section 3(c), any other relevant evidence regarding the competitiveness of the market for substitutable services and any other relevant factors.
 - ii) The Commission may open an investigation at any time pursuant to ORS 756.515 to determine whether further adjustments to the Plan or termination of the Plan is required by the public interest, according to the factors set forth in ORS 759.255(2). The Commission may order further adjustments to the Plan or termination of the Plan only after providing Frontier with notice and the opportunity for a hearing. In any such investigation and proceeding, the Joint Parties agree that the Commission should first attempt to identify and require adjustments to the Plan such that the continuation of the Plan is in the public interest before it orders termination of the Plan.
 - iii) If the Commission orders termination of the Plan, Frontier would no longer be able to increase its rates as it was permitted to do under the Price Plan, but Frontier would be allowed to decrease its rates subject to any applicable price floor.

Amended Exhibit A

- iv) If the Commission orders termination of the Price Plan, Frontier may thereafter pursue any form of price regulation or relief therefrom then permitted under Oregon law, including but not limited to: exemptions from regulation pursuant to ORS 759.052; price listing pursuant to ORS 759.054, 759.056, and/or 759.195; rate regulation pursuant to ORS 759.175-759.190; another price plan pursuant to ORS 759.255; price cap regulation pursuant to ORS 759.405-759.410, or any other statute.
 - v) If the Commission orders early termination of the Price Plan, the Parties agree that the Commission may also, in the same proceeding, adjust Frontier's rates to ensure that Frontier's rates are just and reasonable, and the Parties agree not to advocate for rates that are lower than those that were in effect one year prior to the initiation of the proceeding to terminate the Plan. Frontier would no longer be able to increase its rates as it was permitted to do under the Price Plan, but Frontier would be allowed to decrease its rates subject to any applicable price floor.
4. Pricing and Availability of Services under the Price Plan:
- a) The rates, terms and conditions that Frontier charges under its price lists and approved tariffs are just and reasonable and will be its published terms as of the effective date of the Plan.
 - b) Availability: Frontier will continue to offer residential and business Primary Line Basic Service on a stand-alone basis.
 - c) Non-recurring charges for residential Primary Line Basic Service:
 - i) During the first year of the initial four-year Plan term after the Commission adopts the Price Plan, Frontier may adjust Citizens' residential rates for the Initial Service Order Charge, the Central Office Connection Charge, and the Access Line Work Charge to be equal to the existing equivalent charges of Frontier NW.
 - ii) The total sum of the charges for the Initial Service Order Charge, the Central Office Connection Charge, and the Access Line Work Charge is subject to an annual price cap of \$1.00 beginning in the second year of the initial four-year Plan term after the Commission adopts the Price Plan.
 - d) Non-recurring charges for business Primary Line Basic Service: Charges will not be subject to price caps.
 - e) Recurring charges for residential Primary Line Basic Service: Primary Line Basic Service for residential customers will be subject to price caps.
 - i) Monthly rates for flat rate residential Primary Line Basic Service may not increase by more than \$3.00 in any Plan year and may not increase by more than \$10.00 total over any four-year Plan term.
 - ii) Residential measured service (offered only by Frontier NW): Monthly rates for the line component of measured service shall not be priced any higher than 70% of Frontier's flat rate residential Primary Line Basic Service.
 - iii) On the Plan's effective date, the residential flat rate Primary Line Basic Service rates (excluding EAS) for both the Frontier NW and Citizens companies may be set at the existing Citizens rate of \$15.67.
 - f) Recurring charges for business Primary Line Basic Service:
 - i) Prices for business Primary Line Basic Service will not be subject to price caps.

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- ii) The rate that is charged for this service by Citizens shall be priced no higher than the rate charged by Frontier NW in Rate Group 2.
- g) Extended Area Service (EAS): Rates for existing mandatory EAS are capped at Pre-Plan rates. Frontier is permitted to combine the respective EAS rates and the rate for residential Primary Line Basic Service into a single line item amount for the purpose of bill simplification. Frontier will not be required to establish any new or expanded EAS routes as long as it operates under the Price Plan.
- h) Directory Listings:
 - i) Frontier will provide the first listing included with the Primary Line Basic Service, including those within packages and bundles.
 - ii) Additional listings beyond the initial listing are price capped with increases limited to not more than 25% per Plan year.
- i) Toll Restriction/Call Trace/Unlisted Numbers:
 - i) Toll Restriction and Call Trace will continue to be priced at Pre-Plan rates.
 - ii) Residential Unlisted Numbers will continue to be priced at Pre-Plan rates. However, Citizens may set the rate for this service at a rate equal to that charged by Frontier – NW.
 - iii) Business Unlisted Numbers may not increase by more than \$1.00 in any Plan year and may not increase by more than \$3.00 total over a four-year Plan term.
 - iv) Non-published Numbers may not increase by more than \$1.00 in any Plan year and may not increase by more than \$3.00 total over a four-year Plan term.
- j) Features: "Calling Services" as listed in Section 6 of the Frontier-Northwest Statewide Price List as of May 9, 2018; "Custom Calling Service" and "Customized Local Area Signaling Service (CLASS)" as listed in Section IV of the Citizens Tariff (P.U.C. OR No. 3) as of May 9, 2018 are not subject to price caps.
- k) Other Services: Capped at the greater of 25% or \$.50 per Plan year.
- l) Cost-Based Charges: Prices that are identified as at actual cost in Frontier's Rate Schedules as of May 9, 2018 will continue to be priced at actual cost.
- m) DS-1, DS-3 and ISDN-PRI Services: Rates for DS-1, DS-3 and ISDN-PRI services will not be subject to price caps.
- n) E911 Services: Rates, terms, and conditions for E911 services in Frontier's rate schedules as of the effective date of this plan will remain at Pre-Plan status, except that Frontier may petition the Commission separately for any proposed rate changes or price structures.
- o) Switched Access Rates: Rates for intrastate switched access services will be capped at Pre-Plan rates and the Commission may adjust the price caps if required by FCC action.
- p) New Services: Any New Service introduced after the effective date of the Plan will not be subject to price caps. *Additionally, any service introduced by Frontier during the pendency of any of its prior price plans that qualified as a new service under that plan and that is not otherwise expressly listed in this Price Plan will not be subject to price caps. For the purposes of the prior sentence, a service introduced by Frontier NW or Citizens during the pendency of a prior plan that was already offered by the other company will not be understood to have qualified as a new service under that prior plan.*
- q) Packages and Bundles: Frontier may combine any regulated telecommunications service with any other service(s) to offer Packages and Bundles of services, which may include residential Primary Line Basic Service and EAS, at any price, subject to the below conditions:

Amended Exhibit A

- i) All regulated telecommunications services offered as part of a package or bundle shall remain separately available for purchase from Frontier's Rate Schedules.
 - ii) The package or bundle price shall not exceed the sum of the stand-alone retail prices of all available services in the package or bundle.
 - r) Rate Averaging:
 - i) Frontier will not further de-average the pricing of any existing regulated services that are currently de-averaged.
 - ii) Frontier will not increase the existing dollar differences between rate groups for business Primary Line Basic Service rates. However, Frontier is permitted to reduce any differences in price between these rate groups.
 - iii) For regulated services that as of the effective date of this plan are sold on the basis of a statewide average rate, Frontier will maintain statewide average rates for these regulated services in each Rate Schedule.
5. Facility Improvement Surcharge:
- a) Frontier may implement a single surcharge to recover facilities-related costs. If implemented, the surcharge must be applied using a single uniform rate statewide and shall be applied on a nondiscriminatory basis. If Frontier elects to implement such a surcharge, the residential Primary Line Basic Service price cap for the Plan year in which the surcharge is introduced shall be reduced by the amount of the surcharge. If Frontier subsequently increases the surcharge, the residential Primary Line Basic Service price cap for the Plan year in which the surcharge is increased shall be reduced by the amount of that increase. At any given time, the sum of the increase to the residential Primary Line Basic Service rate and the surcharge shall not exceed either the annual or Term caps described in Section 4.e.i of this Plan.
 - b) If Frontier elects to implement the surcharge discussed in Section 5(a), Frontier will first file a tariff change with the Commission that states the amount of the surcharge and all applicable terms and conditions.
 - c) Frontier will provide notice to customers 30 days before implementing the surcharge described in Section 5(a) or making any changes to that surcharge or related terms and conditions.
 - d) If Frontier wishes to label the surcharge discussed in Section 5(a) as anything other than "Facility Fee," "Facility Surcharge," "Facility Improvement Fee," or "Facility Improvement Surcharge," Frontier will first engage in good faith discussions with Commission Staff and CUB to reach agreement on how the surcharge will be labeled.
6. Recovery of Mandatory Taxes and Fees:
- a) Frontier may, with 30 days' notice to customers and the Commission, recover the public utility Privilege Tax as a pro rata charge equal to the rate imposed by the municipality and shown as a separate line item on all applicable customer bills.
 - b) Frontier may, with 30 days' notice to customers and the Commission, recover the OPUC fee as a separate line item on customers' bills.
7. Exogenous change adjustments: Frontier may petition the Commission for adjustments to the Price Plan to reflect changed circumstances outside Frontier's control that will have an overall material impact on the Company (e.g., changes in law, rule, or tax structure as a result of legislative, judicial,

Amended Exhibit A

- or administrative agency action). For example, the Company may request consideration of the introduction of new or increased taxes or fees assessed on the basis of revenue or margin that will have an overall material impact on the Company, or changes in Universal Service Support, FCC imposed price floors, or other changes if those items are beyond its control and have an overall material impact on the Company. Frontier will have the burden of showing that adjustments will result in rates that are just and reasonable; the Commission may also consider whether Price Plan adjustments are in the public interest, considering the factors set forth in ORS 759.255(2). There is no presumption as part of this Price Plan that the Joint Parties would support such a petition.
8. Establishment of Citizens Price List: Citizens may make a filing moving the services for which the Commission has granted pricing flexibility to a Price List. Citizens shall file with the Commission amendments to its Tariff reflecting those services that remain subject to Commission price regulation, including all services for which the Plan imposes a price cap. Citizens shall make such filings with the Commission at least 30 days prior to the effective date of the filings.
9. Notice of Changes to Rate Schedules:
- a) Commission Notice Requirements
 - i) Tariff Changes: Frontier will file all Tariff changes with the Commission at least 30 days prior to the effective date of the change, except that price decreases may be filed with one-day notice.
 - ii) Price List Changes: Frontier will file notice of all Price List changes with the Commission at least one day prior to the effective date of the change.
 - b) Customer Notice Requirements:
 - i) Monthly Recurring Charges: For price increases and changes to the terms or conditions of service, Frontier will provide 30-day notice to customers subscribing to the service, including business customers under contract or with term commitments.
 - ii) Pay-Per-Use Charges: For price increases and changes to the terms or conditions of service, Frontier will provide 30-day notice to customers who have used the service within the past 12 months.
 - iii) Form of Notice:
 - (1) Retail customer notices may be made by bill message including notice to customers receiving electronic bills.
 - (2) Wholesale customer notices may be made by email.
 - c) Services exempt from regulation: Services that the Commission has already ordered to be exempt from regulation will remain exempt from regulation subject to the conditions of the order that exempted the services from regulation. Frontier retains the ability to petition the Commission to exempt any additional services from regulation under ORS 759.052 or any other applicable rule or law, except for a petition to modify the Plan under ORS 759.255, as discussed in Section 3.b of this Plan.
10. Promotions: Frontier may offer promotions for residential Primary Line Basic Service and other regulated services pursuant to ORS 759.182 and 759.267.

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11. Line Extension Charges: Frontier may revise its Rate Schedules to include line extension charges for extensions of network facilities to render service, subject to the following requirements:
 - a) Frontier may only impose line extension charges for an extension to plant to furnish service where the actual costs exceed \$2,000, and may only impose line extension charges for the portion of the actual costs that exceeds \$2,000.
 - b) Frontier may waive line extension charges for customers.

12. Service Quality: Frontier NW and Citizens shall continue to be subject to the Commission's service quality rules. Frontier has indicated that it may in the future elect to file a petition with the Commission to open a rulemaking to revise the Commission's service quality rules. The Joint Parties would not unreasonably oppose the initiation of such a rulemaking, but there is no presumption as part of this Price Plan that the Joint Parties would support any particular proposed rule modifications put forth in such a petition.

13. Reporting:
 - a) Form O – The following schedules are no longer required as part of Frontier's Form O filing:
 - i) B-3. Analysis of Charges related to Plant Retired;
 - ii) B-4. Long-term Debt;
 - iii) I-4. Operating Taxes other than Federal Income Tax;
 - iv) I-6. Reconciliation of Reported Net Income with Taxable Income for Federal Income Tax;
 - v) I-7. Reconciliation of Reported Net Income with Taxable Income for Oregon State Excise Tax;
 - vi) I-8. Transactions with Affiliated and Non-Regulated Operations.
 - b) Form I
 - i) Citizens will continue to file the Form I annually for as long as Citizens continues to be eligible for current or future state Universal Service support.
 - ii) Frontier NW will no longer be required to file the Form I, beginning with the 2017 reporting cycle.
 - c) Affiliate Transactions
 - i) Frontier will not file with the Commission a report of affiliated interest contracts executed during the period from January 1 through December 31 of the immediately preceding year.

14. Waiver of statutes, rules and prior commission orders:
 - a) Waiver - Pursuant to ORS 759.255(5), Frontier's compliance with the following statutes and the Commission rules implementing these statutes, is waived in full, unless a partial waiver is noted as long as Frontier operates under the Price Plan:
 - i) ORS 759.120 Form and manner of accounts prescribed by Commission; Partial to the extent allowed in prior Commission Orders.
 - ii) ORS 759.125 Records and accounts prescribed by Commission; prohibition on other records or accounts; exception; blanks for reports; Partial to the extent allowed in prior Commission Orders.
 - iii) ORS 759.135 Depreciation accounts; un-depreciated investment allowed in rates; conditions
 - iv) ORS 759.180 Hearing on reasonableness of rates; procedures; exceptions

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- v) ORS 759.185 Suspension of rates pending hearing; time limitation; refund of revenue collected; interim rates
- vi) ORS 759.190 Notice of Schedule Change
- vii) ORS 759.195 Price listing of services; conditions; maximum rates; essential services; justification by utility of rates for price-listed services
- viii) ORS 759.200 Inclusion of amortizations in rates; deferral of certain expenses or revenues; limitation on amounts; prohibited uses
- ix) ORS 759.215 (2) Public access to schedules
- x) ORS 759.220 Joint rates and classifications; procedure; considerations – Partial waiver with regard to joint rates and establishment of new through services, but not with regard to canceling any existing through service.
- xi) ORS 759.285 Charging rates based on cost of property not presently providing service;
- xii) ORS 759.300 to ORS 759.360 - Issuance of Securities.
- xiii) ORS 759.385 to 759.393 Affiliate contracts

Rules - Pursuant to waiver authority the Commission has granted itself in each Division of the Commission's rules, Frontier's compliance with the following rules is waived in full, unless a partial waiver is noted, as long as Frontier operates under the Price Plan:

- i) OAR 860-022-0025(2)(b) and (c) Requirements for Filing Tariffs or Schedules Changing Rates
- ii) OAR 860-022-0030 Requirements for Filing Tariffs or Schedules Naming Increased Rates
- iii) OAR 860-022-0042 Relating to City Privilege Taxes, Fees, and Other Assessments Imposed Upon a Large Telecommunications Utility – Partial waiver of rule to allow Frontier to pass through to its customers the entire amount of City Privilege Taxes, Fees and Other Assessments as a separately itemized charge on its customer's bills.
- iv) OAR 860-022-0047 Recovery of Certain Facility Relocation Costs; Partial waiver to implement section 5, to the extent necessary.
- v) OAR 860-025-0065 Allocation of Carrier of Last Resort (COLR) Reinstatement Costs;
- vi) OAR 860-026-0025(b). Partial waiver to enable Frontier to run promotions for up to 9 months in any 12-month period.
- vii) OAR 860-027-0016 Accounting for Director's Fees
- viii) OAR 860-027-0030 through OAR 860-027-044
- ix) OAR 860-027-0050 through OAR 860-027-0052
- x) OAR 860-027-0070 Annual Report Requirements for Electric, Large Telecommunications, Gas, and Steam Heat Utilities – except as required in Price Plan
- xi) OAR 860-027-0100 Reporting of Affiliated Transactions