

January 18, 2017

Oregon Public Utility Commission
Attn: Filing Center
P.O. Box 1088
Salem, OR 97308-1088
puc.filingcenter@state.or.us

RE: UM 1677 – Frontier Communications Northwest, Inc. – Price Plan Performance Report

Dear Commission:

Attached for filing please find Frontier Communications Northwest's Price Plan Performance Report in accordance with the requirements of Order No. 14-290 and the November 18, 2016 Ruling of the ALJ. Frontier's three Confidential Exhibits (E, H, and I) have been printed on yellow paper, sealed in a separate envelope, and mailed via USPS regular mail.

If you have any questions or comments, please contact Kirk Lee at 425-261-5855, or kirk.lee@ftr.com.

Sincerely,



R. Kirk Lee
Manager-Government and External Affairs
Frontier Communications Corporation

**FRONTIER COMMUNICATIONS NORTHWEST, INC.
PRICE PLAN PERFORMANCE REPORT
DOCKET UM 1677**

On August 18, 2014, in Order No. 14-290 in Docket UM 1677, the Oregon Public Utility Commission (the Commission) adopted a Price Plan for Frontier Communications Northwest, Inc.'s ("Frontier" or "the Company") Oregon operations. The Frontier Price Plan ("the Plan") that was adopted by the Commission resulted from a stipulation between Frontier, Commission Staff, the Citizens' Utility Board of Oregon (CUB), Integra Telecom of Oregon, Inc. and its affiliates (Integra), and PriorityOne Telecommunications, Inc. (PriorityOne). The League of Oregon Cities (the League) also intervened in this proceeding but was not a party to the stipulation.

Section W of the Price Plan sets forth provisions for the Commission to review Frontier's performance under the Price Plan every three years. To commence the review, Frontier is required to file a report regarding its performance as compared to the objectives of the Plan by the 90th day of the third year of operation under the Plan. On November 18, 2016 the Commission granted Frontier an extension until January 18, 2017 to file its report. The purpose of this report is to review how the objectives of the Plan are being met and includes the following information as described in the Order:

1. An analysis of current market conditions for the various categories of Frontier's regulated retail telecommunications services to the extent such information is publically available.
2. Data regarding the gain or loss of access lines by wire center.
3. A discussion of how the pricing flexibility allowed Frontier to meet the Plan's objectives.
4. Identification of any new services that Frontier has introduced; and
5. Identification of any ways in which the burden of regulation for both Frontier and the Commission has been simplified or reduced.

Section A of the Price Plan lays out the detailed objectives to be achieved by Frontier's Price Plan and include the following items:

1. Ensure the Plan is operating in a way that is in the public interest.

2. Produce prices for Frontier's retail telecommunications services that are just and reasonable.
3. Ensure that the quality of existing telecommunications services will stay at or above current levels.
4. Maintain the appropriate balance between the need for regulation and competition.
5. Simplify and reduce the burden of regulation for both Frontier and the Commission.
6. Maintain the availability of primary line basic service at affordable rates throughout the state.
7. Increase Frontier's pricing flexibility to meet changing market conditions.
8. Make new telecommunications services available.

CURRENT MARKET CONDITIONS

As detailed in the Company's original Petition for Approval of a Price Plan filed on December 6, 2013, Frontier faces fierce competition throughout its entire service territory in Oregon including some of the most rural parts of the state. Competitors include (but are not limited to) traditional facilities-based carriers such as Comcast, Charter, Wave, Comspan, Pacific Wave, Priority One, SCS Communications, Integra, Level 3, XO Communications, AT&T, and Verizon Business. In addition, intermodal competitors are providing comparable or substitutable services throughout Frontier's service territory including wireless carriers AT&T, Verizon, Sprint, T-Mobile, US Cellular, Cricket Wireless, and VoIP providers Vonage, Ymax, Basic Talk, Ooma and Google. The continued expansion of broadband connections into the most rural parts of Oregon has made VoIP a widely accepted replacement to wireline voice service. Frontier also faces competition from non-voice services such as email, and texting, and social networking sites such as Skype and FaceTime. These services provide users with the ability to communicate instantly across a wide variety of platforms and customer equipment. Wireless texts, email and other messaging services are now among the primary means of communications for many. They have significantly reduced voice traffic, and compete as substitutes for voice calling. Frontier currently has 116 interconnection agreements in Oregon with a variety of competitors including CLECs, Wireless Providers, Cable Companies and other interconnected-VoIP Providers (see Exhibit A). In addition, there are a number of "over the top" services available to consumers.

Competitive Local Exchange Carriers (CLECs) are just one category of alternative providers of business and residential telephony service in Frontier's Oregon service area. According to the Oregon PUC's 2015 Local Competition Survey Report (using 2014 data), 206 CLECs were registered with the Commission as service providers, down from 256 in the 2012 Report. Of those 206 certified CLECs, 153 were actually providing service to customers, up from 149 in the 2012 Report. While the total number of certified CLECs in Oregon has declined in the past 3 years, a higher number of them are actually providing services, and competing for ILEC customers, as evidenced by the growth in their overall share of the voice market. The 2015 Oregon PUC Report also recognizes that CLECs have made significant inroads into the ILEC customer base. Residential local exchange lines are now split virtually equally between ILECs and CLECs, and the Report notes that the current trend indicates that the CLECs will likely have the larger market share in the near future.

Many CLECs, such as Integra, Granite, Level 3, Time Warner, XO, AT&T and Verizon Business primarily focus on serving business customers; however, there are CLECs who offer residential service in Frontier's footprint such as Priority One, Comspan, Pacific Wave and SCS Communications. Frontier has entered into PUC-approved interconnection agreements with CLECs so that they may offer service and compete for customers in Frontier's service area.

The success of cable companies competing in the telecommunications market has had a significant negative impact on ILEC market share across the state. Companies such as Comcast, Charter Communications, and Wave Broadband compete with Frontier and provide voice communications service to residential and business customers on a stand-alone basis and as part of a bundle of telephone/internet/cable using their own network infrastructure. Cable voice providers offer service in exchanges representing nearly all of Frontier's access lines.

Wireless service providers continue to be the predominant voice service provider in Oregon, serving 4.0 million subscribers in the state as of December 2015 (up from 3.5 million in June 2012) as compared to a combined 1.4 million subscribers for ILEC and non-ILEC access line and VoIP providers of voice services (down from 1.6 million in June 2012) when wireless subscriber numbers are included in the calculation of the entire voice market. Wireless subscribers now represent 74.1% of all voice communications subscribers in the state. As a result, the number of switched access lines served by ILECs as a percent share of customers subscribing to voice service has plummeted to only 11.6% of the total voice service subscriptions as of December 2015

compared to 17.5% of the total as of June 2012.¹ Wireless providers such as AT&T, Verizon, T-Mobile, Sprint, Cricket, TracFone, U.S. Cellular and Virgin Mobile offer stand-alone voice and bundled services of voice and broadband.

Many Oregon consumers have opted to drop their landline completely in favor of wireless service. The National Center for Health Services (NCHS) provides a detailed analysis of wireless substitution. In the 2015 NCHS Report, Oregon specific data provides that an estimated 50.8% of adults were in “wireless only”² households compared to 38.2% for 2011. Conversely, only 6.6% of adults in 2015 were considered to be “landline only” customers and another 12.0% were “mostly” landline. (See Exhibit C) In response to a survey question in the Oregon PUCs 2015 Local Competition Report (see footnote 3), 59% of ILECs noted cell phone usage as the primary reason they have not been able to increase residential market share.

The Oregon PUC has certified numerous wireless ETCs who accept the obligations to provide an alternative low-income wireless service to serve the public interest. The Commission has approved these services as a viable substitute for basic wireline phone service in Oregon and by doing so assures that the lifeline eligible customer base also has competitive alternatives. In fact, nationwide, about 85% of lifeline customers have selected wireless service as their primary connection.³ In designating ETC status for these carriers, the Commission has already made a finding that these wireless carriers provide voice grade access to the public switched network or its functional equivalent and those wireless carriers’ services are available throughout the wire center for which the ETC designation was received.

Frontier has entered into interconnection agreements with wireless carriers to exchange traffic in Oregon. Alternatively, wireless carriers may enter into agreements with other carriers for the exchange of traffic with Frontier. According to public information, there are at least four wireless service providers in every Frontier exchange in the state.

Customer access to broadband connections has been increasing rapidly in Oregon. This has drastically increased the option for and availability of VoIP-based voice services. Cable

¹ Voice Telephone Services: Status as of December 31, 2015. Industry Analysis and Technology Division, Wireline Competition Bureau, Federal Communications Commission, Nov. 2016. <https://www.fcc.gov/voice-telephone-services-report> , See attached Exhibit B for Oregon-specific information.

² NCHS, National Health Interview Survey Early Release Program, Table 1. <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless201612.pdf>

³ CNBC: Government Programs: <http://www.cnbc.com/2015/06/19/these-states-depend-on-obama-phone-the-most.html>

companies offer “managed” VoIP-based services that are non-portable and that carry traffic over private managed networks, rather than the internet. Many other companies, such as Vonage, Skype, Google, Apple (via Facetime), Magic Jack and Basic Talk offer “over-the-top” VoIP services that rely on a third-party broadband connection and transmit calls, at least partially, over the public internet. VoIP service allows a customer to utilize a standard telephone set to originate and receive telephone calls using the same dialing patterns that are used for standard wireline telephone service.

To use VoIP service, a customer must have a high speed connection such as Digital Subscriber Line (“DSL”), Fiber to the Home (FTTH), a high-speed wireless connection, or cable modem service. While a broadband connection is needed to enable VoIP service, when customers purchase broadband service for Internet access, entertainment or other purposes, there is no incremental cost for broadband when they elect to add VoIP service. As a result, the absence of an incremental cost of broadband also provides an incentive for a customer already subscribing to broadband to migrate to a VoIP service available from any of the many providers identified, above, as evidenced by its rapid consumer adoption.

Competitive broadband services are now widely available from multiple providers in Oregon and these services have been embraced by a rapidly increasing number of customers. Frontier’s broadband services in Oregon are now available to almost 97% of the households in its footprint. Frontier also offers a satellite-based broadband product that allows it to reach virtually all households. Each broadband connection represents an existing or potential VoIP subscriber. When considered in combination with the availability of broadband services from other providers, VoIP is a growing service offering and substitute for ILEC voice services for most consumers in Frontier’s service area.

In addition, explosive growth in the number of Wi-Fi hot spots are also providing voice options for consumer. Wireless subscribers can also subscribe to (or use for free) nomadic VoIP providers such as Skype or FaceTime so that even if subscribers lack a cellular signal, voice calls can still be made using VoIP over Wi-Fi. As an example, Starbucks offers Wi-Fi for free in all its company-owned stores in the U.S. Customers, including mobile phone and tablet users, have unlimited access to a Wi-Fi signal with no purchase or subscription required, no password is required and there are no session time limits. There are 248 Starbucks locations in Oregon alone.

In the FCC’s recently released Voice Telephone Services Report for 2015 (see footnote 1), non-ILEC interconnected VoIP subscriptions now account for 11.5% of all voice telephony

subscriptions in Oregon, including wireless. This nearly matches the ILEC switched access line share of 11.6%, and is a significant increase over the 8.8% share that VoIP services held in June 2012. The Oregon PUC's Local Telecommunications Competition Survey (2015 Annual Report)⁴ also notes a substantial increase in the use of VoIP telephone numbers, 22% over 2013 levels. This fact is even more significant when you consider that when an ILEC customer switches to VoIP, they often take their home phone number with them.

In summary, the telecommunications market in Oregon is extremely competitive, and the assortment of competitive telecommunications alternatives available to customers continues to expand and evolve. The FCC's Report (see Exhibit B, Table 2) for December 2015 shows a number of alternative providers reporting voice subscriptions in Oregon, including 6 wireless providers, 55 non-ILEC switched access providers and 152 over-the-top or other interconnected VoIP providers. Frontier's also conducted an audit of FCC Form 477 data to determine the availability of consumer voice service among providers with coverage in each of Frontier wire centers. The December 2016 data in the attached Exhibit D shows a range of 5 to 13 alternative voice providers competing in each of Frontiers exchanges in Oregon. Oregon consumers and businesses have numerous alternatives to meet their local voice calling and broadband needs. The Oregon telecommunications market is becoming more competitive every day, and there is no reason to believe that the growth of competitive alternatives will subside as new technologies are developed and customer preferences change over time.

SWITCHED ACCESS LINES

As noted in the Oregon PUCs 2015 Local Competition Report, statewide, the number of switched access lines served by both ILECs and CLECs in 2014 was approximately 35% lower than in 1999, and the decrease reflects the competitive impact of wireless phones, and the development of fiber optics, cable telephony and other new technologies which enable alternatives to traditional landline phone service. An increasing number of households have dropped landline service altogether and only subscribe to wireless services now.

The fact that Frontier has experienced significant competition from CLEC, Cable, VoIP and wireless alternative service providers is evidenced by the Company's dramatic loss of access lines in Oregon over the last fourteen years. Between 2001 and 2015, Frontier lost approximately

⁴ Table 1, <http://www.puc.state.or.us/telecom/2015%20Telecommunications%20Competition%20Survey.pdf>

256,000 residential retail access lines (from 342,724 access lines to 87,221 access lines) in Oregon. This represents a 75% reduction in residential retail access lines during a period of time where U.S. Census data shows the population in Oregon was increasing. The FCC's Voice Telephone Services Report for 2015 shows that the total market for voice subscriptions has grown as well. Similarly, Frontier has experienced a 63% decrease in the number of business access lines in the same period (from 148,986 access lines to 55,359 access lines) for a combined aggregate line loss of 71%. The continuing and dramatic access line erosion during a time of population growth shows that consumers are subscribing to competitive alternatives to Frontier's services in order to fulfill their telecommunications needs in Oregon. The evidence clearly shows that Frontier does not have a captive customer base or market power for either residential or business services.

Company access lines by wire center, as reported in the monthly service quality reports filed with the Oregon PUC for the first two years of the Price Plan, also demonstrates that line loss has occurred not only in the more densely populated areas of Frontier's market but in 56 of 58 Frontier wire centers. Total line loss during this 24 month period reflects a 16.7% reduction. See Confidential Exhibit E that summarizes line loss by wire center using the company's monthly service quality reports from August 2014 to August 2016. Despite the pricing flexibility gained by Frontier through the Price Plan, competition in the market continues to erode the Company's voice market share at a high rate.

PRICING FLEXIBILITY AND THE PLAN OBJECTIVES

Frontier's Price Plan is an alternative form of regulation that provides the Company with additional pricing flexibility for certain services by allowing these services to be priced commensurate with market conditions and the competitive market. As noted above, Frontier faces fierce competition from a number of alternative voice providers using wireline, wireless, cable and VoIP technologies.

The Plan provides the Company with pricing flexibility for services offered as packages and bundles. Specific caps were not imposed on services offered as part of residential or business bundles, however, the total price for a bundle of services was not allowed to be greater than the sum of the retail prices of the services included in the bundle.

The Plan also allowed Frontier to increase its basic residential service rates by \$2.00 upon the effective date of the Plan, and an additional \$1.00 at the beginning of the 3rd year of the Plan. Basic service rates for business customers were allowed to be increased by \$4.00 upon the effective date of the Plan. For ISDN-PRI and DS1 services, rate increases were allowed up to 10% annually. Other Services, which included services like calling features, were allowed to increase up to 25%, or \$0.50 annually, whichever is greater. A limited number of services were capped at pre-Plan rates, including non-recurring charges for service ordering and installation, Extended Area Service rates, E911, toll restriction, call trace, and unlisted numbers.

By approving Frontier’s Price Plan, the Commission found it to be in the public interest. Among other things, the public interest standard provides for just and reasonable rates. During the term of the Plan, Frontier has utilized the pricing flexibility granted to offer promotional pricing on existing and new bundles of services in response to competitive pressure. Frontier’s customers, as well as the public in general, are beneficiaries of competitively priced options for telecommunications services. See attached Exhibit F for a list of tariff and statewide price list filings made since the beginning of the Plan for products and promotions.

Within the guidelines of the price caps, the Company has also selectively raised the rates for its basic services and certain services in the Other Services category as needed to address the value of its services, and the telecommunications marketplace. For its residential basic local service Frontier raised its rates by \$1.75 per line on October 19, 2014. For business basic local service customers, Frontier raised its rates by \$1.75 on October 19, 2014 and another \$1.25 on October 18, 2015. Those rate changes are summarized below.

	Prior to October 19, 2014	Effective October 19, 2014	Increment Increase
BASIC CALLING SERVICE-Measured			
B1	\$18.00	\$19.75	\$1.75
R1	\$8.07	\$9.82	\$1.75
COMMUNITY CALLING SERVICE			
B1	\$19.00 – 28.27	\$20.75 – 30.02	\$1.75
R1	\$12.59	\$14.34	\$1.75
PREMIUM CALLING SERVICE			
B1	\$19.00 – 28.27	\$20.75 – 30.02	\$1.75
R1	\$12.59	\$14.34	\$1.75

	Prior to October 18, 2015	Effective October 18, 2015	Increment Increase
BASIC CALLING SERVICE-Measured			
B1	\$19.75	\$21.00	\$1.25
R1	\$9.82	\$9.82	\$0.00
COMMUNITY CALLING SERVICE			
B1	\$20.75 – 30.02	\$22.00 – 31.27	\$1.25
R1	\$14.34	\$14.34	\$0.00
PREMIUM CALLING SERVICE			
B1	\$20.75 – 30.02	\$22.00 – 31.27	\$1.25
R1	\$14.34	\$14.34	\$0.00

In the Other Services category, a number of rate changes were made within the guidelines of the Price Plan that affected directory services, directory listings, calling features and operator services. Those rate changes are summarized in Exhibit G.

INTRODUCTION OF NEW SERVICES

Another component of the public interest standard is to ensure high quality services and make new services available. The Price Plan provides that any new service introduced after the effective date of the Plan will not be subject to price caps, however, a very narrow definition of new services was included in the Plan. New services cannot include a repackaging of existing services. During the time that the Plan has been in effect, Frontier has introduced a new bundled service, OneVoice, and a variety of new Operator Service options. In addition, the Company restructured its non-recurring charges for service ordering and installation by adding rate elements for specific activities, and only applying the rates that pertain to a specific customer service order. Promotional pricing for existing service bundles were also offered. All of these new offerings may not strictly meet the Commission’s definition of new service, however, they do provide benefits to Frontier’s customers in terms of rates and options. Please refer back to Exhibit F for a list of these service offerings.

Although not under the jurisdiction of the Commission and not subject to the Price Plan, Frontier also offers a variety of FiOS TV products and services to its Portland-metro area customers, and high speed internet to customers throughout its Oregon service territory. The reduced costs and regulatory burden, and increased pricing flexibility associated with the Price Plan for regulated services allows Frontier as a company to be more responsive to all its customer groups. These video and broadband products and services are subject to the same intense competitive pressures that Frontier faces for its voice services. As a result, Frontier has introduced

new services and products for FiOS TV and Broadband that have benefited its customers as well. Many of those customers are also voice customers. In December 2016, the Company launched its new gigabit broadband service in specific Oregon locations and it went live on January 1st. See Confidential Exhibit H for a list of new FiOS TV and Broadband service offering introduced by Frontier since the beginning of the Plan.

REDUCTION OF REGULATION

Two of the Plan objectives specifically address regulatory burden. First, maintain the appropriate balance between the need for regulation and competition. Second, simplify and reduce the burden of regulation for both Frontier and the Commission. The Plan reduces regulation for Frontier and the Commission by providing for the waiver, in whole or in part, of a number of Statutes as authorized by ORS 759.255(2). In turn, the resources of both the Company and the Commission are freed up to focus on other more important issues that impact Oregon consumers. Those waivers address a variety of subjects and regulatory requirements including:

1. The form and manner of accounts prescribed by the Commission
2. Records and accounts prescribed by the Commission; prohibition on other records or accounts; exception; blanks for reports
3. Depreciation accounts; un-depreciated investment allowed in rates; conditions
4. Hearing on reasonableness of rates; suspension of rates pending hearing; notice of schedule change; price listing of services; inclusion of amortizations in rates
5. Public access to schedules
6. Joint rates and classifications; with regard to joint and new rates, not existing
7. Changing rates based on cost of property not presently providing service
8. Issuance of securities

In addition, the Plan provides for the full or partial waiver of a number of conditions in certain OPUC Orders, and Oregon Administrative Rules as authorized by OAR 860-022-0001(2). Those waivers include the following subject areas and regulatory requirements:

1. Requirements for filing tariffs or schedules changing rates or naming increased rates
2. Privilege tax rule limiting pass through in excess of 4 percent
3. New construction budget
4. Uniform System of Accounts for large telecommunications utilities

5. Allocation of costs by a large telecommunications utility
6. Requirement to submit Form O and Form I
7. Requirement to submit DSL complaints and subscriptions
8. Requirement for quarterly reports for accounts receivables, payables, and dividends

The Plan also provides Frontier with pricing flexibility in its more competitive markets and the ability to respond to competitor initiatives in a timelier manner. With less scrutiny of these rate changes required by the Commission, both the Company and the Commission benefit.

One major area of regulation that was retained by the Price Plan is service quality. However, as the voice communications market has continued to evolve since the adoption of the current Price Plan, these outdated service quality standards and monthly reporting requirements continue to be a significant regulatory burden for the Company and, because our competitors are not subject to such regulation, it creates an un-level playing field in the telecommunication market in Frontier's service area. As discussed above in the Section on Current Market Conditions, ILEC voice service is now less than 12% of the total voice market, yet ILECs are the only group of providers subject to the PUC's service quality standards. This imbalance seems to run contrary to the Legislature's expressed goal for the State in ORS § 759.015, which mandates a "balanced program of regulation and competition." The increased costs of doing business ultimately impact the Company's ability to compete in all its markets including voice, video, and data.

The continuation of a regulatory framework that subjects incumbent telecommunications providers to outdated service quality requirements is out-of-step with consumer behavior in today's marketplace. Today, voice consumers are rapidly "voting with their feet" and dropping their ILEC provided voice services in favor of alternative technologies and providers. This is evidenced by the fact that every segment of the voice market is growing, with the exception of ILEC switched access lines. In a competitive market all providers are incented to provide products and services that meet customer service expectations. A lighter regulatory touch would allow for fair competition with all providers and technologies. Ultimately, consumers have differing priorities and therefore adopt the products and services that best meet their individual needs and provide the best overall value proposition.

MEETING THE OBJECTIVES OF THE PLAN

The Plan continues to operate as it was designed and in the public interest. Frontier's retail communications services are priced at rates that are just and reasonable, and its primary line basic service is affordable throughout the state. Rates for Frontier's residential basic local service are currently at \$14.34 and compare favorably with other ILECs in Oregon and the FCC's residential local service rate floor which is currently at \$18.00, and increasing to \$20.00 in July 2017. By way of comparison, Centurylink QC's flat rate residential rates range from \$15.80 to \$17.80, United Telephone is \$16.43, and CenturyTel of Oregon is \$15.48 to \$17.55. Regardless of the price caps for these services provided for in the Plan, Frontier is somewhat constrained in its ability to set higher rates because of the high degree of competition in the marketplace, especially for business customers. Rates for Frontier's basic business service currently range from \$22.00 to \$31.27, compared to a range of \$28.00 to \$32.00 for Centurylink QC. United Telephone is at \$27.00, and CenturyTel of Oregon ranges from \$23.00 to \$28.00. If Frontier were to raise rates substantially above costs, it would lose considerably more customers. In a marketplace with this many competitive alternatives, Frontier no longer holds market power. Price caps or not, high rates are not sustainable if the Company wants to stay in business.

Frontier also committed to maintaining the quality of its telecommunications services at or above current levels, and retaining service performance guarantees in its tariff. As mentioned above, Frontier continues to file its detailed monthly service quality results reports with the Commission. On average, Frontier has maintained its results at an acceptable level and met its requirements. When service installation and repair time commitments briefly fell below standards during 2015 due to weather and other factors, Frontier responded by adding temporary resources and developing and implementing new dispatch procedures which enabled the Company to come back into compliance.

When business office and repair center answer times increased for a few months Frontier responded by hiring additional call center representatives and providing additional training. Answer times showed significant improvement until April 2016 when Frontier acquired new properties from Verizon in California, Texas and Florida, doubling the size of the Company. Due to issues with the conversion of customers to Frontier systems, our call centers were flooded with additional calls that were not anticipated and again, answer times rose. Since that time, Frontier continues to monitor its results and is working diligently to bring answer times back in line with standards.

Another component of the Plan required Frontier to make network and other investments totaling at least \$400,000 that would improve the quality of its network. One of the projects that Frontier committed to completing was a South Coast Diversity project at an estimated cost of \$300,000. This diverse fiber route was dependent on participation by Centurylink, and was finally completed in July 2016 at a total cost of \$572,251, including a lease for a portion of the route provided by Level 3 Communications.

The second network investment committed to by Frontier was to spend at least \$50,000 to replace existing DCM-24 equipment at Swedetown, in the Clatskanie exchange. This upgrade project was completed in May 2015 at a total cost of \$72,711, including improvements to accommodate new power requirements at the site.

The last commitment made by Frontier was to donate \$50,000 to CUB Connects, which provides a public benefit by helping consumers to navigate the competitive marketplace for telecommunications services. Frontier issued the check for CUB in August 2014. In total, for all three commitments, Frontier spent nearly \$700,000, well above the required amount. Documentation on all these expenditures can be found in attached Confidential Exhibit I.

As noted previously, the Plan has increased Frontier's ability to flexibly price its services to meet changing market conditions and has made additional promotions and products available to the benefit of its customers. The Plan has also helped reduce the burden of regulation for both the Company and the Commission while maintaining a balance between regulation and competition. Frontier believes the Plan could be improved even more in this respect by working towards regulatory parity for all providers in the market, regardless of the technology they employ.

January 18, 2017

Frontier Communications Northwest, Inc. Oregon Interconnection Agreements as of Dec. 2015

<u>Company Name</u>	<u>Agreement Type</u>
360networks (USA) Inc.	Comprehensive
AboveNet Communications Inc.	Interconnection/Unbundled
Access Point, Inc.	Comprehensive
Advanced TelCom, Inc.	Resale
Advanced TelCom, Inc.	Collocation/Interconnection/Unbundled
Airespring, Inc.	Resale
American Fiber Network, Inc.	Comprehensive
Astound Broadband LLC	Comprehensive
AT&T Communications of the Pacific NW	Comprehensive
Bandwidth.com CLEC, LLC	Comprehensive
BendTel, Inc.	Comprehensive
BG Enterprises Inc.	Resale
BLC Management LLC	Comprehensive
Budget PrePay, Inc.	Comprehensive
BullsEye Telecom, Inc.	Comprehensive
Centel Communications Inc.	Comprehensive
Charter Fiberlink OR-CCVII, LLC	Comprehensive
Charter Fiberlink OR-CCVII, LLC	Comprehensive/Interconnection
City of Sandy, Oregon	Comprehensive
Clear Creek Mutual Telephone Company	Interconnection/Resale/Unbundled
CoastCom Inc.	Comprehensive
Comcast Phone of Oregon LLC	Comprehensive
CommPartners, LLC	Comprehensive
Comtel Telcom Assets LP	Comprehensive
Comtel Telcom Assets LP	Comprehensive
Cordia Communications Corp.	Comprehensive
Covad Communications Company	Comprehensive
Covista, Inc.	Comprehensive
Digital Telecommunications Inc.	Resale
Douglas Services Inc.	Interconnection
DSLnet Communications LLC	Comprehensive
Edge Wireless LLC	Wireless
Ednetics, Inc.	Interconnection/Resale/Unbundled
Electric Lightwave, LLC	Comprehensive
Entelegent Solutions, Inc.	Comprehensive
Ernest Communications Inc.	Comprehensive
Eschelon Telecom of Oregon Inc.	Interconnection
Eschelon Telecom of Washington Inc.	Resale/Unbundled
France Telecom Corporate Solutions, LLC	Resale
Global Crossing Local Services Inc	Interconnection/Unbundled

Frontier Communications Northwest, Inc. Oregon Interconnection Agreements as of Dec. 2015

<u>Company Name</u>	<u>Agreement Type</u>
Global Crossing Telemanagement Inc	Resale
Granite Telecommunications, LLC	Comprehensive
Group Six Communications, LLC	Comprehensive
Hunter Communications, Inc.	Comprehensive
ICG Telecom Group Inc.	Comprehensive
InfoTelecom LLC	Comprehensive
Integra Telecom of Oregon, Inc.	Comprehensive
Ionex Comm North, Inc. dba Birch Comm	Comprehensive
IPDataStream, LLC	Resale
LCW Wireless Operations, LLC	Wireless
Level 3 Communications LLC	Comprehensive
Lightspeed Networks Inc.	Comprehensive
Litchfield County Cellular Inc.	Wireless
Matrix Telecom, Inc.	Resale/Unbundled
McGraw Communications, Inc.	Comprehensive
MCImetro Access Transmission Services LLC	Comprehensive
McLeodUSA Telecom Services Inc.	Comprehensive
Metrocall Inc.	Wireless - Paging
Metropolitan Telecom of Oregon, Inc.	Comprehensive
Navigator Telecommunications, LLC	Comprehensive
NET TALK.COM, INC.	Comprehensive
Neutral Tandem - Oregon, LLC	Comprehensive
New Cingular Wireless PCS, LLC	Wireless
New Edge Network Inc.	Comprehensive
New Horizons Communications Corp.	Comprehensive
Next Gen Phone Systems Inc.	Comprehensive
Nextel West Corp.	Wireless
Noel Communications Inc	Interconnection
North County Communications Corp	Comprehensive
Northwest Telephone, Inc.	Comprehensive
NOS Communications Inc.	Comprehensive
O 1 Communications of Oregon LLC	Interconnection/Unbundled
Onvoy Spectrum, LLC	Wireless
Oregon Telecom Inc.	Comprehensive
Pacific Wave Communications	Comprehensive
Pac-West Telecomm Inc.	Interconnection/Unbundled
PNG Telecommunications, Inc.	Comprehensive
Preferred Long Distance, Inc.	Comprehensive
Prime Time Ventures, LLC	Comprehensive
PriorityOne Telecommunications, Inc.	Comprehensive

Frontier Communications Northwest, Inc. Oregon Interconnection Agreements as of Dec. 2015

<u>Company Name</u>	<u>Agreement Type</u>
Quantumshift Comm, Inc. dba vCom Solutions	Interconnection
Qwest Communications Company, LLC	Comprehensive
Qwest Corporation	Comprehensive
Qwest Corporation	ILEC-to-ILEC Interconnection
Radix Networks LLC	Comprehensive
RCC Holdings Inc.	Wireless
SBC Long Distance, LLC	Comprehensive
SCS Communications and Security Inc.	Comprehensive
Selectel, Inc.	Comprehensive
Siafu Telecommunication, LLC	Comprehensive
Silver Star Telecom, LLC	Comprehensive
Smartrak Incorporated	Comprehensive
Sonic Systems, Inc.	Comprehensive
Sprint Communications Limited Partnership	Comprehensive
Sprint Spectrum L.P.	Wireless
TCG Oregon	Comprehensive
Tel West Communications LLC	Comprehensive
TeleQuality Communications, Inc.	Comprehensive
Telrite Corporation	Comprehensive
Threshold Communications, Inc.	Comprehensive
T-Mobile USA Inc.	Wireless
Trans National Comm International, Inc.	Comprehensive
Triarch Marketing, Inc.	Comprehensive
Tribal One Broadband Technologies	Comprehensive
tw telecom of oregon llc	Comprehensive
Umpqua Indian Development Corporation	Comprehensive
United Communications, Inc.	Comprehensive
US Cellular	Wireless
USA Mobility Wireless, Inc.	Wireless - Paging
Verizon Wireless LLC	Wireless
Wantel, Inc.	Comprehensive
Western Independent Networks Inc.	Comprehensive
WindWave Technologies Inc.	Comprehensive
XO Communications Services, Inc.	Interconnection/Unbundled
Ygnition Networks, Inc.	Comprehensive
Ymax Communications Corp.	Comprehensive

FCC Voice Telephone Services: Status as of December 31, 2015
Supplemental Table 1. Voice Subscriptions (in Thousands) - Oregon

Reference	Data element	Dec 2015	June 2015	Dec 2014	June 2014
1	Mobile telephony	3,970	3,859	3,734	3,644
2	Directly-billed or prepaid	3,582	3,474	3,362	3,282
3	Not directly-billed or prepaid	389	385	372	362
4	Wireline End-User Switched Access Lines and Interconnected VoIP Subscriptions	1,387	1,429	1,448	1,473
5	Incumbent LECs	663	689	718	732
6	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	724	739	729	741
7	Consumer-grade service	757	774	802	824
8	Incumbent LECs	376	396	419	442
9	Other (Non-ILECs)	380	377	383	382
10	Business & Government-grade service	631	655	645	650
11	Incumbent LECs	287	293	299	291
12	Other (Non-ILECs)	344	362	346	359
13	Local exchange telephone service (Switched Access Lines)	769	803	843	894
14	Incumbent LECs	619	647	679	710
15	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	150	156	165	184
16	Consumer-grade service	388	406	432	455
17	Incumbent LECs	376	396	419	442
18	Other (Non-ILECs)	12	9	13	13
19	Business & Government-grade service	381	398	412	440
20	Incumbent LECs	243	251	260	269
21	Other (Non-ILECs)	139	147	152	171
22	Interconnected VoIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.	618	625	604	579
23	Incumbent LECs	44	42	40	22
24	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	574	583	565	557
25	Consumer-grade service	369	368	371	369
26	Incumbent LECs	0	0	-	-
27	Other (Non-ILECs)	369	368	371	369
28	Business & Government-grade service	250	257	234	210
29	Incumbent LECs	44	42	40	22
30	Other (Non-ILECs)	205	215	194	188
31	Over-the-top interconnected VoIP	62	57	55	55
32	Incumbent LECs	-	-	-	-
33	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	62	57	55	55
34	Consumer-grade service	34	32	34	35
35	Incumbent LECs	-	-	-	-
36	Other (Non-ILECs)	34	32	34	35
37	Business & Government-grade service	29	24	21	20
38	Incumbent LECs	-	-	-	-
39	Other (Non-ILECs)	29	24	21	20
40	All Other interconnected VoIP	556	569	549	524
41	Incumbent LECs	44	42	40	22
42	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	512	527	509	502
43	Consumer-grade service	335	336	337	335
44	Incumbent LECs	0	0	-	-
45	Other (Non-ILECs)	335	336	337	335
46	Business & Government-grade service	221	233	213	190
47	Incumbent LECs	44	42	40	22
48	Other (Non-ILECs)	177	191	173	168
75	Non-Incumbent LEC local exchange telephone service by means of provisioning	150	156	165	184
76	Provided over owned last-mile facilities	29	45	45	47
77	Provided over UNE-L obtained from unaffiliated entity	68	62	69	78
78	Provided over other services obtained from unaffiliated entity	53	50	50	59
93	End user buys local exchange telephone service and Internet access service from same entity	320	330	339	353
96	End user buys interconnected VoIP and Internet access service from same entity	508	486	467	443

FCC Voice Telephone Service: Status as of December 31, 2015
Supplemental Table 2. Number of Providers Reporting Voice Subscriptions - Oregon

Reference	Data element	Dec 2015	June 2015	Dec 2014	June 2014
1	Mobile telephony	6	6	6	5
4	Wireline End-User Switched Access Lines and Interconnected VoIP Subscriptions	188	179	180	167
6	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	171	162	163	148
13	Local exchange telephone service (Switched Access Lines)	74	69	73	69
	Incumbent LECs	22	22	22	23
15	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	55	50	54	49
76	Provided over owned last-mile facilities	19	18	19	23
22	Interconnected VoIP Subscriptions - Note: Includes both Over-the-top (OTT) and All Other sub-categories.	152	143	142	128
23	Incumbent LECs	4	2	3	1
24	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	150	142	141	128
31	Over-the-top interconnected VoIP	116	107	106	91
32	Incumbent LECs	-	-	-	-
33	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	116	107	106	91
40	All Other interconnected VoIP	56	50	52	50
41	Incumbent LECs	4	2	3	1
42	Other (Non-ILECs) - Note: ILEC voice-service affiliate operating outside ILEC's study area is included here.	54	49	51	50



National Health Interview Survey Early Release Program

Table 1. Modeled estimates (with standard errors) of the percent distribution of household telephone status for adults aged 18 and over, by state: United States, 2015

Geographic area	Wireless-only	Wireless-mostly	Dual-use	Landline-mostly	Landline-only	No telephone service	Total
Alabama	46.0 (2.0)	15.0 (1.5)	18.5 (1.5)	10.7 (1.0)	6.9 (1.0)	2.9	100.0
Alaska	47.1 (2.2)	22.2 (1.8)	18.7 (1.6)	6.3 (0.9)	4.3 (0.8)	1.5	100.0
Arizona	53.1 (1.7)	13.5 (1.3)	15.6 (1.2)	7.8 (0.8)	6.9 (0.9)	3.0	100.0
Arkansas	59.8 (2.0)	12.7 (1.4)	11.5 (1.3)	7.5 (0.9)	4.8 (0.9)	3.7	100.0
California	46.8 (0.9)	18.2 (0.7)	18.7 (0.7)	8.3 (0.5)	5.5 (0.4)	2.5	100.0
Colorado	55.2 (1.7)	16.2 (1.3)	14.3 (1.2)	7.2 (0.8)	4.5 (0.7)	2.6	100.0
Connecticut	31.1 (1.7)	18.1 (1.5)	26.8 (1.5)	13.0 (1.0)	9.1 (1.0)	1.8	100.0
Delaware	32.8 (1.8)	19.5 (1.5)	28.7 (1.7)	10.6 (1.0)	5.6 (0.8)	2.7	100.0
District of Columbia	54.2 (2.0)	17.4 (1.6)	16.4 (1.5)	4.8 (0.8)	4.5 (0.8)	2.7	100.0
Florida	51.0 (1.2)	15.4 (1.0)	15.6 (0.9)	8.0 (0.6)	6.1 (0.6)	3.8	100.0
Georgia	50.7 (1.5)	16.9 (1.2)	16.3 (1.1)	7.0 (0.7)	5.6 (0.7)	3.4	100.0
Hawaii	39.3 (1.8)	15.9 (1.4)	27.5 (1.6)	9.8 (1.0)	5.0 (0.8)	2.4	100.0
Idaho	61.6 (1.9)	12.1 (1.3)	12.2 (1.2)	6.6 (0.8)	4.5 (0.8)	3.0	100.0
Illinois	48.2 (1.4)	16.7 (1.1)	18.3 (1.1)	9.1 (0.7)	4.4 (0.6)	3.2	100.0
Indiana	52.5 (1.7)	12.5 (1.2)	15.5 (1.2)	9.3 (0.9)	6.8 (0.9)	3.3	100.0
Iowa	54.5 (1.6)	15.3 (1.2)	14.0 (1.1)	8.2 (0.7)	4.6 (0.7)	3.5	100.0
Kansas	54.0 (1.7)	12.9 (1.2)	15.7 (1.2)	7.7 (0.8)	5.7 (0.8)	3.9	100.0
Kentucky	50.2 (1.7)	12.1 (1.1)	12.7 (1.1)	13.5 (1.0)	8.0 (0.9)	3.6	100.0
Louisiana	43.6 (1.9)	21.8 (1.7)	17.8 (1.5)	7.0 (0.8)	6.4 (0.9)	3.4	100.0
Maine	45.2 (2.0)	11.6 (1.3)	15.8 (1.4)	17.5 (1.3)	7.4 (1.0)	2.6	100.0
Maryland	37.4 (1.7)	17.7 (1.4)	26.6 (1.5)	10.6 (0.9)	4.5 (0.7)	3.2	100.0
Massachusetts	34.5 (1.6)	18.6 (1.4)	26.5 (1.5)	11.7 (0.9)	6.5 (0.8)	2.1	100.0
Michigan	51.1 (1.5)	13.3 (1.1)	16.3 (1.1)	10.3 (0.8)	6.2 (0.7)	2.9	100.0
Minnesota	46.0 (1.7)	17.3 (1.4)	19.1 (1.3)	10.3 (0.9)	4.6 (0.7)	2.6	100.0
Mississippi	57.7 (1.9)	12.2 (1.4)	12.0 (1.2)	7.8 (0.9)	7.0 (1.0)	3.3	100.0
Missouri	55.8 (1.9)	11.7 (1.3)	15.3 (1.3)	8.7 (0.9)	4.8 (0.8)	3.8	100.0
Montana	45.3 (2.1)	12.5 (1.4)	15.8 (1.5)	12.0 (1.2)	11.6 (1.3)	2.8	100.0
Nebraska	48.9 (1.8)	16.0 (1.4)	17.0 (1.3)	8.7 (0.9)	6.7 (0.9)	2.7	100.0
Nevada	51.2 (1.8)	15.0 (1.3)	16.3 (1.3)	6.7 (0.7)	6.7 (0.9)	4.1	100.0
New Hampshire	36.6 (1.6)	18.7 (1.3)	25.2 (1.3)	13.3 (0.9)	4.2 (0.6)	2.0	100.0
New Jersey	27.5 (1.4)	27.3 (1.5)	26.5 (1.3)	10.4 (0.8)	6.5 (0.7)	1.9	100.0
New Mexico	51.2 (1.9)	10.8 (1.2)	16.6 (1.4)	8.4 (0.9)	9.7 (1.1)	3.2	100.0
New York	32.7 (1.0)	18.6 (0.9)	27.3 (0.9)	11.5 (0.6)	7.4 (0.6)	2.6	100.0
North Carolina	46.1 (1.5)	13.9 (1.1)	20.7 (1.2)	9.8 (0.8)	6.7 (0.7)	2.9	100.0
North Dakota	48.8 (1.8)	15.7 (1.3)	16.0 (1.2)	8.6 (0.9)	8.3 (0.9)	2.6	100.0
Ohio	51.0 (1.4)	14.0 (1.1)	15.8 (1.0)	9.8 (0.7)	5.9 (0.7)	3.4	100.0
Oklahoma	54.0 (1.7)	12.7 (1.2)	17.5 (1.3)	6.3 (0.7)	5.6 (0.8)	3.8	100.0
Oregon	50.8 (1.7)	13.1 (1.2)	14.7 (1.2)	12.0 (0.9)	6.6 (0.8)	2.8	100.0
Pennsylvania	35.2 (1.3)	16.5 (1.1)	24.3 (1.2)	14.3 (0.8)	7.4 (0.7)	2.3	100.0
Rhode Island	37.2 (1.8)	20.1 (1.5)	20.9 (1.5)	13.2 (1.1)	6.2 (0.9)	2.4	100.0
South Carolina	52.0 (1.8)	15.9 (1.4)	14.8 (1.3)	8.7 (0.9)	5.4 (0.8)	3.2	100.0
South Dakota	48.0 (1.7)	18.4 (1.4)	13.2 (1.1)	9.1 (0.9)	7.8 (0.9)	3.5	100.0
Tennessee	52.4 (1.7)	15.9 (1.3)	14.9 (1.2)	8.6 (0.8)	5.0 (0.7)	3.2	100.0
Texas	59.2 (1.0)	16.6 (0.8)	11.8 (0.7)	5.3 (0.4)	4.2 (0.4)	2.9	100.0
Utah	57.8 (1.8)	13.9 (1.3)	16.5 (1.3)	5.8 (0.7)	3.3 (0.6)	2.7	100.0
Vermont	34.4 (1.9)	12.2 (1.3)	13.6 (1.3)	23.3 (1.5)	15.3 (1.4)	1.2	100.0
Virginia	43.3 (1.7)	17.4 (1.4)	21.2 (1.3)	10.1 (0.9)	5.5 (0.8)	2.4	100.0
Washington	50.2 (1.7)	15.5 (1.3)	16.5 (1.2)	8.9 (0.8)	5.9 (0.8)	3.0	100.0
West Virginia	38.6 (2.0)	10.9 (1.3)	12.4 (1.3)	20.7 (1.4)	13.4 (1.4)	3.9	100.0
Wisconsin	49.3 (1.7)	12.1 (1.2)	15.5 (1.2)	12.1 (0.9)	7.7 (0.9)	3.3	100.0
Wyoming	58.5 (1.5)	15.4 (1.1)	16.9 (1.1)	4.0 (0.5)	3.2 (0.5)	2.0	100.0

See notes on next page.

Frontier Communications Northwest, Inc.
Competing Voice Providers in Frontier's Oregon Wire Centers-Dec 2016

Wire-Center Summary		Provider Counts						
Wire Center, State	Wire-Center CLLI8	Wireline Providers	Fixed-Wireless Providers	Sub-Total, Wireline & Fixed-Wireless Providers	Satellite Providers	Sub-Total, Non-Mobile Wireless Providers	Mobile Wireless Providers	Total, All Competing Voice Providers
ALOHA	ALOHORXX	1	2	3	1	4	4	8
AMITY	AMTYORXX	2	3	5	1	6	4	10
AUMSVILLE	AMVLORXX	2	1	3	1	4	4	8
BROOKINGS	BKNGORXX	2	-	2	1	3	5	8
BANDON	BNDNORXX	2	-	2	1	3	5	8
BANKS	BNKSORXX	1	2	3	1	4	4	8
BEAVERTON	BVTNORXB	1	1	2	1	3	4	7
CLATSKANIE	CLTSORXA	1	-	1	1	2	4	6
COVE	COVEORXX	1	1	2	1	3	6	9
COQUILLE	CQLLORXX	2	-	2	1	3	5	8
COOS BAY	CSBYORXX	2	-	2	1	3	4	7
DETROIT	DTRTORXA	1	-	1	1	2	4	6
DAYTON	DYTNORXA	2	3	5	1	6	4	10
ELGIN	ELGNORXX	1	1	2	1	3	5	8
EMPIRE	EMPRORXX	1	-	1	1	2	4	6
ENTERPRISE	ENTRORXX	1	1	2	1	3	5	8
FOREST GROVE	FRGVORXX	1	2	3	1	4	4	8
GRAND ISLAND	GDISORXX	-	3	3	1	4	4	8
GOLD BEACH	GLBHORXX	1	-	1	1	2	5	7
GRESHAM OR	GRHMORXB	2	-	2	1	3	4	7
GASTON	GSTNORXX	1	2	3	1	4	4	8
HOODLAND	HDLTORXA	2	-	2	1	3	4	7
HILLSBORO	HLBOORXB	1	2	3	1	4	4	8
IMBLER	IMBLORXX	-	1	1	1	2	6	8
IMNAHA	IMNHORXX	-	1	1	1	2	7	9
JOSEPH	JSPHORXX	1	1	2	1	3	5	8
LA GRANDE	LAGRORXB	4	1	5	1	6	7	13
LAKESIDE	LKSDORXX	1	-	1	1	2	5	7
LANGLOIS	LNGLORXX	1	-	1	1	2	5	7
LOSTINE	LOSTORXX	-	1	1	1	2	4	6
MILL CITY	MLCYORXA	2	-	2	1	3	5	8
MCMINNVILLE	MMVLORXX	3	2	5	1	6	4	10
MURPHY	MRPHORXX	2	-	2	1	3	5	8
MYRTLE POINT	MYPNORXX	2	-	2	1	3	5	8
NORTH BEND	NBNDORXX	2	-	2	1	3	4	7
NEWBERG	NWBRORXA	1	2	3	1	4	4	8
ORIENT	ORNTORXA	4	-	4	1	5	4	9
PROVOLT	PRVTORXX	1	-	1	1	2	5	7
PORT ORFORD	PTORORXX	2	-	2	1	3	5	8
POWERS	PWRSORXX	-	-	-	1	1	4	5

Frontier Communications Northwest, Inc.
Competing Voice Providers in Frontier's Oregon Wire Centers-Dec 2016

Wire-Center Summary		Provider Counts						
Wire Center, State	Wire-Center CLLI8	Wireline Providers	Fixed-Wireless Providers	Sub-Total, Wireline & Fixed-Wireless Providers	Satellite Providers	Sub-Total, Non-Mobile Wireless Providers	Mobile Wireless Providers	Total, All Competing Voice Providers
REEDSPORT	RDPTORXX	4	-	4	1	5	5	10
SCHOLLS	SCHLORXX	1	2	3	1	4	4	8
SHERWOOD	SHWDORXA	2	2	4	1	5	4	9
SILVERTON	SLTNORXA	6	2	8	1	9	4	13
SOMERSET WEST	SMRWORXA	1	1	2	1	3	4	7
SANDY	SNDYORXA	4	-	4	1	5	4	9
SUNNYSIDE	SNSDORXX	4	-	4	1	5	4	9
STAFFORD	STFRORXX	2	-	2	1	3	4	7
TIGARD	TGRDORXA	1	-	1	1	2	4	6
BULL MOUNTAIN	TGRDORXC	1	1	2	1	3	4	7
TURNER	TRNRORXA	3	1	4	1	5	4	9
TUALATIN	TULTORXA	1	-	1	1	2	4	6
UNION	UNINORXA	2	1	3	1	4	6	10
VERNONIA	VRNNORXX	-	1	1	1	2	4	6
VALLEY VIEW	VYVWORXA	1	-	1	1	2	4	6
WILSONVILLE	WIVLORXA	2	1	3	1	4	4	8
WALLOWA	WLLWORXX	-	1	1	1	2	4	6
YAMHILL	YMHORXA	1	2	3	1	4	4	8

Source: FCC Form 477 data

Frontier Communications Northwest, Inc.
Price Plan Performance Report

Exhibit E

Confidential

Frontier Communications Northwest, Inc.
Products and Promotions
August 2014 – December 2016

- 1) Promotion - August 25, 2014 through November 21, 2014. Eligible new and existing residential customers that accept this offer and order a Frontier Digital Phone bundle will be given a \$2.99 monthly save credit for three months for the Feature Package. Customer must call to cancel the Feature Package service to avoid charges after the promotional period.
- 2) Promotion - January 1, 2015 through March 31, 2015. Frontier Simply Unlimited, new and existing customers who commit to a one, two or three year term will receive the first line at \$29.99 and lines 2-12 at \$24.99. Customer must subscribe to the Frontier Simply Unlimited Long Distance plan through Frontier Communications Online and Long Distance, Inc., as well as Broadband.
- 3) Promotion - April 1, 2015 through June 29, 2015. New and existing customers who subscribe to Frontier Simply Unlimited and commit to a one, two or three year term will receive the first line at \$29.99 and lines 2-12 at \$24.99. Customer must subscribe to the Frontier Simply Unlimited Long Distance plan through Frontier Communications Online and Long Distance, Inc., as well as Broadband.
- 4) Frontier OneVoice new bundled service, effective September 23, 2015.
- 5) Promotion - October 18, 2015 through January 15, 2016. New or upgraded Business broadband customers who purchase the OneVoice Nationwide at a price point of \$39.99 will be guaranteed the price for the OneVoice Nationwide and the broadband for the life of the account. Customer will sign for a one or two year term. Termination fees as described in the tariff will apply if the customer cancels before the end of the term. Two year term customers will have the broadband installation fees waived. Changes to the product services after January 15, 2016 including broadband speed upgrades/downgrades will disqualify the Price for Life guarantee.
- 6) Promotion - April 1, 2016 through June 29, 2016. New or upgraded Business broadband customers who purchase the OneVoice Nationwide at a price point of \$39.99 will be guaranteed the price for the OneVoice Nationwide and the broadband for the life of the account. Customer will sign for a one or two year term. Termination fees as described in the tariff will apply if the customer cancels before the end of the term. Two year term customers will have the broadband installation fees waived. Changes to the product services after June 29, 2016 including broadband speed upgrades/downgrades will disqualify the Price for Life guarantee.
- 7) Introduce Central Office Connection Charge and Access Line Work Charge, effective October 31, 2016
- 8) Introduce a variety of Operator Services - Busy Verification, Busy Interrupt, Collect Call, Operator Assisted Time and charges and Billed to Third Number, effective November 20, 2016.

Frontier Communications Northwest, Inc.
Other Services
August 2014 – December 2016

- 1) Directory new services, effective May 28, 2014
 Foreign Exchange Listing 1.50
 Extra Lines of Information 1 .50
- 2) Directory Listings rate increase, effective December 14, 2014
 - Nonpublished Service from \$1.25 to \$1.75
 - Nonlisted Service from \$1.25 to \$1.75
 - Additional Listing from \$1.50 to \$2.00
 - Foreign Exchange Listing from \$1.50 to \$2.00
 - Extra Lines of Information from \$1.50 to \$2.00
- 3) Calling Services rate increase, effective November 15, 2015

	Residence MRC		Business MRC		Pay Per Use	
	Prior Rate	Rate as of 11/15/15	Prior Rate	Rate as of 11/15/15	Prior Rate	Rate as of 11/15/15
Call Waiting/Cancel Call Waiting	\$2.12	\$2.62	\$2.12	\$2.62		
Distinctive Ring	\$3.00	\$3.50	\$3.00	\$3.50		
Speed Call 8	\$2.00	\$2.50	\$2.00	\$2.50		
Speed Call 30	\$3.00	\$3.50	\$3.00	\$3.50		
3 Way Calling	\$3.50	\$4.00	\$3.50	\$4.00	\$.75 ¹	\$1.25 ¹
Basic Call Forward	\$2.00	\$2.50	\$2.00	\$2.50		
Call Forward Busy/No Answer	\$3.00	\$3.50	\$3.50	\$4.00		
Call Forward	\$2.00	\$2.50	\$2.00	\$2.50		
Call Forward Busy	\$1.25	\$1.75	\$1.25	\$1.75		
Call Forward No Answer	\$1.25	\$1.75	\$1.25	\$1.75		
Remote Call Forward (RCF)	\$12.00	\$12.50	\$12.00	\$12.50		
Additional Path	\$12.00	\$12.50	\$12.00	\$12.50		
Measured Rated	\$12.00	\$12.50	\$12.00	\$12.50		
Measured Rated Additional Path	\$12.00	\$12.50	\$12.00	\$12.50		
Enhanced Call Forward			\$7.00	\$7.50		
Anonymous Call Block/Rejection	\$.25	\$.75	\$.25	\$.75		
*66 Busy Number Redial	\$2.00	\$2.50	\$2.00	\$2.50	\$.75	\$1.25
*69 Call Return	\$2.95	\$3.45	\$2.95	\$3.45	\$.75	\$1.25
Caller ID with Name	\$6.50	\$7.00	\$8.00	\$8.50		
Caller ID–Number Only	\$5.95	\$6.45	\$7.50	\$8.50		
Priority Call	\$2.00	\$2.50	\$2.00	\$2.50		
Selective Call Acceptance	\$3.00	\$3.50	\$3.50	\$4.00		
Selective Call Forward	\$2.00	\$2.50	\$3.00	\$3.50		

Exhibit G

Selective Call Block/Rejection	\$3.00	\$3.50	\$3.00	\$3.50		
Multiple Simultaneous Call Forward				\$11.00		

¹ Per activation rate not to exceed was \$9.00. As of November 15, 2015 it is \$15.00.

- 4) Directory Listings rate increase, effective January 24, 2016
 - Additional Listing from \$2.00 to \$2.50
 - Foreign Exchange Listing from \$2.00 to \$2.50
 - Extra Lines of Information from \$2.00 to \$2.50
- 5) Operator Services rate increases, effective November 20, 2016
 - Operator Assisted Station-to-Station from \$1.00 to \$1.50
 - Operator Assisted Person-to-Person from \$3.00 to \$3.50
 - Operator Assisted – Corrections from \$1.75 to \$2.25
- 6) Calling Services rate increase, effective December 11, 2016

	Residence MRC		Business MRC		Pay Per Use	
	Prior Rate	Rate as of 12/11/16	Prior Rate	Rate as of 12/11/16	Prior Rate	Rate as of 12/11/16
Call Waiting/Cancel Call Waiting	\$2.62	\$3.10	\$2.62	\$3.10		
3 Way Calling	\$4.00	\$4.50	\$4.00	\$4.50	\$1.25	\$1.75
Basic Call Forward	\$2.50	\$3.00	\$2.50	\$3.00		
Call Forward Busy/No Answer	\$3.50	\$4.00	\$4.00	\$4.50		
Call Forward	\$2.50	\$3.00	\$2.50	\$3.00		
Call Forward Busy	\$1.75	\$2.25	\$1.75	\$2.25		
Call Forward No Answer	\$1.75	\$2.25	\$1.75	\$2.25		
Remote Call Forward (RCF)	\$12.50	\$13.00	\$12.50	\$13.00		
Additional Path	\$12.50	\$13.00	\$12.50	\$13.00		
Measured Rated	\$12.50	\$13.00	\$12.50	\$13.00		
Measured Rated Additional Path	\$12.50	\$13.00	\$12.50	\$13.00		
Enhanced Call Forward	\$7.50	\$8.00	\$7.50	\$8.00		
Anonymous Call Block/Rejection	\$.75	\$1.25	\$.75	\$1.25		
*66 Busy Number Redial					\$1.25	\$1.75
*69 Call Return					\$1.25	\$1.75
Caller ID with Name	\$7.00	\$7.50	\$8.50	\$9.00		

- 7) Moved Busy Verification and Interrupt Services from the tariff (P.U.C. OR. No. 18) and include these services in the Statewide Price List and increase rates. These services were inadvertently excluded from the services and rate elements that were moved to the Statewide Price List during the Pricing Flexibility filing submitted in Advice Letter 1041 on August 28, 2014. Effective December 21, 2016.
 - Busy Verification from \$.80 to \$1.30
 - Busy Interrupt from \$1.50 to 2.00

Frontier Communications Northwest, Inc.
Price Plan Performance Report

Exhibit H

Confidential

Frontier Communications Northwest, Inc.
Price Plan Performance Report

Exhibit I

Confidential