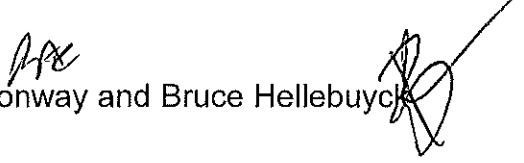



**OREGON PUBLIC UTILITY COMMISSION  
INTEROFFICE CORRESPONDENCE**

**DATE:** October 23, 2019

**TO:** File through Bryan Conway and Bruce Hellebuyck 

**FROM:** Malia Brock 

**SUBJECT:** FRONTIER COMMUNICATIONS NORTHWEST INC: (Docket No. PL 141/Advice No. 066PL) Includes less restrictive language for previously Grandfathered Services.

I have reviewed this filing and recommend that an acknowledgement letter be sent. With this filing, Frontier Communications Northwest Inc. (Frontier) proposes to add less restrictive language for nonrecurring charges for Frontier Digital Phone Unlimited (Challenger) and Unlimited Plus (Challenger). The filing was submitted on October 17, 2019, and went into effect on October 20, 2019.

Applicable Rule or Law

Telecommunications utilities are required under ORS 759.175 to submit tariff filings to the Commission whenever they intend to change their rates, terms, or conditions of service. On August 17, 2018, with Order 18-303 (Docket No. UM 1895), the Commission approved a Price Plan to both Frontier and its affiliate, Citizens Telecommunication Company of Oregon (Citizens) allowed by ORS 759.255.<sup>1</sup>

Analysis

Frontier Digital Phone Unlimited (Challenger), and Frontier and Unlimited Plus (Challenger) are bundled offerings for business customers that were grandfathered in a prior filing, Docket No. PL 88/Advice No. 052SPL.

OAR 860-032-0020(15)(b) allows a telecommunications utility to grandfather a regulated service, without a sunset date, by filing a tariff which designates the service as grandfathered.

This filing removes nonrecurring service order charges for these services.

The filing was submitted on October 17, 2019, with an effective date of October 20, 2019, and therefore complies with the requirements of ORS 759.175 and Section 9.a.ii of the Price Plan.

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<sup>1</sup> Order No. 18-303 was amended on February 14, 2019, with Order No. 19-038.

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*Compliance*

This filing complies with the Price Plan. The filing was submitted more than one day prior to its effective date and therefore complies with the requirements of ORS 759.175 and Section 9.a.ii of the Price Plan.

Conclusion

This filing complies with all applicable laws and Commission orders. The filing has already gone into effect, and an acknowledgement letter should be sent. No further action is necessary.

Frontier.066PL.Grandfathered.Challenger.NRC.Reduction