

**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: August 26, 2020

TO: File through Michael Dougherty and Bruce Hellebuyck

FROM: Russ Beitzel

SUBJECT: FRONTIER COMMUNICATIONS NORTHWEST, LLC.: (Docket No. ADV 1165/Advice No. 20-02)
Change of corporate name.

I have reviewed this filing and recommend that an acknowledgement letter be sent.

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 No. 18-303 (Docket No. UM 1895), the Commission approved a Price Plan applicable to both Frontier Communications Northwest Inc. and its affiliate, Citizens Telecommunications Company of Oregon, as allowed by ORS 759.255.

Section 9.a.i of the Price Plan requires tariff filings to be made at least 30 days prior to their effective dates.

Analysis

Both Frontier Communications Northwest Inc. and Citizens Telecommunications Company of Oregon were purchased by Northwest Fiber LLC and approved with Commission Order No. 20-026 on January 27, 2020 as a result of Docket No. UM 2028. Subsequently, Frontier Communications Northwest, Inc. is now registered as Frontier Communications Northwest, LLC (Frontier or Company).

Frontier attempted to file on July 28, 2020, but the filing was rejected due to file size. The Company received an automated acceptance reply from the Filing Center of the PUC. When notified by Staff that the filing had not occurred, the Company refiled the tariff on Aug 6, 2020 and the maps on Aug 18, 2020 (due to size limitations). For this reason, Staff determined that Frontier was in compliance of the 30 day filing notice.

Frontier's filing proposes to replace its original Tariff No. 18 filed under Frontier Communications Northwest Inc. as the new company, Frontier Communications Northwest, LLC. in Tariff No. 19. A page with a minor error was corrected (Section III, Original Sheet 20) on Aug 12, 2020. Staff accepts this change. A page relating to changes in the OTAP benefit

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amount (Section IV Original Sheet 63) was removed from Frontier's ADV 1165 filing and filed under Docket No. ADV 1163. This filing was made to conform Frontier's new tariff language to reflect Frontier's new ownership and address minor clerical changes.

The filing was submitted on July 28, 2020 then resubmitted on Aug 6, 2020, and August 12 with an effective date of August 28, 2020, and therefore complies with the applicable 30-day filing requirement.

Conclusion

Staff finds that the filing complies with Oregon statutes, applicable Price Plan requirements, and the requirements of ORS 759.175 and therefore, should be allowed to go into effect.

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