



June 15, 2020

***Via Electronic Filing***

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: Responses to May 29, 2020 Secretarial Letter, Docket No. M-2020-3020055**

Dear Secretary Chiavetta,

Please find attached Frontier Communications responses to the Secretarial Letter dated May 29, 2020, Docket No. M-2020-3020055, regarding COVID-19 Customer Service, Billing, and Public Outreach Provisions.

If you have any questions, or require any additional information, please contact me at [carl.yastremski@ftr.com](mailto:carl.yastremski@ftr.com).

Sincerely,

A handwritten signature in blue ink that reads "Carl Yastremski".

Carl Yastremski  
Manager, Regulatory Affairs

Enclosure

Cc: Tom Charles ([thcharles@pa.gov](mailto:thcharles@pa.gov))  
Sarah Dewey ([sdewey@pa.gov](mailto:sdewey@pa.gov))

## Frontier Communications Responses at Docket No. M-2020-3020055

### I. COVID-19 Utility Consumer Service and Billing Policies and Procedures

*Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:*

**Response:** Currently, all customers served by Frontier Communications within the Commonwealth of Pennsylvania are not subject to billing late fees and are protected from the issuance of suspension or termination notices or account treatment.

#### **Termination of Utility Service:**

- *After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?*

**Response:** Frontier had planned to begin termination of service for nonpayment starting July 1, 2020. However, Frontier is aware of Governor Wolf's extension of the state of emergency and the PA PUC's possible extension of its emergency order on suspensions/terminations. Frontier will comply with any directive issued by the PA PUC relative to the date to resume normal account treatment practices consistent with existing PA PUC rules.

- *How does the utility plan to implement terminations and will it start the process with new termination notices?*

**Response:** Frontier plans to re-start account treatment (suspension/termination) notices, which will begin to generate following with the last billing date prior to the lifting of restrictions. Frontier does not plan to commence a new 20-day process following lifting of these restrictions, unless it is part of the resumption of normal business practices performed on a going-forward basis.

- *Broken out by customer class, how many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?*
  - *Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.*

**Response:**

<b>All Customers Subject to Termination</b>		
<b>Customer Class</b>	<b>May-19</b>	<b>May-20</b>
<b>Residential</b>	4,319	3,223
<b>Lifeline</b>	31	16
<b>Commercial</b>	2,625	2,812
<b>Total</b>	6,975	6,051

- *Provide future projections if available.*

**Response:** Frontier has seen a 24.0% increase in unpaid 60-day aged amounts and a 19.8% rise in unpaid aged 90+day amounts during the Commission’s Emergency Order prohibiting terminations, so Frontier’s expectation on future trends is to continue to see a growth of this rate.

- *Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?*

**Response:** Frontier will resume application of restoration fees following lifting of restrictions.

**Universal Service Programs:**

- *Is the utility currently removing customers from CAP for non-payment or failure to recertify?*

**Response:** Customers are not being removed from the Lifeline Program due to non-payment at this time. As a result of the COVID-19 pandemic and consequential financial hardships, the FCC is waiving the recertification and reverification

response deadline for customers currently in the recertification/reverification response window until August 31, 2020.

- *What are the utility's current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history "good faith payment", or CAP participation criteria) and have these requirements been revised due to the pandemic?*

**Response:** Frontier is committed to helping qualified low-income individuals pay for telephone or qualified internet services through its Lifeline Discount Program. Information regarding the Pennsylvania Lifeline Discount Program is available through Frontier call center agents and outlined on Frontier's website <https://frontier.com/resources/discountprograms/lifelineprogram/pennsylvania>.

As a result of the COVID-19 pandemic and consequential financial hardships, the FCC is waiving the recertification and reverification response deadline for customers currently in the recertification/reverification response window until August 31, 2020. This action will prevent the de-enrollment of any Lifeline subscribers who would otherwise have been required to certify their continued eligibility to the National Verifier during the waiver period. In addition, consumers seeking to qualify for the Lifeline program via the income-based eligibility requirements can do so by presenting an official document that confirms their current income information in lieu of the mandated three consecutive months of income documentation.

### **Other Assistance Initiatives:**

- *Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.*

**Response:** Deferred Payment Arrangement offerings extend up to 12 months, with no required down-payment.

- *Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.*

**Response:** See response above.

Utilities are directed to report this information to Sarah Dewey, [sdewey@pa.gov](mailto:sdewey@pa.gov) in the Commission's Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

## II. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, [thcharles@pa.gov](mailto:thcharles@pa.gov), in the Commission's Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

- *Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.*
- *Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.*
- *Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.*
- *Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.*

**Response:** Frontier is committed to helping qualified low-income individuals pay for telephone or qualified internet services through its Lifeline Discount Program. Information regarding the Pennsylvania Lifeline Discount Program is available through Frontier call center agents and outlined on Frontier's website <https://frontier.com/resources/discountprograms/lifelineprogram/pennsylvania>.

As a result of the COVID-19 pandemic and consequential financial hardships, the FCC is waiving the recertification and reverification response deadline for customers currently in the recertification/reverification response window until August 31, 2020. This action will prevent the de-enrollment of any Lifeline subscribers who would otherwise have been required to certify their continued eligibility to the National Verifier during the waiver period. In addition, consumers seeking to qualify for the Lifeline program via the income-based eligibility requirements can do so by presenting an official document that confirms

their current income information in lieu of the mandated three consecutive months of income documentation.

As an ongoing resource, Frontier is maintaining a customer COVID-19 microsite <https://frontier.com/resources/covid-19> outlining useful self-service tools, and key reference information such as FTC consumer protection measures.

*If programs have been modified due to the pandemic, please provide current customer education tools and advertising so that the Commission's own customer education efforts are based on current utility programs and practices.*

**Response:** No changes to existing customer programs have been made other than the preservation of current Lifeline status, consistent with both PA PUC's emergency orders regarding suspensions/terminations as well as the FCC's continuance of Lifeline recertification through August 31, 2020.