Moss & Barnett

May 14, 2018

Mr. Daniel P. Wolf
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of a Commission Inquiry into the Service Quality, Customer Service, and Billing Practices of Frontier Communications
MPUC Docket No.: P-407, 405/CI-18-122

Dear Mr. Wolf:

Enclosed via eFiling, please find Frontier's Answer to the Petition for Reconsideration and/or Clarification of the Minnesota Department of Commerce in the above-entitled docket.

Very truly yours,

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RJJ/keb
Enclosures
cc: Parties of Record

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Before the
Minnesota Public Utilities Commission

Nancy Lange	Chair/Commissioner
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

In the Matter of a Commission Inquiry into the Service Quality, Customer Service, and Billing Practices of Frontier Communications	Docket No. P-407, 405/CI-18-122

Frontier's Answer to the Petition for Reconsideration and/or Clarification of the Minnesota Department of Commerce

I. INTRODUCTION AND SUMMARY

Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC (collectively, "Frontier") submit this Answer under Minn. Rule 7829.3000 to the Petition of the Minnesota Department of Commerce (the "DOC") for Reconsideration and/or Clarification ("DOC Petition") of the April 26, 2018 Order Initiating Investigation and Referring Matter for Public Hearings (the "*April 26 Order*").

As explained below, the DOC Petition should be rejected because the *April 26 Order* is fully supported and appropriate. In contrast, the DOC Petition asks the Commission to expand its jurisdiction and authority to include Internet access services, in clear violation of both federal law and Minnesota statutes.

The *April 26 Order* correctly recognizes the appropriate scope of this docket is "Frontier's telephone service."[1] The *April 26 Order* also correctly recognizes that Internet access services are outside the scope of the Commission's jurisdiction: "[A]cknowledging Frontier's observations that some complaints address matters beyond the Commission's jurisdiction, each notice should clarify the limits of the Commission's jurisdiction over internet service."[2]

The DOC Petition also ignores the consequences of its position. Under the DOC Petition, notices would announce to customers that the Commission has jurisdiction over broadband (which necessarily includes Internet access)[3] that the Commission does not have, and thus encourage customer comments on matters beyond the Commission's jurisdiction at the public hearings. Asserting jurisdiction over Internet access services that the Commission does not have, and encouraging comments related to Internet access services would create false expectations as

[1] *April 26 Order* at 3 ("[T]he Commission finds reason to pursue an investigation of customer service, service quality, and billing practices related to Frontier's *telephone service*.") (emphasis added).
[2] *April 26 Order* at 3.
[3] DOC draft public notice provided on May 9, 2018.

to the purpose of the public hearings, would cause confusion for customers, and needless complications for the Commission, the process and the parties.

The DOC Petition does not raise new issues, point to new and relevant evidence, or expose errors or ambiguities in the *April 26 Order*. Accordingly, there is no basis to reconsider the *April 26 Order*.[4] Rather, as explained below, the DOC Petition asks the Commission to violate state statutes and federal law. Accordingly, there is no basis for reconsideration.

II. THE DOC PETITION SHOULD BE DENIED WITHOUT FURTHER HEARING.

A. The *April 26 Order* established appropriate standards and an appropriate process for providing notice of the public hearings.

The *April 26 Order* appropriately reflects the boundary between the Commission's jurisdiction over telecommunications services and the lack of jurisdiction over Internet access services. The *April 26 Order* noted that Frontier recognized "the Commission's jurisdiction over customer service, service quality, and billing practices related to Frontier's regulated landline phone service," while also noting Frontier's position that "a large share of the complaints appear to pertain to Frontier's internet service. Frontier argues that this service is not subject to the Commission's jurisdiction."[5]

The *April 26 Order* also provided that "Frontier should submit drafts of each type of notice for Commission approval" and that "each notice should clarify the limits of the Commission's jurisdiction over internet service."[6] The Executive Secretary was authorized to approve customer notices, bill inserts, bill format, and any other communications required for this docket.[7] That approach is appropriate and will facilitate completion of the public hearings.

Prior to the filing of the DOC Petition, Commission Staff and parties, including the DOC and the Office of Attorney General, met to discuss the public hearing and customer notice process. Frontier has proposed a draft notice that makes it clear that the public hearings are intended to address service quality and billing issues related to telephone services and other regulated services over which the Commission has jurisdiction, but not Internet access services. The Department, in contrast, and inconsistent with the Commission's Order, has proposed that the notice assert that the Commission has jurisdiction to consider issues pertaining to Internet access services and thereby encouraging the public to attend the hearings to make comments regarding Internet access services. Ultimately, the DOC Petition would create false expectations and confusion for customers. Accordingly, the DOC Petition should be rejected.

[4] *Otter Tail Power Co.*, Docket No. E017/GR-15-1033, Order Granting Reconsideration in Part and Denying in Part at 1 (July 21, 2017).
[5] *April 26 Order* at 2.
[6] *April 26 Order* at 3.
[7] *April 26 Order* at 4.

B. The *April 26 Order* is consistent with Minnesota statutes while adopting the DOC Petition would lead to violation of Minnesota statutes.

The DOC Petition urges the Commission to assert jurisdiction that would be beyond the authority granted by Minnesota statutes and thus violate those statutes.

The *April 26 Order* correctly recognizes that "Minn. Stat. § 237.081 authorizes the Commission to investigate complaints *about telephone service*."[8] That description is completely consistent with the terms of Minn. Stat. § 237.081, which reads in part:

> Subdivision 1.**Commission investigation.** Whenever the commission believes that a service is inadequate or cannot be obtained or that an investigation of any matter relating to any *telephone service* should for any reason be made, it may on its own motion investigate the service or matter …. (Emphasis added).

The DOC Petition does not address Minn. Stat. § 237.081 and instead relies on legislative policy statements. Specifically, the DOC Petition claims that Minn. Stat. §§ 237.011 and 237.012 authorize the Commission to expand its jurisdiction to Frontier's Internet access service.[9] Neither provision supports the DOC Petition.

The plain language of Minn. Stat. § 237.011, which the DOC Petition contends "is directly applicable to the Commission's present fact-gathering process…", forecloses that position. While the Legislature identified as a State goal the encouragement of "economically efficient deployment of infrastructure for higher speed telecommunication services and greater capacity for voice, video, and data transmission", it also limited the Commission consideration of that goal to matters in which the Commission "executes its regulatory duties with respect to *telecommunications services*."[10] As explained below, "telecommunications services" do not include Internet access service.

Minn. Stat. § 237.012 provides even less support to the DOC Petition. The Legislature, through Minn. Stat. § 237.012, has adopted a number of state goals and policies pertaining to broadband,[11] but there is no grant of any additional authority to the Commission, much less any expansion of the Commission's explicit authority under Minn. Stat. § 237.081. A statement of a broad state policy is not a grant of expanded authority, especially when the expansion would conflict with federal law.[12] Such a statement provides no basis to revise other specific statutory terms (*i.e.* Minn. Stat. § 237.081 being limited to "telephone service").

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[8] *April 26 Order* at 2 (emphasis added).
[9] DOC Petition at 3-4.
[10] Minn. Stat. § 237.011 (emphasis added).
[11] Minn. Stat. § 237.012 ("It is a state goal that:…" and "It is a goal of the state that by 2022 and thereafter, the state be in:….").
[12] It is not reasonable to contend that the Legislature silently gave the Commission authority over Frontier's Internet access services, People's Natural Gas Co. v. Minn. Pub. Util. Comm'n, 369 N.W.2d 530, 534 (Minn. 1985) ("The question here is whether the legislature intended, without saying so, to confer a [] power on the Commission."), especially given the reluctance to find implied authority, In re N. States Power Co., 414 N.W.2d 383, 387 (Minn. 1987) ("Historically, we have been reluctant to find implied statutory authority."), and the clear expressions of Congress that Internet access services remain free of state regulation.

C. Adopting the DOC Petition would lead to violation of Federal law.

The DOC Petition recommends that the Commission violate both the Congressional directive in the Communications Act of 1934 as amended (the "Act") to rely on market forces rather than regulation on Internet access service and specific federal prohibitions on state regulation of Internet access service. None of the arguments made in the DOC Petition change that prohibition on any added state obligations of the type recommended in the DOC Petition. Accordingly, the Commission should reject the DOC Petition.

The Act: At the outset, the Act demonstrates Congress's intent that the federal government should exercise exclusive jurisdiction over interstate communications, including Internet access traffic. Section 152 of the Act affords the Federal Communications Commission ("FCC") authority over "all interstate and foreign communication" and "all persons engaged … in such communication,"[13] and reserves state authority only with regard to "intrastate communication service."[14] Congress has also made an explicit decision reflected in 47 U.S.C. § 230(b)(2) "to preserve the vibrant and competitive free market that presently exists for the Internet and other interactive computer services, unfettered by Federal or State regulation."

Section 706: The DOC Petition relies on Section 706 of the Act,[15] mistakenly claiming that because the Commission "has regulatory jurisdiction over telecommunications services…" it may, under Section 706 of the Act, regulate Frontier's Internet access service.[16] Contrary to the DOC Petition, Section 706 "does not constitute an affirmative grant of regulatory authority, but instead simply provides guidance to [the FCC] and the state commissions on *how to use any authority conferred by other provisions of federal and state law.*"[17]

The DOC Petition focuses on the phrase "other regulatory methods" in Section 706 and infers that this phrase is intended as a broad-scale grant of authority that includes traditional quality of service regulation.[18] That argument is refuted by the immediately following words in Section 706 which describe the "other regulatory methods *that remove barriers to infrastructure investment.*" The FCC has also confirmed that the phrase "other regulatory methods" is to be determined by reference to prior terms, which include "price cap regulation, regulatory forbearance, measures that promote competition in the local telecommunications market, or other regulatory methods that remove barriers to infrastructure investment."[19] There is no basis to support the DOC Petition's inference that this term is an invitation for a state commission to impose quality of service regulation.

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[13] 47 U.S.C. § 152(a).
[14] *Id.* § 152(b).
[15] Codified at 47 U.S.C. § 1302.
[16] DOC Petition at 2.
[17] *Restoring Internet Freedom*, Declaratory Ruling, Report and Order, and Order, FCC 17-166, 33 FCC Rcd. 311 at ¶ 195, n. 731 (2018) [*hereinafter 2018 Internet Freedom Order*].
[18] DOC Petition at 2.
[19] *2018 Internet Freedom Order* at ¶ 270 ("Further, consistent with normal canons of statutory interpretation, the language 'other regulating methods' in section 706(a) is best understood as consistent with the language that precedes it, and thus likewise reasonably is read as focused on the exercise of other statutory authority like that under the Communications Act, rather than itself constituting an independent grant of regulatory authority.").

The DOC also quotes the FCC website, which suggests that customers contact their state commissions and describes the importance of broadband.[20] But there is no basis to argue that a suggestion on the FCC website provides a grant of expanded authority, much less a basis to ignore the limitations of Minn. Stat. § 237.081 or overrule decisions of the FCC or federal courts.

FCC and Federal Court decisions: In addition to the prohibition on state regulation of Internet access service found in the Act, the FCC has consistently found that broadband Internet access is an interstate service. Twenty years ago, the FCC concluded that xDSL offerings were interstate in nature.[21] In 2002, the FCC confirmed that broadband communications is an interstate offering. More recently, the *2015 Open Internet Order* reaffirmed the FCC's "longstanding conclusion that broadband Internet access service is jurisdictionally interstate for regulatory purposes."[22] Finally, in the *2018 Internet Freedom Order*, the FCC stated that "it is well-settled that Internet access is a jurisdictionally interstate service."[23] These repeated FCC decisions underscore that decisions regarding regulatory treatment of Internet access service are within the sole province of the federal government, not state public utility commissions.

The FCC has also exercised its preemption authority with respect to Internet access in particular and information services generally, and repeatedly has found that states may not impose requirements that exceed those set forth in federal law.

While there have been significant changes over time to *regulation* of the Internet by *the FCC*, the *prohibition of state regulation* of Internet service has been consistent, whether Internet access service was classified *for FCC regulatory purposes* as a Title I or Title II service. In the *2015 Open Internet Order*, the FCC concluded that Internet access service was a Title II service and that states are precluded "from imposing obligations on broadband service that are inconsistent with the [FCC's] carefully tailored regulatory scheme."[24] The FCC also established that states were bound by its forbearance determinations[25] and announced its "firm intention to exercise [its] preemption authority to preclude states from imposing obligations on broadband service that are inconsistent with the carefully tailored regulatory scheme" it adopted.[26]

While the *2018 Internet Freedom Order* reversed the Title II classification and restored Internet access service to Title I classification, the FCC maintained the prohibition that states may not impose requirements "that are inconsistent with the federal deregulatory approach we adopt today."[27] The FCC expressly held that its regulatory regime precluded concomitant state

[20] DOC Petition at 7.
[21] *GTE Telephone Operating Cos.*, Memorandum Opinion and Order, FCC 98-292 at ¶ 19 (1998).
[22] *Protecting and Promoting the Open Internet*, Report and Order on Remand, Declaratory Ruling, and Order, FCC 15-24, 30 FCC Rcd. 5601 at ¶ 431 (2015) [*hereinafter 2015 Open Internet Order*].
[23] *2018 Internet Freedom Order* at ¶ 199 (quoting Bell Atl. Tel. Cos. v. FCC, 206 F.3d 1, 5 (D.C. Cir. 2000)).
[24] *2015 Open Internet Order* at ¶ 433 ("Finally, we announce our firm intention to exercise our preemption authority to preclude states from imposing obligations on broadband service that are inconsistent with the carefully tailored regulatory scheme we adopt in this Order.").
[25] *2018 Internet Freedom Order* at ¶ 432.
[26] *2015 Open Internet Order* at ¶ 433.
[27] *2018 Internet Freedom Order* at ¶ 194 ("We conclude that regulation of broadband Internet access service should be governed principally by a uniform set of federal regulations, rather than by a patchwork that includes separate state and local requirements. … ")

public utility regulation of broadband Internet access, ultimately concluding "regulation of broadband Internet access service should be governed principally by a uniform set of federal regulations, rather than by a patchwork that includes separate state and local requirements."[28] The FCC went on to state:

> *We therefore preempt any state or local measures* that would effectively impose rules or requirements that we have repealed or decided to refrain from imposing in this order or *that would impose more stringent requirements for any aspect of broadband service that we address in this order*.[29]

The FCC further explained its decision saying:

> *Among other things, we thereby preempt any so-called 'economic' or 'public utility-type' regulation, including common-carriage requirements akin to those found in Title II of the Act and its implementing rules*, as well as other rules or requirements that we repeal or refrain from imposing today because they could pose an obstacle to or place an undue burden on the provision of broadband Internet access service and conflict with the deregulatory approach we adopt today."[30]

Common carriage requirements, such as requirements to extend service, are not allowed because of the burden they could impose and the conflict with the FCC's deregulatory approach. Finally, the FCC recognized that more stringent state requirements could not be allowed because:

> Allowing state and local governments to adopt their own separate requirements, which could impose far greater burdens that the federal regulatory regime, could significantly disrupt the balance we strike here.[31]

Clearly, additional service quality or deployment obligations are preempted.

In short, even with major changes in FCC regulation of the Internet, the prohibition on state regulation of the Internet remained the same. Thus, any state-imposed, sector-specific regulation resulting from an investigation of Frontier's customer service, service quality, and/or billing practices would immediately disturb the federal regime regarding Internet access service, and would be preempted.

Holding public hearings directed to Internet access service complaints would not be constructive because the Commission would be precluded from taking action concerning Internet service rates or service quality using any information it may collect during the public hearings. Broadband Internet access service is an interstate offering classified by the FCC as Title I information service, and the FCC has preempted the states from imposing public utility regulations – including mandates regarding rates and/or service quality – on such offerings.

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[28] *2018 Internet Freedom Order* at ¶ 194.
[29] *2018 Internet Freedom Order* at ¶ 195 (emphasis added).
[30] *2018 Internet Freedom Order* at ¶ 195 (emphasis added).
[31] *2018 Internet Freedom Order* at ¶ 194.

The federal courts have similarly recognized that Internet access services are exempt from state regulation. In *Vonage*, the district court noted that "Congress has expressed a clear intent to leave the Internet free from undue regulation," and added that "[s]tate regulation would effectively decimate" this mandate.[32] In affirming the district court, the Eighth Circuit stated that "*any* regulation of an information service conflicts with the federal policy of nonregulation."[33] Similarly, in *Charter Advanced Services*, the district court concluded that state regulation of Charter's interconnected VoIP offering was "preempted and impermissible."[34]

These FCC and court decisions show that the Commission could not take action with respect to Frontier's offering, availability or quality of Internet access service. As such, there is no reasonable basis to conduct public hearings directed to those topics, which would create confusion and unreasonable consumer expectations. Rather, as the *April 26 Order* provides, the public notices should make it clear that the purpose of its public hearings is to focus on telephone service and other services explicitly regulated by the Commission.

D. The Frontier-Minnesota and CTC-Minnesota AFOR plans require investments at certain levels and do not specify Internet access performance or quality of service levels.

The DOC Petition infers that because the Frontier-Minnesota and CTC-Minnesota AFOR plans impose investment obligations, the Commission can order public hearings into Frontier Internet access services. To the contrary, there is no connection between those AFOR Plans and the public hearings because: (1) there is no indication that Frontier-Minnesota or CTC-Minnesota did not meet the investment commitments in their AFOR plans; and (2) there is no reason to believe that public hearings to receive customer concerns regarding Internet services would provide any information relating to Frontier-Minnesota or CTC-Minnesota investments. As a result, the DOC Petition's claim does not support any modification of the *April 26 Order*.

Frontier has met its AFOR investment obligations. Frontier-Minnesota submitted infrastructure reports in 2018, 2017 and 2016.[35] Those reports showed annual infrastructure spending of $8.4 million (2017), $9.0 million (2016) and $5.8 million (2015). These investment levels are consistent with the Frontier AFOR Plan.[36] CTC-Minnesota submitted infrastructure reports in 2018, 2017 and 2016.[37] Those reports showed annual infrastructure spending of $16.6 million (2017), $14.1 million (2016) and $11.2 million (2015). These investment levels are also consistent with the CTC-Minnesota AFOR Plan.[38]

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[32] Vonage Holdings Corp. v. Minn. Pub. Util. Comm'n, 290 F. Supp. 2d 993, 994 (D. Minn. 2003).
[33] Minn. Pub. Util. Comm'n v. FCC, 483 F.3d 570, 580 (8th Cir. 2007) (emphasis added).
[34] Charter Advanced Servs. (MN) v. Lange, 259 F. Supp. 3d 980, 991 (D. Minn. 2017).
[35] *See* Docket No. P405/AR-14-735.
[36] *Frontier AFOR Plan*, Docket No. P405/AR-14-735, Order Approving Alternative Regulation Plan as Modified at Appendix A, p. 3 (Feb. 23, 2015). ("Frontier invested approximately $20M during 2012, 2013, and 2014. It is expected that capital investment will exceed these levels in the next three years, reflecting the anticipated CAF II impact.").
[37] *Citizens AFOR Plan*, Docket No. P407/AR-15-388.
[38] *Citizens AFOR Plan*, Docket No. P407/AR-15-388, Order Approving Adoption of Existing AFOR Plan (Oct. 19, 2015) ("CTC-Minnesota invested approximately $32M during 2012, 2013, and 2014. It is expected that capital investment will exceed these levels in the next three years, reflecting the anticipated CAF II impact.").

There is nothing in customer concerns that would support any claim that insufficient investments have been made by Frontier under its AFOR plans or any other applicable statutory requirement. Accordingly, nothing in the Frontier-Minnesota AFOR or CTC-Minnesota AFOR supports Commission jurisdiction over Internet quality of service or holding public hearings on Internet service availability or the quality of service.

E. ETC recertification is based solely on whether universal service support is used for authorized purposes, not on customer comments regarding telephone service, much less Internet access service.

The DOC Petition also relies on a description of *Background* in the FCC's *2018 Connect America Fund Order*[39] to argue that Commission annual ETC recertification of Frontier-Minnesota and CTC-Minnesota expands the Commission's jurisdiction over Internet access services provided using broadband facilities that receive universal service support.[40] The *2018 Connect America Fund Order* does not expand the Commission's role. Specifically, the *2018 Connect America Fund Order* simply that: (1) the role of state commissions is to assure that "universal service support is used as intended" for the "provision, maintenance, and upgrading of facilities and services for which the support is intended;" and (2) only ETC's designated by state commissions and certified each year may receive universal service support.[41]

The DOC Petition also incorrectly relies on the *2011 USF/ICC Transformation Order*.[42] Nothing in the *USF/ICC Transformation Order* or in any of the DOC Petition quotes is new or expands the Commission's jurisdiction to include regulation of service quality for Internet access services or imposing state determined deployment requirements for Internet access services.

The DOC Petition notes that ETC recertification by the Commission applies to both regulated telecommunications providers and to providers over which the Commission does not have authority.[43] That assertion is correct, but it has no effect to expand the Commission's jurisdiction over Internet access services or to grant any authority over Internet quality of service or service availability. Rather, the Commission's role, while important, is to verify that the universal service support received by ETCs (whether service regulated by the Commission or not) was used for the intended purposes. The Commission's jurisdiction is concerned with proper use of funds.

The Commission's important role regarding use of high cost support does not include jurisdiction over the quality of service provided by using that support, nor the specifics of deployment of or quality of broadband service. The DOC may think that this is a defect in the federal plan, but the Commission should decline the DOC's invitation to reform federal determinations, or set the scope of public hearings as though such limitations did not exist.

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[39] *Connect America Fund*, Report and Order, Third Order on Reconsideration, and Notice of Proposed Rulemaking, FCC 18-29 (2018) [*hereinafter 2018 Connect America Fund Order*].
[40] DOC Petition at 5-6.
[41] *2018 Connect America Fund Order* at ¶ 11.
[42] DOC Petition at 6 (citing *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17667 (2011)).
[43] DOC Petition at 6.

Customers will have no information regarding use of funds by Frontier and customer comments will provide no information regarding the use of funds or support any inference that the levels of high cost support provided were not used as intended.

III. CONCLUSION

For all of these reasons, the DOC Petition should be denied.

May 14, 2018.

Frontier Communications of Minnesota, Inc.
Citizens Telecommunications Company of Minnesota, LLC

By: */s/ Kevin Saville*

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CERTIFICATE OF SERVICE

In the Matter of a Commission Inquiry into the Service Quality, Customer Service, and Billing Practices of Frontier Communications

MPUC Docket No.: P-407, 405/CI-18-122

Karen E. Berg certifies that on the 14th day of May, 2018, she filed a true and correct copy of **Frontier's Answer to the Petition for Reconsideration and/or Clarification of the Minnesota Department of Commerce on behalf of Frontier Communications of Minnesota, Inc. and Citizens Telecommunications Company of Minnesota, LLC**, by positing it on www.edockets.state.mn.us. Said document was also served via U.S. Mail and e-mail as designated on the Official Service List on file with the Minnesota Public Utilities Commission and attached hereto.

/s/ Karen E. Berg
Karen E. Berg

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_18-122_Official Service List
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_18-122_Official Service List
Brent	Christensen	bchristensen@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_18-122_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-122_Official Service List
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-122_Official Service List
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