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2009 OCT 27 PM 2: 07

IDAHO PUBLIC  
UTILITIES COMMISSION

October 23, 2009

Mrs. Jean Jewell  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, ID 83702

RE: Case No. RUL-T-09-0<sup>1</sup>/<sub>3</sub>, In the matter of the Commission's Review of  
Telecommunications Customer Relations Rules

Mrs. Jewell,

Please find enclosed the original and 4 copies of the comments of Citizens  
Telecommunications of Idaho, dba, Frontier Communications of Idaho.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Ingo Henningsen".

Ingo Henningsen  
Manager, Government and External Affairs

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October 22, 2009

2009 OCT 27 PM 2: 07

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE COMMISSION'S )  
REVIEW OF TELEPHONE CUSTOMER )  
RELATIONS RULES. )

CASE NO. RUL-T-09-03<sup>1</sup>

FRONTIER COMMUNICATIONS )  
OF IDAHO COMMENTS )  
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COMMENTS

Citizens Telecommunications Company of Idaho, dba Frontier Communications of Idaho, (Frontier) respectfully submits the following comments regarding the proposed changes to telephone customer relations rules that were published in the Idaho Administrative Bulletin on October 7, 2009.

Generally, Frontier does not oppose the proposed rule changes. However, there are specific items discussed below that the Commission should consider.

The single issue of greatest concern to Frontier is found in rule 604, "Public Notice" regarding public notice of rate changes. This new section states:

"Telephone companies must give "public notice" of all proposed changes in rates as required by Section 62-606, Idaho Code. Public notice must be reasonably designed to call affected customers' attention to the proposed changes in rates. Legal advertisements alone will not be considered adequate public notice. Individual notice to all customers affected will always constitute public notice. Notices must be provided to individual customers at least thirty (30) days before change is effective." (emphasis added).

Frontier believes that the thirty-day notice period should only apply to rate increases. The current wording would require that companies also provide the thirty-day notice for rate decreases. Section 62-606 specifically excludes rate reductions. It states "... changes that result in price reductions, shall be effective immediately upon filing with the commission and no other public notice shall be required". Therefore, a requirement for advance customer notice of rate reductions is contrary to the wording in the statute. There is no need to delay rate decreases to provide customer notice. Customers would benefit from the rate reduction so there is no protection provided by prior notice and the related delay that would occur. A delay could also impair a regulated providers ability to rapidly respond to changes in the marketplace created by providers that are not subject to Commission regulation. Frontier therefore, recommends that the Commission modify rule 604 to apply only to rate increases. Additionally, the language in Section 607-02, Changes to Price Lists or Tariffs, should be modified to allow rate reductions to become effective upon filing with the Commission.

Frontier also has some concerns regarding rule 309 “Restriction on Termination of Local Exchange Service – Opportunity to Avoid Termination of Local Exchange Service.”

Section 309-02(c) expands the time period when termination of service may be accomplished at premises that are unoccupied and service has been abandoned, to include Fridays. Frontier does not support the need for any restriction on termination of service to an unoccupied premise. This restriction can only lead to additional cost and confusion for service providers. Frontier recommends that there be no time or day restrictions for the disconnection of service to unoccupied premises.

Section 309-2(d) allows for the termination of service to be extended to 9 pm “if the company is unable to gain access to equipment during normal business hours or for illegal use of service”. Frontier does not believe that there should be any restrictions on the time or day for disconnection of service for illegal use of service. If a service is being used illegally, the user has no right to the service and should have no protections regarding disconnection. Frontier therefore, recommends that the rule be modified to allow disconnection of illegal use of service at any time.

Respectfully submitted,



Ingo Henningsen  
Manager, Government and External Affairs