

CWA Local 7270 President Carson Turnquist Remarks to the Minnesota Public Utility Commission - April 14, 2022

My name is Carson Turnquist and I am the president of the Communications Workers of America Local 7270. I'm speaking today as a representative of CWA members working as technicians and in call centers for Frontier in the southern Minnesota area.

I want to thank the Minnesota Public Utilities Commission for undertaking this inquiry into the future of Frontier's telecommunications service in Minnesota. Everyday I see the impact of Frontier's lack of investment in Minnesota among my members. We have spoken to this commission before about the refusal of Frontier to bring on sufficient new staff to replace technicians that have retired or quit. In 2019, CWA represented 100 Frontier members in my Local. That number has been cut by a third to 66 just in the last two years. This is despite the ongoing pandemic and the increasing reliance of our customers on the services Frontier provides. **This week Frontier announced new staff reductions across CWA & IBEW units in Minnesota. For CWA, this reduction will apply to a group of technicians that perform installation and repair functions for customers. We do not know what else Frontier might have planned for the Minnesota workforce now that the 2020 Service Quality settlement has expired.**

The Commission opened this investigation following approval of Frontier's bankruptcy-related restructuring to seek assurance that Frontier had a plan to sufficiently invest in the Minnesota network to ensure the long-term viability and resiliency of critical telecommunications services for Minnesota customers. Other state regulatory agencies that approved Frontier's restructuring had similar concerns and sought binding investment commitments to assure that service would be adequate.

CWA believes that Frontier has failed to comply with Commission's September 29, 2021 order, which intended to understand Frontier's plans for investment in telecommunications services in Minnesota, and was not limited to the company's evolving definition of the phrase "Virtual Separation." Unfortunately, Frontier's "informational filings" in this docket lack transparency, resort to generic statements, and fail to address this explicit instruction by the Commission to provide information regarding Frontier's investment plans in Minnesota.

For example, Frontier states that "InvestCo" and "ImproveCo" are not in current use by the company, despite the fact that Frontier negotiated settlements that are under enforcement by regulatory agencies in other states that use this terminology.

We urge the Commission to adopt decision option number 2 outlined in the staff memo and require Frontier provide information that is responsive to the Commission's September 29th Order, including:

1. Frontier's current plans for fiber and other investment in Minnesota
2. The "wave" of investment Minnesota service areas have been placed in under Frontier's current long-term investment plan
3. Information describing how those investment plans were determined
4. Frontier's plans to deploy sufficient staffing and resources to maintain service quality for Minnesota customers following the expiration of the 2020 Service Quality settlement in January 2022.

The Commission's investigation into these issues is critical both for my members and for Frontier customers across the state. Thank you again for the chance to summarize our concerns today. I and my colleague Dan Reynolds would be happy to try and answer any questions you may have.

Possible Commission Questions

- Specifics of staffing needs - how is low staffing hurting customers?

Important maintenance tasks are not being performed because of a lack of staffing.

Currently there is one person assigned to central office maintenance throughout Frontier's southern Minnesota service area, assigned to critical tasks like checking batteries and generator maintenance. This technician is charged with maintaining one hundred units across a five city area.

In the past, Frontier maintained dedicated technicians for cable maintenance, work that is not being assigned now.

- Frontier's fiber deployment - What areas are being left behind?
- Service Quality Settlement
 - What actions has Frontier taken to improve service quality? Why are these not sufficient to ensure long-run service quality?

The company cites metrics tracked under the service quality concerned with repair response and cites actions it has taken to respond and restore service for customers. This does not address actions Frontier has taken to improve maintenance of the network. It's investment in maintenance that can ensure service quality over the long-run, especially now that Frontier's reporting obligations under the service quality docket have expired.