

## FRONTIER COMMUNICATIONS OF THE CAROLINAS LLC

# Annual Report to the North Carolina General Assembly Joint Legislative Commission on Governmental Operations

# STATE OF THE COMPANY'S OPERATIONS January 29, 2016

(filed pursuant to G.S. §62-133.5(k))

Prepared by: Susan A. Miller, Manager

Government and Regulatory Affairs
Frontier Communications of the Carolinas LLC



#### Introduction

On January 30, 2012, Frontier Communications of the Carolinas LLC ("Frontier") filed notice with the North Carolina Utilities Commission ("NC Commission") of its election to have its rates, terms and conditions for services determined pursuant to G.S. §62-133.5(h) ("Subsection H").

Under this subsection of the statute, Frontier is required to continue offering stand-alone basic residential lines to all customers who choose to subscribe to that service, and rate increases for that service are limited to the percentage increase over the prior year in the Gross Domestic Product Price Index. The rates, terms, and conditions of Frontiers other retail services — excluding the low-income residential Lifeline program — are not governed by the NC Commission.

The NC Commission does, however, retain jurisdiction over enforcement of federal requirements on the local exchange company's marketing activities, telecommunications relay service, the Life Line program, State universal service funding (pursuant to G.S. 62-110(f1)), carrier of last resort obligations (pursuant to G.S. 62-110), management of the numbering resources involving that local exchange company, and rates, terms, and conditions of wholesale services.

#### Competition

Competition in the communications industry is intense. Frontier experiences competition from many communications service providers, including cable operators offering video, data and Voice over Internet Protocol ("VoIP") products, wireless carriers, long-distance providers, competitive local exchange carriers, Internet providers, and other wireline carriers. On a national level, the most recent FCC Mobile Wireless Competition Report, issued December 23, 2015, indicates that 97.2% of the total United States population has mobile wireless voice coverage available from three or more service providers. The same report indicates that 99.9% of the population has wireless voice coverage from at least one provider. The FCC Report also indicates that 46.7% of adults in the United States live in a household that has a wireless phone but not a landline phone. The comparable percentages for North Carolina are not included in the report, but are believed to be equal to or higher than national averages.



Information on telephone subscribership specific to North Carolina is no longer reported by the FCC, but trends reflected in older FCC publications<sup>1</sup> show a steady increase in non-incumbent local exchange providers' and wireless companies' market share, while the number of lines served by ILECs and the ILECs' market share declined:

#### **North Carolina**

Year End Telephone Subscriptions (Millions)

	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>
ILEC	3.2	2.9	2.7	2.5	2.3
% of Market	26%	22%	20%	19%	17%
Non-ILEC	1.2	1.5	1.6	1.7	1.8
% of Market	10%	12%	12%	13%	14%
Wireless/Mobile	8.1	8.5	9.1	9.0	9.0
% of Market	65%	66%	68%	67%	69%

Frontier believes that these trends have continued through 2014 and 2015, as the number of its own switched access lines in North Carolina have also declined during the same period. The majority of this loss is attributable to customers who migrate from landline service to strictly wireless service – in other words, customers who "cut the cord" – and customers who switch to other non-wireless providers, including cable providers.

Frontier believes that election under Subsection H has enabled it to compete more effectively in the North Carolina telecommunications market. Not only does Frontier have more pricing and product flexibility, it has been able to reduce regulatory overhead costs to a level closer to parity with the wireless and cable companies and other local providers.

#### **Service Quality**

Frontier believes its quality of service has improved since it made its election under Subsection H. Although results from Frontier customer surveys are not available at this time, there has been a decline in filed complaints.

The total number of customer complaints submitted to Frontier from the Public Staff of the North Carolina Utilities Commission and from the North Carolina Office of the Attorney General declined for a fourth year in a row since Frontier's election under Subsection H.

<sup>&</sup>lt;sup>1</sup> "Local Telephone Competition: Status as of December 31, 2013" issued October 16, 2014 by the Federal Communications Commission Industry Analysis and Technology Division of the Wireline Competition Bureau, Tables 13, 14 and 18.



### **Local Exchange Rates**

Frontier's monthly basic local exchange rates for residential service increased by approximately 1.5% in 2015 – the first such increase since 2012. Basic residential service monthly rates are \$20.52 in the Durham area and Union County, and \$22.12 in the western portion of the state.

Frontier also offers bundled services that include unlimited local and domestic long distance calling, with additional discounts available when customers also subscribe to other services such as high speed internet or satellite television programming.