verizon

One Verizon Way
MailStop DM
Basking Ridge, NJ 07920

Joseph A. Post
Associate General Counsel
State Regulatory Affairs
(212) 519-4717
(732) 947-8096
joseph.a.post@verizon.com

May 18, 2026

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Case 24-C-0537 – Plan for Implementation of Audit Report

Dear Secretary Phillips:

Pursuant to Ordering Paragraphs 2 through 5 of the Commission's March 19, 2026 "Order Releasing Audit Report," Frontier Communications Parent, Inc. respectfully submits this Plan for Implementing the Recommendations of the Final Report of the Focused Operations Audit.[1]

Respectfully submitted,

Joseph A. Post

Joseph A. Post

[1] The time for filing this Plan was extended by the Secretary in letters dated April 20, 2026 and May 4, 2026.

Case 24-C-0537

Plan of Frontier Parent, Inc. for Implementing the Recommendations of the Final Report of the Focused Operations Audit

May 18, 2026

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

AUTOMATION OF SERVICE QUALITY REPORTING AND DETECTION OF REBATE TRIGGERING CONDITIONS

1.1 The Recommendation

Audit Report Reference: Section III.D., Recommendation No. 1

Audit Recommendation: Automate generation of Monthly Service Quality Reports as well as the detection of customer rebate triggering conditions under program Case 08-C-1140 to reduce manual workload and error rate.

1.2 Implementation Actions

Frontier will undertake the following actions:

- Identify authoritative system sources for access line counts, trouble tickets, CTRR, and OOS metrics.
- Develop automated monthly summary reports listing customer trouble report rates (CTRR) for each central office entity (COEs). If Frontier's rolling 12-month average CTRR remains under 90%, a summary report will list the COEs with a CTRR exceeding 3.3, thus identifying the COEs for which rebates are required.

1.3 Implementation Schedule and Timeline

Start Date: Q2 2026

Target Completion Date: Q2 2027

Key Milestones:

- IT Requirements definition and system design – Q3 2026
- Development and testing – Q4 2026 to Q1 2027
- Parallel run and validation – Q2 2027

1.4 Executive Responsibility

Executive Sponsor: VP, Data Engineering

1.5 Deliverables and Evidence of Implementation

- System-generated Monthly Service Quality Reports.
- Management certification of implementation completion.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

1.6 Cost/Benefit Summary

Estimated Costs:

- One-time system development and integration costs were previously estimated at $15,000 in response to Information Request 168. The actual implementation costs may be higher, but cannot be precisely quantified at this time. It should be noted that this initiative will address other recommendations as well. See, for example, the discussions of Audit Area 1, Nos. 2 through 6 and Audit Area 2, No. 1 of this Plan.
- Ongoing system maintenance costs are estimated to be modest and are expected to be below the ongoing costs of manual report generation.

Expected Benefits:

- Greater accuracy in reporting and identifying the COEs that qualify for rebates.
- Reduced costs of reporting and correct identification of COE that qualify for rebates.

1.7 Cost Tracking and Financial Oversight

Implementation costs will be tracked through designated project codes.

1.8 Risks and Mitigation Measures

Risks:

- Complexity of integrating new programming within legacy Frontier systems.
- The newly-developed Frontier systems may not be utilized if these functions are migrated to Verizon systems as part of the post-acquisition integration process.

Mitigation: The first risk will be mitigated by phased deployment, parallel testing, and manual fallback controls during the transition to automation.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

REVISE CTRR THRESHOLD CALCULATION

2.1 The Recommendation

Audit Report Reference: Section III.D., Recommendation No. 2

Audit Recommendation: Correct the formulas for counting the number of COEs that meet the 3.3 threshold to use the exact threshold as identified in Uniform Measurement Guidelines ("<=3.3") instead of Frontier's current formula, which uses the mathematical expression "<3.35."

2.2 Implementation Actions

This logic will be incorporated in the automation initiative described in Section 1.1, above, to identify the COEs that qualify for a rebate. However, pending development of the necessary systems, the recommendation will be implemented in the company's manually-generated reports.

2.3 Implementation Schedule and Timeline

Start Date: May 2026 (manual implementation)

Target Completion Date: May 2026 (manual implementation)

2.4 Executive Responsibility

Executive Sponsor: VP, Regulatory Reporting & VP, Data Engineering

2.5 Deliverables and Evidence of Implementation

The access line counts and trouble ticket counts are currently reported to New York state using a DPS-prescribed Excel file, which calculates the CTRRs in protected cells. This file is the source of the data for the workpapers that are used to manually calculate the 12-month rolling average CTRR for each COE, which is in turn the basis for determining the rebates for which Frontier will be liable under the OMP.

2.6 Cost/Benefit Summary

Estimated Costs: There will be no costs for manual implementation. See Section 1.1, above, for automation costs.

Expected Benefits: See note at end of this section of the Plan.

2.7 Cost Tracking and Financial Oversight

See Section 1.1, above.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

2.9 Note

Frontier stated in its public comments that its CTRR calculation approach is consistent with the Telecommunications Service Quality Uniform Measurement Guidelines issued in Case 97-C-0139, that it applies rebate standards consistent with Case 08-C-1140, and that this recommendation is therefore unfounded.[2] For these reasons, Frontier believes that this recommendation should not be implemented. (*See* Order at page 9.)

[2] See Company Comments (uploaded to the PSC's website on March 19, 2026) ("Company Comments"), at 1.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

REVISE COUNT OF COEs USED IN MONTHLY SERVICE QUALITY REPORTS

3.1 The Recommendation

Audit Report Reference: Section III.D., Recommendation No. 3

Audit Recommendation: Revise the COE list on Monthly Service Quality Reports by adopting the COE list used in the Service Quarterly Quality Reports under Case 20-C-0267 to increase the accuracy of Service Quality reporting and rebate program, and to reduce the manual workload of the Frontier regulatory team. This change would align service quality reporting for Frontier of Rochester with the rules, which prescribe that reporting is done by Switch or Exchange rather than Rate Center. In the alternative, if keeping the COE list currently used in Monthly Service Quality Reports, remove the Jefferson Road COE that is marked inactive. Align the COE definitions used across service quality reporting frameworks.

3.2 Implementation Actions

Frontier will remove Jefferson Road from the list of COEs for which customer trouble report rates (CTTR) are reported to DPS. This change will initially be made in the manual reporting and then will be incorporated into the automated reporting discussed in Section 1.1, above.

3.3 Implementation Schedule and Timeline

Start Date: May 2026 reporting (manual).

Target Completion Date: May 2026 reporting (manual)

3.4 Executive Responsibility

Executive Sponsor: VP, Regulatory Reporting

3.5 Deliverables and Evidence of Implementation

Monthly and quarterly service quality reporting will reflect 209 COEs.

3.6 Cost/Benefit Summary

Estimated Costs: There will be no costs for this change in the manual reporting process. For automation costs, see Section 1.1, above.

Expected Benefits: See Section 1.1, above.

3.7 Cost Tracking and Financial Oversight

See Section 1.1, above.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

3.8 Note

Frontier noted in its public comments that the Joint Stipulation and Agreement in Case 08-C-1140 (Open Market Plan), Section D, page 7, explicitly provides that the rebate program was to be based on 210 COEs.[3] Frontier believes any changes would require a Commission Order and be prospective only. For this reason, Frontier believes that this recommendation should not be implemented. (*See* Order at page 9.)

[3] See Company Comments at 1-2.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

REMOVE ISDN FROM ACCESS LINE COUNTS

4.1 The Recommendation

Audit Report Reference: Section III.D., Recommendation No. 4

Audit Recommendation: Regarding the procedure for compiling line counts and tickets for Monthly Service Quality Reports metrics: remove ISDN lines from considerations as directed by the Uniform Measurement Guidelines.

4.2 Implementation Actions

Remove ISDN lines from access line counts. This change will initially be made in the manual reporting and then will be incorporated into the automated reporting discussed in Section 1.1, above.

4.3 Implementation Schedule and Timeline

Start Date: This recommendation was implemented for the current manual reporting with the report for November 2025. See Section 1.1, above, for the anticipated automation schedule.

Target Completion Date: See Section 1.1, above.

4.4 Executive Responsibility

Executive Sponsor: VP, Regulatory Reporting and VP, IT Development

4.5 Deliverables and Evidence of Implementation

- Quarterly service quality reporting will exclude ISDN lines.
- Management will certify completion of implementation.

4.6 Cost/Benefit Summary

See Section 1.1, above.

4.7 Cost Tracking and Financial Oversight

See Section 1.1, above.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

REMOVE CUSTOMER-NEGOTIATED APPOINTMENTS FROM OOS CALCULATION

5.1 The Recommendation

Audit Report Reference: Section III.D., Recommendation No. 5

Audit Recommendation: Correct the denominator in the Frontier formula for %OOS>24 Hours to remove tickets with all customer-negotiated appointments regardless of whether these tickets were cleared within or beyond the 24-hour time frame. Given Frontier's position that it should be able to take credit for tickets for which customers requested or accepted repairs outside the 24 hours but which were cleared within 24 hours, seek clarification from the Commission on the treatment of these tickets in metric %OOS>24 Hours.

5.2 Implementation Actions

Frontier will revise its manual reporting of %OOS>24 to conform to the first sentence of this recommendation. However, consistent with the recommendation, Frontier will seek clarification on how to proceed from the Commission prior to making any programming changes.

5.3 Implementation Schedule and Timeline

Start Date: Q2 2026

Target Completion Date: Any potential changes in programming will be implemented as part of programming discussed in Section 1.1, above.

5.4 Executive Responsibility

Executive Sponsor: VP, Regulatory Reporting and VP, IT Development

5.5 Deliverables and Evidence of Implementation

Management certification of implementation upon completion.

5.6 Cost/Benefit Summary

See Section 1.1, above.

5.7 Cost Tracking and Financial Oversight

See Section 1.1, above.

Audit Area 1: Customer Operations Internal Controls and Processes (Section III of Audit Report)

CLASSIFICATION OF TICKETS AS OOS/NOOS

6.1 The Recommendation

Audit Report Reference: Section III.D., Recommendation No. 6

Audit Recommendation: Regarding Frontier's classification of tickets into OOS and NOOS in general trouble ticket databases: (i) Review and revise the formula for identifying OOS tickets to make sure all tickets describing out of service situations in field "Report Cd Ds" (a description of the Report Code) are counted as OOS; (ii) Improve trouble ticket creation process, develop guidelines and conduct training for customer agents, Interactive Voice Response ("IVR"), online chat bots/Artificial Intelligence ("AI") assistants who receive and record information on customer troubles to make sure OOS tickets are properly classified and given repair priority.

6.2 Implementation Actions

- Part (i): Frontier will program all "no dial tone" tickets to default to an Out-of-Service ticket, regardless of conflicting information that may be entered in the system by a customer service agent.
- Part (ii): Frontier will send reminders to the agents to flag "no dial tone" tickets as Out-of-Service. However, disregarding the Out of Service indicator on "no dial tone" tickets and counting all those tickets as Out of Service, remedies the issue.

6.3 Implementation Schedule and Timeline

Manual implementation will be reflected in the May 2026 reporting; automated implementation will be part of the initiative described in Section 1.1, above.

6.4 Executive Responsibility

Executive Sponsor: VP, Regulatory Reporting and VP, IT Development

6.5 Deliverables and Evidence of Implementation

Management certification of implementation completion.

6.6 Cost/Benefit Summary

See Section 1.1, above.

6.7 Cost Tracking and Financial Oversight

See Section 1.1, above.

Audit Area 2: Root Causes of Service Quality Failures
(Section IV of Audit Report)

DIFFUSION OF BEST PRACTICES

1.1 The Recommendation

Audit Report Reference: Section IV.D., Recommendation No. 1

Audit Recommendation:

[i] Frontier should establish a formal process through which the NY Directors of Field Operations in Frontier's Field Operations and Services and their Local Managers are provided with system generated CTRR and %OOS>24 Hours reports.

[ii] The NY Directors of Field Operations in Frontier's Field Operations and Services Group should work with Staff to identify the COEs that are consistently meeting the %OOS>24 Hours metric, as well as those COEs that are chronically missing that metric. (Consultant can provide initial lists based on our findings).

[iii] Next, they should form a working group to establish a process by which those NY Directors and their Local Managers for field techs can share their best practices aimed at improving performance on that metric in the other COEs in NY that have been experiencing substandard performance. This process should include both (1) regular meetings (e.g. on a quarterly basis) to devise and refine these best practices, in the form of a written document; and (2) opportunities for training of Local Managers (and potentially the field techs they supervise) to impart those best practices.

1.2 Implementation Actions

- Part [i]: This has already been partially implemented. The New York Directors of Field Operations and the Local Managers receive, via email, CTRR and %OOS>24 reports at the COE level monthly. In the longer run, the programming initiative described in Section 1.1, above, will include the creation of a dashboard to which field directors and managers will have access.

- Part [ii]: Frontier will schedule an initial meeting with DPS Staff to review COEs that consistently miss service quality metrics.

- Part [iii]: A list of best practices will be developed and periodically revised in consultation with field directors and managers. A working group will be established and will meet on a quarterly basis to discuss those practices. As best practices are identified and refined, they will be cascaded to the field through meetings, bulletins, and other means identified in the quarterly meetings.

Audit Area 2: Root Causes of Service Quality Failures
(Section IV of Audit Report)

1.3 Implementation Schedule and Timeline

Start Date:

- Part [i]: Field Operations currently receive monthly service quality reports via email. They will receive access to system generated reports dependent on completion of the automation initiative discussed in Section 1.1, above.
- Part [ii]: A meeting with DPS will be scheduled within the next 45 days.
- Part [iii]: A working group will be established in Q3 2026.

Target Completion Date:

- Part [i]: Access to system generated reports is dependent on the programming initiative discussed in Section 1.1, above.
- Part [ii]: Frontier will continue to meet with DPS until DPS determines the meetings are no longer necessary.
- Part [iii]: The working group will continue until lower performing COEs achieve sustained compliance.

Milestones: Identification of priority COEs – Q2 2026

1.4 Executive Responsibility

Executive Sponsor: SVP, Field Operations & Services and Regional Directors of Field Operations

1.5 Deliverables and Evidence of Implementation

- Development of Best Practices Document and recurring meetings taking place.
- COE-level service quality metrics demonstrating stabilization or improvement.
- Management certification of implementation completion.

1.6 Cost/Benefit Summary

Estimated Costs: Minimal costs.

Expected Benefits:

- Improved timeliness of repairs.
- Reduced %OOS>24 failures.

Audit Area 2: Root Causes of Service Quality Failures
(Section IV of Audit Report)

1.7 Cost Tracking and Financial Oversight

Minimal costs.

1.8 Risks and Mitigation Measures

Risk: Service quality does not show improvement.

Mitigation: Set up more frequent meetings to review practices and results. Reevaluate manpower requirements.

Audit Area 2: Root Causes of Service Quality Failures
(Section IV of Audit Report)

UTILIZE CONTRACTORS TO AUGMENT EXISTING STAFF

2.1 The Recommendation

Audit Report Reference: Section IV.D., Recommendation No. 2

Audit Recommendation: To the extent Frontier cannot achieve compliance with existing Technician headcount, it should utilize contractors to augment its current staff until it reaches compliance across its COEs.

2.2 Implementation Actions

- This recommendation by its terms only applies "[t]o the extent Frontier cannot achieve compliance …." Thus, the initial implementation step will be to assess the results of implementing the consultant's other recommendations in order to determine whether substantial compliance has been achieved or whether additional force will be necessary. Frontier's conclusions in this regard will be set forth in a memorandum to DPS Staff.

- If additional force is necessary, Frontier will consider its headcount and, to the extent it utilizes contractors, it will do so only to the extent then permitted by the collective bargaining agreements applicable in each of its service areas. Some CBAs do include restrictions on the use of contractors. Only as necessary and permitted, qualified contractors would be engaged to supplement the work force during periods of elevated demand, targeting COEs where demand outweighs available force.

2.3 Implementation Schedule and Timeline

As described under "Implementation Actions," the scheduling of the implementation steps will depend upon the timing of other elements of this Plan.

2.4 Executive Responsibility

Executive Sponsor: SVP, Field Operations & VP, Operations (Dispatch)

2.5 Deliverables and Evidence of Implementation

- The memorandum described in Section 2.2, above.

- Management certification of implementation completion.

2.6 Cost/Benefit Summary

Estimated Costs: Incremental operating expenses associated with contractor utilization. These expenses cannot be quantified at this time.

Audit Area 2: Root Causes of Service Quality Failures
(Section IV of Audit Report)

Expected Benefits:

- Improved timeliness of repairs.
- Improved compliance with %OOS>24 metrics.

2.7 Cost Tracking and Financial Oversight

Contractor costs will be tracked as operating expenses and reviewed by Operations Finance and executive management.

2.8 Risks and Mitigation Measures

Risk: Over-reliance on contractors.

Mitigation: Periodic reassessment and transition back to internal staffing where feasible.

Audit Area 2: Root Causes of Service Quality Failures
(Section IV of Audit Report)

USE OF "SPOT AWARDS" AS INCENTIVES

3.1 The Recommendation

Audit Report Reference: Section IV.D., Recommendation No. 3

Audit Recommendation: Consultant also recommends human resources and/or Director of Operations be given the flexibility to provide "spot awards" to Local Managers that consistently demonstrate results compliant with state regulatory requirements and/or that have taken traditionally underperforming reporting centers to centers that meet state regulatory reporting requirements with respect to CTRR and %OOS>24 Hours. We understand NYDPS Staff prefers this approach only be considered after compliance is consistently demonstrated based on appropriate investment and also, labor force, as is noted in the recommendation immediately above.

3.2 Implementation Actions

It is unclear whether this recommendation, in referring to "spot awards," is intended to be limited to one-time payments, or whether it is intended to encompass other monetary incentives as well. Under Frontier's current practices, off-cycle merit increases can be provided to Local Managers who exceed expectations. Frontier's Human Resources organization disfavors one-time payments as an incentive, but this may change as part of the post-acquisition integration process. Consistent with the consultant's statement as to Staff's preference, we propose that implementation of additional incentives should be deferred until "after compliance is consistently demonstrated" because of integration and the implementation of the consultant's other recommendations.

3.3 Implementation Schedule and Timeline

See discussion in Section 3.2, above.

3.4 Executive Responsibility

Executive Sponsor: Dir, Operations

3.5 Deliverables and Evidence of Implementation

Management certification of implementation completion.

3.6 Cost/Benefit Summary

Estimated Costs: Minimal, and any costs will be driven by improved service quality results.

Expected Benefits: Local Managers are incentivized to drive positive service quality results.

3.7 Cost Tracking and Financial Oversight

Minimal.

3.8 Risks and Mitigation Measures

Risk: None.

Mitigation: N/A.

Audit Area 3: Preventative Maintenance Program
(Section V of Audit Report)

PREVENTATIVE MAINTENANCE PROGRAM (PMP)

1-3.1 The Recommendation

Audit Report Reference: Section V.D., Recommendations Nos. 1-3

Audit Recommendation:

No. 1: The automated PMP should remain in place on a going forward basis. Recommendations are made to strengthen the PMP in Nos. 3 and 4 below.

No. 2: The PMP should continue to be managed on a statewide basis.

No. 3: [i] Frontier should retrain its field technicians and local managers to ensure that PMP tickets are properly closed out within the MTP [Mobile Tech Portal], consistent with the procedures used for installation and trouble tickets. [ii] The Company should also review its PMP ticket data on a quarterly basis to identify and address gaps in ticket completion, thereby ensuring it can demonstrate that PMP activities are completed on time.

No. 4: See following Section (4.1).

1-3.2 Implementation Actions

Nos. 1 and 2: Completed. The PMP is in force and is managed on a statewide basis.

No. 3[i]: Completed. Frontier completed re-training in September 2025.

Beginning September 2025, the Central Office Team implemented monthly checkpoints, occurring during the third week of each month. At that time, any routines at risk of being missed will be prioritized and expedited for completion.

The communication below was shared with all teams, and it has been documented that each team member received the message.

> *CO Team,*
>
> *Monthly and quarterly CO generator and CO battery PMP routines are essential tests to ensure equipment readiness for our customers in the event of a commercial power outage. These routines are critical to sustaining system reliability and compliance.*
>
> *To support timely completion, a* ***weekly report*** *listing all sites with incomplete tasks will be sent out by the local manager. This report serves as a reminder and accountability measure.*

Audit Area 3: Preventative Maintenance Program
(Section V of Audit Report)

Action Required:

- *You are expected to **respond to acknowledge receipt** of this notice.*
- *Complete the **VX ticket** (if applicable), or the task directly in **PMP** (if no VX ticket is issued).*
- *Upload the **generator maintenance document** to the **PMP Database** to record the completed activity.*

*All CO sites must have both **monthly and quarterly PMP routines** completed as indicated in PMP. This data is also used for **regulatory reporting**, so accuracy and timely execution are essential.*

No. 3[ii]: Frontier will review its PMP ticket data on a quarterly basis to identify and address gaps in ticket completion, thereby ensuring it can demonstrate that PMP activities are completed on time.

1-3.3 Implementation Schedule and Timeline

Completed.

1-3.4 Executive Responsibility

Executive Sponsor: Dir, Operations

1-3.5 Deliverables and Evidence of Implementation

- 3[i]: Weekly reports. Email to CO employees reminding them of the requirement to close PMP tasks in systems.
- 3[ii]: Reports of quarterly reviews.

1-3.6 Cost/Benefit Summary

Estimated Costs: Minimal costs.

Expected Benefits:

- Improved network resilience.
- Enhanced tracking and ability to demonstrate compliance with PMP tasks.

1-3.7 Cost Tracking and Financial Oversight

None necessary.

Audit Area 3: Preventative Maintenance Program
(Section V of Audit Report)

1-3.8 Risks and Mitigation Measures

Risk: Incomplete technician adoption.

Mitigation: Supervisory oversight and periodic audits of task completion records.

Audit Area 3: Preventative Maintenance Program
(Section V of Audit Report)

PMP: Review of Outage Data

4.1 The Recommendation

Audit Report Reference: Section V.D., Recommendation No. 4

Audit Recommendation: Frontier should review the customer outage data (including related trouble tickets and technician notes identified in Appendix 8 to this report) and its closed PMP tickets to determine the extent to which outages could have been avoided through more rigorous or enhanced PMP routines. The Company should report its findings to the Department and implement any necessary changes to the PMP to reduce avoidable customer outages following a loss of commercial power.

4.2 Implementation Actions

On a monthly basis, Frontier will reconcile all trouble tickets identified as being caused by a commercial power outage with the power-testing reports referenced in Audit Area 3, No. 3V 3. This reconciliation will verify the date and results for the most recent testing for each affected site. Frontier will report its findings on a quarterly basis to NY DPS along with plans to implement changes.

4.3 Implementation Schedule and Timeline

Start Date:

- Q2 2026 to perform monthly review.
- Q3 2026 report on 2Q findings.

Target Completion Date:

- Q2 2026 monthly review will be implemented.
- Q3 2026 report on quarterly findings will be implemented.

4.4 Executive Responsibility

Executive Sponsor: Dir, Operations

4.5 Deliverables and Evidence of Implementation

Monthly report on tickets caused by a commercial outage and most recent testing/inspection date and results.

Audit Area 3: Preventative Maintenance Program
(Section V of Audit Report)

4.6 Cost/Benefit Summary

Estimated Costs: Minimal costs.

Expected Benefits: Improved network resilience.

4.7 Cost Tracking and Financial Oversight

Minimal costs.

4.8 Risks and Mitigation Measures

Risk: Tickets may be due to commercial power outage at the customer premises and not the central office which may not be captured in the technician notes. Technician notes are often vague or incomplete.

Mitigation: Reliance on trouble ticket disposition codes.

Audit Area 4: Adequacy of Reporting under Case 20-C-0267
(Section VI of Audit Report)

Reporting Under 2020 Agreement

1.1 The Recommendation

Audit Report Reference: Section VI.D., Recommendation No. 1

Audit Recommendation: Consultant recommends stopping quarterly reporting under the 2020 Restructure Settlement Agreement, or in alternative, reducing the scope of reporting to only OOS metrics.

1.2 Implementation Actions

Frontier will limit quarterly reporting to the OOS>24 Hours metric.

1.3 Implementation Schedule and Timeline

Start Date: Q2 2026

Target Completion Date: Q2 2026

1.4 Executive Responsibility

Executive Sponsor: VP, Regulatory Reporting

1.5 Deliverables and Evidence of Implementation

Quarterly service quality reporting on OOS>24 Hours at the 209 COE level. (When the second quarter report is filed in July 2026 it will include revised January through March results.)

1.6 Cost/Benefit Summary

Estimated Costs: No added cost.

Expected Benefits: Consistent reporting between monthly CTRR reports and OOS>24 Hours quarterly reports.

1.7 Cost Tracking and Financial Oversight

None.

1.8 Risks and Mitigation Measures

Risk: Minimal risk.

Mitigation: N/A.

Audit Area 5: Accuracy of Reports Filed with the Commission (Section VII of Audit Report)

There are no stand-alone recommendations for this Audit Area.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

IMPLEMENTATION OF PROCESS IMPROVEMENTS TO KPI

1.1 The Recommendation

Audit Report Reference: Section VIII.D., Recommendation No. 1

Audit Recommendation: Frontier should implement system/process improvements to improve KPI performance related to Days to Close and Days to Create. The goal of these improvements should be to more consistently meet the applicable resolution timeframes in accordance with the established benchmark. Potential improvements may involve evaluating agent workforce allocation, assignment, and management; specifically identifying ("flagging") and addressing customers/BTNs with repeat complaints; increased automation; assessing ticket prioritization practices; hiring additional agents; etc.

1.2 Implementation Actions

Completed Q3 2025. Frontier developed expanded reporting to flag/prioritize outstanding repair-related complaints. Frontier also automated the ticket creation process, reducing time and effort. This frees up more time to focus on customer interactions, resolutions, and root-cause analysis rather than on initial clerical intake.

1.3 Implementation Schedule and Timeline

Start Date: Implementation complete.

Target Completion Date: Completed.

1.4 Executive Responsibility

Executive Sponsor: Manager, Office of the President

1.5 Deliverables and Evidence of Implementation

Management certification of implementation completion.

1.6 Cost/Benefit Summary

Estimated Costs: Minimal.

Expected Benefits:

- Sustainable compliance with complaint KPIs.
- Improved customer outcomes.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

1.7 Risks and Mitigation Measures

Risk: Minimal risk.

Mitigation: N/A.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

IDENTIFY AND TRACK COMPLAINT "HOT TOPICS"

2.1 The Recommendation

Audit Report Reference: Section VIII.D., Recommendation No. 2

Audit Recommendation: Frontier should establish a formal process to identify, record, and track Hot Topics and process improvements discussed during the closed-loop feedback process/weekly structured meetings. The process should identify and document each actionable Hot Topic/process improvement, track dissemination to other departments and leadership teams, and monitor implementation and impacts.

2.2 Implementation Actions

Completed. In Q3 2025, "hot topic" submissions were transitioned to an Excel-based tracking system. This centralized tracker captures key details for each submission, involved stakeholders, actions taken, and the date the issue was resolved. This enhancement improved visibility, accountability, and follow-through on high-priority items.

2.3 Implementation Schedule and Timeline

Start Date: Implementation complete.

Target Completion Date: Completed.

2.4 Executive Responsibility

Executive Sponsor: Manager, Office of the President

2.5 Deliverables and Evidence of Implementation

- Management certification of implementation completion.
- Hot Topic File.

2.6 Cost/Benefit Summary

Estimated Costs: Minimal (process and reporting enhancements).

Expected Benefits: Improved tracking and feedback regarding "hot topics."

2.7 Cost Tracking and Financial Oversight

Minimal.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

2.8 Risks and Mitigation Measures

Risk: Data quality or consistency.

Mitigation: Supervisor oversight and reinforced training.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

ROOT CAUSE ANALYSIS FEEDBACK AND COACHING

3.1 The Recommendation

Audit Report Reference: Section VIII.D., Recommendation No. 3

Audit Recommendation: Customer complaint KPIs should be expanded to monitor/track RCA [Root Case Analysis] feedback/coaching. These KPIs should evaluate frequency, quality, and consistency of RCA feedback/coaching.

3.2 Implementation Actions

Completed.

For clarification, RCA Feedback Forms are meant to indicate a need for coaching the individual who caused a "people driven" complaint. They are submitted by the OOTP agent.

In 3Q 2025, the Office of the President began to incorporate outstanding root cause analysis for its Frontier employees in monthly leadership reports. These reports contain coaching recommendations issued in response to people-driven complaints. The file includes both complete and pending coaching recommendations by site, leader, and agent.

3.3 Implementation Schedule and Timeline

Start Date: Implementation complete.

Target Completion Date: Complete.

3.4 Executive Responsibility

Executive Sponsor: Manager, Office of the President

3.5 Deliverables and Evidence of Implementation

Management certification of implementation completion.

3.6 Cost/Benefit Summary

Estimated Costs: Minimal (process and reporting enhancements).

Expected Benefits: Improved communication of root cause analysis of customer service issues caused by Frontier employees to leadership.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

3.7 Cost Tracking and Financial Oversight

Minimal.

3.8 Risks and Mitigation Measures

Risk: Data quality or consistency.

Mitigation: Supervisor oversight.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

WEEKLY REPORTS TO FIELD TEAMS

4.1 The Recommendation

Audit Report Reference: Section VIII.D., Recommendation No. 4

Audit Recommendation: Frontier should establish a process in which management and field leaders responsible for New York are provided with weekly reports summarizing customer complaints, with a special focus on open New York-specific repair-related customer complaints and issues that need to be addressed. Frontier can build upon similar reports that are generated for other states.

4.2 Implementation Actions

Completed. In Q3 2025, the Office of the President began to send weekly reports to the New York field teams. This report includes all complaints requiring actions from the field operations teams. For easy navigation, the report lists the responsible Local Manager, Reporting Center, and any relevant notes that could help explain the issue and the requested resolution.

4.3 Implementation Schedule and Timeline

Start Date: Implementation complete.

Target Completion Date: Completed.

4.4 Executive Responsibility

Executive Sponsor: Manager, Office of the President

4.5 Deliverables and Evidence of Implementation

A sample of an emailed file.

4.6 Cost/Benefit Summary

Estimated Costs: Minimal (process and reporting enhancements).

Expected Benefits: Field operations may prioritize resolving open complaints.

4.7 Cost Tracking and Financial Oversight

Minimal.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

4.8 Risks and Mitigation Measures

Risk: Field operations does not utilize the weekly reports.

Mitigation: Supervisor oversight.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

WEEKLY REPORTS TO FIELD TEAMS

5.1 The Recommendation

Audit Report Reference: Section VIII.D., Recommendation No. 5

Audit Recommendation:

[i] Job performance evaluations of OOTP personnel should incorporate KPI performance. For instance, evaluation criteria for an OOTP employee should include his/her performance related to the Days to Close and Days to Create KPIs, with specific improvement goals established for each reporting period. These evaluation factors may also include the employee's performance related to preventing escalations and repeat complaints.

[ii] In addition, while the OOTP workforce has been relatively stable in recent years (meaning that attrition is likely not a primary factor in OOTP being unable to consistently meet the KPIs), Frontier should investigate whether additional OOTP headcount will achieve consistent compliance with KPIs. If it is determined that Frontier is understaffed to consistently meet the KPIs, then Frontier should devise a staffing plan to add headcount in OOTP sufficient to achieve consistent KPI compliance.

5.2 Implementation Actions

Part [i]: For clarification, we note that Office of the President personnel are generally not responsible for Days to Close KPIs, as most times resolution closure is dependent on actions taken within other departments. Most repairs are sent to the field operations team and if that team fails to timely resolve an issue, this would not reflect any performance failure on the part of an OOTP agent. Moreover, union-represented employees are not subject to year-end performance evaluations. KPIs are part of year-end review for leadership, and we submit that that should be deemed to constitute completed implementation of Part [i] of this recommendation.

Part [ii]: Frontier will perform a review of OOTP headcount.

5.3 Implementation Schedule and Timeline

Start Date: Q3 2026

Target Completion Date: Q4 2026

5.4 Executive Responsibility

Executive Sponsor: Manager, Office of the President

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

5.5 Deliverables and Evidence of Implementation

Management certification of implementation completion.

5.6 Cost/Benefit Summary

Estimated Costs: Minimal.

Expected Benefits: Better understanding of resource needs.

5.7 Cost Tracking and Financial Oversight

Minimal.

5.8 Risks and Mitigation Measures

Risk: Minimal.

Mitigation: N/A.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

PMP Reports for Repair-Related Complaints

6.1 The Recommendation

Audit Report Reference: Section VIII.D., Recommendation No. 6

Audit Recommendation: Frontier technicians in New York should inspect OSP associated with New York-specific repair-related complaints (see Recommendation #4 above), coordinate those inspections through an electronic database, and identify network problems that need addressed in order to avoid future problems and repeat/escalated customer complaints.

6.2 Implementation Actions

The PMP database will be enhanced to capture repair related complaint tickets. It is currently Frontier practice to inspect outside plant when performing repairs to the network.

6.3 Implementation Schedule and Timeline

Start Date: Q3 2026

Target Completion Date: Q4 2026

6.4 Executive Responsibility

Executive Sponsor: VP, Data Engineering

6.5 Deliverables and Evidence of Implementation

Management certification of implementation completion.

6.6 Cost/Benefit Summary

Estimated Costs: Minimal.

Expected Benefits: Identification of plant needing repair to reduce repeat troubles.

6.7 Cost Tracking and Financial Oversight

Minimal.

Audit Area 6: Customer Complaints
(Section VIII of Audit Report)

6.8 Risks and Mitigation Measures

Risk: Integration complexity across legacy systems and upcoming migration to Verizon systems.

Mitigation: Phased deployment, parallel testing, and manual fallback controls during transition to automated tracking.