



**JOSEPH J. STARSICK, JR.**  
Associate General Counsel  
Frontier Communications  
1500 MacCorkle Ave., S.E.  
Charleston, West Virginia 25396  
(304) 344-7644  
[Joseph.Starsick@FTR.com](mailto:Joseph.Starsick@FTR.com)

March 18, 2022

**Via Electronic Filing**

Karen Buckley  
Acting Executive Secretary  
Public Service Commission  
201 Brooks Street  
Charleston, West Virginia 25301

**Re: Case No. 22-0274-T-C - Ohio County 9-1-1 v. Frontier West Virginia Inc.**

**Case No. 22-0275-T-C - West Virginia Enhanced 9-1-1 Council v. Frontier West Virginia Inc.**

**Case No. 22-0277-T-C - Marshall County 9-1-1 v. Frontier West Virginia Inc.**

**Case No. 22-0278-T-C - Brooke County 9-1-1, v. Frontier West Virginia Inc.**

Dear Ms. Buckley:

Please find attached for filing an **Answer of Frontier West Virginia Inc.** in the above-referenced matter.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph J. Starsick, Jr.", with a stylized flourish at the end.

Joseph J. Starsick, Jr.  
(State Bar No. 3576)

JJSjr/sc  
Attachment

cc: Ohio County 9-1-1  
West Virginia Enhanced 9-1-1 Council  
Marshall County 9-1-1  
Brooke County 9-1-1  
Complainants  
Angie McCall  
Frontier

**PUBLIC SERVICE COMMISSION  
OF WEST VIRGINIA  
CHARLESTON**

**CASE NO. 22-0274-T-C**

**OHIO COUNTY 9-1-1,  
Wheeling, Ohio County,**

**Complainant,**

**CASE NO. 22-0275-T-C**

**WEST VIRGINIA ENHANCED 9-1-1 COUNCIL,  
Hinton, Summers County,**

**Complainant,**

**CASE NO. 22-0277-T-C**

**MARSHALL COUNTY 9-1-1,  
Moundsville, Marshall County,**

**Complainant,**

**CASE NO. 22-0278-T-C**

**BROOKE COUNTY 9-1-1,  
Wellsburg, Brooke County,**

**Complainant,**

**v.**

**FRONTIER WEST VIRGINIA INC.  
a public utility,**

**Defendant.**

**ANSWER OF FRONTIER WEST VIRGINIA INC.**

Defendant, Frontier West Virginia Inc. ("Frontier"), for its Answer in these consolidated proceedings, says:

1. West Virginia has a resilient enhanced 9-1-1 network. Most West Virginia wire centers with 9-1-1 public safety answering points (“PSAPs”) are on fiber optic rings. Using Synchronous Optical Network (“SONET”) technology, if the fiber is damaged on one side of the ring, traffic is automatically rerouted to the other side, and enhanced 9-1-1 service remains uninterrupted. In addition to the SONET network rings, the Enhanced 9-1-1 selective routers and the Enhanced 9-1-1 tandem switches in the State are redundant.

2. In early March, unrelated events caused unusual outages in the network affecting PSAPs on the same ring. Frontier respectfully believes that the issues are best addressed on an informal basis between Frontier and the affected PSAPs at the working level. As of the date of this Answer, the West Virginia Enhanced 9-1-1 Council and Ohio County 9-1-1 already have accepted mediation, to which Frontier has agreed. Pending responses by the Brooke and Marshall County PSAPs, Frontier will respond further as follows.

**March 4th outage impacting Hancock, Ohio, Brooke, Harrison-Taylor County PSAPs**

3. On March 4, 2022, at approximately 2:37 AM, Frontier’s National 911 Customer Care Center was notified of network issues impacting trunks and Automatic Line Identification (ALI) circuits serving Hancock, Ohio, Brooke, Harrison-Taylor County PSAPs.

4. At 3:39 AM, Frontier instituted rerouting of calls according to the instructions provided to Frontier by each PSAP.

5. Following troubleshooting, it was determined that an issue in a controller card in the network had caused issues with associated working and protect cards in other locations. The card issues were remotely resolved, and service was restored at approximately 4:17 AM.

6. Following 911 PSAP service interruption procedures, Frontier’s Customer Care Center contacted the PSAPs to verify service was restored, and successful test calls were made.

**March 5th outage impacting Ohio, Grant, Harrison-Taylor, Brooke, Barbour, Tyler, Marshall, Wetzel County PSAPs**

7. On March 5, 2022, at approximately 4 PM, Frontier's 911 National Call Center began to receive calls from PSAPs reporting a service outage.

8. On one side of the fiber ring, a tow truck with its boom fully extended hit Frontier aerial cable in Tunnelton, West Virginia, causing significant damage to Frontier's network which included damaging multiple poles and ripping fiber and copper lines down.


9. Frontier dispatched construction, splicer, and line crews to assess and complete damage repairs, including placing new poles, repairing facilities, and other work to reestablish network connectivity. The necessary work was completed at 10:46 AM on March 6, 2022.

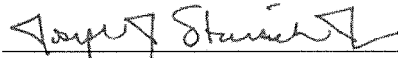
10. Unrelated to the tow truck damage, a separate and unrelated SONET outage in Frontier's network was detected between Sistersville and Moundsville at 7:54 PM on March 5, 2022.

11. Extensive diagnostic and repair work commenced. Service was restored at 10:59 PM on March 6, 2022.

12. The Tyler County PSAP remained down, but recovered service after it contacted its equipment vendor and rebooted its equipment.

Frontier West Virginia Inc.

  
Affiant



Joseph J. Starsick, Jr. (WV State Bar #3576)

Associate General Counsel

Frontier Communications

1500 MacCorkle Avenue, S.E.

Charleston, West Virginia 25396

(304) 344-7644

[Joseph.Starsick@FTR.com](mailto:Joseph.Starsick@FTR.com)

*Attorney for Frontier West Virginia Inc.*

**VERIFICATION**

STATE OF SOUTH CAROLINA

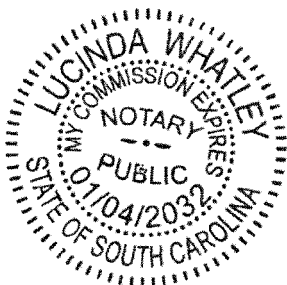
COUNTY OF HORRY

I, Angela C. McCall, after first being duly sworn, state that I am State Government Affairs Manager of **Frontier West Virginia Inc.**, and that, as State Government Affairs Manager, I am authorized to verify the Statement in Case Nos: 22-0274-T-C, 22-0275-T-C, 22-0277-T-C, and 22-0278-T-C and I state that said verified Statement is true and correct to the best of my knowledge, information and belief.

**Frontier West Virginia Inc.**

  
State Government Affairs Manager

Taken, sworn to and subscribed before me this 17<sup>th</sup> day of March 2022.



  
Notary Public

**CERTIFICATE OF SERVICE**


I, Joseph J. Starsick, Jr., Counsel for Defendant Frontier West Virginia Inc., do hereby certify that I have served the foregoing Answer upon the parties via electronic mail, this 18<sup>th</sup> day March 2022, addressed as follows:

Ohio County 9-1-1  
c/o Theresa Russell  
1500 Chapline Street  
Wheeling, WV 26003  
[trussell@ohiocountywv.gov](mailto:trussell@ohiocountywv.gov)  
*Complainant*

West Virginia Enhanced 9-1-1 Council  
c/o Michael G. Tatum  
451 1<sup>st</sup> Avenue  
Suite 101  
Hinton, WV 25951  
[mtatum@ccerc911.org](mailto:mtatum@ccerc911.org)  
*Complainant*

Marshall County 9-1-1  
c/o Carol Robinson  
601 Seventh Street  
Moundsville, WV 26041  
[crobinson@marshallcountywv.org](mailto:crobinson@marshallcountywv.org)  
*Complainant*

Brooke County 9-1-1  
c/o Christina White  
632 Main Street  
Wellsburg, WV 26070  
[cwhite@commission.state.wv.us](mailto:cwhite@commission.state.wv.us)  
*Complainant*

  
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Joseph J. Starsick, Jr. (WV State Bar #3576)