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November 24, 2018

The Vermont Public Utilities Commission
Attn: Judith Whitney, Clerk of the VT PUC
112 State Street
Montpelier, VT 05620

Re: DPS Petition re Consolidated SQ Investigation, Docket No. 18-3231-PET

Dear Ms. Whitney,

I am a part time resident of Stowe (Bull Moose Ridge Road in Sterling Valley) and my wife Barbara and I split time between Stowe and Bryn Mawr, Pennsylvania. I was formerly the Cabinet level Secretary of Pennsylvania's Department of Environmental Protection (PADEP) from 2011 to 2013 so I am aware of the issues and challenges of proper organizational management. While PADEP Secretary, I also worked very closely with then Pennsylvania Public Utility Commission Chairman (and my good friend), Rob Powelson, on matters of mutual concern to both PADEP and the PA PUC so I also have a keen experiential awareness of the issues the Vermont PUC, and the three PUC Commissioners, face and the importance of the PUC's role with respect to the public and the regulated community.

I must share with you my profound disappointment in what I have personally observed on numerous occasions as a complete abdication of responsibility by Consolidated Communications in virtually every respect. It is clear that the public interest is not currently being served by Consolidated and that the Vermont PUC needs to take action to compel Consolidated to perform at a much higher level without delay or equivocation.

Two recent examples that I can provide from my personal experience will illustrate.

First, on or about October 4, 2018 I discovered upon arrival that our telephone and internet was totally down, *i.e.*, no dial tone. After some neighborhood investigation it turned out that our entire road in Sterling Valley was completely without telephone or internet service because an underground line had been accidentally cut a day or two before. I telephoned Consolidated to report this and the service representative had no idea of the situation; in other words I knew more about what had happened than she did. After further discussion with the Consolidated representative I was given a target service date of October 13th which was a full 9 days later and more than 9 days after the service had been lost. It is obviously a default by Consolidated to serve the public interest when an entire block of customers is left with no service line at all for necessary communications for a period of over 9 days.

In recent proceedings before the PA PUC in *Petition of Communications Workers of America for a Public, On-the-Record Commission Investigation of the Safety, Adequacy, and Reasonableness of Service Provided by Verizon Pennsylvania, LLC*, Docket No. P-2015-2509336, expert witness Susan M. Baldwin testified that, “[i]n various states that I am familiar with, PUCs set an objective in terms of percentage of out-of-service trouble reports cleared within a specified interval of time (e.g., 90% within 24 hours for repairing 4 out of service troubles). She further testified that the basic standard for non-emergency out-of-service trouble calls is as follows: “the benchmark is [response] within 24 hours.” It is clear that Consolidated is flagrantly deficient.¹

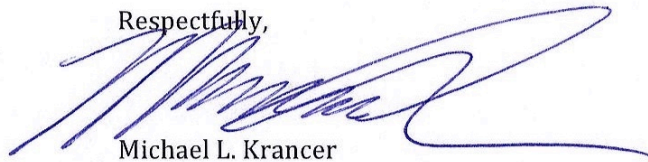
This systemic Consolidated deficiency in service is no small matter. As Ms. Baldwin further testified, “[i]f dial tone lines do not function, the network cannot be considered adequate and safe.” Clearly, Consolidated is failing in its duty to allocate sufficient organizational resources to the maintenance of its network and/or it is seriously mismanaging the resources it has.

Second, I contacted Consolidated on November 23, 2018 to request telephone and internet service be installed at a second property we recently purchased just down the street from where we reside. After spending 45 minutes on the telephone with the service representative I was told that the single address actually had two hook-up locations; a garage and the main house; not a problem of course. I requested service at both locations in the same house. To my total dismay I was told not only that the service install dates for the same physical address would be on two different dates but that the service dates would not be until December 12th and 13th -- a full 19 and 20 days later. Clearly the public interest is not being served with such lethargic service install response times.

What is perhaps an even more egregious example of Consolidated’s inability to conduct its business in the public interest, Consolidated was systemically unable to schedule a single service install visit for the same location. Instead, it had to be two different visits for the exact same house. That blatant inefficiency in scheduling ability and rendering of services is an obvious mismanagement and waste of resources and reason alone for the VT PUC to take decided action to force Consolidated to deliver on its obligation to provide reasonable and efficient service to the public.

The docket in this matter already shows that you are hearing from others with similar or worse experiences and I’m sure the docket will be quite crowded with more evidence of deficiencies on the part of Consolidated as time goes on. There is a clear basis here for the Vermont PUC to act decisively to compel compliance by Consolidated to fulfill its obligation to serve the public interest.

Respectfully,



Michael L. Krancer

¹ See: https://www.cwa-union.org/sites/default/files/baldwin_testimony_final_verified.pdf