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May 15, 2023

**SENT VIA ELECTRONIC MAIL**

Robert Osborn  
Director, Communications Division California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

Subject: Compliance with D.21-04-008, Ordering Paragraph 4 (e)

Dear Mr. Osborn:

Pursuant to Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008, Frontier Communications Corporation, Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California Inc. (U 1024 C), Frontier Communications of the Southwest Inc. (U 1026 C), Frontier Communications Online and Long Distance Inc. (U 7167 C), and Frontier Communications of America, Inc. (U 5429 C) (collectively, "Frontier") is hereby providing its quarterly report for first quarter 2023.

I can be reached at [Jenny.Smith@ftr.com](mailto:Jenny.Smith@ftr.com) or by phone at 916-686-3533 if there are any questions.

Sincerely,

Jenny Smith  
Director, Government and Regulatory Affairs

Cc:

David Reed, Compliance Monitor CPUC  
Liza Tano, CPUC  
Shonta Bryant, CPUC  
[CDCompliance@cpuc.ca.gov](mailto:CDCompliance@cpuc.ca.gov)

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

Pursuant to Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008, Frontier Communications Corporation, Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California Inc. (U 1024 C), Frontier Communications of the Southwest Inc. (U 1026 C), Frontier Communications Online and Long Distance Inc. (U 7167 C), and Frontier Communications of America, Inc. (U 5429 C) (collectively, “Frontier”) is hereby providing its quarterly report for Q2 2022.

Public Advocates Settlement Agreement Attachment 1, Paragraph A.1 - Frontier will spend at least \$1.75 billion in capital expenditures within California over four calendar years—2021-2024. At least \$222 million of these capital expenditures will be for service quality and network enhancement projects to meet Commission General Order (“G.O.”) 133-D standards and improve service quality, network redundancy, and reliability for existing facilities and will be exclusive of expenditures related to Fiber to the Premises (“FTTP”) deployment as described in paragraph 19 of this Agreement. No more than 10% of the \$1.75 billion, or \$175 million, may come from the Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund (“RDOF”) or the California Advanced Services Fund (“CASF”). Frontier will expend a minimum of \$400 million per year for each of the four years. By the end of year two, Frontier will meet at minimum 50% of the capital expenditure commitment (\$875 million) and by the end of year four, Frontier will meet at minimum 100% of the capital expenditure commitment (\$1.75 billion).

Status update: In compliance. See following status on Public Advocates Settlement Agreement Attachment 1, Paragraph A.2. To date, Frontier has received approximately \$3.2M of RDOF funding for California, which is below 10% of the to-date capex spend since emerging from Chapter 11 and well below 10% of \$1.75 billion.

Public Advocates Settlement Agreement Attachment 1, Paragraph A.2 - By March 1, 2021, and annually thereafter for three years, Frontier will provide a California-specific, confidential capital expenditure budget (broken down by California ILEC operating entity and into the Frontier categories of Success Based Capex, Total Revenue Projects, Maintenance, and Other). By March 1st of each year starting in 2022 and annually until March 1, 2025, Frontier will also report actual capital expenditures compared to budgeted capital expenditures annually for the prior calendar year, with an explanation of variances between the budget and actual expenditures. In addition, Frontier will report capital expenditures for service quality and network enhancement projects as part of these annual reports. Frontier’s last report on capital expenditures will be issued by March 1, 2025 or earlier, to reflect capital expenditures for calendar year 2024. These reports will be served on Cal Advocates, TURN, CWA, the Yurok Tribe and the Commission’s Communications Division.

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Status: In compliance. Frontier submitted its 8-month budget on May 28, 2021. Frontier submitted the 12-month budget for May 2021 through April 2022 along with May 2021 through Jan 2022 spend on March 1, 2022. Frontier filed its May 2021 through April 2022 (12-month) spend and budget on May 31, 2022.

Frontier filed its 9 months capital spend for May 2022 through January 2023 against the 12-month budget on February 28, 2023, and will file its 12-month capital spend for May 2022 through April 2023 (12-month) spend on or before May 30, 2023. The filing will reflect that Frontier spent more than \$875 million for the second 12-month period since emerging from Chapter 11 and is on track to satisfy the \$1.75 billion spend commitment over four years.

On each report, Frontier reflects the capital spend specific to service quality and network enhancement projects to meet Commission General Order (“G.O.”) 133-D standards. The spend amounts are specific to maintenance and repair of the copper network. Frontier is on track to spend the committed \$222 million.

Note: Pursuant to the Public Advocates Settlement Agreement Attachment 1, footnote 5, the timing of Frontier’s capital expenditure commitments is contingent upon Frontier completing the Restructuring as described in its application and emerging from Chapter 11 on or before March 31, 2021. To the extent Frontier’s emergence is delayed beyond March 31, 2021, the expenditures timeframes will commence at Frontier’s emergence from Chapter 11 and the applicable period for the capital expenditure commitment will continue for four years thereafter.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.3 - Within 60 days after emergence from Chapter 11, Frontier will provide a detailed confidential report that: 1) identifies each wire center by California ILEC; 2) identifies the number of FTTP served locations within each wire center and the total served locations in the wire center; 3) ranks the wire centers by out of service (“OOS”) performance for each California ILEC; 4) identifies, by wire center, the “root causes” for OOS events; 5) ranks the root causes for each of the wire centers that fall into the top 25% of non-compliance with the OOS metric; 6) identifies each project currently identified to use the “investment in lieu of fines” structure pursuant to G.O. 133-D, including the location, budget, and status of each project; and 7) for each wire center, identifies whether the wire center serves tribal lands and the number of tribal locations served. This report will be served on Cal Advocates, TURN, CWA, the Yurok Tribe, and the Commission’s Communications Division.

Status: Complete. Frontier submitted its detailed confidential report on June 25, 2021.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.4 - Within 90 days after emergence from Chapter 11, Frontier will submit a detailed plan identifying actions Frontier will take to improve service quality, including but not limited to OOS performance. Frontier will prepare this plan with input from Cal Advocates, TURN and CWA. This plan will evaluate and identify the specific geographic wire centers that have experienced the highest number of OOS

conditions not restored in 24 hours as well as extended outages consistent with G.O. 133-D OOS reporting requirements. The plan will include data specific to tribal lands. The plan will identify specific actions to be taken by Frontier, including but not limited to plant repair and maintenance, investment and hiring, and semi-annually thereafter, Frontier will submit a report on actions taken, the success and challenges related to those actions, and expenditures made to enhance service quality. Expenditures in this report will be broken down by wire center (or next mutually agreeable level of detail) and further broken down into mutually agreeable categories to allow monitoring of expenditures aimed to address root cause issues (e.g. plant, labor, investment, repair). This plan will be provided to Cal Advocates, TURN, CWA, the Yurok Tribe, and the Commission’s Communications Division.

Status: In compliance. Frontier submitted its confidential report on July 29, 2021. Frontier submitted its first semi-annual report on actions taken on January 31, 2022. Frontier filed its second semi-annual report on actions taken on July 28, 2022. Frontier filed its third semi-annual report on actions taken on January 31, 2023, Frontier continues to make progress on the projects that have been identified. The projects on the reports are for maintenance and repair to the copper network.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.5 – For three years after emergence from Chapter 11, Frontier will provide each affected customer a customer credit of \$5/day for any OOS period greater than 24 hours, or \$10/day if the customer is located on tribal lands in addition to any outage credit currently required through a tariff or contract. However, outages exempted in G.O. 133-D will be exempt from this requirement.

Status update: In compliance. Frontier provided the required credits as described above, with the actual number of credits and dollar amount shown in the table below.

Month	Tribal		Non-Tribal		Total	
	Count	Amount	Count	Amount	Count	Amount
April	5	50	48	455	53	505
May	12	260	64	535	76	795
June	10	190	66	505	76	695
<b>2Q21</b>	<b>27</b>	<b>500</b>	<b>178</b>	<b>1495</b>	<b>205</b>	<b>1995</b>
July	22	250	167	1545	189	1795
August	13	130	193	2065	206	2195
September	13	590	87	1090	100	1680
<b>3Q21</b>	<b>48</b>	<b>970</b>	<b>447</b>	<b>4700</b>	<b>495</b>	<b>5670</b>
October	20	270	149	1185	169	1455
November	21	490	106	1185	127	1675
December	16	270	176	2035	192	2305
<b>4Q21</b>	<b>57</b>	<b>1030</b>	<b>431</b>	<b>4405</b>	<b>488</b>	<b>5435</b>

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Month	Tribal		Non-Tribal		Total	
	Count	Amount	Count	Amount	Count	Amount
January	18	930	140	2135	158	3065
February	13	610	111	3755	124	4365
March	11	980	101	860	112	1840
<b>1Q22</b>	<b>42</b>	<b>2520</b>	<b>352</b>	<b>6750</b>	<b>394</b>	<b>9270</b>
April	3	300	90	1190	93	1490
May	16	210	100	1370	116	1580
June	39	690	102	2800	141	3490
<b>2Q22</b>	<b>58</b>	<b>1200</b>	<b>292</b>	<b>5360</b>	<b>350</b>	<b>6560</b>
July	3	50	60	1480	63	1530
August	12	220	31	225	43	445
September	15	340	133	3440	148	3780
<b>3Q22</b>	<b>30</b>	<b>610</b>	<b>224</b>	<b>5145</b>	<b>254</b>	<b>5755</b>
October	32	1670	187	2490	219	4160
November	19	310	382	5805	401	6115
December	27	450	454	11190	481	11640
<b>4Q22</b>	<b>78</b>	<b>2430</b>	<b>1023</b>	<b>19485</b>	<b>1101</b>	<b>21915</b>

Month	Tribal		Non-Tribal		Total	
	Count	Amount	Count	Amount	Count	Amount
January	98	4100	1105	30390	1203	34490
February	70	4340	975	51950	1045	56290
March	132	6210	1218	40635	1350	46845
<b>1Q23</b>	<b>300</b>	<b>14650</b>	<b>3298</b>	<b>122975</b>	<b>3598</b>	<b>137625</b>

Public Advocates Settlement Agreement Attachment 1, Paragraph B.6 - Frontier will ramp up to come into compliance with the OOS metric in 2021 and will commit to achieve 80% OOS disaggregated by California ILEC and by copper plant in 2022 and 90% disaggregated by California ILEC and by copper plant in 2023 and 2024. If Frontier fails to meet the applicable G.O. 133-D OOS standard disaggregated by California ILEC and by copper plant in any month in any of these three years (2022 – 2024), the applicable California ILEC will be subject to an incremental tiered penalty beyond G.O. 133-D requirements of: up to \$7 million/year if one or more of the three California ILECs misses the metric by more than 10%; or up to \$3.5

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million/year if any of the three California ILECs misses the metric by 10% or less. Any penalty shall be calculated per California ILEC based on a proportionate number of access lines for each Frontier California ILEC relative to the total aggregate access lines for the three California ILECs multiplied by the applicable aggregate penalty of \$7 million or \$3.5 million applied on a per month basis for each month a California ILEC misses the metric. Unlike G.O. 133-D, where a penalty arises only after a chronic failure, the penalty in this paragraph 6 applies each month that a California ILEC fails to meet the metric. This penalty shall be deployed as incremental expenditures targeted at service quality, in addition to the aggregate capital expenditure commitments discussed in paragraph 1 above and in addition to the current penalty/investment structure in G.O. 133-D. In the event an additional penalty is incurred under this provision, Frontier will consult with Cal Advocates, TURN, and CWA to discuss the potential areas for the expenditures, including potential expenditures on tribal lands and/or in tribal communities, and Frontier will provide a report to the Commission's Communications Division, Cal Advocates, TURN, CWA, and the Yurok Tribe by March 1 of the following year that identifies its planned incremental penalty expenditures, the locations/wire centers and budget for each project where these incremental penalties will be spent, how the projects are expected to enhance service quality, and shall report by March 1 of the following year, project status including any variance from the budget and the impact/result on OOS performance.

Status: As reported on its 3Q21 G.O. 133-D report filed on November 15, 2021, each of Frontier's companies has exceeded 80% OOS repaired within 24 hours in each of the three months in the third quarter.

As reported on its 4Q21 G.O. 133-D report filed on February 15, 2022, each of Frontier's companies has exceeded 80% OOS repaired within 24 hours in each of the three months in the fourth quarter.

As reported on its 1Q22 G.O. 133-D report filed on May 16, 2022, each of Frontier's companies has exceeded 80% OOS repaired within 24 hours in each of the three months in the quarter.

As reported on its 2Q22 G.O. 133-D report that will be filed on August 15, 2022, each of Frontier's companies has exceeded 80% OOS repaired within 24 hours in each of the three months in the quarter.

As reported on its 3Q22 G.O. 133-D report filed on November 15, 2022, each of Frontier's companies has exceeded 80% OOS repaired within 24 hours in each of the three months in the quarter.

Frontier filed the 4Q22 G.O. 133-D report on February 15, 2022. Frontier California failed to meet the 80% benchmark for Out of Service < 24 hrs. for Frontier California in October, November, and December. Citizens Telecommunications Company of California (CTC CA) failed to meet the 80% benchmark for Out of Service < 24 hrs. in November and December. Frontier Communications of the Southwest Frontier met the Out of Service < 24 hrs. for each month of the fourth quarter. As a result of Frontier California and CTC CA missing the metric for the quarter, Frontier will commit no less than \$1,132,772 in incremental spend targeted specifically to improve service quality in California. Frontier met with the parties identified in

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the settlement condition on February 22, 2023 to review the service improvement plan prior to filing the plan.. The parties did not follow up with any questions and the plan was filed on March 1, 2023. Frontier will file a status of the plan on or before March 1, 2024.

Frontier filed the 1Q23 G.O. 133-D report on May 15, 2022. Frontier failed to meet the 90% benchmark for Out of Service < 24 hrs. for each month for Frontier California and CTC California. Frontier Communications of the Southwest met the benchmark in January and March and missed the benchmark in February. Frontier's year to date incremental spend penalty is \$1.7 million. The required improvement plan will be filed March 1, 2024.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.7 - Frontier will not decrease the total employee technician staffing level in California (as referenced in Mr. Mark D. Nielsen's October 9, 2020, confidential testimony at p. 52, and included in Frontier's response to PAO DR-09) over the next three years through December 31, 2023. In addition, Frontier will commit to evaluating and increasing its employee technician staffing levels to meet the G.O. 133-D standards through December 31, 2023, as determined by Frontier in consultation with Cal Advocates, TURN and CWA.

Status: In compliance. Frontier files confidential quarterly employee count reports pursuant to Public Advocates Settlement Agreement Attachment 1, Paragraph B.9. Frontier has increased its staffing levels in California beyond the identified threshold.

Frontier continues to maintain staffing levels in California beyond the identified threshold.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.8 – Frontier commits to keep the following call center operations (as constituted by the listed job titles in the Settlement Agreement in the event of a name change to any of these centers) open and in operation through December 31, 2023.

Status: Frontier consolidated some customer support personnel from Camarillo to Newberry on June 29, 2021. There was no reduction to headcount associated with this action. Specifically, 56 employees on the Customer Service and Sales Support teams were moved to Newbury Park. Camarillo was a leased location, and the lease was terminated effective 6/29/21.

Effective January 21, 2022, the Victorville HOA/OSC/MDU center moved to 16461 Mojave Drive, Bldg. C, Victorville, CA. 92395. This is less than a mile from the original location that was located at 15168 La Paz Drive, Victorville, CA 92395. There was no change to headcount or job titles. There are 48 employees assigned to this location. However, only 7 are currently reporting into the office.

There have been no other modifications to call centers.

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Public Advocates Settlement Agreement Attachment 1, Paragraph B.9 - For five years starting after Frontier emerges from Chapter 11, Frontier will file quarterly reports (starting with the first full quarter following Frontier's emergence from Chapter 11) with employee and customer counts for California, breaking down the number of employees by function and location (California-based and outside California). The reports will specify to what extent employees outside California support Frontier's California operations. Frontier will provide information in the same format for its national employees and customers. In addition, Frontier will provide the same information related to its use of contractors for network and service quality enhancements in California. The information and reports related to this condition will be provided on a confidential basis to the Commission's Communications Division, Cal Advocates, TURN, and CWA.

Status: In compliance.

The first report for the full quarter July 1, 2021, to September 30, 2021, was filed on October 29, 2021. The second full quarter report for October 1, 2021, to December 31, 2021, was filed on January 28, 2022.

The third full quarter report for January through March 2022, was filed on April 14, 2022. The fourth full quarter report for April through June 2022, was filed on July 20, 2022. The fifth full quarter report for July through September 2022 was filed on October 24, 2022. The sixth full quarter report for October through December 2022 was filed on January 22, 2023.

The seventh full quarter report for January through March 2023 was filed on April 14, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.10 - Within 180 days after emergence from Chapter 11, Frontier will retain an independent expert survey consultant to conduct semi-annual customer satisfaction surveys (similar to the 2015 Verizon settlement agreement, but with a larger sample size and addressing additional issues). Frontier will hold joint meetings with Cal Advocates, TURN, CWA, the Yurok Tribe and other public interest consumer groups to discuss and provide input regarding the scope, sample size and questions to be included in the survey.

Status: In compliance. Frontier retained ThinkNow on September 21, 2021, to be its independent expert survey consultant to conduct semi-annual customer satisfaction surveys. Frontier had a scheduled meeting on November 15 with Cal Advocates, TURN, CWA, the Yurok Tribe, and other public interest consumer groups to discuss and provide input regarding the survey scope, sample size, and content.

Frontier met with the parties on November 15, 2021. ThinkNow participated and provided a comprehensive overview of the survey questions, format, and anticipated timeline. The parties had some questions, which were answered during the meeting and via follow up emails.



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ThinkNow conducted the first semi-annual survey on Frontier's behalf in the March/April 2022 timeframe.

The second semi-annual survey started October 14, 2022, and completed November 4, 2022.

The third semi-annual survey kicked off mid April and is wrapping up.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.11 – After completion of the surveys, Frontier will present the findings of the survey in jointly held confidential meetings with the consultant identified in paragraph 10, Cal Advocates, TURN CWA, the Yurok Tribe, and other public interest consumer groups. The survey period will include six semi-annual surveys over three years, and will include surveying customers who have called with trouble reports and customers with closed or completed installation service orders during each month for the prior six-month period. The survey will measure customer satisfaction with resolution of these issues, along with other actionable concerns.

Status: Frontier and ThinkNow presented a report on the first semi-annual survey findings on May 31, 2022. The CPUC, Yurok Tribe and CWA were invited to the meeting.

Frontier and ThinkNow presented a report on the second semi-annual survey findings on December 15, 2022 to review the survey findings. CPUC, the Yurok Tribe and CWA were invited to the meeting.

Frontier has reached out to the parties asking for a meeting on June 28, 2023, for purpose of reviewing the survey results. Frontier anticipates confirming the date in the next week.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.12 – Frontier will provide the Communications Division, Cal Advocates, TURN, CWA, and the Yurok Tribe with California-specific semi-annual reports for 2021 on September 1, 2021 and March 1, 2022 and annual reports thereafter through 2024 on March 1<sup>st</sup> for the following customer service initiatives in response to customer service performance problems identified in Frontier's "Modernization Report." These reports shall be confidential and quantify for each California ILEC the volume of escalated customer complaints related to the following issues: • Being bounced around from agent to agent who are unable to help resolve a problem; • Never hearing back from Frontier as a follow up to a problem; • Failing to execute on a service change, truck, shipment, credit; • Unexplained changes to bill as a result of an unrelated service change; • Inflexibility in crediting accounts for Frontier caused problems; and • Repeated problems with service particularly for low speed copper customers.

Status: In compliance. Frontier filed its first report on August 25, 2021. Frontier's second report was filed on February 15, 2022. The third report was filed on February 28, 2023.

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Public Advocates Settlement Agreement Attachment 1, Paragraph B.13 – Frontier also will provide the Commission’s Communications Division, Cal Advocates, TURN, CWA, and the Yurok Tribe on a confidential basis within 60 days after emergence from Chapter 11, a California-specific report including a narrative discussion and further description of each initiative, and the status of implementation of each item described in the Frontier Modernization Report.

Status: Complete. Frontier submitted its confidential report on June 29, 2021.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.14 - Frontier will provide the Commission’s Communications Division, Cal Advocates, TURN, CWA, and the Yurok Tribe on a confidential basis within 30 days after emergence from Chapter 11, a California-specific report including a narrative discussion and further description of each customer retention and other items listed below: • Segmenting customer base for differential treatment; • Policies and authorizations for providing credits; • Incentives balancing churn and spend; • Active takedown and price increase management; • Customer communications; • Self-service initiatives; and • Tool consolidation and modernization. Frontier will provide an annual report due March 1<sup>st</sup> of each year, which updates the initial report through 2023.

Status: In compliance. Frontier submitted its confidential report on May 28, 2021. Frontier filed its first annual report on March 1, 2022. Frontier filed its second annual report on March 1, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph B.15 – Frontier will identify and retain two (2) employee tribal liaisons—one in Frontier’s Northern California service area and one in Frontier’s Southern California service area—tasked to work with and improve customer service on tribal lands and for tribal governments and tribal customers served by Frontier.

Status: In compliance. Frontier sent letters to the tribes throughout June 2021 that identified Amy Warshauer as the tribal liaison for the Northern California service area and Dawn Gilbert as the tribal liaison Southern California service area. The tribal liaisons’ contact information has been provided to the tribes via email, virtual tribal quarterly meetings, and other stakeholder meetings (the Governor’s office/CETF/etc.).

During first quarter 2022, Amy Warshauer left the company and Dawn Gilbert remains the tribal liaison for Southern California service areas and Charlie Born is the liaison for Northern California service areas. Charlie and Dawn serve as back-up for the other’s respective area. Beginning December 1, 2022, Jenny Smith replaced Charlie Born, who retired from Frontier, as the Northern California area liaison. The December 1, 2022 change was communicated via email as well as at the fourth quarter meeting.

Dawn Gilbert and Jenny Smith remain the tribal liaisons for the Southern and Northern California areas, respectively, with Dawn and Jenny serving as each other’s back-up.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.16 – Frontier reaffirms and will fulfill its remaining broadband commitments from the 2015 Verizon Settlement Agreement (“Verizon Agreement Broadband Commitments”) and Frontier will fulfill the remaining CAF II obligations in accordance with the FCC’s requirements. Within 90 days of emergence from Chapter 11 and for projects that have not commenced (i.e., the engineering, procurement or construction phase has not started), Frontier will evaluate and report whether and to what number and percentage of locations it will exceed its remaining Verizon Agreement Broadband Commitments consistent with the goals set forth in the California Governor’s Executive Order N-73-20. The preceding requirement will not apply to the CAF II obligations.

Status: Complete. Frontier submitted its confidential report on July 29, 2021. Regarding the remaining 2015 acquisition settlement commitment with TURN, Office of Ratepayer Advocates and Center for Accessible Technology (Consumer Advocates) and approved in D.15-12-005, for Frontier to augment the broadband speed to 400,000 households to a minimum of 25/2-3 Mbps by December 31, 2022, Frontier exceeded the 2021 target of cumulative 300,000 households by approximately 40,000 households. Approximately 174,000 locations exceed the 25/2-3 Mbps speed with approximately 27,000 FTTH with 1 Gbps. available. Frontier exceeded the 2022 cumulative target of 400,000 locations.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.17 – Based on U.S. Census data for tribal lands, provided to Frontier by the Commission’s Communications Division, Frontier estimates that there is a population of approximately 55,000 people and approximately 24,000 tribal households on 41 tribal lands in Frontier’s California service territory. In addition to Frontier’s outstanding Verizon Agreement Broadband Commitments and the FTTP broadband commitments described below, Frontier will agree to dedicate \$11.6 million of capital expenditures over 4 years to deploy at minimum 25 Megabits per second (“Mbps”) download and 2-3 Mbps upload service (25/2-3 Mbps) to at least 4,000 locations within tribal lands in Frontier’s service territory. Frontier will review the feasibility of and strive to deploy broadband speeds higher than the 25/2-3 Mbps to these locations. As part of the deployment of the 4,000 locations Frontier will consult with Cal Advocates, TURN, CWA, the Yurok Tribe and other tribal government representatives to discuss the potential areas for deployment.

Status: In compliance. Frontier met with the parties on December 1, 2021, to discuss deployment plans. Timeline for completion is 4 years. Frontier continues to identify and write projects for this commitment and anticipated completion of initial locations by year end 2022. Frontier continues to share its plans with the tribes during the quarterly meetings.

Frontier held a meeting with the parties on March 23, 2023 and a follow up meeting on April 19, 2023. Frontier provided a PowerPoint prior to the April 19<sup>th</sup> meeting that identified potential deployment locations and timelines.

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Public Advocates Settlement Agreement Attachment 1, Paragraph C.18 - Frontier affirms that its “operations” in California will be classified as “InvestCo,” a designation signifying that the reorganized Frontier will conduct fiber deployments consistent with Article IX.A.10 of the Plan of Reorganization approved by the Bankruptcy Court on August 27, 2020, and the Restructuring Support Agreement executed by Frontier on April 14, 2020.

Status: In compliance. Frontier confirms, consistent with Frontier’s Virtual Separations reporting completed on May 28, 2021, and during discussion with the settlement parties, that although Frontier no longer uses the term “InvestCo” internally, it remains committed to investment in and deployment of fiber to the premises to at least 350,000 locations within six years consistent with the terms of the Settlement and the Commission’s order approving the Restructuring.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.19 - Frontier commits to FTTP buildout to at least 350,000 locations within six years from approval of the Settlement with the following milestones: 100,000 locations by December 31, 2022; 250,000 locations by December 31, 2024; and 350,000 locations by December 31, 2026.14 Frontier agrees that no less than 150,000 of the total 350,000 locations will be locations Frontier identified in its Modernization Report projections as having an Internal Rate of Return (“IRR”) of less than 20%. The 350,000 FTTP locations will not be considered to fulfill the Verizon Agreement Broadband Commitments that remain outstanding as of Frontier’s emergence from Chapter 11 and buildout obligations under any RDOF awards. However, for clarity, to the extent Frontier upgrades locations with FTTP after December 31, 2020, to which it had deployed broadband service of 6/1 Mbps and 10/1 Mbps under its Verizon Agreement Broadband Commitments on or before December 31, 2020, those locations can be considered in fulfilling this 350,000 FTTP commitment.

Status: In compliance. Frontier has begun planning and remains committed to investment in and deployment of fiber to the premises to at least 350,000 locations within six years consistent with the Settlement and the Commission’s order approving the Restructuring. In accordance with Ordering Paragraph 4 (a) of California Public Utilities Commission Decision No. D.21-04-008, Attachment 1, Paragraph C.21, Frontier filed a confidential annual report on March 1, 2022, detailing completed FTTH locations. Frontier filed a confidential annual report on March 1, 2023. Frontier has met the milestone to build out 100,000 locations by December 31, 2022. The report details the locations completed and identifies the locations that have an IRR of less than 20%.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.20 - Frontier will provide the Commission’s Communications Division, Cal Advocates, TURN, CWA, and the Yurok Tribe a detailed plan within 60 days from emergence from Chapter 11 that estimates the number of locations and the individual locations by census block for the first 100,000 FTTP locations to be completed by December 31, 2022. Frontier will identify for each planned location the census block and whether the locations are residential, commercial or located on tribal lands. Frontier will also provide additional demographic information describing whether the location is an

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anchor institution<sup>15</sup> and whether the location falls within a census block designated as low-income and/or underserved, to the extent such information is available. The plan will also detail locations broken down by California ILEC. As part of the deployment of the 150,000 locations with an IRR of less than 20%, Frontier will also meet with Cal Advocates, TURN, CWA, the Yurok Tribe and other tribal government representatives to discuss the potential areas for deployment, including tribal lands and tribal communities and taking in consideration the RDOF auction assigned support awarded to Frontier and the other service providers in Frontier's California service territory. Frontier will update this plan annually by March 1st each year for the FTTP locations to be completed that calendar year.

Status: Complete. Frontier submitted its confidential report due within 60 days from emergence from Chapter 11 on June 25, 2021. On March 1, 2022, in accordance with Ordering Paragraph 4 (a) of California Public Utilities Commission Decision No. D.21-04-008, Attachment 1, Paragraph C.21, Frontier reported that 95,308 locations were completed. Frontier passed the 100,000 location commitment in early 2022.

Frontier filed a confidential annual report on March 1, 2023, that reflected over 100,000 total locations. The report identified the census block, whether the location is residential, commercial, or located on tribal lands and if the IRR is less than 20%.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.21 - By March 1, 2022 and annually thereafter until the 350,000 locations are completed, Frontier will provide a progress report including the number of completed, built-out FTTP locations by census block and identify which locations have an IRR of less than 20%. Frontier will identify for each completed, built-out FTTP location whether the location is residential, commercial, and/or located on tribal lands. Frontier will also provide additional demographic information describing whether each location is an anchor institution, and whether the location falls within a census block designated as low-income and/or underserved, to the extent such information is available, and the expected broadband service offerings, including pricing. The reports in paragraph 20 and 21 will be provided on a confidential basis to the Commission's Communications Division, Cal Advocates, TURN, CWA, and the Yurok Tribe.

Status update: Frontier filed its first confidential report on March 1, 2022. Frontier filed its second confidential annual report on March 1, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.22 - In addition, Frontier agrees to target a portion of its capital expenditure commitment to improving scale, quality, and reliability of backhaul and expanding broadband deployment in unserved and underserved communities in rural areas. Frontier will continue to actively participate in the Commission's CASF program to advance deployment of broadband in unserved and underserved areas of the State, including tribal lands. Frontier will submit an annual report to the Communications

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Division, Cal Advocates, TURN, CWA, the and the Yurok Tribe on March 1st for each year, for three years on initiatives and expenditures related to these issues.

Status update: Frontier filed its first report on March 1, 2022. Frontier filed its second report on March 1, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph C.23 - Frontier shall provide a report to Communications Division, Cal Advocates, TURN, and CWA on a confidential basis, identifying the specific census block groups in California in which it placed RDOF bids, the wire centers identified for each project, the amount of each of Frontier's bids, and the name and bid amount of the winning bidder, and the winning bid if different from Frontier's bid, in each specific census block group in California in which Frontier placed a bid, all subject to FCC disclosure limitations, within 30 days after emergence from Chapter 11.

Status: Complete. Frontier submitted its confidential report on May 28, 2021.

Public Advocates Settlement Agreement Attachment 1, Paragraph D. 24 - Frontier will continue to offer through December 31, 2023, its two existing low-income broadband plans in California, Affordable Broadband and Frontier Fundamental Internet (which is a stand-alone service offering) at the same or higher speeds as required by the FCC Lifeline program and at equal to or lower pricing than current rates. Within 90 days of its emergence from Chapter 11, Frontier shall meet with Cal Advocates, TURN, CWA, the Yurok Tribe and other tribal government representatives to discuss the provision and expansion of the benefits of the existing federal and state communications low-income programs to tribal governments, tribal members, tribal organizations and/or tribal entities in Frontier's California service territory.

Status: In compliance. Frontier continues to offer Affordable Broadband and Frontier Fundamental Internet. Information regarding Frontier Affordable Broadband information is available at: <https://frontier.com/offer/affordable-broadband>. Information for Frontier Fundamental plan information is available at: <https://frontier.com/fundamental-internet>. Frontier also participates in the Affordable Connectivity Program at <https://frontier.com/discount-programs/affordable-connectivity-program>.

Public Advocates Settlement Agreement Attachment 1, Paragraph D. 25 - Through December 31, 2021, Frontier will not increase residential rates for copper-based standalone voice services, fiber-based standalone basic primary voice service, copper-based broadband services, and copper-based voice/broadband bundles.

Status: Complete. This obligation has expired.

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Public Advocates Settlement Agreement Attachment 1, Paragraph D. 26 - Frontier will provide the Communications Division, Cal Advocates, TURN and CWA, on a confidential basis, within 60 days after emergence from Chapter 11, a California-specific report, including a narrative discussion and further description including specification of products and services, separately for each California ILEC for which Frontier plans to increase deposits and/or introduce higher upfront fees.

Status: Complete. Frontier submitted its confidential report on June 24, 2021. This was a one-time report.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 27 - Within 30 days of the completion of Virtual Separation Report described in the Plan of Reorganization, the final version of which is expected to be delivered by March 31, 2021, Frontier will provide a complete and unredacted copy of the Virtual Separation Report to the Communications Division, Cal Advocates, TURN and CWA on a confidential basis. Frontier shall also provide narrative language which states with specificity what “better understanding” it has regarding “the economics and financial data for” California, broken out by operating entity to the extent available and applicable, based on the “more precise state-level financial revenue and expense data” expected by completion of the virtual separation process. Finally, Frontier will meet with Cal Advocates, TURN and CWA within 30 days of providing the Virtual Separation Report, or on alternative dates as mutually agreed, to discuss the Virtual Separation Report and answer questions about its significance for California.

Status: Complete. Frontier submitted its confidential report on May 28, 2021. This was a one-time report.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 28 - Frontier will provide, on a confidential basis, complete and unredacted documents to the Commission’s Communications Division, Cal Advocates, TURN and CWA showing the “internal revenue and cost sharing model based around the Virtual Separation” (Restructuring Term Sheet, “Business Plan,” page 9), the final version of which is expected to be delivered by March 31, 2021. On a one time basis, within 90 days after providing the Report referenced in paragraph 27 to the Commission’s Communication Division, Cal Advocates, TURN, and CWA, Frontier will also provide pro forma FY 2020 financial statements (Income Statement and Balance Sheet) for each California ILEC: a) using the current chart of accounts, accounting practices and expense allocation methodologies; and b) using the revised chart of accounts, accounting practices and expense allocation methodologies developed under the virtual separation process as contained in the Virtual Separation Report. Frontier will provide narrative language describing the extent to which capitalization of labor and expenses may differ for each of the three California ILECs using the Virtual Separation cost allocation methodology versus pre-Virtual Separation accounting and allocation methodologies.

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Status: Complete. Frontier submitted its confidential report on May 28, 2021. This was a one-time report.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 29 - Frontier will provide the Commission's Communications Division, Cal Advocates, TURN and CWA annual variance reports on a confidential basis tracking variances between the projected amounts shown in Frontier's Exhibit E Financial Projections ("Base Case" income statements, statement of cash flows, and balance sheet, included with the Disclosure Statement) for each projection year versus actual achieved results, with an explanation of material differences between projected and actual results, for each line item. The initial report for 2020 shall be provided within 90 days after emergence from Chapter 11, and annually thereafter on April 1st through 2023.

Status update: Complete. Frontier submitted its confidential report on July 29, 2021. Frontier filed its first annual report on March 30, 2022. The final report was filed April 3, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 30 - Frontier will provide the Commission's Communications Division, Cal Advocates, TURN and CWA annual variance reports tracking variances between the projected amounts shown in Frontier's response to PAO 2.6 CONFIDENTIAL attachment ("Base Case" detailed revenues, direct and indirect expenses, EBITDA and Capex) for each projection year versus actual achieved results, with an explanation of the material differences between projected and actual results, for each line item. The initial report for 2020 shall be provided within 90 days after emergence from Chapter 11, and annually thereafter on April 1st through 2023. The annual variance report shall be broken down by each California operating company with statewide totals allocated to each on a percentage of revenues basis.

Status update: Complete. Frontier submitted its confidential report on July 29, 2021. Frontier filed its first annual report on April 1, 2022. The final report was filed April 3, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 31 - Frontier agrees that its California ILECs will not make debt payments associated with the Restructuring and commits not to be debtors, guarantors or to pledge/encumber the assets of California ILECs for existing/assumed debt as part of the Restructuring, excluding the prebankruptcy debt obligation of \$200 million already directly held by Frontier California Inc., or to directly issue new debt without Commission approval.

Status: In compliance. The California ILECs have not made debt payments associated with the Restructuring. Frontier is not a debtor nor guarantor to pledge/encumber the assets of California ILECS for existing/assumed debt as part of the Restructuring.



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Public Advocates Settlement Agreement Attachment 1, Paragraph E. 32 - For three years following emergence from Chapter 11 and to the extent permitted by Securities and Exchange Commission disclosure limitations, Frontier will provide to the Communications Division, Cal Advocates, TURN, and CWA information regarding dividends declared by the parent Frontier company Board and any written dividend policy.

Status: In compliance. Frontier has not declared any dividends.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 33 - For three years following emergence from Chapter 11, Frontier will submit within 30 days, a report to the Commission's Communications Division, Cal Advocates, TURN and CWA identifying the amount and timing of any dividends declared and paid by the California ILECs.

Status: In compliance. Frontier has not declared any dividends.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 34 - Within 90 days of emergence from Chapter 11, Frontier will submit to Cal Advocates, TURN and CWA a report identifying the debt-to-equity ratio of each of its California ILECs and for the parent Frontier company. For reference, Frontier will also include in the report the industry average debt-to-equity ratio based on comparable public peers, which would include but it is not limited to Consolidated Communications, Lumen Technologies (CenturyLink), Windstream, TDS Telecommunications, Inc. and other comparable public peer companies mutually agreed up on the Parties. Supporting documentation including data sources and calculations shall be provided with this report.

Status update: Complete. Frontier submitted its confidential report on July 29, 2021. This was a one-time report.

Public Advocates Settlement Agreement Attachment 1, Paragraph E. 35 - By March 1, 2021, and annually thereafter for three years, Frontier will submit an annual report to Communications Division, Cal Advocates, TURN and CWA on a confidential basis that contains the debt-to-equity ratio of each of its three California ILECs and for the Frontier parent company and an updated industry average ratio as described in paragraph 34. Supporting documentation, including data sources and calculations, shall be provided with this report. Frontier will provide an explanation to Communications Division, Cal Advocates, TURN and CWA on a confidential basis describing any material changes in the debt-to-equity ratio for any of the three California ILECs or the Frontier parent company. If the debt-to-equity ratio for any of the Frontier entities has materially changed (increased 20% from the previously reported Frontier ratios), Frontier will file a Tier 2 Advice Letter with the Commission describing the reason for the change in the debt-to-equity ratio, as well as data and information regarding the industry average ratios and a

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status update on the capital investment requirement as agreed to in paragraph 1 of this Agreement.

Status: In compliance. Frontier submitted its report on May 28, 2021. Frontier filed its first annual report February 25, 2022. Frontier filed its second annual report March 1, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph F. 36 - Frontier will notify the Communications Division, Cal Advocates, TURN and CWA of the date it emerges from Chapter 11 within 5 days of its emergence from Chapter 11.

Status: Complete. Frontier notified the Communications Division, Cal Advocates, TURN and CWA of its May 1, 2021, emergence from Chapter 11 on May 3, 2021. This was a one-time report.

Public Advocates Settlement Agreement Attachment 1, Paragraph F. 37 - Frontier shall meet and confer with CWA quarterly regarding updates on settlement commitments, service quality, hiring, training and any issues arising under its collective bargaining agreements with CWA.

Status update: In compliance. Frontier met with the CWA on September 29, 2021. Participants agreed to meet the third week of the last month of the quarter according to attendee availability. Frontier reached out to the CWA to set up a meeting in December. CWA responded that they were in regular meetings with Frontier and felt they did not need to meet in December regarding this obligation, especially given holiday schedules. Frontier met with the CWA on March 30, 2022. Frontier met with the CWA on June 15, 2022. Frontier met with the CWA on September 29, 2022. The fourth quarter meeting was scheduled for December 16, 2022. Frontier had representatives in attendance, but the CWA was unable to attend due to last minute circumstances. Two meetings were calendared for 1st quarter 2023 on March 8<sup>th</sup> and March 15<sup>th</sup>, dependent on CWA's availability. CWA chose to meet March 15<sup>th</sup>. Subsequently, CWA cancelled the March 15<sup>th</sup> meeting and asked to reschedule. The meeting was held April 12<sup>th</sup> and lasted for approximately 30 minutes. The discussion focused on first quarter trainings, employee counts and future hiring. The 2<sup>nd</sup> quarter meeting is scheduled for June 13, 2023.

Public Advocates Settlement Agreement Attachment 1, Paragraph F. 38 – Within 1 year of its emergence from Chapter 11, Frontier will offer and provide training for its employee technicians in California on mixed generation technologies.

Status: Complete. Frontier offered and continues to offer a suite of courses to educate technicians on new products, services, and procedures. Technician Training curriculums include, but are not limited to:

- Fiber To The Home; Expansion project and existing Fiber upgrade training for technicians
- WiFi; In-home Wi-Fi installation and customer device hook ups

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- MTP-Next; Mobile Tech Portal – Next, project training. This new digital technology will enable to technician to provide a better customer experience by putting what they need at their fingertips – in a modern, digital way.
- Personalized Training. Curriculums available for the technicians to personalize their training based upon skill development or classification change
- Frontier Foundation; New hire training for field Technicians and Local Managers, providing them the education and confidence they need when starting their new positions.
- Fixed Wireless; Training for technicians impacted by the implementation of fixed wireless technology. Fixed wireless is: Point to Point internet signal transmission occurring through the air over a terrestrial microwave platform rather than through copper or fiber.

Public Advocates Settlement Agreement Attachment 1, Paragraph F. 39 – Frontier and CWA agree that their current collective bargaining agreements in California are currently in effect as of the execution of this Agreement and remain in effect through the current extension date of September 4, 2021. Frontier reaffirms and CWA agrees that under the Plan approved by the Bankruptcy Court these collective bargaining agreements that are in place as of the date Frontier emerges from Chapter 11 will be assumed by the reorganized Frontier companies and shall remain in place at emergence from Chapter 11. Frontier reaffirms its commitment to fulfill the terms of these California agreements through the remainder of the collective bargaining agreements extended terms, however, CWA and Frontier agree that any and all grievances, arbitrations, disputes, violations, remedies, issues or claims under the collective bargaining agreements will be resolved by the terms of those agreements and will not be submitted to, considered or addressed by the Commission.

Status: Complete. The contract is expired.

Public Advocates Settlement Agreement Attachment 1, Paragraph F. 40 - Frontier shall invite the Governor's Office of the Tribal Advisor, the Yurok Tribe and other tribal government representatives and conduct quarterly meetings with interested tribal representatives regarding updates on settlement commitments, service quality, broadband deployment and any issues with Frontier's services impacting tribal lands or tribal communities.

Status: In compliance. Frontier conducted the first meeting on August 5, 2021, and its second meeting on November 4, 2021. Participants included representatives from the Yurok Tribe, the Mewuk Tribe, TURN, PAO, and the California PUC.

Frontier conducted a quarterly meeting on February 3, 2022. Participants included representatives from PAO, the Yurok Tribe, the Morongo Tribe, and the California PUC. Frontier conducted its quarterly meeting on June 2, 2022. Frontier conducted its third quarter meeting on September 22, 2022. Frontier's fourth quarter meeting was on December 15, 2022. At each of these meetings, Frontier presented its then current broadband deployment plans for

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tribal communities, reiterated Frontier's tribal liaison contacts, and opened the discussion to address any customers issues with Frontier's services.

Frontier held a meeting with the parties on March 23,2023 and a follow up meeting on April 19, 2023. Frontier provided a PowerPoint prior to the April 19<sup>th</sup> meeting that identified potential build locations and timelines.

Public Advocates Settlement Agreement Attachment 1, Paragraph F. 41 – Frontier and its California subsidiaries will provide data requested by the Communications Division, Cal Advocates, TURN and CWA subject to the Commission's discovery rules, to verify compliance with the conditions in the Agreement.

Status: In compliance.

Frontier responded to Public Advocates Office data request 1 that was issued September 17, 2021, regarding customer credits. Frontier responded to Public Advocates Office data request 2 that was issued on October 15, 2021, regarding financials, service improvement commitments, and broadband expansion. Frontier responded to data request 3 that was issued January 12, 2022, regarding staffing and residential pricing. Frontier responded to data request 4 that was issued May 9, 2022, regarding capital spending and customer credits. Frontier responded to data request 5 that was issued August 18, 2022, regarding staffing. Frontier responded to data request 6 that was issued May 9, 2022, regarding staffing and Tribal Land build projects.

California Emerging Technology Fund ("CETF") Settlement Agreement Attachment 2, Paragraph B.2.c.(ii) and (iii) – (ii) As of December 1, 2020, Frontier has purchased 29,221 Chromebooks, which includes 4,000 devices that are currently on order and are expected to be distributed by December 31, 2020. (iii) Frontier shall undertake good faith efforts to purchase and the Parties shall jointly work to distribute the remaining 20, 779 Wi-Fi capable devices by September 1, 2021. All remaining devices are eligible to be distributed to low-income students in high need school districts or other similar student or community distribution program as the Parties may jointly develop and no fewer than 4,000 devices shall be distributed in Tribal communities. Frontier will continue to advance additional funds to CETF at \$60 per qualified adoptions from the \$3 million identified in paragraph 24 of the MOU as set forth at para. 13 (iii). in the Amendment and in order to facilitate the digital literacy training efforts it and the CBOs are undertaking in connection with the devices distributed to students or community members. In the event that not all devices are, or are expected to be, distributed by September 1, 2021, the parties agree to meet and confer to discuss next steps to attempt to accomplish distribution of the balance of Wi-Fi enabled devices by December 31, 2021. In the event supply chain issues arise throughout the year and all devices are not either distributed or on order by December 31, 2021, the parties agree that Frontier may elect to fulfill this condition through a lump sum payment after December 31, 2021 equal to the cost per unit of remaining undistributed devices (including

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tax and shipping fees). In addition, if the lump sum payment option is exercised, Frontier shall pay, at the same time, all remaining outstanding adoption payments to CETF.

Status: Complete. Frontier has distributed over 52,000 chrome books of which 4080 have been distributed to tribes in Northern and Southern California.

California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2, Paragraph C.7 - Frontier shall continue to offer its Affordable Broadband and Frontier Fundamental low-income broadband service plans at equal or lower pricing than current rates through December 31, 2023. While the Agreement is in effect, and every low-income household enrolling in any such service shall be counted toward the aspirational goal set forth in Section A(3). In the event that neither the California Public Utilities Commission nor the Federal Communications Commission has finalized action on Lifeline or an equivalent support mechanism for low-income broadband services by December 31, 2023, the Parties agree to meet and confer regarding an extension for a period of one year (to December 31, 2024) of Frontier's Affordable Broadband and Frontier Fundamental low-income broadband service plans at equal or lower pricing than current rates

Status update: In compliance. Frontier continues to offer Affordable Broadband and Frontier Fundamental service plans. Frontier Affordable Broadband information is available at: <https://frontier.com/offer/affordable-broadband>. Frontier Fundamental plan information is available at: <https://frontier.com/fundamental-internet>.

Frontier also participates in the FCC’s Affordable Connectivity Program (ACP). Information regarding ACP is found at: <https://frontier.com/resources/discountprograms/affordable-connectivity-program>.

California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2, 15 Covenant 9 of MOU - Requires the Parties to mutually identify 50 locations where Frontier will install public Wi-Fi subject to the conditions of Covenant 9(a). In addition, Wi-Fi deployments were addressed in Paragraph 17 of the Amendment. As of the effective date of this Second Amendment, Frontier has installed public Wi-Fi at 19 locations despite good faith efforts in collaboration with CETF to identify and complete more deployments and to surmount the access and deployment challenges presented by the COVID-19 pandemic. Accordingly, to achieve the core goal of this Covenant 9 of the MOU-expanded community-based access to broadband services, particularly for low-income and underserved community members-the Parties agree to revise Frontier's Wi-Fi hot spot deployment obligations as set forth herein. Specifically, the Parties agree to expand the locations eligible for public Wi-Fi to include any community location organization, or other institution (such as libraries, skilled nursing facilities, shelters, etc.), that is capable of facilitating Wi-Fi service to primarily low-income or underserved users as the Parties mutually agree and shall jointly work to identify and prioritize Tribal locations for Wi-Fi hotspot deployments. In addition, the Parties agree

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that in lieu of a Wi-Fi deployment, where it has facilities deployed to a community location, organization, or other institution that facilitates broadband access and use by low-income or underserved community members, Frontier may elect to provide two years of free broadband service to a community location, organization, or other institution in order to facilitate broadband access by low-income or underserved community members with priority given to those locations/entities serving Tribal members. Frontier shall work diligently and in good faith to complete its Wi-Fi community access commitment to 31 locations despite the challenges created by the COVID-19 pandemic by December 31, 2021 by: 1) completing a Wi-Fi installation; or 2) providing two years of free broadband service to a community location, organization, or other institution that facilitates broadband access/use by low-income or underserved community members as the parties mutually agree; or 3) any combination thereof. In the event that Frontier is not able to complete its Wi-Fi community access commitment by December 31, 2021, Frontier may elect to immediately disburse an amount equal to the sum of the number of remaining deployments multiplied by \$4,000.00 to CETF, which is calculated to include both the average cost of a Wi-Fi deployment, including the efforts of CETF staff resources to oversee and achieve the remaining Wi-Fi deployments.

Status: Complete. As of December 2021, Frontier completed 24 Wi-Fi deployments. On December 28, 2021, Frontier and CETF filed a joint request for an extension of time—until March 2022—to complete additional deployments. The CPUC granted Frontier and CETF’s request for an extension on February 2, 2022. Frontier is working in good faith and in close coordination with CETF to complete this item.

Frontier notified CETF via a letter dated March 31, 2022 and received CETF written acknowledgement in reply that Frontier had fulfilled its Wi-Fi Hotspots commitment. Frontier provided CETF with a file that listed the 50 community organizations for which Frontier deployed service or provided credits.

California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2, 16 –  
The Parties shall continue to collaborate on potential California Advanced Services Fund (CASF) grant applications to reach unserved households and effectuate other benefits in unserved or underserved areas within Frontier’s service territory.

Status: In compliance. Frontier has provided regular updates on CASF projects in process as well as updates on non-CASF broadband projects. Frontier has discussed potential additional areas, including collaboration with CASF consortia that work with CETF. CETF has been supportive of Frontier’s grants in California and is poised to do so again once the CPUC opens new grant application windows.

California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2, 17 –  
The parties agree that within 90 days of Frontier’s emergency from Chapter 11, currently

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expected to be no later than March 31, 2021, Frontier's CEO and at least one new Frontier Board member (who is not a member of Frontier's management team) will meet with the CETF Board of Directors, as mutually agreed, in order to get a fuller understanding from CETF of the specific broadband needs and challenges of serving California residents, including those that are low-income and underserved.

Status: Complete. CEO Nick Jeffries and Board of Directors' member Lisa Chang met with CETF on August 3, 2021.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Numbers 1. A and 1. B - In collaboration with the Yurok Tribe, Frontier will coordinate with the Yurok Tribe and potential third parties on the evaluation and potential deployment of:

- A. "Middle-mile" fiber from the Klamath River Rural Broadband Initiative ("KRRBI") project end in Orick, CA to Hunter Creek Rd. in Klamath, CA; and,
- B. "Fiber to the Premises" to certain Yurok Reservation locations along the above- referenced middle-mile fiber route (collectively, the "Project").

Status: In compliance. Frontier provided the Yurok tribe with a detailed engineering plan and is waiting for the Yurok tribe to respond.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 2. A - Frontier and the Yurok Tribe will collaborate to complete the Project. Frontier will contribute 1/2 of the Project costs, up to a \$5.0 million cap, from its planned capital expenditures and broadband deployment commitments made in the Cal Advocates/TURN/CWA Settlement. This expenditure will include upfront payment to the Yurok Tribe of \$75,000 to cover startup costs related to Project planning and implementation, including securing additional funding. The remainder of the funds shall be released by Frontier for Frontier's use to complete the Project upon the Yurok Tribe securing its portion of Project funding.

Status: Complete in part. Frontier provided the upfront payment to the Yurok Tribe of \$75,000 to cover startup costs on May 28, 2021. Frontier and the Yurok Tribe's collaboration to complete the Project remains in progress.

The Yurok tribe received a NTIA grant for middle mile that includes this route. Frontier and the Yurok Tribe will have further discussions regarding the impact of the NTIA grant and the impact on this settlement commitment. <https://www.yuroktribe.org/post/yurok-tribe-receives-61-million-grant-for-transformational-broadband-project>. This discussion item is ongoing with the Yurok tribe.

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Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 2. C - Frontier will be primarily responsible for the design, engineering, and construction of the Project. The Yurok Tribe will be primarily responsible for securing any necessary federal, state, local or tribal permits and authorizations; Frontier will assist with such efforts as needed, including providing information, licenses, or other proof necessary to complete competitive funding applications. Where applicable, Frontier will work with the Yurok Tribe to leverage state and federal funding opportunities for the benefit of the Project (e.g. CASF, etc.).

Status: In process. Not yet due.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 2. D - Frontier will coordinate with the Tribe to complete the construction.

Status: In process. Not yet due.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 2. E and 2. F - Upon completion, the Tribe will be provided 1) ownership and use of the constructed fiber capacity based on its proportionate financial contribution to the Project and 2) other non-fiber benefits (e.g. income, etc.) that may arise as a result of the Project's supplemental infrastructure (e.g leasing space on tower infrastructure, conduit space, etc.) based on its proportionate financial contribution to the Project. For example, if the Project ultimately costs \$15 million and the Yurok Tribe directly or indirectly contributes \$10 million, the Yurok Tribe will receive 66% of the Project fiber capacity and other non-fiber project benefits. For purposes of clarity, Frontier may use its proportional fiber capacity to provide telecommunications services and this use and the provision of telecommunications services are not considered other non-fiber benefits to be shared or provided to the Yurok Tribe.

If the Yurok Tribe is unable to secure the necessary resources and/or funding to complete the Project within four years, Frontier shall deploy \$3 million, less any funding already expended by Frontier on the Project, to benefit, improve, or expand infrastructure serving the Yurok Reservation, Yurok Lands, and Yurok's ancestral territory in compliance with the terms of the Cal Advocates/TURN/CWA Settlement. Frontier and the Tribe shall consult in good faith to determine these alternate projects or activities, prioritizing work within the Yurok Reservation.

Status: The Yurok tribe received a NTIA grant for middle mile that includes this route. Frontier and the Yurok Tribe will have additional discussions regarding this grant and the impact on the settlement condition. <https://www.yuroktribe.org/post/yurok-tribe-receives-61-million-grant-for-transformational-broadband-project>. This continues to be a discussion item with the Yurok tribe.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Numbers 3.A and 3.B

A. Within sixty (60) days of the consummation of Frontier's corporate Restructuring and its



emergence from Chapter 11, Frontier will provide the Yurok Tribe with \$400,000 to enable the Tribe to administer and provide reimbursement, credits or discounts for any services provided to consumers or business on Yurok Lands or in the Yurok Tribe's ancestral territory; to cover its costs related to the Frontier restructuring transaction; and/or to provide reimbursement, credits or discounts to the Yurok Tribe for its and its affiliated business and consumer subscriptions and "backhaul services" contract fees, for the period between 2017-2022; and

- B. Within sixty (60) days of the consummation of Frontier's corporate Restructuring and its emergence from Chapter 11, Frontier will provide the Yurok Tribe an additional \$100,000 for its use as described in 3.A if the Yurok Tribe works in good faith to support Frontier's efforts to quickly conclude the A.20-05-010 proceeding, including by finalizing and submitting this Settlement by January 19, 2021, filing comments in support of the Cal Advocates/TURN/CWA and CETF Settlements by January 20, 2021, and the Commission approving Frontier's transfer of control/restructuring application in A.20-05-010 by March 30, 2021.

Status update: Complete. Frontier issued the \$400,000 payment due in subpart A. on May 14, 2021. Frontier issued the \$100,000 payment due in subpart B. on May 13, 2021.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 4 - Within sixty (60) days of the consummation of Frontier's corporate Restructuring and its emergence from Chapter 11, Frontier will provide the Yurok Tribe with its existing local maps of Frontier's infrastructure and equipment along with information on infrastructure and equipment within the Yurok Tribe's ancestral territory, together with any existing maps of adjacent areas that identify the points of integration of such infrastructure with the remainder of Frontier's system.

Status: Complete. On June 7, 2021, Frontier provided the Yurok Tribe with its existing local maps of Frontier's infrastructure and equipment along with information on infrastructure and equipment within the Yurok Tribe's ancestral territory.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 5 - Within three (3) months of the consummation of Frontier's corporate Restructuring and its emergence from Chapter 11, Frontier agrees to hire or designate a local, high-level employee as the Yurok Tribe's point of contact or tribal liaison to provide Out Of Service response, customer service, and information sharing. The Yurok Tribe shall have direct access to the tribal liaison via phone and email. The tribal liaison shall have the availability, access, and authority to generally provide a response to the Yurok Tribe within 24 hours. To the extent the Commission approves the Cal Advocates/TURN/CWA Settlement's tribal liaison condition, the Yurok Tribe anticipates that the Yurok Tribe's tribal liaison contemplated in this term could also satisfy that condition.

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

Status: Complete. Frontier designated a local, high-level employee as the Yurok Tribe's point of contact or tribal liaison—and communicated this information to the Yurok tribe—to provide Out of Service response, customer service, and information sharing.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 6 - Frontier will evaluate and make good faith efforts to negotiate an increased bandwidth backhaul services contract with the Yurok Tribe for the benefit of Yurok Connect, with a price that is lower than the standard business pricing to account for the public service purpose of the contract. The Tribe recognizes that bandwidth capacity is limited by the microwave facilities use for backhaul services and Frontier may not be able to significantly increase bandwidth capacity available. However, Frontier will prioritize the Yurok Tribe by providing the Tribe with an option to purchase increased bandwidth as it becomes available.

Status: In compliance. Evaluation and discussions are ongoing.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 7 - Frontier will work with the Yurok Tribe and hold good faith discussions and share information for the purpose of an acquisition feasibility study by the Yurok Tribe and potential acquisition at a fair market value identified by one or more independent third parties (excluding the market value of the Project at the time of the transfer). The potential acquisition would include infrastructure, staffing, equipment, assets, licenses and authorizations related to Frontier's seven (7) wire centers/exchanges: six (6) which Frontier acquired from Verizon in 2010 comprising Verizon West Coast, Inc. (Klamath, Orick, Crescent City, Smith River, Gasquet, Hiouchi and one (1) additional wire center/exchange (Hoopa) which Frontier acquired from Verizon in 2016 (hereafter "Feasibility Study Facilities")).

Status: In compliance. Frontier and the Yurok tribe are engaged in good faith discussions and information sharing in furtherance of this commitment. In July, the Yurok tribe submitted a prioritized list of data requests and Frontier has responded to each one. The Yurok tribe submitted a list of data requests on October 18, 2021 and on October 28, 2021. Frontier has responded to all data requests.

Frontier met with a Yurok tribe representative on October 6, 2022 to review the data request responses. Frontier was requested to update data provided in. Frontier provided the requested data in October and November 2022.

Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions Number 7c - Frontier will have quarterly meetings with the Yurok Tribe during the feasibility study and due diligence period to provide information to enable the Yurok Tribe's assessment and compliance with its feasibility study funding requirements. The first meeting will be scheduled within sixty (60) days of Commission approval of this Settlement.

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

Status: In compliance. Frontier met with the Yurok on June 28, 2021. The third quarter meeting was held on September 28, 2021. The parties agreed to hold the fourth quarter meeting on January 12 to accommodate for the holiday schedule. The parties met on January 12, 2022. The first quarter meeting was scheduled for March 15, 2022 but was cancelled by request from the Yurok tribe. The second quarter meeting was June 7, 2022. The third quarter meeting was held on August 30. The parties agreed to extend the time for the study until April 30, 2022. The fourth quarter meeting was on December 15, 2022. The first quarter 2023 meeting was held on February 14, 2023.

California D.21-04-008 OP4 (e) - Compliance Monitor. At the expense of Frontier, the Commission shall hire an independent monitor (Compliance Monitor) to review Frontier's compliance with the terms, requirements, and conditions of this Ordering Paragraph. Within 15 days after receipt of notice from the Commission's Communications Division (CD) staff, Frontier shall deposit into a reimbursable account (A.20-05-010 General Reimbursable Account) the amounts specified by CD staff reflecting the fees and expenses of the Compliance Monitor. Within 45 days after the end of each calendar quarter, Frontier shall submit to the Compliance Monitor and to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov) a compliance report in a format designed by CD staff that will be treated as public information. The Compliance Monitor shall meet with Commission CD staff at least four times per year and at other times as requested by CD staff to report on Frontier's compliance with the terms, requirements, and conditions of this Ordering Paragraph and shall submit semi-annual reports to CD staff and reports at other times as requested by CD staff regarding Frontier's compliance with the requirements and conditions of this Ordering Paragraph. If and when the Compliance Monitor concludes that Frontier is not in compliance with any requirement or condition of this Ordering Paragraph, the Compliance Monitor may recommend a penalty to bring Frontier into compliance and forward findings and a recommendation to the Commission's CD Director at [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov). Any recommended penalty shall be addressed consistent with the procedures and maximum penalty established under subparagraph (f). The Commission may request the Attorney General to enforce this Order either pursuant to Public Utilities Code Sections 702 and 2101, or under its independent authority, and such enforcement actions would not interfere with the Commission's authority but would be complementary.

Status: The CA PUC engaged a Compliance Monitor in May 2022. Frontier remains timely in making payments for invoiced amounts for the Compliance Monitor.

CD staff has not provided a prescribed format for this quarterly report. Frontier filed its 2Q22 status report on August 16, 2021. Frontier filed its 3Q21 status report on November 15, 2021. Frontier filed its 4Q21 status report on February 15, 2022. The 1Q22 status report was filed on May 16, 2022 and the 2Q22 status report was filed on August 12, 2022. The 3Q22 status report was filed on November 10, 2022. The 4Q22 status report was filed on February 14, 2023. This filing is the 1Q23 status report.

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

California D.21-04-008 OP4 (g) - Right of First Offer to Tribes and Local Governments. Every tribe and local government shall have a right of first offer (ROFO) to purchase property that Frontier proposes to sell or dispose of and for which Commission approval is required under Public Utilities (Pub. Util.) Code Section 851 pursuant to the provisions of this subparagraph. To the maximum possible extent that is not inconsistent with this subparagraph, the “Guidelines to Implement the CPUC Tribal Land Policy” identified as Attachment A to Resolution E-5076 (Guidelines) shall apply to the ROFO, provided that (i) in addition to its application to tribes, the Guidelines shall also apply to a local government wherever possible by construing a Guidelines reference to “Tribe” to refer to the local government and a Guidelines reference to “ancestral territory” or “Indian country” to refer to the legally recognized jurisdiction of the local government, (ii) “disposition” shall mean all sales or disposals of property under Pub. Util. Code Section 851 and not have the meaning set forth in Section 1.3.d of the Guidelines, (iii) “investor-owned utility (IOU)” shall mean Frontier and not have the meaning set forth in Section 1.3.f of the Guidelines, and (iv) if a tribe and a local government have a ROFO under this subparagraph to the same property, the tribe’s ROFO shall precede and be preferred to the local government’s ROFO. This subparagraph shall not interfere with the terms of the Attachment 3 Settlement Agreement, including the potential acquisition described in Section 7 of the Attachment 3 Settlement Agreement.

California D.21-04-008 OP4 (h) - By no later than February 1 of each year, Frontier shall submit to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov) via the Commission’s website <https://cpucftp.cpuc.ca.gov> a report as of December 31 of the preceding year in a format designed by CD staff that includes, for each ROFO notice issued by Frontier, the notice date, tribe or local government recipient, individual contact, recipient address, property location, and result of the notice.

Status: Frontier filed confirmation on January 12, 2022 that the company had not issued a right of first offer (ROFO) in 2021. Frontier filed confirmation on January 5, 2023, that the company had not issued a ROFO in 2022.

California D.21-04-008 OP4 (i) - Frontier shall work with the Native American Heritage Commission to identify all tribes within its California service territory that have either a reservation or land in trust.

Status: Frontier coordinated with the Native American Heritage Commission to establish a current list of tribes and reservations and contacts. Frontier reviews this list each year and updates as applicable.

California D.21-04-008 OP4 (j) - Upon request, and subject to execution of a reasonable non-disclosure agreement with Frontier, Frontier shall provide any identified tribe within its California service territory with existing local maps of, and information on, Frontier’s owned, leased, and operated facilities in and around the tribe’s ancestral territory and any existing maps

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

of adjacent areas that identify points of integration of those facilities with the remainder of Frontier's system.

Status Update: Frontier provided confidential local maps of its infrastructure and equipment within the Yurok Tribe's ancestral territory, together with any existing maps of adjacent areas on June 7, 2021. Frontier has not received any other tribal requests for maps.

California D.21-04-008 OP4 (k) - In every California county that Frontier serves, Frontier must appoint a high-level employee as a tribal liaison to provide OOS response, customer service, and information sharing. Each tribe shall have direct access to the tribal liaison via phone and email, and the tribal liaison shall have the availability, access, and authority to respond to the tribes and address their concerns.

Status Update: Dawn Gilbert is the tribal liaison for Southern California counties and Charlie Born is the liaison for Northern California counties. Charlie and Dawn serve as back-up for the other's respective area. Beginning December 1, 2022, Jenny Smith will replace Charlie Born as the Northern California Northern counties liaison. The tribes are reminded of these contacts at each quarterly meeting.

California D.21-04-008 OP4 (l) - By no later than February 1 of each year, Frontier shall submit to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov) via the Commission's website <https://cpucftp.cpuc.ca.gov> a subscriber information report as of December 31 of the preceding year in a format designed by CD staff that will be treated as confidential information.

Status: CD staff did not provide a recommended format. Frontier filed its first confidential report on January 26, 2022, and its second confidential report on January 30, 2023.

California D.21-04-008 OP4 (m) - For the period from the effective date of this decision through February 14, 2025, Frontier shall submit quarterly reports within 45 days after the end of the reporting quarter to the Commission's CD at [telcoservicequality@cpuc.ca.gov](mailto:telcoservicequality@cpuc.ca.gov) in a format designed by CD staff that includes the following information:

- (i) The name and city, county, and zip code of each wire center.
- (ii) Each wire center's number of plain old telephone service customers, Voice over Internet Protocol customers, and customers served with fiber to the premises.
- (iii) Each wire center's monthly OOS repair rate for the previous two years.
- (iv) The Common Language Location Identifier codes for mapping purposes for each wire center.

- (v) Detailed plans for each project that attempts to improve service quality performance, including major milestones, task-level project details, test plans, and results.
- (vi) A justification for each project that attempts to improve service quality performance.
- (vii) The pre- and post-OOS repair rate and closeout package containing pre- and post-test result screenshots and pictures clearly showing changes made to improve service quality for all applicable wire center areas.
- (viii) All formulas used by Frontier to calculate a wire center's OOS repair rate, including the start time and date of each outage, time and date of service restoration, total outage duration, and the actual formula (not pasted in values) used to calculate the outage duration.
- (ix) A detailed inventory of major equipment used to repair or upgrade the network, including the equipment manufacturer's end of life information.
- (x) All supporting financial documentation to demonstrate the extent to which all investment plan projects were funded in excess of Frontier's business as usual funding levels.

Status: CD staff did not provide a recommended format. However, Frontier met with CD staff on January 19, 2022 to review the 2Q21 and 3Q21 report format used by Frontier. Staff requested that items (l) and (m) i, ii, iii, and iv, be combined into one file. Frontier explained that the formula to determine time to repair for a ticket is not an excel formula but programmed (sql) within the data warehouse. The sql formula remains unchanged. Due to the volume of data associated with v and vii, the data is provided quarterly to a SharePoint to which Staff has access. During the January 19, 2022 meeting, Frontier demonstrated to Staff how the excel file submitted in response to 4.m(x) serves as a reference index to correlate the data files by exchange name and project ID that are in the Share Point.

During the October 5, 2022, meeting, the Compliance Monitor requested that Frontier provide previous quarterly reported POTS, VoIP, and FTTP service adoption on the current report. Frontier made this requested change on the third quarter report.

All of the projects loaded to the SharePoint are new Fiber-to-the-Premise (FTTP) projects, also referred to as "Brownfield Modernization" projects. Prior to emergence from Chapter 11, Frontier did not invest in such projects and therefore, these projects are in excess to business-as-usual funding. These projects are not projects covering locations under RDOF.

Frontier filed the 2Q21 report on August 16, 2021. Frontier filed the 3Q21 report on November 15, 2021. Frontier filed the 4Q21 report on February 15, 2022. Frontier filed the 1Q22 report, using the new requested format, on May 16, 2022. Frontier filed the 2Q22 report on August 12,

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

2022. Frontier filed the 3Q22 report on November 15, 2022. The 4Q22 report was filed on February 14, 2023. The compliance monitor requested that Frontier add the following data to the 4.m.x report for 1Q23:

Meets 8% IRR- Y/N

Cost per Location

Avg IRR %

Maximum Cost for 8% IRR

Frontier will file the 1Q23 report on May 15, 2023 and will include the requested 4 data fields.

California D.21-04-008 OP4 (n) - Within 60 days of the effective date of this decision, Frontier shall open consultations with the Commission's Digital Infrastructure and Video Competition Act (DIVCA) staff to refine and improve the Commission's DIVCA map.

California D.21-04-008 OP4 (p) - Within 60 days of the effective date of this decision, Frontier shall open consultations with the Commission's CD staff for the purpose of providing more granular voice, video, and broadband availability and subscribership data."

Status OP4 (n) and OP4 (p): Frontier conducted an initial meeting with the parties on June 11, 2021, and a follow up meeting on July 27. Frontier provided requested confidential level information on September 15, 2021, related to broadband and video locations and subscribership. This condition is complete.

California D.21-04-008 OP4 (o) - At least 10 percent of Frontier's planned fiber buildout to the 150,000 locations with an Internal Rate of Return of 20 percent or less set forth in Paragraph 19 of the Attachment 1 Settlement Agreement shall be in locations in which Frontier is the only fixed broadband Internet access service provider. Frontier shall use the California Interactive Broadband Map (Map) to identify areas with only one service provider, unless it is able to show that the Map is inaccurate. At least 10 percent of the funds Frontier allocates to the fiber buildout to the 150,000 locations shall go to locations outside of Urbanized Areas, as defined by the U.S. Census Bureau as areas with fewer than 50,000 people.

Status: In accordance with Ordering Paragraph 4 (a) of California Public Utilities Commission Decision No. D.21-04-008, Attachment 1, Paragraph C.21, Frontier files an annual report of the fiber locations completed in the previous year. Beginning in 2024, Frontier will include data for the 150,000 locations identifying which locations are outside of urbanized areas and for which locations Frontier is the only fixed broadband internet access service provider.

California D.21-04-008 OP4 (q) - Frontier shall deploy either Fiber To The Home or a minimum 25/3 megabits per second to all households in the approved California Advanced Services Fund (CASF) projects in areas from Resolutions T- 17660 Weimar, T-17668 Taft

Quarterly Compliance Report in compliance with Ordering Paragraph 4 (e) of California Public Utilities Commission Decision No. D.21-04-008.

Cluster, and T-17671 Northeast Phase I. The completion deadlines for the Weimar and Taft Cluster projects shall be extended to one year from the effective date of this decision. The completion deadline for the Northeast Phase I project shall remain unchanged. By no later than March 1 and September 1 of each year, Frontier shall submit a report to CD staff describing its compliance with this subparagraph, including, without limitation, project accomplishments, project milestones (including major construction milestones) with completion percentage and completion dates, problems encountered and actions taken to resolve problems, upcoming milestones, subscribership information to date including households, businesses, and anchor institutions, payments received to date, and payment amounts currently being requested.

Status update: Frontier has filed its reports on September 1, 2021, March 1, 2022, August 31, 2022 and March 1, 2023.

California D.21-04-008 OP4 (r) - All middle mile infrastructure owned by Frontier for which the Commission has approved CASF grant funding in Resolutions T-17671 Northeast Phase I and T-17613 Lytle Creek shall be open access, with non-discriminatory access to independent service providers or other entities on reasonable and equal terms. All completion deadlines for projects referenced in this subparagraph shall remain unchanged. By no later than January 15 of each year for the life of the infrastructure of each project referenced in this subparagraph, Frontier shall submit a confidential report to CD staff describing its compliance with this subparagraph, including, without limitation, the number of interconnection requests and executed service agreements and, for each interconnection request, the date, requesting party, location, service requested, outcome, pricing, applicable tariffs, and terms and conditions.

Status update: Frontier has filed its first report on January 12, 2022. Frontier filed its second report on January 11, 2023. As shown in both reports, Frontier confirms, to date, that it has not received any requests for middle mile access.