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November 25, 2024

**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 submitting a revised submission for second quarter 2024 because this cover letter was not included in the original filing on August 15, 2024 and page one of the filed report stated "fourth quarter 2023" in the second paragraph and should have been "second quarter 2024". Frontier was asked to resubmit with this cover letter and corrections.

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:

Liza Tano, CPUC  
Llela Tan-Walsh, CPUC  
Johnny Tran, CPUC

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 the second quarter 2024.

Note: All completed requirements have been moved to the end of this document beginning with the fourth quarter 2023 report filed February 14, 2024.

## Table of Contents

<b>Settlement Agreement Attachment 1 .....</b>	<b>5</b>
Paragraph A.1.....	5
Paragraph A.2.....	5
Paragraph B.6.....	6
Paragraph B.9.....	8
Paragraph B.10.....	9
Paragraph B.11.....	9
Paragraph B.15.....	10
Paragraph C.17.....	11
Paragraph C.18.....	12
Paragraph C.22.....	12
Paragraph E. 31.....	12
Paragraph E. 32.....	12
Paragraph E. 33.....	13
Paragraph F. 37.....	13
Paragraph F. 40.....	14
Paragraph F. 41.....	15
<b>California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2... 15</b>	
<b>Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions .....</b>	<b>16</b>
Numbers 1. A and 1. B .....	16
Number 2. A.....	16
Number 2. C.....	17
Number 2. D.....	17
Number 2. E and 2. F.....	17
Number 6 .....	18
Number 7 .....	18
Number 7c.....	19
<b>California D.21-04-008 - Compliance.....</b>	<b>19</b>
OP4 (e) .....	19
OP4 (g).....	20
OP4 (h) .....	20
OP4 (i) .....	21

OP4 (j) .....	21
OP4 (k).....	21
OP4 (l) .....	22
OP4 (m) .....	22
OP4 (n) .....	24
OP4 (o) .....	24
OP4 (p) .....	24
OP4 (q) .....	25
OP4 (r) .....	26
<b>COMPLETED COMPLIANCE OBLIGATIONS.....</b>	<b>27</b>
<b>SETTLEMENT AGREEMENT 1 – PUBLIC ADVOCATES, TURN, CWA .....</b>	<b>27</b>
<b>SETTLEMENT AGREEMENT 2 - CALIFORNIA EMERGENING TECHNOLOGY FUND (CETF) .....</b>	<b>27</b>
<b>SETTLEMENT AGREEMENT 3 - YUROK TRIBE .....</b>	<b>28</b>
<b>Public Advocates Settlement Agreement Attachment 1.....</b>	<b>28</b>
Paragraph B.3.....	28
Paragraph B.4.....	28
Paragraph B.5.....	29
Paragraph B.7.....	31
Paragraph B.8.....	31
Paragraph B.12.....	32
Paragraph B.13.....	32
Paragraph B.14.....	32
Paragraph C.16.....	33
Paragraph C.19.....	33
Paragraph C.20.....	34
Paragraph C.21.....	34
Paragraph C.23.....	35
Paragraph D.24 .....	35
Paragraph D.25 .....	36
Paragraph D.26 .....	36
Paragraph E.27 - .....	36
Paragraph E.28 - .....	36

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

Paragraph E.29 .....	37
Paragraph E.30 .....	37
Paragraph E.34 .....	37
Paragraph E.35 .....	38
Paragraph F.36 .....	38
Paragraph F.38 .....	38
Paragraph F.39 .....	39
<b>California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2...</b>	<b>39</b>
Paragraph B.2.c.(ii) and (iii) - (ii) - .....	39
Paragraph C.7 .....	40
Paragraph C.16 .....	40
15 Covenant 9 of MOU .....	41
Paragraph 17 .....	42
<b>SETTLEMENT AGREEMENT 3 - YUROK TRIBE .....</b>	<b>42</b>
<b>Yurok Tribe Settlement Agreement Attachment 3, Terms and Conditions .....</b>	<b>42</b>
Numbers 3.A and 3.B .....	42
Number 4 .....	43
Number 5 .....	43

## **Settlement Agreement Attachment 1** **(Public Advocates, TURN, CWA)**

**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: In compliance.

See following status on Public Advocates Settlement Agreement Attachment 1, Paragraph A.2 for the reporting obligation. To date, Frontier has received approximately \$6.7M of RDOF (May 2022 – Mar 2024) funding and \$4.3M in CASF reimbursements in California (with another \$350K in reimbursements pending for CASF grants in Crescent City and Smith River), which is below 10% of the to-date capex spend in CA since emerging from Chapter 11 and well below 10% of \$1.75 billion. As of May 2023, the end of year two since emerging from Chapter 11, Frontier had spent over \$875 million in total capex that includes over \$222 million in investment in its copper voice network. As of December 2023, Frontier has spent over \$1.75 billion, including over \$222 million in capex investment in its copper voice network. (Note: Approximate CASF Funding received was previously noted at \$5.1M which is higher than actual reimbursements received between April 2021 and December 2023.)

**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 1<sup>st</sup> 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.

Status: In compliance.

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

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

Frontier filed its 12 months capital spend for May 2022 through April 2023 against the 12-month budget on May 30, 2023. The filing reflects that Frontier has spent more than \$875 million by April 30, 2023, and is on track to satisfy the \$1.75 billion spend commitment by May 2025.

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 has surpassed the \$222 million commitment.

Frontier will file its next confidential capital spend report to reflect May 2023 through January 2024 on or before March 1, 2024. Frontier will update the report to include February through April 2024 on or before May 30, 2024.

Frontier filed its confidential capital spend report on February 27, 2024, and will file the full year on or before May 30, 2024.

Frontier filed its confidential capital spend update, which included Jan 2024-April 2024 on June 18th, 2024.

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.

**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 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: In compliance.

As reported in its public report, 3Q21 G.O. 133-D, 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 in its public report, 4Q21 G.O. 133-D, 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 in its public report, 1Q22 G.O. 133-D, 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 in its public report, 2Q22 G.O. 133-D, 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 in its public report, 3Q22 G.O. 133-D, 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.

As reported in its public report, 4Q22 G.O. 133-D, filed on February 15, 2023, Frontier California failed to meet the 80% benchmark for Out of Service < 24 hrs. for 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 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 the settlement condition for B.6 on February 22, 2023, and reviewed the service improvement plan prior to filing the plan with the CPUC Communication's Division. The parties did not follow up with any



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

questions and the plan was filed on March 1, 2023. Frontier will file a status of the plan on or before March 1, 2024.

As reported in its public report, 1Q23 G.O. 133-D, filed on May 15, 2023, 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.

As reported in its public report, 2Q23 G.O. 133-D, filed on August 15, 2023, Frontier California and CTC California failed to meet the 90% benchmark for Out of Service < 24 hrs. for each month in the second quarter. Frontier Communications of the Southwest met the 90% benchmark for each month.

As reported in its public report, 3Q23 G.O. 133-D, filed on November 14, 2023, Frontier California, CTC California and Frontier Communications of the Southwest each failed to meet the 90% benchmark for Out of Service < 24 hrs. for each month in the third quarter.

Frontier's penalty for failing to meet its OOS metrics in 2023 is \$6,982,447. Frontier presented a proposed service quality improvement plan to the settlement parties on February 13, 2024, and filed its plan on March 1, 2024.

Frontier filed a status update on the Service Improvement Plan filed March 1, 2023, based on year 2022 results, on March 1, 2024.

Frontier filed an update to the 2022 Service Improvement Plan filed March 1, 2023, on August 8, 2024.

**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,

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

2023. The eighth full quarter report for April through June 2023, was filed on July 24, 2023. The ninth full quarter report for July through September 2023, was filed on October 13, 2023.

The 10<sup>th</sup> quarterly report was filed on January 22, 2024.

The 11<sup>th</sup> quarterly report was filed on April 18, 2024.

Frontier filed a quarterly report on July 18, 2024, which would be the 12<sup>th</sup> quarterly report.

**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 met on November 15, 2021, 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. ThinkNow provided to the parties 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.

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 started April 4, 2023, and completed May 16, 2023.

The fourth semi-annual survey started October 16, 2023, and completed November 10, 2023.

The fifth semi-annual survey will be completed by May 31, 2024.

The fifth semi-annual survey was completed May 31, 2024.

**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: In compliance.

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

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 and ThinkNow presented a report on the third semi-annual survey findings on June 28, 2023, to review the survey findings. CPUC, the Yurok Tribe and CWA were invited to the meeting.

Frontier and ThinkNow will present a report on the fourth semi-annual survey findings in mid-December 2023. The meeting data has not yet been finalized.

Frontier and ThinkNow presented wave four semi-annual survey findings on December 11, 2023. Public Advocates, CWA, TURN and the Yurok Tribe were present.

Frontier will schedule review of the fifth semi-annual survey findings with the settlement parties upon completion of the survey.

Review of the fifth semi-annual survey findings was held on June 18, 2024, where ThinkNow presented the results to those parties who were able to attend.

**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 liaison for the Northern California service area and Dawn Gilbert as the liaison for Frontier’s Southern California service area. The liaisons’ contact information has been provided to the all the Nations via email, virtual Tribal quarterly meetings, and other stakeholder meetings (the Governor’s office/CETF/etc.).

During the first quarter 2022, Amy Warshauer left the company and Dawn Gilbert remains the liaison for the Southern California service areas and Charlie Born is the liaison for the 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 during the fourth quarter meeting.

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

Effective January 1, 2024, Tim Watts and Dennis Deccio have replaced Dawn Gilbert. A new Exhibit A is included with this report. This information was shared during the fourth quarter Tribal meeting.

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

As of the date of this public report, Jenny Smith, Tim Watts and Dennis Deccio are designated as Frontier's Tribal Liaison's. Exhibit A is included with this report and there have been no changes since the filing on February 14, 2024.

There are no changes to Frontier's designated Tribal Liaisons for this quarterly public report.

**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 estimated timelines. Frontier met with the parties on June 22, 2023, and on July 25, 2023, to share a more detailed project tracking template which included accomplishments and challenges.

Frontier held its 3<sup>rd</sup> quarter Tribal meeting on September 21, 2023. All Tribal communities within Frontier's operating exchanges and the settlement parties were invited to attend and provide their input and recommendations on updates to the project plan. Frontier's current project plans to deploy either fiber to the home or 25/3 broadband services were discussed in detail. Meeting attendees included the Karuk Tribe and Public Advocates.

Frontier shares its plans and progress towards meeting its commitments. These plans are confidential and covered under Non-Disclosure Agreements. Frontier continues to schedule one on one meetings with Tribal leaders to collaborate on potential projects.

Frontier held its 4<sup>th</sup> quarter Tribal meeting on December 14, 2023. Frontier held its 1<sup>st</sup> quarter 2024 meeting on March 21<sup>st</sup> and provided updated information and status on Frontier's projects to deliver broadband to more than 15 different Tribal Nations. The 2<sup>nd</sup> quarter 2024 meeting is scheduled for June 20, 2024.

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

The 2<sup>nd</sup> quarter 2024 meeting was held on June 21<sup>st</sup>. Project status was provided to all attendees.

**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.

**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 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:** Complete.

Frontier filed its first report on March 1, 2022. Frontier filed its second report on March 1, 2023. Frontier filed its third report on March 1, 2024. Paragraph C.22 will be reflected in the completed section of the next quarterly status report.

Frontier filed an update to this report on August 5, 2024 at the request of the Compliance Monitor. This section will be moved to the completed section with the next quarterly report.

**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.

**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

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

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.

Frontier has not declared any dividends as of this 2<sup>nd</sup> quarter update. This section will move to the completed section with the next report filing for 3<sup>rd</sup> quarter 2024.

**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 as of this 2<sup>nd</sup> quarter update. This section will move to the completed section with the next report filing for 3<sup>rd</sup> quarter 2024.

**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: 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.

A meeting was calendared for 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. Frontier and CWA met on April 12<sup>th</sup> and the agenda included current head count for CWA employees, on-boarding of new hires and current trainings. The weather and the numerous State of Emergencies were also discussed as crews are all working overtime to address increased volumes. Frontier met with CWA again on June 13, 2023, for the 2<sup>nd</sup> quarterly meeting of 2023 and the same topics were discussed.

The 3<sup>rd</sup> quarter meeting was held on September 19<sup>th</sup> and the discussion centered around headcount and the open positions Frontier has available. The recent pole climbing training was also discussed.

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

On December 20, 2023, Frontier held a meeting with CWA. The meeting centered around headcount, available positions and current trainings. In the fourth quarter, Frontier conducted new hire training and pole climbing training.

The first quarter 2024 meeting was held on March 27, 2024. It was discussed if CWA and Frontier wanted to continue discussions through 2024 and it was agreed we would maintain our quarterly check-in meetings.

Frontier attempted to meet with CWA during the 2<sup>nd</sup> quarter but no meeting was held. It appears there was confusion as to which settlement obligations would be discussed as many of the commitments for head count, fiber deployment and capital expenditures have been met. Frontier will continue to work with CWA on scheduling a follow up meeting.

**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 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. An issues log has been created to document service issues from the Tribal communities. The issues list and action items are reviewed during each quarterly meeting. Frontier provided a PowerPoint prior to the April 19<sup>th</sup> meeting that identified potential build locations and timelines. Frontier met with the parties on June 22, 2023, and on July 25, 2023. The presentation decks were provided to the parties in advance of the meetings.

Frontier met with the parties on Thursday, September 21, 2023. An agenda, project log and issues log were provided two days prior to the meeting. Please see settlement condition C.17 beginning on page 11 for further information regarding quarterly Tribal meetings.

Frontier and the settlement parties met on December 14<sup>th</sup>. The agenda included an issues log with status updates for fourth quarter issues raised by Tribal representatives. Please see settlement condition C.17 on page 14-15 for more details on the quarterly Tribal meetings. Frontier continues to encourage Tribal leaders or their designated representatives to attend.

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

Frontier and the settlement parties met March 21, 2024. The issues log was reviewed, and status updates were provided. Please see settlement condition C.17 beginning on page 15 for further information regarding quarterly Tribal meetings.

Frontier conducted a meeting with the settlement parties and other Tribal representatives on June 21, 2024.

**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. Frontier responded to data request 7, issued June 19, 2023, regarding capex actuals, budget and FTTP projects. On January 19, 2024, Public Advocates submitted follow up questions to their Data Request #7. Frontier responded as data was available on February 1, February 6, and February 27<sup>th</sup>. Frontier received data request #8 on January 25, 2024, and Frontier supplied responses on February 5<sup>th</sup> and February 9<sup>th</sup>. Data request #9 was received on February 28, 2024, and was asked to provide a three-business day turn around. Frontier was able to meet the request and provided a response on February 28, 2024. Frontier received data request #10 on March 18, 2024, with questions relating to numerous Frontier filings, most of which related to Frontier’s customer survey and Frontier’s commitment to build broadband to 4000 Tribal locations. Frontier responded on April 1, 2024 and April 15<sup>th</sup>. Public Advocates Office submitted data request #11 on April 5, 2024, regarding Frontier’s March 1, 2024 filing on proposed network projects to improve out of service quality based on 2023 results. Frontier responded on April 16, 2024. On April 15<sup>th</sup> Public Advocates requested a meeting with additional data requests regarding Frontier’s submission to data request #7. Frontier submitted a response on May 8, 2024.

Frontier received data request #12 from Public Advocates on July 11, 2024 and Frontier responded on the due date, July 25<sup>th</sup>.

**California Emerging Technology Fund (“CETF”) Settlement Agreement Attachment 2**

All items are complete under this settlement agreement.



### **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. See comments in condition 2.A below regarding the NTIA grant awarded to the Yurok Tribe.

The Yurok Tribe has advised Frontier that it no longer is interested in working with Frontier to complete the Middle-mile fiber project from Orick to Klamath, CA. The Yurok Tribe has indicated that they have received their own grant funding and will not pursue this project further with Frontier.

**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 an 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: In Compliance

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.

The Yurok Tribe has advised Frontier that it no longer is interested in working with Frontier to complete the Middle-mile fiber project from Orick to Klamath, CA. The Yurok Tribe has indicated that they have received their own grant funding and will not pursue this project further with Frontier.

**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:** Complete.

The Yurok Tribe has advised Frontier that it no longer is interested in working with Frontier to complete the Middle-mile fiber project from Orick to Klamath, CA. The Yurok Tribe has indicated that they have received their own grant funding and will not pursue this project further with Frontier.

**Number 2. D** - Frontier will coordinate with the Tribe to complete the construction.

**Status:** Complete

The Yurok Tribe has advised Frontier that it no longer is interested in working with Frontier to complete the Middle-mile fiber project from Orick to Klamath, CA. The Yurok Tribe has indicated that they have received their own grant funding and will not pursue this project further with Frontier.

**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:** In compliance.

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

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

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.

The Yurok Tribe has advised Frontier that it no longer is interested in working with Frontier to complete the Middle-mile fiber project from Orick to Klamath, CA. The Yurok Tribe has indicated that they have received their own grant funding and will not pursue this project further with Frontier.

In lieu of the middle-mile project with Frontier, Frontier and the Yurok Tribe have held meetings every 3-4 weeks to discuss other potential projects for the benefit of the Yurok Reservation.

Frontier met with the Yurok tribe on April 2, 2024. Meetings are on-going.

Frontier and the Yurok have exchanged emails since the last April meeting and no further meetings have been scheduled at this time.

**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 used 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.

**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 Tribal representative on October 6, 2022 to review the data request responses. Frontier provided updated data in October and November 2022. Frontier has not received any further requests for information.

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

Ongoing negotiations and discussions continue between the Yurok and Frontier pursuant to settlement agreements terms and will continue. Frontier met with the Yurok on April 2, 2024.

**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.

**Status:** In compliance.

Frontier met with the Yurok Tribe 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. The second quarter 2023 meeting was held on May 2nd and again on June 12<sup>th</sup>. The third quarter 2023 meeting was held on August 10<sup>th</sup>.

The fourth quarter meeting was held on December 1, 2023. The first quarter meetings were held on January 10<sup>th</sup> and February 7<sup>th</sup>. A meeting was planned on March 6, 2024; however, this meeting needed to be rescheduled due to a conflict with the Yurok. A follow up meeting was held on April 2, 2024.

Due to a non-disclosure agreement with the Yurok Tribe, no details from the meetings will be published as part of this public report.

### **California D.21-04-008 - Compliance**

**OP4 (e)** -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

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

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: In compliance.

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

Frontier filed its 2Q21 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. The 1Q23 status report was filed May 15, 2023. The 2Q23 status report was filed on August 15, 2023. The 3<sup>rd</sup> quarter report was filed on November 14, 2023. The 4Q23 status report was filed on February 14, 2024. The 1Q 2024 status report was filed on May 15, 2024.

**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.

**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: In compliance.

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

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. On January 8, 2024, Frontier filed confirmation that the company had not issued a ROFO in 2023.

**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: In compliance.

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. There have not been any additional Nations added within the Frontier operating areas as of the date of this filing. Frontier continues to work with the Native American Heritage Commission in the event there are changes to the list of Nations we have been provided.

In November of 2023, Frontier worked with the Native American Heritage Commission to update the current list of Tribes, including contact information.

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

Status: In compliance.

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.

Frontier has provided fiber to the home project related maps to the Bishop Tribe in 2023.

Frontier provide maps to Round Valley Indian Tribe on March 14, 2024 related to fiber to the home projects pending within their territory and again on May 28, 2024 at their request.

**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: In compliance.

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 liaison. The Tribes are reminded of these contacts at each quarterly meeting.

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

Please see the attached Exhibit A for a detailed list of which liaison represents which county within the State.

Effective January 1, 2024, Dawn Gilbert was replaced by Tim Watts and Dennis Deccio. An updated Exhibit A was provided with the 4Q23 status report.

Exhibit A provided as part of February 15<sup>th</sup> filing is still valid as of the date of this filing.

**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: In compliance.

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. Frontier filed its third confidential report on January 30, 2024.

**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: In compliance.

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 the projects loaded to the SharePoint are new Fiber-to-the-Premise (FTTP) projects, also referred to as "Brownfield Modernization" projects. The most long-lasting method to improve quality of the network is to modernize it by building fiber optic facilities. Frontier's Building Gigabit America program focuses on building out fiber to the premise facilities. A fiber telecommunications network is a state-of-the-art infrastructure that modernizes the network and offers several benefits over traditional copper networks. Fiber networks eliminates the risk of electrical interference, which can result in network downtime. Fiber is also much more durable and resistant to environmental factors such as temperature, moisture, and corrosion, ensuring the network remains operational in harsh conditions. 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 do not include 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, 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



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

- Avg IRR %
- Maximum Cost for 8% IRR

Frontier filed the 1Q23 report on May 15, 2023. The report included the additional requested data. The 2Q23 report was submitted on August 15, 2023. The 3Q23 report was filed on November 15, 2023.

The Compliance monitor requested an additional template be provided that summarizes the projects in the Share Point. The 4Q23 report, including the additional template, was filed on February 14, 2024.

Frontier will file its 1Q24 report on May 15, 2024. This filing was completed on the 15<sup>th</sup> of May.

**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.

**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 compliance.

**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): In compliance.

Frontier conducted an initial meeting with the parties on June 11, 2021, and a follow up meeting on July 27<sup>th</sup>. Frontier provided to Ms. Selena Huang at the California Public Utilities Commission on September 15, 2021 the following requested data sets:

- Household level video service availability and subscribers
- Current, non-promotional, non-bundled video rates and subscribership
- Broadband speed profiles, such as the actual speed delivered to a household within a census block.

Neither the staff from the Commission’s Digital Infrastructure and Video Competition Act (DIVCA) or the Commission CD staff have had any additional requests.

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

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. The milestone associated with achieving 10 percent of the fund Frontier allocates to fiber buildout is the end of the program.

Frontier and the Compliance Monitor met with CPUC Staff on April 21, 2023, to review the California Interactive Broadband Map and how Frontier may utilize it to identify where Frontier is the only service provider. The CPUC Staff provided underlying map files to Frontier to assist in identifying locations.

Frontier used the underlying files provided by the CPUC staff to produce a report in response to Public Advocates Data Request No. 7-6, issued June 19, 2023. Frontier provided a confidential file that identified locations outside urbanized areas and locations where Frontier is the only service provider. The file was submitted and made available to the compliance monitor.

The annual 2024 report will identify which locations are outside of urbanized areas and those locations for which Frontier is the only fixed broadband internet access service provider.

Frontier provided a confidential file on March 1, 2024, with fiber location information under ordering paragraph C.21 that identified locations outside of urbanized areas and where Frontier was the only fixed broadband internet service provider based on the California Interactive Broadband Map available at the time Frontier exited bankruptcy in 2021. In addition, Frontier provided a narrative on the report filed to the Compliance Monitor highlighting the number of locations and that Frontier was able to exceed the 10% of 150,000 location requirement.

Frontier provided an update to this section on July 26, 2024 with additional financial information regarding the 10% of 150,000 locations in non-urban areas.

**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 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: In compliance.

Frontier has filed its reports on September 1, 2021, March 1, 2022, August 31, 2022, and March 1, 2023. Frontier provided an emailed status report on August 31, 2023, and a

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

supplemental status report on September 18, 2023. Frontier will file a report on or before March 1, 2024 noting Resolutions T-17660 for Weimar and T-17688 Taft Cluster have been completed and all remaining compliance material has been submitted to the CPUC.

Frontier filed an update report on February 27, 2024, noting both Resolutions T-17660 for Weimar and T-17688 Taft Cluster have been completed. In addition, Frontier provided detailed updates for the remaining Northeast Phase 1 (T-17671) CASF grant project. Frontier will file its next update report on or before September 1, 2024.

**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: In compliance.

Frontier has filed its first report on January 12, 2022. Frontier filed its second report on January 11, 2023. Frontier confirms, to date, that it has not received any requests for middle mile access.

Frontier filed a report on January 8, 2024, for the year of 2023, and continues to confirm there have been no requests received for access to middle mile.

## COMPLETED COMPLIANCE OBLIGATIONS

### SETTLEMENT AGREEMENT 1 – PUBLIC ADVOCATES, TURN, CWA

PARAGRAPH	COMPLETION DATE
B.3	June 25, 2021
B.4	February 5, 2024
B.5	March 31, 2024
B.7	December 31, 2023
B.8	December 31, 2023
B.12	February 23, 2024
B.13	June 29, 2021
B.14	March 1, 2024
C.16	July 29, 2021
C.19	March 1, 2024
C.20	March 1, 2023
C.21	March 1, 2024
C.23	May 28, 2021
D.24	January 1, 2024
D.25	December 31, 2021
D.26	June 24, 2021
E.27	May 28, 2021
E.28	May 28, 2021
E.29	April 3, 2023
E.30	April 3, 2023
E.34	July 29, 2021
E.35	March 1, 2024
F.36	May 3, 2021
F.38	May 1, 2022
F.39	March 1, 2024

### SETTLEMENT AGREEMENT 2 - CALIFORNIA EMERGENING TECHNOLOGY FUND (CETF)

PARAGRAPH	COMPLETION DATE
B.2 ii - iii	December 31, 2021
C.7	December 31, 2023
C.16	December 31, 2023
15 Covenant 9 of MOU	March 31, 2022
17	August 3, 2021

### **SETTLEMENT AGREEMENT 3 - YUOK TRIBE**

<b>PARAGRAPH</b>	<b>COMPLETION DATE</b>
3.A	May 14, 2021
3.B	May 13, 2021
4.	June 7, 2021
5.	May 3, 2021

### **SETTLEMENT AGREEMENT 1 – PUBLIC ADVOCATES, TURN, CWA**

#### **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 this one-time detailed confidential report on June 25, 2021

**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: Complete

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

Frontier emailed a draft of the service improvement plan to parties on July 1, 2021, and emailed an updated plan on July 20, 2021. Frontier met with the parties on July 21, 2021, to review the plan. Frontier did not receive follow up inquiries or comments from the parties. The projects in the plan are for maintenance and repair to the copper network. 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 filed its fourth semi-annual report on July 27, 2023. Frontier continues to make progress on the projects that have been identified and will file its next semi-annual report on or before January 31, 2024.

On January 31, 2024, Frontier submitted its next semi-annual report and had one project remaining. On February 5, 2024, Frontier submitted a final report with all projects completed effective January 31, 2024.

**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: Complete

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>

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

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>
April	93	6640	678	37545	771	44185
May	74	6370	646	26985	720	33355
June	63	1670	459	15020	522	16690
<b>2Q23</b>	<b>230</b>	<b>14680</b>	<b>1783</b>	<b>79550</b>	<b>2013</b>	<b>94230</b>
July	54	1030	393	9550	447	10580
August	63	1410	572	14535	635	15945
September	66	2720	498	9290	564	12010
<b>3Q23</b>	<b>183</b>	<b>5160</b>	<b>1463</b>	<b>33375</b>	<b>1646</b>	<b>38535</b>
October	93	7080	756	16695	849	23775
November	134	15750	721	15590	855	31340
December	65	2430	560	9270	625	11700
<b>4Q23</b>	<b>292</b>	<b>25260</b>	<b>2037</b>	<b>41555</b>	<b>2329</b>	<b>66815</b>

Month	Tribal		Non-Tribal		Total	
	Count	Amount	Count	Amount	Count	Amount
January	62	3920	622	10525	684	14445
February	117	4160	1011	19090	1128	23250
March	61	2860	592	19930	653	22790
<b>1Q24</b>	<b>240</b>	<b>10940</b>	<b>2225</b>	<b>49545</b>	<b>2465</b>	<b>60485</b>

**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: Complete

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. See B.9 reporting obligation.

As of this February 15, 2024 report, Frontier still maintains staffing levels greater than the identified threshold.

**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: Complete.

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 as of September 2023.

Effective February 15, 2024 there have been no further modifications to the call centers.



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

This obligation has expired and will move to the completed portion of the report with the first quarter 2024 report filing in May.

**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: Complete

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. Frontier will file its fourth and final report on or before March 1, 2024.

Frontier filed its fourth and final report on February 23, 2024. Effective with the 3<sup>rd</sup> Quarter filing of this public report, this section, B.12, will move to the complete file at the end of the report.

**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 one-time confidential report on June 29, 2021.

**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: Complete

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

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 May 11, 2023. Frontier will file its fourth and final report on or before March 1, 2024.

Frontier filed the fourth and final report on March 1, 2024. Paragraph B.14 will move to the completed section on the next quarterly status report.

**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 one-time 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.

**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.<sup>14</sup> 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:** Complete.

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)

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

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%. The reports identified the census block, whether the location is residential, commercial, or located on Tribal lands and if the IRR is less than 20%.

Frontier filed its confidential report on March 1, 2024.

**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 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, for the first 100,000 FTTP locations. 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 locations commitment in early 2022.

Frontier filed a confidential annual report on March 1, 2023, that reflected over 260,000 total locations. The report identified the census block, full address, whether the location is residential, commercial, or located on Tribal lands and if the IRR is less than 20%. Fiber builds to date have taken place in over 120 wire centers throughout Frontier's California footprint.

**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

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

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: Complete.

Frontier filed its first confidential report on March 1, 2022. Frontier filed its second confidential annual report on March 1, 2023 (see reporting for C20). Frontier filed its third confidential report on March 1, 2024. Broadband service offerings to the FTTP locations start at a speed of 200M for only \$29.99 with the selection of autopay. There are many other offerings with increased speeds depending on each customer's needs.

**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 one-time confidential report on May 28, 2021.

**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: Complete

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>.

The availability of discount broadband programs continues to be part of the presentation deck and discussion at each quarterly Tribal meeting. The presentation deck is emailed to all the Nations within Frontier exchanges and the settlement parties prior to the meeting, and all are encouraged to attend.

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

Frontier continues to offer Affordable Broadband and Frontier Fundamental Internet to its existing customers who currently have those services. Effective April 30, 2024, the Affordable Connectivity Program credits will no longer be applied to customer accounts. To support our low-income customers, Frontier offers a 200M FTTP service at \$29.99 with autopay and lifeline credits can be applied for additional discounts. This section will move to the completed section with the next filing.

**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.

**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 one-time confidential report on June 24, 2021.

**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 one-time confidential report on May 28, 2021.

**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,

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

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.

Status: Complete.

Frontier submitted its one-time confidential report on May 28, 2021.

**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: 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 on April 3, 2023.

**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: 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.

**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

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

mutually agreed up on the Parties. Supporting documentation including data sources and calculations shall be provided with this report.

Status: Complete.

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

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

Status: Complete.

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. Frontier filed its third and final report on or before March 1, 2024. Paragraph E.35 will be reflected in the completed section of the next quarterly status report to be filed on or before August 15, 2024.

**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.

**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 (FTTH); Expansion project and existing Fiber upgrade training for technicians
- WiFi; In-home Wi-Fi installation and customer device hook ups

- MTP-Next; Mobile Tech Portal – Next, project training. This new digital technology will enable technicians to provide a better customer experience by putting what they need at their fingertips – in a modern, digital way.
- Personalized Training. Curriculums are 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 with 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.

**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.

Frontier remains in compliance with all current collective bargaining agreements. Paragraph F.39 will move to the completed portion in its next quarterly report to be filed on or before August 15, 2024.

## **SETTLEMENT AGREEMENT 2 – CALIFORNIA EMERGENING TECHNOLOGY FUND (CETF)**

### **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 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 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.

On September 28, 2023, Frontier donated 5 chrome books to be used for ACP outreach contests.

**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: Complete.

Frontier continued to offer Affordable Broadband and Frontier Fundamental service plans through December 2023. 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 plans to roll out a new broadband plan for lower income households in the first quarter of 2024 and once the new program begins, the above websites will no longer be available.

**Paragraph C.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: Complete

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 and has most recently provided letters of support for 12 CASF applications Frontier submitted in June of 2023 and letters of support for 23 Federal Funding Account applications Frontier submitted in California.

**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 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.

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

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.

**Paragraph 17** – The parties agree that within 90 days of Frontier’s emergency from Chapter 11, currently 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.

### **SETTLEMENT AGREEMENT 3 - 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: 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.

**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.

**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.

Status: Complete.

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

## EXHIBIT A

### California D.21-04-008 OP4 (k)

<b>Company Name</b>	<b>Exchange Name</b>	<b>County</b>	<b>Tribal Liaison</b>
Citizens Telecommunications Company of California, Inc.	MAXWELL	COLUSA	Jenny Smith
Citizens Telecommunications Company of California, Inc.	PRINCETON CA	COLUSA	Jenny Smith
Citizens Telecommunications Company of California, Inc.	ARBUCKLE	COLUSA	Jenny Smith
Citizens Telecommunications Company of California, Inc.	COLUSA	COLUSA	Jenny Smith
Citizens Telecommunications Company of California, Inc.	GRIMES	COLUSA	Jenny Smith
Citizens Telecommunications Company of California, Inc.	WILLIAMS CA	COLUSA	Jenny Smith
Citizens Telecommunications Company of California, Inc.	FERNDALE	HUMBOLDT	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	PETROLIA	HUMBOLDT	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	ADIN	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	BIEBER	LASSEN	Jenny Smith/Tim Watts

Citizens Telecommunications Company of California, Inc.	EAGLE LAKE	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	HERLONG	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	JANESVILLE	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	RAVENDALE	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	STANDISH	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	SUSANVILLE	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	WESTWOOD	LASSEN	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	LIVINGSTON CA	MERCED	Jenny Smith
Citizens Telecommunications Company of California, Inc.	ALTURAS	MODOC	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	CEDARVILLE	MODOC	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	CHESTER	PLUMAS	Jenny Smith/Tim Watts

Citizens Telecommunications Company of California, Inc.	GREENVILLE	PLUMAS	Jenny Smith
Citizens Telecommunications Company of California, Inc.	KEDDIE	PLUMAS	Jenny Smith
Citizens Telecommunications Company of California, Inc.	LAKE ALMANOR	PLUMAS	Jenny Smith
Citizens Telecommunications Company of California, Inc.	ISLETON	SACRAMENTO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	COURTLAND	SACRAMENTO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	MEADOWVIEW	SACRAMENTO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	WALNUT GROVE	SACRAMENTO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	ELK GROVE	SACREMENTO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	NEEDLES	SAN BERNADINO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	MUSCOY	SAN BERNARDINO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	SAN BERNARDINO	SAN BERNARDINO	Jenny Smith

Citizens Telecommunications Company of California, Inc.	SAN ANTONIO VALLEY	SANTA CLARA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	PALO CEDRO	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	BELLA VISTA	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	BURNEY	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	FALL RIVER MILLS	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	MONTGOMERY CREEK	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	OAK RUN	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	SHINGLETOWN	SHASTA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	MCCLLOUD	SISKIYOU	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	RIO VISTA	SOLANO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	PATTERSON	STANISLAUS	Jenny Smith



Citizens Telecommunications Company of California, Inc.	MINERAL	TEHAMA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	PAYNES CREEK	TEHAMA	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	WEAVERVILLE	TRINITY	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	TUOLUMNE	TUOLUMNE	Jenny Smith
Citizens Telecommunications Company of California, Inc.	CLARKSBURG	YOLO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	GUINDA	YOLO	Jenny Smith
Citizens Telecommunications Company of California, Inc.	CRESCENT CITY	DEL NORTE	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	GASQUET	DEL NORTE	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	HIOUCHI	DEL NORTE	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	KLAMATH	DEL NORTE	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	SMITH RIVER	DEL NORTE	Jenny Smith/Tim Watts

Citizens Telecommunications Company of California, Inc.	ORICK	HUMBOLDT	Jenny Smith/Tim Watts
Citizens Telecommunications Company of California, Inc.	CRESCENT CITY	DEL NORTE	Jenny Smith/Tim Watts
Frontier California, Inc	POMONA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	DESERT HOT SPRINGS	RIVERSIDE	Dennis Deccio
Frontier California, Inc	PERRIS	RIVERSIDE	Dennis Deccio
Frontier California, Inc	WOODFORDS	ALPINE	Jenny Smith
Frontier California, Inc	PACOIMA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	DUNLAP	FRESNO	Jenny Smith
Frontier California, Inc	FOWLER	FRESNO	Jenny Smith
Frontier California, Inc	GRANT GROVE VILLAGE	FRESNO	Jenny Smith
Frontier California, Inc	MIRAMONTE	FRESNO	Jenny Smith
Frontier California, Inc	REEDLEY	FRESNO	Jenny Smith
Frontier California, Inc	SAN JOAQUIN	FRESNO	Jenny Smith
Frontier California, Inc	SQUAW VALLEY (Olympic Valley)	PLACER	Jenny Smith
Frontier California, Inc	FERNDAL	HUMBOLDT	Jenny Smith
Frontier California, Inc	DESERT SHORES	IMPERIAL	Jenny Smith
Frontier California, Inc	SALTON CITY	IMPERIAL	Jenny Smith
Frontier California, Inc	BISHOP	INYO	Jenny Smith
Frontier California, Inc	CHINA LAKE	KERN	Dennis Deccio
Frontier California, Inc	RIDGECREST	KERN	Jenny Smith
Frontier California, Inc	CORCORAN	KINGS	Jenny Smith
Frontier California, Inc	SUSANVILLE	LASSEN	Jenny Smith/Tim Watts
Frontier California, Inc	QUARTZ HILL	LOS ANGELES	Dennis Deccio
Frontier California, Inc	LA PUENTE E VALLEY	LOS ANGELES	Dennis Deccio
Frontier California, Inc	ARTESIA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	AZUSA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	BALDWIN PARK	LOS ANGELES	Dennis Deccio
Frontier California, Inc	BEL AIR	LOS ANGELES	Dennis Deccio
Frontier California, Inc	BELL GARDENS	LOS ANGELES	Dennis Deccio
Frontier California, Inc	BELLFLOWER	LOS ANGELES	Dennis Deccio
Frontier California, Inc	CANAAN	LOS ANGELES	Dennis Deccio
Frontier California, Inc	CLAREMONT	LOS ANGELES	Dennis Deccio
Frontier California, Inc	DIAMOND BAR	LOS ANGELES	Dennis Deccio

Frontier California, Inc	DOWNEY	LOS ANGELES	Dennis Deccio
Frontier California, Inc	GLENDORA	LOS ANGELES	Jenny Smith
Frontier California, Inc	GRANADA HILLS	LOS ANGELES	Dennis Deccio
Frontier California, Inc	HERMOSA BEACH	LOS ANGELES	Dennis Deccio
Frontier California, Inc	LA HABRA	ORANGE	Dennis Deccio
Frontier California, Inc	LA VERNE	LOS ANGELES	Dennis Deccio
Frontier California, Inc	LAKE HUGHES	LOS ANGELES	Dennis Deccio
Frontier California, Inc	LANCASTER	LOS ANGELES	Dennis Deccio
Frontier California, Inc	LONG BEACH	LOS ANGELES	Dennis Deccio
Frontier California, Inc	LOS ANGELES	LOS ANGELES	Dennis Deccio
Frontier California, Inc	MALIBU	LOS ANGELES	Dennis Deccio
Frontier California, Inc	MANHATTAN BEACH	LOS ANGELES	Dennis Deccio
Frontier California, Inc	MONROVIA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	NEWBURY PARK	LOS ANGELES	Dennis Deccio
Frontier California, Inc	NORWALK	LOS ANGELES	Dennis Deccio
Frontier California, Inc	ONTARIO MAIN	LOS ANGELES	Dennis Deccio
Frontier California, Inc	OXNARD	LOS ANGELES	Dennis Deccio
Frontier California, Inc	PALOS VERDES ESTATES	LOS ANGELES	Dennis Deccio
Frontier California, Inc	PASADENA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	PICO RIVERA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	POINT MUGU NAWC	LOS ANGELES	Dennis Deccio
Frontier California, Inc	POMONA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	REDONDO BEACH	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SAN DIMAS	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SAN FERNANDO	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SANTA MONICA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SEAL BEACH	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SEPULVEDA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SIERRA MADRE	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SOUTH LAGUNA BEACH	ORANGE	Dennis Deccio
Frontier California, Inc	SUNLAND/TUJUNGA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	SYLMAR	LOS ANGELES	Dennis Deccio
Frontier California, Inc	THOUSAND OAKS	VENTURA	Dennis Deccio
Frontier California, Inc	TOPANGA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	TORRANCE	LOS ANGELES	Dennis Deccio
Frontier California, Inc	UPLAND	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	WEST LOS ANGELES	LOS ANGELES	Dennis Deccio
Frontier California, Inc	WESTMINSTER	ORANGE	Dennis Deccio
Frontier California, Inc	WHITTIER LA HABRA	LOS ANGELES	Dennis Deccio

Frontier California, Inc	PLAYA DEL REY	LOS ANGELES	Dennis Deccio
Frontier California, Inc	WALNUT	LOS ANGELES	Dennis Deccio
Frontier California, Inc	HUNTINGTON BEACH	ORANGE	Dennis Deccio
Frontier California, Inc	LAGUNA BEACH	ORANGE	Dennis Deccio
Frontier California, Inc	SEAL BEACH	ORANGE	Dennis Deccio
Frontier California, Inc	ANZA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	BANNING	RIVERSIDE	Dennis Deccio
Frontier California, Inc	BARSTOW	SAN BERNADINO	
Frontier California, Inc	BEAUMONT	RIVERSIDE	Dennis Deccio
Frontier California, Inc	BERMUDA DUNES	RIVERSIDE	Dennis Deccio
Frontier California, Inc	BLYTHE	RIVERSIDE	Dennis Deccio
Frontier California, Inc	CALIMESA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	COACHELLA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	DESERT CENTER	RIVERSIDE	Dennis Deccio
Frontier California, Inc	EDGEMONT	RIVERSIDE	Dennis Deccio
Frontier California, Inc	ELSINORE	RIVERSIDE	Dennis Deccio
Frontier California, Inc	HEMET	RIVERSIDE	Dennis Deccio
Frontier California, Inc	HOMELAND	RIVERSIDE	Dennis Deccio
Frontier California, Inc	IDYLLWILD	RIVERSIDE	Dennis Deccio
Frontier California, Inc	LA QUINTA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	MECCA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	MURRIETA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	NORTH SHORE	RIVERSIDE	Dennis Deccio
Frontier California, Inc	OASIS	RIVERSIDE	Dennis Deccio
Frontier California, Inc	PALM DESERT	RIVERSIDE	Jenny Smith
Frontier California, Inc	PERRIS	RIVERSIDE	Dennis Deccio
Frontier California, Inc	PINYON PINES	RIVERSIDE	Dennis Deccio
Frontier California, Inc	QUAIL VALLEY	RIVERSIDE	Dennis Deccio
Frontier California, Inc	RANCHO CALIFORNIA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	RANCHO MIRAGE	RIVERSIDE	Dennis Deccio
Frontier California, Inc	SAN JACINTO	RIVERSIDE	Dennis Deccio
Frontier California, Inc	SUN CITY	RIVERSIDE	Dennis Deccio
Frontier California, Inc	SUNNYMEAD	RIVERSIDE	Dennis Deccio
Frontier California, Inc	TEMECULA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	THERMAL	RIVERSIDE	Dennis Deccio
Frontier California, Inc	VALLE VISTA	RIVERSIDE	Dennis Deccio
Frontier California, Inc	INDIO	RIVERSIDE	Dennis Deccio
Frontier California, Inc	MEADOWVIEW	SACRAMENTO	Jenny Smith
Frontier California, Inc	MENTONE	SAN BERDARDINO	Dennis Deccio
Frontier California, Inc	ARROWHEAD FARMS	SAN BERNARDINO	Dennis Deccio

Frontier California, Inc	CHINO	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	CRESTLINE	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	CUCAMONGA	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	DESERT HEIGHTS	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	ETIWANDA	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	HESPERIA	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	HOMESTEAD VALLEY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	JOSHUA TREE	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	LENWOOD	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	LOMA LINDA	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	LOS SERRANOS	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	LUCERNE VALLEY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	MORONGO VALLEY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	MUSCOY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	PALM SPRINGS	RIVERSIDE	Jenny Smith
Frontier California, Inc	TWENTYNINE PALMS	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	VICTORVILLE	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	YUCAIPA	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	YUCCA VALLEY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	REDLANDS	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	LATHROP	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	MANTECA	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	GUADALUPE	SAN LUIS OBISPO	Jenny Smith
Frontier California, Inc	SANTA MARIA	SAN LUIS OBISPO	Jenny Smith
Frontier California, Inc	CARPINTERIA	SANTA BARBARA	Jenny Smith
Frontier California, Inc	GOLETA	SANTA BARBARA	Jenny Smith
Frontier California, Inc	LOMPOC	SANTA BARBARA	Jenny Smith
Frontier California, Inc	LOS ALAMOS	SANTA BARBARA	Jenny Smith
Frontier California, Inc	MONTECITO	SANTA BARBARA	Jenny Smith
Frontier California, Inc	ORCUTT	SANTA BARBARA	Jenny Smith
Frontier California, Inc	SAN BERNARDINO MARSHALL	SAN BERNARDINO	Jenny Smith
Frontier California, Inc	VANDENBERG AFB	SANTA BARBARA	Jenny Smith
Frontier California, Inc	SANTA BARBARA	SANTA BARBARA	Jenny Smith
Frontier California, Inc	GILROY	SANTA CLARA	Jenny Smith
Frontier California, Inc	LOS GATOS	SANTA CLARA	Jenny Smith
Frontier California, Inc	MORGAN HILL	SANTA CLARA	Jenny Smith
Frontier California, Inc	NOVATO	SANTA CLARA	Jenny Smith
Frontier California, Inc	FALL RIVER MILLS	SHASTA	Jenny Smith/Tim Watts
Frontier California, Inc	RIO VISTA	SOLANO	Jenny Smith

Frontier California, Inc	KENWOOD	SONOMA	Jenny Smith
Frontier California, Inc	TIMBER COVE	SONOMA	Jenny Smith
Frontier California, Inc	PATTERSON	STANISLAUS	Jenny Smith/Tim Watts
Frontier California, Inc	WEAVERVILLE	TRINITY	Jenny Smith/Tim Watts
Frontier California, Inc	ALPAUGH	TULARE	Dennis Deccio
Frontier California, Inc	BADGER	TULARE	Jenny Smith
Frontier California, Inc	LINDSAY	TULARE	Jenny Smith
Frontier California, Inc	REEDLEY	TULARE	Jenny Smith
Frontier California, Inc	STRATHMORE	TULARE	Jenny Smith
Frontier California, Inc	EL RIO	VENTURA	Dennis Deccio
Frontier California, Inc	NEWBURY PARK	VENTURA	Dennis Deccio
Frontier California, Inc	PACIFIC PALISADES	VENTURA	Dennis Deccio
Frontier California, Inc	SANTA PAULA	VENTURA	Dennis Deccio
Frontier California, Inc	CAMARILLO	VENTURE	Dennis Deccio
Frontier California, Inc	COVINA	LOS ANGELES	Dennis Deccio
Frontier California, Inc	CANTUA CREEK	FRESNO	Jenny Smith
Frontier California, Inc	ORO LOMA	FRESNO	Jenny Smith
Frontier California, Inc	SANGER	FRESNO	Jenny Smith
Frontier California, Inc	TIVY VALLEY	FRESNO	Jenny Smith
Frontier California, Inc	TRANQUILLITY	FRESNO	Jenny Smith
Frontier California, Inc	ALDERPOINT	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	GARBERVILLE	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	GREENVILLE	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	HOOPA	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	ORLEANS	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	WHITETHORN	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	WILLOW CREEK	HUMBOLDT	Jenny Smith/Tim Watts
Frontier California, Inc	PIERCY	MENDOCINO	Jenny Smith
Frontier California, Inc	BIG PINE	INYO	Jenny Smith
Frontier California, Inc	INDEPENDENCE	INYO	Jenny Smith
Frontier California, Inc	INYOKERN	KERN	Dennis Deccio
Frontier California, Inc	JUNE LAKE	INYO	Jenny Smith
Frontier California, Inc	LONE PINE	INYO	Jenny Smith
Frontier California, Inc	OLANCHA	INYO	Jenny Smith
Frontier California, Inc	PINE CREEK	INYO	Jenny Smith
Frontier California, Inc	BERRENDA MESA	KERN	Dennis Deccio
Frontier California, Inc	BORON	KERN	Dennis Deccio
Frontier California, Inc	BUTTONWILLOW	KERN	Dennis Deccio
Frontier California, Inc	CALIFORNIA CITY	KERN	Dennis Deccio
Frontier California, Inc	FELLOWS	KERN	Jenny Smith

Frontier California, Inc	GLENNVILLE	KERN	Dennis Deccio
Frontier California, Inc	KERNVILLE	KERN	Jenny Smith
Frontier California, Inc	LAKE ISABELLA	KERN	Jenny Smith
Frontier California, Inc	LOST HILLS	KERN	Jenny Smith
Frontier California, Inc	MARICOPA	KERN	Jenny Smith
Frontier California, Inc	MCFARLAND	KERN	Jenny Smith
Frontier California, Inc	MCKITTRICK	KERN	Jenny Smith
Frontier California, Inc	NORTH EDWARDS	KERN	Jenny Smith
Frontier California, Inc	RANDBURG	KERN	Jenny Smith
Frontier California, Inc	TAFT	KERN	Jenny Smith
Frontier California, Inc	WELDON	KERN	Jenny Smith
Frontier California, Inc	COVELO	MENDOCINO	Jenny Smith
Frontier California, Inc	LAYTONVILLE	MENDOCINO	Jenny Smith
Frontier California, Inc	LEGGETT	MENDOCINO	Jenny Smith
Frontier California, Inc	DOS PALOS	MERCED	Jenny Smith
Frontier California, Inc	SNELLING	MERCED	Jenny Smith
Frontier California, Inc	BENTON	MONO	Jenny Smith
Frontier California, Inc	BRIDGEPORT	MONO	Jenny Smith
Frontier California, Inc	CROWLEY LAKE	MONO	Jenny Smith
Frontier California, Inc	LEE VINING	MONO	Jenny Smith
Frontier California, Inc	MAMMOTH LAKES	MONO	Jenny Smith
Frontier California, Inc	PARKFIELD	MONTEREY	Jenny Smith
Frontier California, Inc	COLFAX	PLACER	Jenny Smith
Frontier California, Inc	WEIMAR	PLACER	Jenny Smith
Frontier California, Inc	ADELANTO	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	APPLE VALLEY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	BIG BEAR CITY	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	BIG BEAR LAKE	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	DESERT KNOLLS	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	EL MIRAGE	SAN BERNARDINO	Jenny Smith
Frontier California, Inc	FORT IRWIN	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	HELENDALE-SILVER LAKES	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	LENWOOD	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	NEWBERRY SPRINGS	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	PHELAN	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	RUNNING SPRINGS	SAN BERNARDINO	Jenny Smith
Frontier California, Inc	SUMMIT VALLEY	SAN BERNARDINO	Jenny Smith
Frontier California, Inc	TRONA	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	WRIGHTWOOD	SAN BERNARDINO	Dennis Deccio

Frontier California, Inc	YERMO	SAN BERNARDINO	Dennis Deccio
Frontier California, Inc	CLEMENTS	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	FARMINGTON	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	LATHROP	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	LINDEN	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	RIPON	SAN JOAQUIN	Jenny Smith
Frontier California, Inc	SAN MIGUEL	SAN LUIS OBISPO	Jenny Smith
Frontier California, Inc	CUYAMA	SANTA BARBARA	Jenny Smith
Frontier California, Inc	ELLWOOD	SANTA BARBARA	Jenny Smith
Frontier California, Inc	CAZADERO	SONOMA	Jenny Smith
Frontier California, Inc	SEA RANCH	SONOMA	Jenny Smith
Frontier California, Inc	TIMBER COVE	SONOMA	Jenny Smith
Frontier California, Inc	ROBBINS	SUTTER	Jenny Smith
Frontier California, Inc	HAYFORK	TRINITY	Jenny Smith
Frontier California, Inc	MAD RIVER	TRINITY	Jenny Smith
Frontier California, Inc	WEAVERVILLE	TRINITY	Jenny Smith
Frontier California, Inc	CALIFORNIA HOT SPRINGS	TULARE	Jenny Smith
Frontier California, Inc	EXETER	TULARE	Jenny Smith
Frontier California, Inc	FARMERSVILLE	TULARE	Jenny Smith
Frontier California, Inc	LEMON COVE	TULARE	Jenny Smith
Frontier California, Inc	KNIGHTS LANDING	YOLO	Jenny Smith
Frontier California, Inc	SOLVANG	SAN LUIS OBISPO	Jenny Smith
Frontier Communications of the Southwest, Inc	WOODFORDS	ALPINE	Jenny Smith
Frontier Communications of the Southwest, Inc	PALO VERDE	IMPERIAL	Dennis Deccio
Frontier Communications of the Southwest, Inc	COLEVILLE	MONO	Jenny Smith
Frontier Communications of the Southwest, Inc	BLYTHE	RIVERSIDE	Dennis Deccio
Frontier Communications of the Southwest, Inc	BIG RIVER	SAN BERNARDINO	Dennis Deccio
Frontier Communications of the Southwest, Inc	HAVASU LAKE	SAN BERNARDINO	Dennis Deccio



Frontier Communications of the Southwest, Inc	Alpine	SAN BERNARDINO	Dennis Deccio
Frontier Communications of the Southwest, Inc	Earp	SAN BERNARDINO	Dennis Deccio
Frontier Communications of the Southwest, Inc	Parker Dam	SAN BERNARDINO	Dennis Deccio