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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking  
Regarding Emergency Disaster Relief  
Program.

R. 18-03-011  
(March 22, 2018)

**OPENING COMMENTS OF  
FRONTIER CALIFORNIA, INC. (U 1002 C)  
FRONTIER COMMUNICATIONS OF CALIFORNIA (U 1024 C)  
FRONTIER COMMUNICATIONS OF THE SOUTHWEST, INC. (U 1026 C)  
("FRONTIER")  
ON MARCH 6, 2020 ASSIGNED COMMISSIONER'S  
RULING AND PROPOSAL**

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April 3, 2020

Attorneys for Frontier

1 **I. INTRODUCTION.**

2 Frontier California, Inc. (U 1002 C), Frontier Communications of California (U 1024 C),  
3 and Frontier Communications of the Southwest (U 1026 C) (collectively, "Frontier") hereby  
4 respond to the March 6, 2020 Assigned Commissioner’s Ruling of President Batjer (“Ruling”)  
5 according to the schedule outlined in the Ruling. The Ruling attaches an Assigned  
6 Commissioner’s Proposal (“Proposal”) that presents “Communications Service Provider  
7 Resiliency and Disaster Response Requirements.” The Ruling seeks comments on this Proposal  
8 and asks parties to respond to eight separate sets of questions related to network resiliency and  
9 protocols for responding to emergencies like wildfires and Public Safety Power Shutoff  
10 (“PSPS”) events.

11 Frontier strongly supports the goals of network resiliency and network restoration that  
12 animate the Proposal. Frontier designs its networks to incorporate as much redundancy as  
13 reasonably possible and Frontier has devoted significant effort to developing its plans to  
14 maintain and restore networks when they are impacted by disasters. Frontier agrees that safety  
15 considerations should be paramount. Likewise, in setting public policy, the Commission should  
16 also be mindful of the costs of its regulations and the impact that they will have on the price of  
17 telecommunications services in California. The Commission should strive for a balanced set of  
18 regulations that are targeted to mitigate the specific problems associated with wildfires and PSPS  
19 events without imposing impracticable requirements or unduly costly solutions.

20 In the following comments, Frontier responds to each of the questions posed in the  
21 Ruling. Frontier has addressed the issues to the best of its ability given the information that is  
22 currently available and the constraints surrounding the context and timing of these comments.  
23 The ongoing COVID-19 health crisis has necessarily diverted significant resources to customer  
24 protection, employee safety, and operational concerns during this time. In addition, the  
25 Commission’s docket office has suspended the ability to file confidential information until at

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1 least May 1st.<sup>1</sup> Therefore, Frontier provides these comments using only public information.  
2 Frontier reserves the right to augment this submission with additional materials that may be  
3 responsive to the questions at a time that is less impacted than the present.

4 **II. FRONTIER’S RESPONSES TO THE TOPICS IDENTIFIED IN THE RULING.**

5 The Ruling seeks comments on the requirements and principles included in the Proposal,  
6 including input on the scope of the requirements, the definitional terms to be used in describing  
7 carriers’ obligations, specific backup power requirement, clean energy alternatives, emergency  
8 response planning, and current efforts to mitigate threats to service continuity. Each of the eight  
9 issue areas are reprinted below in advance of Frontier’s responses for ease of reference.

10 **1. Applicability of Requirements: The Proposal states that the requirements shall be**  
11 **applicable to all companies owning, operating, or otherwise responsible for**  
**infrastructure that provides or otherwise carries 9-1-1, voice, text messages, or data.**

12 **(a) Is this definition of applicability reasonably tailored to ensure regulatory**  
13 **compliance over all communications service providers? Why or why not?**

14 **(b) Which types of providers, if any, should be excluded from these**  
15 **requirements because their services are not essential to reliable access to 9-1-**  
**1 and the distribution of essential emergency information?**

16 The applicability statement in the Proposal is generally reasonable insofar as it focuses on  
17 ownership or operation of infrastructure rather than on specific services.<sup>2</sup> The scope of any  
18 additional rules in this proceeding must align with the extent of the Commission’s jurisdiction,  
19 which encompasses regulation of intrastate jurisdictional public utilities, their regulated services,  
20 and the infrastructure used to provide regulated services.<sup>3</sup> However, the Commission’s authority  
21 does not extend to interstate services or services that the Federal Communications Commission  
22 has designated as non-regulated, such as broadband data services. To avoid misunderstandings

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24 <sup>1</sup> This limitation is reflected in the “Temporary Filing and Service Protocol for Formal Proceedings” at  
the following link: <https://www.cpuc.ca.gov/COVID19practitioneralert/>

25 <sup>2</sup> *Proposal*, Appendix A, at p. 2.

26 <sup>3</sup> See Pub. Util. Code §§ 216 (public utilities include “telephone corporations”); 234 (defining “telephone  
27 corporation” based on whether an entity “own[s], control[s], operat[es], or manag[es] a telephone line for  
compensation within this state”); 233 (defining “telephone line” with reference to “conduits, ducts, poles,  
wires, cables, instruments, and appliances . . . to facilitate communication by telephone”); 202  
(Commission jurisdiction does not extend to interstate commerce).

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1 or conflicts about the scope of the rules relative to federal restrictions on regulation of broadband  
2 services, the reference to “data” should be removed from the applicability statement.<sup>4</sup>

3 **2. Alternatively, D.19-08-025 defined communications service providers into the**  
4 **following categories: (1) facilities-based and non-facilities-based landline providers**  
5 **include 9-1-1/E9-1-1 providers, LifeLine providers, providers of Voice Over**  
6 **Internet Protocol [VoIP], Carriers of Last Resort [COLRs], and other landline**  
7 **providers that do not fall into the aforementioned groups; (2) wireless providers**  
8 **include those that provide access to E9-1-1 and/or LifeLine services; (2A) facilities-**  
9 **based wireless providers; and (2B) non-facilities-based wireless providers, include**  
10 **resellers and mobile virtual network operators [MVNOs].**

11 **(a) For purposes of Phase II, should the Commission apply the definition from**  
12 **D.19-08-025, instead of the proposed definition in the Proposal?**

13 As explained above, Frontier supports the applicability statement in the Proposal with a  
14 minor edit to remove the reference to “data.” The “alternative” definition in D.19-08-025 relies  
15 on a concept of “communications service providers” that lacks any link to statutory authority and  
16 which could create confusion in its application. The taxonomy of “communications service  
17 providers” proffered in this definition relies on overlapping and duplicative categorizations such  
18 as “LifeLine providers,” “landline providers,” and Carriers of Last Resort.” The alternative  
19 definition could also create confusion by suggesting that the proposed rules would apply to  
20 providers who do not own or manage any facilities, such as VoIP providers or resellers. The  
21 applicability statement in the Proposal properly focuses on companies who manage or operate  
22 public utility facilities rather than attempting to classify all types of service providers. The  
23 Commission should strive for simple definitions that focus on how to apply rules that implicate  
24 facilities resiliency and restoration. The Commission should also ensure that its definitions are  
25 competitively neutral and do not inadvertently create disparities in regulatory obligations for  
26 similarly-situated competitors. With the modification proposed to the “Application of  
27 Requirements” section of the Proposal, Frontier supports the use of that scoping statement.  
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25 <sup>4</sup> See *In the Matter of Restoring Internet Freedom*, WC Docket No. 17-108, *Declaratory Ruling, Report*  
26 *and Order, and Order (“Restoring Internet Freedom Order”)*, FCC 17-166 (rel. Jan. 4, 2018) at ¶¶ 20  
27 (classifying “broadband Internet access service” as an “information service”) 199 (confirming that  
28 Internet access is a “jurisdictionally interstate service”); see also *Mozilla Corp. v. FCC* (D.C. Cir.), Case  
No. 18-1051 (partially vacating other aspects of *Restoring Internet Freedom Order*). For the same  
reasons, the reference to “text messages” appears to be misplaced.

1 3. **Definition of Resiliency: The Proposal defines resiliency as the ability to recover**  
2 **from or adjust easily to adversity or change and is achieved by Providers through**  
3 **utilizing a variety of strategies. The proposal lists an array of strategies and**  
4 **provides definitions for each one.**

- 5 (a) **Please provide comments on the definition of resiliency in the context of**  
6 **communications service resiliency strategies and their definitions.**
- 7 (b) **Please comment on any recommendations or modifications that should be**  
8 **considered to the proposed resiliency definition and the resiliency strategies.**  
9 **Please provide a complete discussion for any proposed recommendations or**  
10 **modifications.**

11 Resiliency is critical to quality customer service and Frontier prioritizes the ability to  
12 recover in the event of a network outage or network issue leading to a loss of customer service.  
13 Inter-office facilities are one of the most important determinants of resiliency and Frontier's  
14 facilities are typically built to survive single route or single node failure by having both a  
15 working facility and protected facility. The central offices equipment is likewise networked so  
16 that the equipment will have multiple feeds running back to power panels that also have diverse  
17 feeds to the power source. Frontier's offices generally have three power sources: commercial  
18 power, a backup generator, and battery backup to withstand typical outages. For Frontier's  
19 critical distribution hubs and major long-haul routes, Frontier has built diversity into the network  
20 to create further resiliency.

21 With these perspectives in mind, Frontier generally supports the definition of resiliency  
22 provided in Question 3 and Section 1 of the Proposal. Frontier further agrees that employing  
23 multiple strategies to maintain communications networks during emergencies increases network  
24 resiliency. These strategies should include the following, as appropriate given each carrier's  
25 specific operational platform, facilities architecture, and regional dynamics: (1) backup power;  
26 (2) network redundancy; (3) network hardening; (4) communication and coordination with other  
27 providers, utilities, emergency responders, and the public; and (5) preparedness planning.  
28 Frontier agrees with the observation in the Proposal that a "one size fits all" approach to

1 “ensuring resiliency” would not be appropriate.<sup>5</sup>

2 As Frontier adjusts to the “new normal” of more frequent wildfires and periodic PSPS  
3 events, Frontier is working on “hardening” its network and to increasing its response time when  
4 outages occur or facilities are unavoidably compromised by natural disasters. The Commission  
5 should not assume that networks will be impervious to these impacts even if network  
6 enhancements are made. The proposed rules should give carriers the flexibility to establish the  
7 mix of resiliency and restoration strategies that best suits the carriers’ operations and their  
8 customers.

9 **4. Backup Power Requirement: The Proposal recommends that all Providers have:  
10 on-site emergency backup power to support all essential communications equipment  
11 including but not limited to, switching centers, central offices, wire centers, head  
12 ends, network nodes, field cabinets, remote terminals, and cellular sites (or their  
13 functional equivalents) necessary to maintain service for a minimum of 72 hours  
14 immediately following a power outage. Service must be sufficient to maintain access  
15 for all customers to 9-1-1 service, to receive emergency notifications, and to access  
16 web browsing for emergency notices.**

17 (a) Please provide comments on the proposed backup power requirement.

18 (b) How should “outage” be defined?

19 (c) Should the length of the 72 hour backup power requirement be shorter,  
20 longer or indefinite? Please provide an analysis to support your  
21 recommendation.

22 (d) What other backup power requirements or components should the  
23 Commission consider? Please provide an analysis to support your discussion  
24 of any additional requirements or components.

25 The proposed 72-hour backup power requirement is reasonable as applied to central  
26 offices and remote switches, but would not be reasonable as to all “field cabinets.” Frontier  
27 currently has backup power of at least 72 hours at its remotes and central offices, where the most  
28 critical routing equipment and electronics reside, but Frontier has many smaller cabinets that are  
deeper into the network toward the customer premise. Frontier has approximately 1,500 of these

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<sup>5</sup> *Proposal*, Appendix A, at p. 2. For example, physical route diversity is an important tool for achieving resiliency, but physical diversity is not feasible or prudent in all cases. Logical diversity, achieved through signal re-routing where certain aspects of a network are disabled, is also an effective means of maintaining resiliency.

1 smaller network components, and it would require an extraordinary investment to equip all of  
2 these smaller equipment sites with 72 hours of power. Likewise, there are certain locations  
3 where this simply may not be possible due to specific geographical features, environmental  
4 issues or prohibitions, permitting issues, and overall cost. Frontier currently uses portable  
5 generators to ensure that these sites are appropriately powered during PSPS events and other  
6 commercial power outages, but Frontier could not feasibly operate a portable generator at every  
7 one of these locations. Similarly, installing 72 hours of battery backup at these locations would  
8 require an enormous expense and would be impossible or infeasible in many situations. In some  
9 cases, installing battery backup at smaller cabinet would greatly increase the size of the space  
10 needed at the location. In light of these concerns, the Proposal should be refined to exclude  
11 “field cabinets” and the broad reference to “all essential communications equipment” should be  
12 removed because it is not precise enough to be operationalized.

13           Regarding the definition of “outage,” Frontier understands that backup power proposal  
14 refers to a “power outage.” In that context, an “outage” should refer to a material loss of  
15 commercial power that would require the use of backup power sources by communications  
16 carriers. Beyond that straightforward definition, the concept of an “outage” would be dependent  
17 on various contextual factors.

18 **5. Backup Power Plans: The Proposal recommends that Providers file a Backup**  
19 **Power Plan with the Commission six months from the effective date of an adopted**  
20 **Commission decision with an array of requirements that illustrate the Provider’s**  
21 **preparedness to ensure 9-1-1 access, ability to receive emergency notifications, and**  
22 **access web browsing for 100 percent of customers in the event of a commercial**  
23 **power outage. Please provide comments and analysis on this compliance**  
24 **requirement.**

25 (a) **Clean Energy Generation: The Proposal directs Providers to utilize clean**  
26 **energy backup power options (e.g., solar, etc.) as reasonable before using**  
27 **diesel generators to meet the backup power requirement, among other**  
28 **provisions. Please provide comments and analysis on this issue, and**  
**specifically address the following:**

i. **How should “clean energy backup” be defined?**

ii. **Provide specific information on barriers to procuring specific types of**  
**clean energy backup power (e.g., cost, permitting, etc.).**

- 1 (b) **Waivers:** The Proposal directs Providers to submit waivers if they qualify for  
2 any of the exemptions enumerated in the Proposal. Please provide comments  
3 and analysis on this issue.
- 3 (c) **Critical Facility Location Information Sharing:** The Proposal directs  
4 Providers to share critical facility location information to emergency  
5 responders to enhance the ability to defend vital facilities against wildfire  
6 damage and ensure facility redundancy. Please provide comments and  
7 analysis on this issue.
- 6 (d) **Critical Infrastructure Resiliency, Hardening and Location Information**  
7 **Sharing:** The Proposal directs Providers to annually submit geographic  
8 information system (GIS) information with the specific location of network  
9 facilities and backhaul routes to the Commission. The Proposal directs  
10 Commission staff to analyze and process this information, so it is accessible  
11 to state and local emergency responders, subject to confidentiality  
12 requirements. Please provide comments and analysis on these proposed  
13 directives.

11 Frontier supports the use of clean energy sources to provide backup power where  
12 reasonable, and Frontier is exploring those options. Indeed, Frontier has installed solar panels  
13 and accompanying generators in some locations to provide backup power. However, Frontier  
14 does not support any sort of quota or minimum requirement for backup power clean energy  
15 sources at this time. This is particularly true given that California experienced significantly  
16 lower than average rain and snowfall this past winter, increasing the likelihood of a severe fire  
17 season. Thus, Frontier believes that efforts and resources in this area should be focused on  
18 improving network resiliency and redundancy in areas that are most at risk, rather than on  
19 pursuing alternative energy sources in areas that already have sufficient backup power.

20 Waivers for redundant or non-compliant facilities will be necessary because rigid  
21 requirements are not appropriate and carriers should not be penalized for circumstances beyond  
22 their control. In particular, the unique climatological and geographic terrain of California will  
23 likely make compliance impossible in some locations. In addition, the waiver process should  
24 take into account environmental delays and prohibitions, permitting issues, total population  
25 served by specific equipment, and general cost.

26 Frontier also endorses the use of critical infrastructure location information sharing with  
27 emergency responders to defend these facilities against wildfire damage. Frontier similarly  
28



1 supports the confidential sharing of information related to critical infrastructure resiliency and  
2 hardening with the Commission to assist state and local emergency responders.

3 Correspondingly, Frontier has created a robust infrastructure information sharing program for  
4 government officials and emergency responders, which is outlined below.

5 **6. Emergency Operations Plans: The Proposal directs Providers to file emergency**  
6 **operations plans with the Commission, discussing how their operations are**  
7 **prepared to respond to emergencies. Please provide comments and analysis on this**  
8 **issue.**

9 (a) **Additionally, the Proposal itemizes required content that the Providers must**  
10 **submit to the Commission. Please provide comments and analysis on this**  
11 **issue.**

12 (b) **Should the proposed rule for Emergency Operations Plans include any other**  
13 **information that the Proposal does not address? Please explain why any**  
14 **additional information is legitimate and necessary for adoption.**

15 Frontier supports the proposal directing all providers to develop and file an emergency  
16 operations plan with the Commission. Frontier currently has an Emergency Operations Center  
17 Team located in California that is available 24 hours a day, 7 days a week, which has undergone  
18 training with Cal OES and the California Utilities Emergency Association. This team  
19 continuously monitors potential and current emergency situations and retains subject matter  
20 experts as needed to provide advice and assistance.

21 Additionally, Frontier has a toll-free emergency number that is also staffed 24 hours a  
22 day, 7 days a week by employees trained to handle emergency response. This special phone  
23 number is provided to the appropriate government and tribal emergency contacts for their use  
24 during crises. Frontier regularly reviews its list of official emergency contacts, including local  
25 contacts, to ensure a current and immediate line of communication exists for catastrophic events.  
26 Frontier also participates in local government meetings involving emergency response as well as  
27 in emergency preparedness exercises. Furthermore, Frontier has created appropriate redundancy  
28 in its method of communicating with customers during disaster situations through the use of  
press releases, customer emails, text messages, and dedicated, situational webpages.

Similarly, Frontier has created a Business Continuity Plan (“BCP”) team based in

1 California that leads cross-functional efforts to allow Frontier to continue to maintain its  
2 operations, serve its customers, and protect its employees in the event of an emergency. To  
3 maintain awareness of and prepare for potential events, the BCP team is in regular contact with  
4 the appropriate federal and state agencies. When emergencies arise, such as wildfires,  
5 hurricanes, floods, and most recently, a pandemic, the BCP team will convene “Emergency  
6 Response Center” calls, which are forums to analyze and neutralize the emergency impact on  
7 local Frontier groups. This approach allows Frontier to preserve efficiency and flexibility in  
8 business operations and public service during emergencies.

9 **7. Current Mitigation Efforts: in response to this ruling, all respondent**  
10 **communications service providers shall provide a discussion of what current**  
11 **mitigation efforts they are undertaking to ensure continuity of service in**  
12 **preparation and in advance of the upcoming 2020 wildfire and grid outage season.**  
13 **This should include, but is not limited to, the following topics:**

- 14 (a) **Number of additional generators acquired (both fixed and mobile);**
- 15 (b) **Number of additional temporary facilities acquired (e.g., COWs, COLTs,**  
16 **etc.);**
- 17 (c) **Additional network redundancy built into network (e.g., logical and**  
18 **physical);**
- 19 (d) **Provide details on plans in the near, intermediate and long term to further**  
20 **harden facilities;**
- 21 (e) **Identify barriers to building resiliency into your networks;**
- 22 (f) **Identify any other investments or cooperative agreements that will be made**  
23 **to build in more backup generation or minimize the need for backup**  
24 **generation; and**
- 25 (g) **Identify if communications service outages as a result of future public safety**  
26 **power shutoff events are expected. Identify specific locations and reasons**  
27 **where network outages are expected.**

28 **To the extent practicable, communication service providers are directed to submit**  
29 **as much of this information as possible without assertion of confidentiality.**

30 Frontier strongly supports the overall policy objectives of network resiliency and  
31 promoting mitigation efforts to avoid losses of service. To that effect, Frontier has invested  
32 millions of dollars throughout the State of California, including \$720 million in the years 2017  
33 and 2018, to improve the quality and reliability of its network, which is of direct benefit to  
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1 customers in emergency situations. In particular, Frontier has invested in route diversity,<sup>6</sup>  
2 undergrounding, enhanced backup power,<sup>7</sup> increased deployment of fiber,<sup>8</sup> seismic retrofitting,  
3 ring technology, among other things. Frontier is particularly interested in improving service and  
4 reliability in remote areas and continues to commit investment toward these goals.

5 Frontier has over 600 network hubs in California, including central offices, remote  
6 switching units, controlled environmental vaults, and remote hut locations. Most of the locations  
7 have fixed generators and Frontier also has a significant number of portable generators that can  
8 be deployed throughout its territory as needed. Additionally, the facilities with fixed generators  
9 have an auto-start emergency generator that can supply 72 hours of continuous power during an  
10 outage, as well as on-site batteries that can provide an additional three to four hours of power.  
11 The locations which do not have fixed generator are presently equipped with battery backup that  
12 can supply eight hours of additional power and have designated portable generators that can be  
13 delivered to meet the 72-hour standard. All of Frontier's locations, generators, and batteries are  
14 subject to consistent maintenance and testing to verify operational performance.

15 Frontier has also created a detailed Emergency Management Plan and a Business  
16 Continuity Plan to ensure continuity of service in emergency situations. As described above,  
17 Frontier has a trained Emergency Operations Center Team in California that is available all day,  
18 every day to monitor and respond to emergency situations. Additionally, Frontier created a 24/7  
19 emergency contact number for government and tribal officials to use as necessary. Frontier  
20 frequently evaluates its list of official emergency contacts, to ensure it is current. Frontier also  
21 participates in local government meetings involving emergency response and is a member of the  
22 California Utilities Emergency Association which is a collection of utilities that work

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23 <sup>6</sup> Wherever possible, Frontier's network is built with logical diversity and facilities protections. In many  
24 cases, Frontier deploys link aggregation groups that build capacity to cover diverse routes so that, upon  
failure, the network will continue to be able to pass traffic and continue to function.

25 <sup>7</sup> Frontier continues to increase resiliency throughout its network to achieve at least 72 hour backup  
26 capability at all central offices and eight hours of backup power at all remote switching sites. Again, it is  
not feasible to equip every smaller cabinet with this level of backup power.

27 <sup>8</sup> Fiber is less vulnerable to natural disasters and weather events such as fires and electrical storms. Fiber  
also allows for re-routing of signals during catastrophic events to maintain functionality.

1 collaboratively to maintain or restore service during emergency situations.

2           Frontier has strategically distributed equipment and materials throughout its service  
3 territory to expedite any necessary repairs during emergencies, with particular emphasis on items  
4 that are difficult items to procure such as fiber-optic cable and large gauge telecom cables.  
5 Similarly, Frontier has created a network of construction teams geographically spread throughout  
6 its territory to rapidly respond when called upon.

7           Frontier has also provided credits and waivers to assist those impacted by wildfires  
8 including, among other benefits: waiver of the one-time activation fee for establishing remote  
9 call forwarding, remote access to call forwarding, call forwarding features and messaging  
10 services, waiver of the monthly rate for one month for remote call forwarding, remote access to  
11 call forwarding, call forwarding, call forwarding features, and messaging services; and waiver of  
12 the service charge for installation of service at the temporary or new permanent location of the  
13 customer and again when the customer moves back to the premises.

14           Frontier is committed to improving the service and reliability of its network. In this  
15 effort, Frontier encounters certain engineering and logistical challenges. These include local  
16 permitting and zoning opposition, inadequate easements, environmental regulatory issues,  
17 logistical difficulties in installing, maintaining, and testing the equipment in remote areas,  
18 inadequate spatial requirements, and extremely high per user cost in remote areas.

19 **8. Other Topics for Commission Consideration: Parties may identify issues in addition**  
20 **to the proposed rules and discussion in the Proposal.**

21           Frontier does not have any additional issues to raise at this time.

22 **III. CONCLUSION**

23           Frontier supports the overall objectives of this proceeding to pursue reasonable ways to  
24 improve network resiliency and response efforts in the face of emergencies that may threaten the  
25 functionality of critical networks. Frontier has offered comments on the Ruling and the Proposal  
26 to the extent possible given its current limitations and the important focus that must be given to  
27 consumer protections and employee safety concerns surrounding the COVID-19 crisis. Frontier  
28

1 looks forward to further opportunities to provide input on these subjects as the proceeding  
2 evolves and proposals are further refined.

3 Dated this 3rd day of April, 2020, at San Francisco, California.

4 Respectfully submitted,

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