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

Order Instituting Rulemaking Proceeding to
Consider Changes to the Commission's Carrier of
Last Resort Rules. R. 24-06-012

**REVISIONS TO INITIAL PROPOSALS OF
FRONTIER CALIFORNIA INC. (U 1002 C)
CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. DBA
FRONTIER COMMUNICATIONS OF CALIFORNIA (U 1024 C)
FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC. (U 1026 C)
("FRONTIER")**

**ON ORDER INSTITUTING RULEMAKING PROCEEDING TO CONSIDER
CHANGES TO THE COMMISSION'S CARRIER OF LAST RESORT RULES**

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December 6, 2024

I. INTRODUCTION.

In accordance with the procedural schedule established in the Order Instituting Rulemaking (“OIR”) this proceeding,¹ Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California Inc. dba Frontier Communications of California (U 1024 C), and Frontier Communications of the Southwest Inc. (U 1026 C) (collectively, “Frontier”) provide this submission in response to the deadline for “Revisions to Initial Proposals” in the Order Instituting Rulemaking (“OIR”). Frontier’s overall positions in this proceeding have not changed—it continues to believe that Carrier of Last Resort (“COLR”) obligations are not necessary in competitive markets and that the Commission should prioritize COLR relief in urban and suburban areas to avoid ongoing competitive disparities between Incumbent Local Exchange Carriers (“ILECs”) and their competitors.² Frontier hereby confirms its proposals, as presented in its opening comments, and asks that the Commission create an efficient way to prioritize COLR relief in more populous areas of California, where there is undeniably robust competition from many intermodal competitors.

Some of the other parties to this proceeding have asked the Commission to expand this proceeding or divert its focus to a wide range of irrelevant and tangential matters, including vast potential expansions of COLR obligations and proposals to extent COLR requirements to broadband services.³ Some parties also mischaracterize what it would mean to implement COLR relief, suggesting that it would be akin to an exit from the market, which it is not.⁴ The Commission should not be distracted by these suggestions. It should focus on addressing the most pressing issue for which this OIR was initiated—whether or not to retain COLR obligations in areas that have highly competitive characteristics.⁵

Frontier has conferred with AT&T regarding a reasonable schedule for a “Phase 1” of the proceeding. Frontier supports AT&T’s scope and schedule for Phase 1, as summarized in Attachment A to this submission.

¹ *OIR* at 7.

² *Frontier Opening Comments* at 1-2.

³ See *TURN/CWA/CforAT Opening Comments* at 14-15, 17; *Cal Advocates Opening Comments* at 74-77.

⁴ See *TURN/CWA/CforAT Opening Comments* at 42, 49-52.

⁵ See, e.g., *OIR* at 4-5 (Issues (a), (d)).

II. THE COMMISSION SHOULD SCOPE THIS PROCEEDING TO PRIORITIZE AN IDENTIFICATION OF THE AREAS WHERE COMPETITION MAKES COLR OBLIGATIONS OBSOLETE.

As explained in Frontier’s opening comments, California has many urban and suburban markets where customers have numerous options for voice service, including many areas where there are competing wireless and wireline networks with high levels of overlap with Frontier’s network. These areas can be efficiently identified from public sources and other resources at the Commission’s disposal reflecting the availability of voice service. The Commission should focus on this issue in Phase 1, utilizing workshops and comments to develop a plan for COLR relief in these areas. As Frontier has explained, the implementation mechanism for the areas where COLR relief is appropriate should be a Tier 2 advice letter following a final decision in Phase 1 of this proceeding.⁶

AT&T has developed a procedural schedule that would complete the review of this issue within the third quarter of 2025 and Frontier supports that schedule.⁷ The remaining issues in the proceeding can be addressed in Phase 2 thereafter, including potential revisions to definition of a COLR and the “basic service” definition that will govern the scope of services for COLR obligations that remain.⁸ For convenience, Frontier has replicated AT&T’s proposal in Attachment A of this submission.

⁶ *Frontier Opening Comments* at 1-2.

⁷ Frontier notes that AT&T has also included the issue of areas where there are no customer discernible customer locations. This issue has not been a focus for Frontier, but it is reasonable to address it in Phase 1 of this proceeding.

⁸ See *OIR* at 5; see *Frontier Opening Comments* at 5.

III. CONCLUSION.

Parties have raised a wide variety of proposals in this proceeding, but there is one set of questions that merits prioritization in a Phase 1 of this proceeding—an identification of the areas of California are sufficiently competitive to justify lifting the Commission’s outdated COLR construct. AT&T has made a reasonable proposal for how to address this issue efficiently, which Frontier supports. Frontier looks forward to discussing this matter further as part of the scoping and scheduling issues at the upcoming Pre-Hearing Conference (“PHC”).

Respectfully submitted on December 6, 2024 at Oakland, California.

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Attachment A

COLR PROPOSED SCHEDULE

Prehearing Conference	December 13, 2024
Scoping Memo	January 2025

Phase One

Workshops with Party Participants & Neutral Mediator	January 2025
Staff Report on Workshops	February 2025
Opening & Reply Comments	March 2025
Proposed Decision	June 2025
Opening & Reply Comments on Proposed Decision	July 2025
Commission Decision	August 2025 (No later than 60 days after PD)

Phase Two

Workshops with Party Participants & Neutral Mediator	September 2025
Staff Report on Workshops	October 2025
Opening & Reply Comments	November 2025
Proposed Decision	February 2026
Opening & Reply Comments on Proposed Decision	March 2026
Commission Decision	April 2026 (No later than 60 days after PD)