

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



FILED

07/09/25

03:57 PM

A2410006

A.24-10-006

In the Matter of the Joint Application of Verizon Communications Inc., Frontier Communications Parent, Inc., Frontier California Inc., Citizens Telecommunications Company of California Inc., Frontier Communications of the Southwest Inc., Frontier Communications Online and Long Distance Inc., and Frontier Communications of America, Inc. for Approval of the Transfer of Control of Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California (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), to Verizon Communications Inc. Pursuant to California Public Utilities Code Section 854

JOINT APPLICANTS' NOTICE OF EX PARTE COMMUNICATION

Kristin Jacobson
DLA Piper LLP (US)
555 Mission Street, Suite 2400
San Francisco, California 94105-2933
Telephone: (415) 615-6061
Email: kristin.jacobson@us.dlapiper.com

Geoffrey G. Why
Verrill Dana LLP
One Federal St., 20th Floor
Boston, MA 02110
Telephone: (617) 292-2854
Email: gwhy@verrill-law.com

Jesús G. Román
Verizon
15505 Sand Canyon Ave.
Irvine, CA, 92618
Telephone: (949) 286-7202
jesus.g.roman@verizon.com

Attorneys for Verizon Communications Inc.

Sarah J. Banola
Patrick M. Rosvall
BRB Law LLP
492 9th Street, Suite 220
Oakland, CA 94607
Telephone: (510) 955-1082
Email: sarah@brblawgroup.com

Attorneys for Frontier Communications Parent, Inc.; Frontier California Inc.; Citizens Telecommunications Company of California Inc.; Frontier Communications of the Southwest Inc.; Frontier Communications Online and Long Distance, Inc.; and Frontier Communications of America, Inc.

July 9, 2025

Pursuant to Rule 8.4(a) of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), Verizon Communications Inc. (“Verizon”), Frontier Communications Parent, Inc., Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California (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”) (Verizon and Frontier together are “Joint Applicants”) hereby provide this notice of an *ex parte* communication in the above-captioned proceeding, which occurred on June 30, 2025 between representatives of Joint Applicants, advisors from Commissioner John Reynolds’ office and Commissioner Houck’s office, and members of the Commission’s Legal and Communications Divisions. The meeting focused on the need to resolve this proceeding by the end of 2025 to ensure benefits of the proposed transaction are achieved, as well as Verizon’s plans for compliance with CPUC General Order 156 in response to a change in federal policy and regulatory landscape on diversity, equity, and inclusion (“DEI”) practices going forward (including an FCC inquiry expressing concerns with Verizon’s policies). Mr. Reyes noted that Verizon has a long history of serving all members in the communities where we operate, and the company is committed to the core principles that have made it successful -- an inclusive culture based on trust, care, and excellence which enables us to provide market leading services to all of our customers.

The Commission participants included the following: Carolyn Chen and Andrew Klutey, Advisors to Commissioner John Reynolds; Kerriann Sheppard and Caleb Jones, Advisors to Commissioner Houck; Jonathan Koltz and Ella Krainsky, Attorneys, Commission Legal Division; and Director Rob Osborn and Cole Pryzbyla, Communications Division. On behalf of the Joint Applicants, the participants were:

- Rudolph M. Reyes, Regional Vice President and Deputy General Counsel, Verizon;
- Jesús G. Román, Managing Associate General Counsel, Verizon;
- Kristin Jacobson, Attorney, DLA Piper, outside counsel to Verizon;
- Kevin Saville, Senior Vice President and General Counsel to Frontier;
- Jenny Smith, Director of Government and Regulatory Affairs to Frontier; and
- Sarah Banola, Attorney, BRB Law LLP, outside counsel to Frontier.

The communication occurred via video-conference using Webex, starting at or around 9:33 a.m. and lasting until approximately 10:04 a.m. The communication was strictly oral; no written materials were used or distributed.

Mr. Reyes explained that Verizon is committed to compliance with both Commission General Order (“G.O.”) 156 supplier diversity reporting requirements as well as Verizon’s commitments made to the Federal Communications Commission (“FCC”) in its letter to Chairman Carr. Mr. Reyes emphasized that it is critical that the Commission approve the proposed transaction by the end of the year. He noted that the FCC and several states have already approved the proposed transaction and pledged Verizon’s cooperation to work with the parties and the Commission to accelerate the timeline set forth in the Revised Scoping Memo . Mr. Reyes and Mr. Saville explained that Frontier has been facing financial challenges and debt that impair its ability to continue to pursue broadband-capable investments in California beyond 2025, and that it does not have the capacity to continue operating its business as it has over the last five years.

Mr. Reyes also stated that Verizon is committed to ensuring that Frontier’s service quality is up to Verizon’s standards post-transaction, including by undertaking an audit of Frontier’s network and understanding and addressing any issues identified. He stated that Verizon has the financial resources to fulfill Frontier’s grant commitments for fiber deployment.

In addition, Mr. Reyes noted that intervenors’ second supplemental testimony reflects an incorrect assumption that Frontier’s DEI policies are more robust than Verizon’s policies. Mr. Saville further explained that Frontier does not have more expansive DEI policies or practices than Verizon that would need to be scaled back as a result of the proposed transaction and its current policies and practices are consistent with the current FCC policies as reflected in Verizon’s letter to Chairman Carr. Mr. Reyes stated that Verizon will shift the focus of its supplier program to provide opportunities for small businesses to partner with Verizon, and that Verizon committed to invest \$5 billion over the next five years in small business suppliers with the launch of its new Small Business Supplier Accelerator. Mr. Reyes observed that this approach aligns with the Commission’s G.O. 156 goals because significant percentages of small businesses in California are owned by individuals from G.O. 156 target groups, as detailed in his supplemental testimony. Mr. Reyes further noted that Verizon is working cooperatively with the

