



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

**FILED**

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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

A.24-10-006

**JOINT APPLICANTS MOTION TO MODIFY THE PROCEDURAL SCHEDULE**

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Inc.; Frontier Communications of the  
Southwest Inc.; Frontier Communications  
Online and Long Distance, Inc.; and Frontier  
Communications of America, Inc. ("Frontier")

September 5, 2025

## I. INTRODUCTION.

Pursuant to Rule 11.1 of the California Public Utilities Commission (“Commission”)’s Rules of Practice and Procedure (“Rules”), 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 referenced as “Joint Applicants”) hereby submit this Motion to Modify the Procedural Schedule (“Motion”) to expedite the briefing schedule and shorten time in connection with recently-submitted Rule 12.1 settlement motions. These proposed changes will give the Commission a reasonable opportunity to resolve this proceeding no later than the last agenda meeting of the year, which is set for December 18, 2025.

Changes to the schedule are merited by recent developments in the proceeding, including the recent execution of three extensive settlement agreements with intervenors—with the Public Advocates Office (“Cal Advocates”), the California Emerging Technology Fund (“CETF”), and the Communications Workers of America, District 9 (“CWA”)—all of which were submitted on September 4, 2025. The submission of these settlement agreements significantly narrows the nature and extent of the disputes in this proceeding, enabling shorter and more focused briefs that can be presented on earlier dates than currently contemplated by the Administrative Law Judge’s (“ALJ”) Ruling Modifying the Procedural Schedule, dated July 23, 2025. Given the breadth of these proposed settlement agreements and wide range of issues that they resolve, it is reasonable to consider their terms on shortened time as part of the briefs. Joint Applicants propose the following modified schedule:

Opening briefs and comments on 9/4/25 settlement motions	September 26
Reply briefs and reply comments on 9/4/25 settlement motions	October 6
Proposed decision	November 18 <sup>1</sup>
Final decision	December 18

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<sup>1</sup> If requested, any oral argument should occur after issuance of the proposed decision in early December, without creating any further delay.

These changes move the opening brief date backward by two weeks and reduce the interval between opening and reply briefs from three weeks to 10 days. By including the comments on the September 4, 2025 settlement agreements in the same pleadings, the Commission and the parties will achieve significant efficiencies, while only shortening time for opening comments on the settlements by six business days. Similarly, this proposal only results in a reduction of one business day in the timeframe for reply comments on the settlements under Rule 12.2.

These adjustments are reasonable in light of the imperatives to complete this proceeding by the end of the year. Good cause exists to expedite and consolidate the existing deadlines, and the fulsome state of the record permits the Commission to pursue these reasonable adjustments. Absent revisions to the schedule, it may not be feasible for the Commission to adopt a final decision in December 2025, and delaying a resolution until 2026 would unnecessarily perpetuate Frontier's financial challenges and risk restarting the clock on the United States Department of Justice's ("DOJ") clearance, which expires on February 13, 2026.

## **II. MEET AND CONFER EFFORTS RELATING TO PROPOSED PROCEDURAL MODIFICATIONS.**

Although it is not required in connection with motions to shorten deadlines, Joint Applicants have been communicating regularly with the parties regarding ways to expedite the schedule. Joint Applicants met and conferred with all active parties about changes to the briefing schedule through an email sent on the morning of September 2, 2025, and there was further discussion at a follow-up meet and confer video-conference held on the same date. Following the September 4, 2025 ALJ Ruling addressing the hearing schedule, Joint Applicants communicated further with the parties to discuss their positions regarding the proposed changes in this Motion and an additional meet and confer discussion occurred on the afternoon of September 5<sup>th</sup>. Based on Joint Applicants' outreach to the parties, CETF, Cal Advocates, and the Communications Workers of America, District 9 ("CWA") support this Motion. The Utility Reform Network ("TURN") and the Center for Accessible Technology ("CforAT") oppose it. As part of the meet and confer discussions, CforAT's counsel also pointed out that the Jewish high holidays fall during the requested briefing period, and Joint Applicants, and Joint Applicants made adjustments to their proposal to address these concerns.<sup>2</sup> No other party

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<sup>2</sup> Rosh Hashanah will be celebrated from the evening of September 22nd through September 24th, which falls in between the proposed opening and reply dates. Yom Kippur begins on the evening of October 1st and lasts through the evening of October 2nd. To ensure that there is not a deadline immediately after Rosh Hashanah, Joint Applicants are proposing September 26th for opening briefs. Yom Kippur falls in between the proposed deadlines, with reasonable space both before and after.

reported a position. While the proposed changes are not unanimous amongst the parties, the scheduling modifications nevertheless remain reasonable, and they will be important to ensure a timely resolution of this matter for the benefit of Frontier's financial position and its ratepayers' short-term and long-term welfare.

## **II. GOOD CAUSE EXISTS TO EXPEDITE THE SCHEDULE.**

There are several compelling reasons to grant this Motion. *First*, retention of the existing briefing and comment schedule materially jeopardizes the Commission's ability to issue a final decision in 2025. Such a delay would deepen Frontier's financial challenges and delay further fiber deployment in California. In addition, as noted above, the DOJ clearance regarding this transaction is subject to a sunset date of February 13, 2026, so if that date elapses and the transaction cannot be completed by then, the DOJ would have to conduct a new review. *Second*, the existence and expansive scope of the Settlement Agreements with Cal Advocates, CETF, and CWA should greatly reduce the scope of the disputes in the proceeding. The collective weight of the many commitments in these three Settlement Agreements establishes a powerful set of tangible deliverables that, when combined with the extensive testimony from the parties already presented in the proceeding, greatly narrow the issues to be briefed. *Third*, for similar reasons, there is no longer an imperative to provide extended intervals between hearings and briefs, nor is it necessary to create a large gap between opening and reply briefs or provide the full 30 days for comment on the September 4, 2025 settlement agreements.

With the limited and more focused set of remaining issues, Joint Applicants are optimistic that a hearing transcript would be available relatively quickly and in more than enough time to accommodate an opening brief date of September 26. Likewise, reduced time is appropriate between opening and reply briefs given the more limited scope of issues. Considering the comprehensive nature of the Settlement Agreements, it is likely that the briefs would focus largely on DEI issues. The parties' positions are well developed on that topic—they were addressed in two rounds of extensive supplemental and supplemental rebuttal testimony and were subject to written discovery. Any legal or policy issues in that domain can be briefed in a straightforward and responsive manner. Therefore, there are tangible benefits to modifying the schedule and no reasonable shortcomings in making the changes requested. No party will be harmed by these revisions, and even if the shortening of time creates perceived exigencies around the briefing, these alleged concerns are outweighed by the material benefits of the modifications. Efficiencies will also be achieved by combining the comments on the settlements

with the briefing.

### **III. REQUEST FOR EXPEDITED RULING.**

Given the importance of creating a path to approval of this transfer of control by December 18, 2025, Joint Applicants request an expedited ruling on this Motion. Pursuant to Rule 11.1(g), the ALJ may rule “on a motion before responses or replies are filed,” and Joint Applicants request that the Commission rule on this Motion expeditiously, regardless of whether other parties have responded formally to this Motion.

### **IV. CONCLUSION.**

It is crucial that this proceeding be adjudicated and resolved within 2025, and the scheduling modifications herein give the Commission a path to achieve this goal. Joint Applicants have done their part by pursuing reasonable settlements between Verizon and key parties, and the Commission should recognize these significant developments and align the procedural schedule with the objective of efficiently concluding this proceeding in time for a final decision to be adopted on the December 18, 2025 agenda.

Executed on this 5th day of September 2025.<sup>3</sup>

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<sup>3</sup> Verizon has authorized Frontier to sign this Notice on its behalf pursuant to Rule 1.8(d).