



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

FILED

10/02/25

04:59 PM

C2510001

Rasheed Ali,

Complainant,

vs.

Frontier California Inc. (U1002C), Citizens
Telecommunications Co. Of Ca. d/b/a Frontier
Communications of California (U1024C),
Frontier Communication of America, Inc. d/b/a
Frontier Communications (U1548C), Frontier
California (U4439C), and Frontier
Communications of America, Inc. d/b/a Citizens
Long Distance (U5429C),

Defendants.

(ECP)

Case (C.) _____

Expedited Complaint
(Rule 4.6)

COMPLAINANT	DEFENDANTS
<p style="text-align: center;">Rasheed Ali 2758 Reserve Street Manteca CA 95337 T: 209-561-0529 E-mail: rasheedali2004@gmail.com</p>	<p>Frontier California Inc. (U1002C), Citizens Telecommunications Co. Of Ca. d/b/a Frontier Communications of California (U1024C), Frontier Communication of America, Inc. d/b/a Frontier Communications (U1548C), Frontier California (U4439C), and Frontier Communications of America, Inc. d/b/a Citizens Long Distance (U5429C). Attn: Jenny Smith, Director, Regulatory & GOV. Affairs. 9260 E. Stockton Blvd Elk Grove CA 95624 T: 916-686-3533 E-mail 1: Frontier.CA.1002@ftr.com E-mail 2: Frontier.CA.1024@ftr.com E-mail 3: Frontier.CA.1548@ftr.com E-mail 4: Frontier.CA.4439@ftr.com</p>

	E-mail 5: Frontier.CA.5429@ftr.com
--	--

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A)

Rasheed Ali

COMPLAINANT(S)

vs.

(B)

Frontier California Inc.

DEFENDANT(S)

(Include Utility "U-Number", if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES

☐ NO

Has staff responded to your complaint?

☒ YES

☐ NO

Did you appeal to the Consumer Affairs Manager?

☒ YES

☐ NO

Do you have money on deposit with the Commission?

☐ YES

☒ NO

Amount \$ _____

Is your service now disconnected?

☐ YES

☒ NO

COMPLAINT

(D)

The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
Rasheed Ali	2758 Reserve Street, Manteca, CA 95337	(209) 561-0529

respectfully shows that:

(E)

Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
Frontier California Inc.		

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

Frontier is the designated Carrier of Last Resort (COLR) for Manteca, California. Despite this legal obligation, Frontier has refused to provide analog copper landline service at my residence, 2758 Reserve Street.

In late 2023, Frontier confirmed that service was available at my address, accepted my order, and scheduled installation. A technician later arrived and said no facilities were present. Despite this, Frontier continued calling me, leaving voicemails confirming that facilities existed and urging me to reschedule. This contradictory conduct demonstrates disorganization and misrepresentation. Eventually, Frontier deleted my address from its records entirely, which is a deliberate act of regulatory evasion.

On August 20, 2025, I received a call from Bruce Fitzpatrick of Frontier, who stated that their regulatory department decided not to install copper at my address. He claimed that because my subdivision (built in 2015–2016) was not originally trenched for Frontier, they were not responsible for serving it, and that Comcast was the “only” provider. This reasoning is false and legally irrelevant. Frontier was the COLR in 2015–2016 and remains so today. COLR duties cannot be avoided by private developer arrangements or by pointing to Comcast, which is not a COLR and does not provide regulated, utility-grade service. Comcast’s product is VoIP bundled with internet, which fails during blackouts and does not meet COLR

See additional pages for further explanation.

(G) Scoping Memo Information (Rule 4.2(a))

(1) The proposed category for the Complaint is (check one):

☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

☐ ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

- Whether Frontier, as COLR, is legally obligated to serve my residence.
- Whether Comcast or other alternatives can satisfy COLR requirements (they cannot).
- Whether Frontier’s deletion of my address from its system constitutes unlawful regulatory evasion.
- The public safety and disability access implications of refusing copper service.

- (5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	
Hearing (Example: 7/1/09)	

Explain here if you propose a schedule different from the above guidelines.

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

I respectfully request that the Commission issue an order requiring:

1. Frontier California Inc. (U-1002-C) to immediately install analog copper landline service at my residence, 2758 Reserve Street, Manteca, California. The installation must be completed to a utility-grade standard, with high-quality, buried copper conduit and wiring designed to last reliably for decades without failure, so that I am not subjected to repeated outages or deterioration after only months or a few years.
See additional pages for further explanation.

(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

rasheedali2004@gmail.com

(J)

Dated _____, California, this _____ day of _____, _____
(City) (date) (month) (year)

Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

J. Date and signature:

Manteca, California

September 29, 2025

/s/ Rasheed Ali (Complainant, blind, pro se)

(K)**REPRESENTATIVE'S INFORMATION:**

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	
Address:	
Telephone Number:	
E-mail:	
Signature	

K. Representative:

None. I represent myself

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L)

Executed on _____, at _____, California
(date) (City)

(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)

Executed on _____, at _____, California
(date) (City)

Signature of Officer

Title

(N) NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to: California Public Utilities Commission
Attn: Docket Office

L. Verification:

I, Rasheed Ali, am the complainant in the above-entitled matter. The statements in this complaint are true to my knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Manteca, California

September 29, 2025

/s/ Rasheed Ali (Complainant, blind, pro se)

505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACYNOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

Signature

Date

Print your name

Privacy Notice:

Manteca, California

September 29, 2025

/s/ Rasheed Ali (Complainant, blind, pro se)

Rasheed Ali Formal Complaint Additional Pages

(F) Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any

supporting documentation):

Frontier is the designated Carrier of Last Resort (COLR) for Manteca, California. Despite this legal obligation, Frontier has refused to provide analog copper landline service at my residence, 2758 Reserve Street.

In late 2023, Frontier confirmed that service was available at my address, accepted my order, and scheduled installation. A technician later arrived and said no facilities were present. Despite this, Frontier continued calling me, leaving voicemails confirming that facilities existed and urging me to reschedule. This contradictory conduct demonstrates disorganization and misrepresentation. Eventually, Frontier deleted my address from its records entirely, which is a deliberate act of regulatory evasion.

On August 20, 2025, I received a call from Bruce Fitzpatrick of Frontier, who stated that their regulatory department decided not to install copper at my address. He claimed that because my subdivision (built in 2015–2016) was not originally trenched for Frontier, they were not responsible for serving it, and that Comcast was the “only” provider. This reasoning is false and legally irrelevant. Frontier was the COLR in 2015–2016 and remains so today. COLR duties cannot be avoided by private developer arrangements or by pointing to Comcast, which is not a COLR and does not provide regulated, utility-grade service. Comcast’s product is VoIP bundled with internet, which fails during blackouts and does not meet COLR requirements.

I am blind, and I live with my younger brother, who is also blind, autistic, and has seizures. We require guaranteed, uninterrupted 911 access, especially during emergencies and power outages. Copper service, powered from the central office, is uniquely reliable and independent of local electricity. In contrast, wireless, fiber, and VoIP all fail when power or internet goes out.

Manteca has already experienced multiple major power outages, and Comcast/Xfinity internet outages are frequent and well-documented. These failures underscore why analog copper landline service is essential for public safety and accessibility. Frontier’s refusal to provide service puts my household, and others similarly situated, at unacceptable risk.

Frontier’s excuse that “I may be the only customer” is not valid. COLR obligations apply to every eligible address, regardless of how many subscribers may exist nearby. The law requires universal service, not selective service based on convenience.

(H) Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

1. Frontier California Inc. (U-1002-C) to immediately install analog copper landline service at my residence, 2758 Reserve Street, Manteca, California. The installation must be completed to a utility-grade standard, with high-quality, buried copper conduit and wiring designed to last reliably for decades without failure, so that I am not subjected to repeated outages or deterioration after only months or a few years.
2. That Frontier be prohibited from substituting VoIP, fiber, wireless, or cable phone as “basic service” in satisfaction of its COLR duties.
3. That Frontier’s deletion of my address from its system and its pattern of misrepresentation be fully investigated as possible regulatory evasion.
4. That appropriate penalties be imposed to deter similar violations, and to reaffirm the Commission’s enforcement of COLR obligations.
5. That the Commission reaffirm, on the record, that COLR duties are permanent, universal, and cannot be avoided on grounds of cost, developer arrangements, or convenience.

PUBLIC UTILITIES COMMISSION

320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013



August 26, 2025

Rasheed Ali
2758 Reserve Street
Manteca CA 95337

Subject: Commission File No: 691361 for Complaint with Frontier California Inc.

Dear Rasheed Ali:

The Consumer Affairs Branch (CAB) of the California Public Utilities Commission has completed its review of your complaint against **Frontier California Inc.** As part of the review, CAB considered the information that you provided, the information that **Frontier California Inc.** provided to us about your account and applicable codes, orders and tariffs.

In your complaint to CAB, you stated that you requested new phone service from Frontier California, Inc. You were repeatedly told that phone service was available in your area, only to have a utility technician inform you that no conduit or copper facilities exist, making it impossible to obtain landline service. You believe the utility has removed your area from their system. You have requested that Frontier provide reliable landline services as required by CPUC Decision 12-12-038. You noted that the utility suggested you apply for phone service with Comcast, which offers only VOIP services, not analog service. You have contacted the CPUC to request that Frontier install copper landline services in your area.

Frontier California, Inc. investigated your request and reported that while phone service is available in Manteca, it is currently not available at your specific address. According to the company, they do not provide phone service within a half-mile radius of 2758 Reserve in Manteca, and they do not have any network infrastructure installed in your residential area.

Their Review Manager reported that your neighborhood was developed between 2015 and 2016. During this time the developer did not allow the utility to participate in joint trenching, which is necessary to provide phone service to potential customers in your area. Unfortunately, the developer provided limited access to the property.

As a result of the above information, CAB is closing your informal complaint. We thank you for bringing this matter to our attention. In the future, if you have other matters that need to be addressed, you may contact our office at the number listed below, and we will contact the Executive Office of Frontier California Inc. We are available Monday through Friday, 8:30 a.m. – 4:30 p.m.

Frontier California Inc. conducted an investigation following the filing of your complaint. Based on the review of this information, CAB has determined that **Frontier California Inc.** is not in violation of the rules or regulations of the CPUC.

If you disagree with this result, you may either provide new evidence or appeal. Detailed instructions for sending new evidence or an appeal are attached. You must file within **15 days** of this letter and include supporting documentation. Please provide any information you believe contradicts the utility's representations.

We thank you for bringing this matter to our attention.

PUBLIC UTILITIES COMMISSION

320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013



Sincerely,

Written Operations Unit
Consumer Affairs Branch
1-800-649-7570
www.cpuc.ca.gov

PUBLIC UTILITIES COMMISSION

320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013



September 11, 2025

File No:691361

Rasheed Ali
2758 Reserve St
Manteca CA 95337

Dear Rasheed Ali:

The Consumer Affairs Branch (CAB) of the California Public Utilities Commission (CPUC) received your informal Appeal of your case, **File No:691361**. Our letter closing your case informed you that in order for CAB to consider an Appeal, you must demonstrate that:

CAB made one of three specific types of errors:

- CAB made a mistake in the *facts in the case* or
- CAB made a mistake in the *laws in the case* or
- CAB made a mistake by *not considering evidence*.

You are required to show that correction of CAB's error/s would have otherwise resulted in the disposition being in your favor. Your appeal did not provide new evidence, or you disagreed with the utility's response and CAB's position that does not fulfill CAB's Appeal requirements. Therefore, your appeal has been **denied**.

On September 8, 20125, the CPUC received your appeal against Frontier California, Inc. Unfortunately, the utility position remains the same as their previous response. Their Review Manager states that they spoke with you on August 20, 2025, and advised that they do not provide phone service within a half mile of your address (2758 Reserve, Manteca), no does it have any network installed in your neighborhood. According to the utility, your area was developed between 2015-2016, and during that time the developer did not allow the utility to participate in the joint trenching to provide services to potential customers in the area. The developer provided limited access to the primary cable provider. Unfortunately, Frontier does not plan to provide phones services in your area in the near future.

Since CAB's authority is limited and cannot compel the utility to provide you with the relief you requested, you have **two other available options**:

The **first option** is to convert this Informal Complaint to a **Formal Complaint**— please refer to the Formal Complaint instructions accompanying this letter. You can get further assistance by going to our website: <https://www.cpuc.ca.gov/formalcomplaintinfo/> or you may contact the Public Advisors Officer (PAO) at (866) 849-8390. The PAO is available if you need assistance with completing the necessary forms and assist you with the filing of your paperwork.

The **second option** is to seek legal advice and file a **legal process in a civil or** municipal court or in a court of competent jurisdiction in accordance with **PU Code §2106**.

Sincerely,

PUBLIC UTILITIES COMMISSION

320 W. 4th STREET, SUITE 520
LOS ANGELES, CA 90013



Written Operations Unit
Consumer Affairs Branch
1-800-649-7570
www.cpuc.ca.gov