

BEFORE THE PUBLIC UTILITIES COMMISSION OF  
THE STATE OF CALIFORNIA



**FILED**

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Application 24-10-006  
(Filed October 18, 2024)

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. (U1002C), Citizens Telecommunications Company of California (U1024C), Frontier Communications of the Southwest Inc. (U1026C), Frontier Communications Online and Long Distance Inc. (U7167C), and Frontier Communications of America, Inc. (U5429C), to Verizon Communications Inc. Pursuant to California Public Utilities Code Section 854.

**CENTER FOR ACCESSIBLE TECHNOLOGY'S NOTICE OF EX PARTE  
COMMUNICATION**

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November 3, 2025

Pursuant to Rule 8.4 of the Commission's Rules of Practice and Procedure, Center for Accessible Technology (CforAT) hereby files this notice of an ex parte meeting with advisors to Assigned Commissioner John Reynolds and Commissioner Darcie Houck, which occurred on October 29, 2025 and lasted from approximately 3:01 to 3:31pm. The purpose of the meeting regarding the A.24-10-006 proceeding was to discuss the DEI impacts of the proposed transaction and the problematic nature of commitments introduced in Verizon's opening brief.

From the Commissioners' offices, the participants were Andrew Klutey, Advisor to Commissioner Reynolds; Caleb Jones, Advisor to Commissioner Houck; and Kerriann Sheppard, Advisor to Commissioner Houck. The participants from CforAT were Melissa W. Kasnitz, Legal Director; Paul Goodman, Legal Counsel; and Rachel Sweetnam, Staff Attorney.

The meeting was scheduled at CforAT's request and noticed to the service list on October 24, 2025. The meeting was held virtually on WebEx and lasted approximately 30 minutes. The communication was strictly oral; no handouts or writings were shared.

First, CforAT provided an update on our efforts in the proceeding, sharing that we took to heart Commissioner Reynolds' recommendation from our prior ex parte meeting to work towards a settlement with Applicants on DEI issues and that we had lowered our settlement expectations accordingly to try to reach an agreement. However, despite expending substantial time and efforts, CforAT conveyed that we were unable to reach a settlement with Verizon.

CforAT referred to the record in the proceeding regarding Verizon's position on DEI and discussed our frustration that Verizon has grown increasingly oppositional and defiant and unwilling to commit to any efforts that look or sound like DEI. In addition, CforAT noted that Verizon has inexplicably devoted itself to the conditions it agreed to in order to seek approval from the FCC and has never taken responsibility for abandoning DEI. In contrast, Verizon has

failed to demonstrate the same respect for state authority, the Commission and California's diversity requirements.

CforAT referenced our testimony describing conditions that would reduce, but not eliminate, expected harms resulting from the transaction. Emphasizing our concerns that Verizon does not uphold its commitments, CforAT underscored the importance of appointing an outside party to evaluate Verizon's diversity and to provide recommendations to ensure necessary improvements are made; Verizon should not be allowed to monitor itself. CforAT also supported the recommendations put forth in California African American Chamber of Commerce's (CAACC) Motion for Intervention and Party Status, which are highly compatible with CforAT's position despite no coordination in advance of CAACC's motion.

Next, CforAT discussed our concerns conveyed in our Motion to Strike, filed on October 15, 2025, regarding purported new commitments in Verizon's Opening Brief and the mostly-finalized deal described in the Opening Brief of the Santa Ynez Band of Chumash Indians (Chumash Brief). CforAT disputed Verizon's claims that CforAT does not support the ability of parties to change their position or make clarifications. Rather, CforAT identified the problematic nature of these last-minute commitments that lack a meaningful level of detail and information in the record for the Commission to rely on in making a public interest determination. CforAT described the limited information available in the record regarding Verizon's new commitments and outstanding questions surrounding implementation and enforceability of these proposals, without any opportunity for stakeholders to vet or analyze these commitments. Similarly, the unfinalized deal described in the Chumash Brief lacks sufficient information in the record and does not allow for Rule 12 review. CforAT explained that these last-minute commitments exemplify Verizon's pattern in this proceeding of doling out as little information as possible until

they are ordered to take additional steps or until Verizon determines more information is in its self-interest. This is not only inappropriate burden-shifting and minimizing of responsibility by Verizon, but it also does not allow for sufficient review and development of the record.

CforAT requested that the Commission grant CAACC's Motion for Party Status to allow this group an opportunity to provide their perspective. CforAT shared that we spoke to CAACC after the motion was filed and understand that a number of groups and CBOs monitoring this proceeding have tried to converse with Verizon but received no response until they raised concerns at the Supplier Diversity En Banc. While Verizon has objected to the fact that CAACC's position on the merger has evolved, CforAT pointed out that this evolution potentially makes their input more compelling to understand why their position changed and the impacts they now anticipate from the transaction. Consistent with our position in the Motion to Strike, CforAT clarified that CAACC should not be allowed to introduce new information into the record, but that they should be allowed to share their perspective on the existing record in a reply brief and/or comments on a proposed decision. To the extent the Commission determines that the record should be reopened, CAACC should be allowed to provide any relevant information.

Finally, CforAT requested that regardless of outcome, the Commission should include a factual finding in its decision that Verizon's abandonment of DEI has caused and will continue to cause public interest harms. Given pending and anticipated future mergers occurring under the current federal administration, it is important for the Commission to set a precedent on DEI and include this factual finding to guide Commission and stakeholder review of other transactions.

Respectfully submitted,  
November 3, 2025

/s/ Melissa W. Kasnitz  
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