

ATTACHMENT D

Chumash Tribe Settlement Agreement



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

10/31/25 04:59 PM A2410006

A.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. (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

MOTION OF THE SANTA YNEZ BAND OF CHUMASH INDIANS FOR PROPOSAL OF SETTLEMENT AGREEMENT

In accordance with the Administrative Law Judge's ("ALJ") October 30, 2025, Email Ruling Requiring Resubmission of Chumash Tribe Settlement, which directs the Santa Ynez Band of Chumash Indians (the "Chumash Tribe") to re-file its opening brief as a settlement agreement "by written motion," the Chumash Tribe hereby re-submits its opening brief through this motion pursuant to Rule 11.1 and Rule 12.1 of the Commission's Rules of Practice and Procedure ("Rules"). To date, the Chumash Tribe and Verizon have not reached an agreement memorializing the terms outlined in its opening brief. The Chumash Tribe continues to seek to update its position to support the transaction and urges the Commission to expeditiously approve Verizon's acquisition of Frontier.

The Chumash Tribe was granted party status on September 2, 2025. The ALJ Ruling noted good cause in that the Chumash Tribe fully disclosed their interests in how the proposed transaction may affect: (1) broadband access, telecommunications infrastructure, and service

quality in tribal lands and surrounding rural communities; and (2) governmental, educational,

and health services that depend on reliable telecommunications services.

Prior to the Ruling, Verizon and the Chumash Tribe had been in discussions and

negotiations about the communications needs on the Santa Ynez Reservation and other lands

owned by the Chumash Tribe. Those negotiations resulted in a proposal from Verizon regarding

the potential building of two macro towers and the placement of a neutral host distributed

antenna system in the Chumash Casino.

On October 8, 2025, the Chumash Tribe's Business Committee (the Tribal Leadership)

accepted Verizon's proposal, pending final review and approval of the terms and conditions.

The Business Committee acknowledges that the proposal, as presented, appears to address to the

satisfaction of the Business Committee and the Chumash Tribe the issues that prompted the

Chumash Tribe's motion for party status.

In light of the cooperation from and the good will demonstrated by Verizon and Frontier

in the negotiations, the Chumash Tribe recommends that the Commission should approve

Verizon's acquisition of Frontier.

Dated: October 31, 2025

Respectfully submitted,

/s/ Walter Viar

Walter Viar

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