

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



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Order Instituting Rulemaking
Proceeding to Consider Changes to
the Commission's Carrier of Last
Resort Rules.

R.24-06-012

OPENING COMMENTS OF

**FRONTIER CALIFORNIA INC. (U 1002 C)
CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. DBA
FRONTIER COMMUNICATIONS OF CALIFORNIA (U 1024 C)
FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC. (U 1026 C)
("FRONTIER")**

**ON ASSIGNED ADMINISTRATIVE LAW JUDGE'S RULING ISSUING STAFF
PROPOSAL FOR COMMENT**

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January 30, 2026

Pursuant to the Administrative Law Judge’s (“ALJ”) December 15, 2025 Ruling Issuing Staff Proposal for Comment (“Ruling”), Frontier California Inc., Citizens Telecommunications Company of California Inc. dba Frontier Communications of California, and Frontier Communications of the Southwest Inc. (collectively, “Frontier”) respectfully submit these joint comments to the Ruling and the accompanying Staff Proposal.¹ Following regulatory approval from the California Public Utilities Commission (“Commission”) in D.26-01-023, Verizon Communications, Inc. (“Verizon”) consummated its acquisition of the Frontier Incumbent Local Exchange Carriers (“ILEC”) listed herein.² Frontier notes that each of the Frontier entities designated as Carrier of Last Resort (“COLRs”) in California are now subsidiaries of Verizon. While Verizon was deemed a party to this proceeding during the pendency of its transfer of control application, it is not offering comments in response to the Ruling at this time because it does not have input on the subjects in the Ruling that differs from Frontier.³

I. INTRODUCTION.

Frontier appreciates Communications Division (“CD”) staff’s work to prepare a tangible proposal for updating and modernizing COLR service to better accommodate current technologies and customer needs. The Staff Proposal correctly recognizes that telecommunications technology has evolved from Plain Old Telephone Service (“POTS”) delivered over legacy copper networks and that consumers now rely on advanced technologies across various modalities for their primary communications needs. In this regard, the staff’s removal of outdated regulations that were only tailored to legacy service are a welcome change. Updating the elements of “basic service” is critical to realizing CD’s stated intention to allow COLRs to use alternate technologies such as Voice over Internet Protocol (“VoIP”) or wireless services to fulfill their obligations, consistent with the Commission’s commitment to technological neutrality.⁴ However, the Staff Proposal’s requirement that COLRs include

¹ On January 6, 2026, the ALJ granted an extension of the deadline for opening comments until January 30, 2025.

² See D.26-01-023 (approving the Joint Application of Verizon Communications Inc., Frontier Communications Parent, Inc., to transfer 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.).

³ Frontier’s comments are provided on behalf of itself and its affiliates.

⁴ *Staff Proposal* at 9, 10, 17 (“Current COLR service requirements are technology neutral . . . ” “any

LifeLine broadband as a “modernized essential service” is infeasible, inequitable, costly, and beyond the scope of this proceeding and the Commission’s jurisdiction.

Frontier nonetheless appreciates that the Staff Proposal recommends a path to COLR withdrawal and its recognition that competitive conditions should trigger COLR relief. Nevertheless, the specific proposal for COLR de-certification in the Staff Proposal, as written, will be unreasonably burdensome, inefficient, and overly complex, creating a regime that would ultimately impose more burdens and offer no hope of relief at all. If adopted as proposed, the withdrawal process for a single COLR would take five years or longer, even in areas where robust competitive alternatives are presently available.

Additionally, the Staff Proposal includes statements about wireless service and coverage that are outdated, inaccurate, and inconsistent with the Commission’s stated commitment to technology neutrality. Contrary to certain conclusions in the Staff Proposal, consumers today are overwhelmingly using wireless service as their primary voice communications method. Consumers would not be pursuing these options if they were dissatisfied with wireless service or found it to be unreliable. Moreover, wireless service and coverage maps are reliable and will continue to become even more so as the industry densifies networks and moves toward 6G technology.

Finally, while the ALJ Ruling indicates that the record will be considered “submitted” after comments on the Staff Proposal, certain aspects of the Staff Proposal are vague and would benefit from further clarification. As noted above, the Staff Proposal to include LifeLine broadband service in the new definition of “modernized essential service” also presents jurisdictional and statutory problems that require the removal of this feature from the list of mandated service elements. Frontier recommends that a revised set of proposed COLR rules be circulated for further comment—with adjustments responding to these comments and other proposed improvements identified by other parties—before a Proposed Decision is issued.

Frontier hereby provides its responses to the specific questions posed in the Ruling and provides additional context and overall feedback regarding the approach in the Staff Proposal.

carrier may use any technology to satisfy any obligation to provide basic service.” “. . . COLRs may need time to upgrade their networks to provide Modernized Essential Services. This can be done using any technology that meets the requirements, including fiber, wireless, coaxial cable, or any combination thereof”)

Overall, the Staff Proposal is a step in the right direction toward modernizing the Commission’s COLR framework, but significant additional clarifications and improvements to the proposal will be important to make the approach reasonable, legally-supported, and workable in practice.

II. RESPONSES TO QUESTIONS POSED IN STAFF PROPOSAL.

Chapter II: Modernizing Access to Essential Communications Services

1. Should the Commission include LifeLine broadband as a requirement of “Modernized Essential Communications Services?”

Response: Quite simply, imposing a LifeLine broadband requirement as part of the definition of “modernized essential service” for COLR providers represents a universal broadband buildout mandate that would neutralize any efforts at reform, cost billions, and put these providers at a massive competitive disadvantage for no reason other than their legacy holdings.

The COLR construct is—and always has been—a voice-only obligation, consistent with state jurisdiction and historical obligations. While universal broadband access is a worthy policy goal and it should be pursued through other means, it should not be imposed as a requirement for just one set of providers—traditional COLRs—which are often not the primary providers of broadband in any area, particularly where cable companies are present. Increasing broadband penetration is more appropriately addressed through the Commission’s ongoing efforts related to the California Advanced Services Fund (“CASF”), Federal Funding Account (“FFA”), and Broadband Equity Access and Deployment (“BEAD”) programs. The recently-adopted LifeLine broadband pilot program is also an important vehicle for enhancing broadband access.⁵ As long as a COLR provides voice service with the appropriate “basic” features to all reasonable locations, COLR obligations should be satisfied. Likewise, the Commission should be indifferent to the particular technology through which such a voice service is provided if the required functionalities are met.

Moreover, the Commission lacks authority to regulate broadband service, so it cannot lawfully be included as a mandatory feature as part of “basic service” or “modernized essential service.” As a matter of state law, the Commission’s statutory and constitutional authority extends to intrastate, regulated activities of California public utilities, including telephone corporations, but does not include *interstate* broadband services.⁶

⁵ See D.25-08-050.

⁶ See Pub. Util. Code §§ 234(a) (limiting authority over “telephone corporations” to companies that own,

Requiring provision of LifeLine broadband as an element of modernized essential service would also be subject to preemption directives and/or conflict preemption principles under federal law, as it would constitute regulation of broadband service that the Federal Communications Commission (“FCC”) has designated as expressly interstate and non-regulated. The Sixth Circuit Court of Appeals overturned the FCC’s designation of broadband service as a “telecommunications service” in 2025.⁷ Accordingly, The FCC’s “Title II” Order is no longer operative, and the jurisdictional status of broadband service has reverted to the previous “Title I” framework.⁸ Broadband service remains subject to federal interstate authority,⁹ and the Commission’s attempts to regulate broadband service through its COLR framework definitions would be subject to preemption.¹⁰ The Commission’s attempts to regulate broadband operations would impermissibly conflict with the FCC’s determinations that broadband should be free of “public utility-type” regulations.

This de facto universal broadband buildout mandate undermines the other salutary parts of the proposal. Frontier supports staff’s proposed elimination of outdated elements of basic

control, operate, or manage a “telephone line” “within this state”), 216 (defining public utility with reference to “telephone corporations”); Cal. Const., art. XII, §§ 3 (defining public utilities that are “subject to control by the Legislature”), 6 (the CPUC “may fix rates . . . for all public utilities subject to its jurisdiction.”) (emphasis added); *see also City & County of San Francisco v. W. Air Lines, Inc.*, 204 Cal.App.2d 105, 131 (1962) (“Unless the enterprise or activity in question is a public utility as defined in the Constitution or Public Utilities Code, it is not subject to the jurisdiction of such commission.”) (citing *Television Transmission v. Public Util. Comm’n.*, 47 Cal.2d 82, 84 (1956)).

⁷ *Ohio Telecom Association v. FCC (In re MCP)*, 124 F.4th 993 (6th Cir. 2025); *In re MCP No. 185*, 2024 U.S.App.LEXIS 19815 (2024) (stay imposed in “per curiam” opinion); *see also In the Matter of Safeguarding and Securing the Open Internet Restoring Internet Freedom*, WC Docket 23-320, *Report and Order, et al.*, FCC 24-52 (rel. May 27, 2024) at ¶¶ 29, 106, 265, 268, 383. (“Title II Order”).

⁸ *See In the Matter of Restoring Internet Freedom*, WC Docket No. 17-108, *Declaratory Ruling, Report and Order, and Order*, FCC 17-166 (rel. Jan. 4, 2018) (“Restoring Internet Freedom Order”), ¶¶ 1, 20, 100 (adopting classification of broadband as an “information service” under “Title I” of the Telecommunications Act, and confirming that that ISPs must be free of “utility style regulation.”), vacated in part on other grounds by *Mozilla Corp. v. FCC*, 940 F.3d 1, 35 (D.C. Cir. 2019) (upholding the FCC’s classification of broadband Internet access as an “information service”).

⁹ *Restoring Internet Freedom Order*, FCC 17 166 at ¶ 199, 2018 FCC LEXIS 44 (“it is well-settled that Internet access is a jurisdictionally interstate service because ‘a substantial portion of Internet traffic involves accessing interstate or foreign websites.’”) (citing *Bell Atl. Tel. Cos. v. FCC*, 206 F.3d 1, 5 (D.C. Cir. 2000), vacated on other grounds by *Mozilla v. FCC*, 940 F.3d 1 (D.C. Cir. 2019)).

¹⁰ *Geier v. American Honda Motor Co.*, 529 U.S. 861, 873 (2000) (citing *Hines v. Davidowitz*, 312 U.S. 52, 67 (1941) (“a “state law” will be preempted if it “stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress.”); *see Mozilla, supra*, 940 F.3d at 81-82, 86 (preserving conflict preemption as a possibility if there are future “particular state law[s]” that “conflict with the 2018 Order.”)).

service—such as directory listings, operator services, and tariffing requirements—from its proposed modernized essential service definition. These elements are not necessary in today’s world where consumers rely on online resources to locate information, and where communications services are not price-regulated. Elimination of these elements is consistent with the Commission’s commitment to evaluate which services are deemed essential on an ongoing basis.¹¹ These reforms are also consistent with the use of alternate technologies such as VoIP, wireless, or satellite technology to provide services. As such, it is technology-neutral in its approach and will help to promote modernization of networks.

While the universal broadband mandate is the biggest concern, the procedures surrounding the implementation of “modernized essential service” should also be streamlined. The Staff Proposal would require that a carrier electing to offer modernized essential service in all or part of its service territory using multiple, different technologies, provide details regarding the offering for each technology, including the terms, conditions and pricing practices via a Tier 2 advice letter. This requirement is unnecessary and unreasonably burdensome. Instead, providers using alternative technologies to satisfy modern essential service obligations should simply be bound by the rules governing such technology and service. This is consistent with the essential goal of ensuring that COLR is technology neutral.

There is also a technical flaw inherent in including California LifeLine service as an element of “modernized essential service,” which is that the mandated features of LifeLine service in General Order (“G.O.”) 153-A include many of the outdated “basic service” elements that the Staff Proposal recommends be eliminated.¹² Unless the Commission expressly states otherwise, the cross-reference to California LifeLine may undermine the streamlining efforts that Staff proposes. For example, the “service elements” for wireline carriers in G.O. 153 include “local white page telephone directory,” “operator services,” “directory assistance” and tariffing requirements.¹³ If a COLR must provide “modernized essential service” and LifeLine is part of that service, the antiquated features in “basic service” will be bootstrapped back onto COLRs. To resolve this problem and avoid undercutting CD’s intention, the Commission should either confirm that the LifeLine elements will be revised to conform to the proposed changes to “basic

¹¹ D.96-10-066 at 47.

¹² See G.O. 153, Appendix A-1 (identifying the “Service Elements of California LifeLine” for wireline carriers).

¹³ *Id.*, Appendix A-1 at 2-3.

service,” or explain that the LifeLine requirement imposed on COLRs is not governed by G.O. 153, and instead encompasses only an obligation to provide the LifeLine service discounts reflected in G.O. 153 for any technology that can otherwise meet the definition of “modernized essential service”—without mandating all of the other specific service elements under G.O. 153.

The Commission should adjust the Staff Proposal to address these concerns. In addition, if the Commission intends to rely on the new term “modernized essential service” in lieu of “basic service,” it should clarify expressly that all prior references in Commission decisions or statutory provisions to “basic service” should be interpreted to mean “modernized essential service.” This clarification will avoid the misimpression that “basic service” has been preserved alongside “modernized essential service” and mitigate confusion over the meaning of prior directives referencing “basic service.”

Chapter IV: Significant Consumer Choice - Withdrawal Process: Pre- Application Phase

- 1. How should the Commission limit the scope of a COLR withdrawal application?**
- 2. What should be the maximum number of customers affected?**
- 3. What is a reasonable limit on the size of geographic span in which a COLR may seek to withdraw?**
- 4. Must the proposed withdrawal area be contiguous?**

Response: Frontier disagrees with the proposed limitations on withdrawal applications. The Staff Proposal recommends that COLR withdrawal applications be limited to a maximum of 20% of the total units within the designated COLR territory that the COLR is seeking to withdraw from, and that the COLR territories must be geographically contiguous and no larger than 10,500 square miles. The proposal also limits each COLR to one application per calendar year. These limitations are arbitrary and misguided. If CD’s proposed restrictions are adopted as proposed, it would take five years to complete the withdrawal process from a single COLR territory, not including the time for the provisional withdrawal period. The scope of COLR withdrawal applications should not be artificially limited based on either the number of customers within the territory, the size of the territory, or whether the COLR territory is geographically contiguous. Instead, applicants seeking COLR withdrawal should be provided discretion to scope their applications based on evidence of consumer choice in areas that the applicant defines.

The sole reason cited by Staff for the proposed scoping restrictions is to “ensure that the Commission, the public, and all interested parties are able to effectively and thoroughly evaluate

the application and the potential effect on customers.”¹⁴ The Staff Proposal, however, does not explain how or why such arbitrary restrictions are necessary for this purpose. If the Commission or interested parties need additional time to evaluate a COLR application, such requests can be considered and addressed in the context of each particular application. As such, CD’s proposed scoping restrictions should not be adopted.

Chapter IV: Significant Consumer Choice - Withdrawal Process: Application Phase

- 1. What documentation would provide sufficient evidence of consumer choice?**
- 2. If a replacement COLR is not designated, is a customer transition plan necessary? If so, what elements should the transition include?**

Response: The Commission should permit COLRs applying for withdrawal to demonstrate consumer choice through various forms of evidence, including through the FCC’s broadband maps. To the extent that there are questions about the existence of wireless providers operating in an area, Frontier believes that the FCC’s maps are adequate and reliable indicators of coverage.

In considering the role of mobile providers in the context of consumer choice, the Staff Proposal makes several unnecessary and inaccurate statements about the reliability of wireless service.¹⁵ For example, the Staff Proposal states that wireless service is subject to “coverage gaps and weak wireless signals or weak indoor wireless signals” and that mobile providers may not be able to meet the ‘special needs of customers with disabilities for the features provided by landline service, such as compatibility with medical devices or with TTY and TTY relay services.’”¹⁶

These statements refer to a 2016 Commission decision that is now a decade old. Wireless service has evolved significantly from a decade ago, and consumers’ reliance on wireless service has correspondingly increased. Today, 98% of American consumers own a wireless phone, with an estimated 579 million wireless devices.¹⁷ As the Staff Proposal notes, in July 2025, there were 45.08 million wireless voice subscribers in California, comprising 84 percent of all access lines.¹⁸ In a survey of consumer behavior from July-December 2024, 78.0% of adults had

¹⁴ *Staff Proposal* at 28.

¹⁵ *Staff Proposal* at 23-24.

¹⁶ *Staff Proposal* at 23-24.

¹⁷ See <https://www.ctia.org/the-wireless-industry/wireless-industry>

¹⁸ *Staff Proposal* at 22.

wireless-only households¹⁹ – a significant increase from July-December 2016, when 50% of adults were wireless-only households.²⁰ Conversely, in July-December 2024, only 1.4% of adults had landline-only households,²¹ a fall from the 6.5% of adults that had landline-only households in July-December 2016.²²

Indeed, wireless technology is so interwoven with American life that 72% of Americans would rather give up chocolate than their cell phone, and 89% have stated that they cannot reasonably live without their cell phone.²³ These statistics reflect that American consumers are not only undeniably comfortable with wireless technology, but in many cases, rely on it as their predominant or sole means of communications.

Consumers would not primarily rely on wireless service if the service were not reliable. The wireless industry has invested more than \$219 billion in capital since 2018 to upgrade networks to 5G technology. Wireless speeds today are 157 times what they were in 2010. The Staff Proposal itself notes that in California, “[t]otal capital investments in wireless networks totaled \$4.78 billion for 2022, which represents a 5.66% year-over-year increase from 2021,”²⁴ and that “[b]ecause of increased infrastructure and redundancy, mobile service has become more reliable.”²⁵

Moreover, Staff’s concerns about compatibility with medical devices or TTY devices and services are addressed by the responses to the October 1, 2025 ALJ Ruling seeking comments on issues from the August 2025 workshop. In particular, parties stated that alternate technologies are compatible with medical devices, TTY, and TTY relay service. AT&T stated that all of its non-POTS services (except for one) are compatible with TTY and TTY relay service. Verizon’s

¹⁹ See *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey*, (July-December 2024), <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202506.pdf>

²⁰ *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, July–December 2016*, https://archive.cdc.gov/www_cdc_gov/nchs/data/nhis/earlyrelease/wireless201705.pdf?utm_source=link_news9&utm_campaign=item_235367&utm_medium=copy

²¹ See *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey*, (July-December 2024), <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202506.pdf>

²² *Wireless Substitution: Early Release of Estimates From the National Health Interview Survey, July–December 2016*, https://archive.cdc.gov/www_cdc_gov/nchs/data/nhis/earlyrelease/wireless201705.pdf?utm_source=link_news9&utm_campaign=item_235367&utm_medium=copy

²³ See <https://www.ctia.org/the-wireless-industry/wireless-industry>

²⁴ *Staff Proposal* at 23.

²⁵ *Id.* at 22.

fixed-location Voice Connect service (operating on its wireless network) should support many medical devices, including Life Alert.²⁶ Wireless service customers can connect their wireless devices to traditional TTY hardware,²⁷ or pair with keyboards and other peripherals; a wireless caller can also call California Relay (or federal relay services) using their wireless phone.²⁸

Chapter IV: Significant Consumer Choice - Withdrawal Process: Provisional Withdrawal Period

- 1. How long should the COLR be required to provide basic service to existing customers after the withdrawal decision is Approved?**
- 2. How can the provisional withdrawal period be structured to ensure that all customers are able to find alternative service before the withdrawal is made permanent? Is it necessary for the Provisional Withdrawal period to continue after the COLR is permitted to cease offering basic service?**
- 3. What information should customers provide as part of the extended customer input process?**
- 4. Identify any other data that should be included in the required reporting.**

Response: There is no need to require a provisional withdrawal period after a COLR has obtained relief by demonstrating the availability of competitive alternatives. As part of the proposed provisional withdrawal period, staff would require the COLR to set up a process “for customers to request continuation of basic service” with a final report at the end of the provisional withdrawal period showing that “all existing Basic Service customers have transitioned to a Qualified Provider.”²⁹ Frontier does not oppose collection of data of a reasonable nature following Commission approval of an application to withdraw, but where the Commission has approved withdrawal based on the presence of competitive alternatives in a given area, there should be no need for a 2-year provisional withdrawal period.

²⁶ *Comments Of Verizon On ALJ Ruling Regarding Topics Discussed At August 22, 2025 Workshop (“Verizon Comments on August Workshop Report”)* at 12. See, e.g.,

<https://www.verizon.com/support/residential/homephone/voice-connect>

²⁷ See <https://www.verizon.com/support/residential/homephone/voice-connect>

²⁸ See *Verizon Comments on August Workshop Report*, at 2-3.

²⁹ *Staff Proposal* at 37-38.

Chapter IV: Significant Consumer Choice - Withdrawal Process: Conclusion of Provisional Withdrawal Period

- 1. What should the standards be for the Commission to determine if a COLR has passed or failed the provisional withdrawal period?**
- 2. If the Commission restores COLR obligations, how should the area be determined? Should the COLR obligation be restored throughout the entire area identified in the application/decision? Or should specific areas be carved out?**

Response: As noted in the response above, Frontier does not believe a provisional withdrawal period is needed. In the event that the Commission restores COLR obligations for a former COLR it should be limited to the area in which the Commission determines that there are insufficient competitive alternatives. This area may well be significantly smaller than the prior COLR area given that the Commission would have recently concluded that there was significant consumer choice throughout the area.

Chapter IV: Significant Consumer Choice: Post-Withdrawal Phase

- 1. For Significant Consumer Choice areas where the COLR chooses to withdraw, what are the net costs (total costs minus savings associated with COLR withdrawal) associated with withdrawing from COLR obligations?**

Response: Although complete information on costs is difficult to pinpoint, Frontier can say with certainty that it spends hundreds of millions of dollars on energy costs alone, and that more modern technologies are 100 times more efficient than services over copper with respect to energy.³⁰

Chapter V: Limited Consumer Choice – COLR Requirements

- 1. For Limited Consumer Choice areas where the COLR chooses to withdraw, what are the net costs (total costs minus savings associated with COLR withdrawal) associated with deploying infrastructure capable of delivering indoor broadband speeds of 100 Mbps download and 20 Mbps upload and sufficient latency to enable VoIP to all Broadband Serviceable Locations in the area within five years of the Application’s approval date?**

Response: Frontier does not have sufficient information to provide a full cost estimate in response to this question. The costs of broadband deployment are highly variable based on the distances and terrain involved, among other factors, so the costs would depend on the scope of

³⁰ See *Verizon ESG Report 2023*, at 45 (“Our fiber-delivered broadband services are at least 100 times more efficient on a kilowatt hour (kWh) per gigabyte basis than copper-delivered broadband services”). (<https://www.verizon.com/about/sites/default/files/Verizon-2023-ESG-Report.pdf>)

the proposed withdrawal and the specific topographies and geographies involved.

That being said, information from California’s BEAD program could be viewed as a rough, “ballpark” estimate of the range of costs of deploying fiber infrastructure in California. Based on the PUC’s Dec. 19, 2025, draft Final Proposal “fp_deployment_projects” data³¹ for 67 provisionally awarded fiber-only projects, our calculations show the median fiber-only project’s cost per mile (CPM) is \$182,501.

Some additional cost-per-mile percentiles for provisionally-awarded fiber-only projects are:

Percentile	Cost Per Fiber Mile
25th	\$135,759
50th (median)	\$182,501
75th	\$234,719

This data is for provisionally *awarded* projects. For the “cost” of a project, Frontier used the sum of the BEAD subsidy and all matching funds (ISP, federal, state, and “other” match).

Our data set includes BEAD-awarded projects that meet all of the following conditions:

- The “project_description” column refers to “Fiber to the Premises” and does not refer to any other technology.
- The Final Proposal data shows a non-zero value for total fiber mileage (aerial plus buried) for the project.

Please note actual BEAD fiber miles and deployment costs for individual projects could differ materially from the estimates reflected in the PUC’s draft Final Proposal data. Also, the data we used could become outdated if the PUC releases updated data.

Regardless of these specifics, Frontier does not believe that the “limited consumer choice” alternative should be linked to any type of mandatory broadband deployment requirement. In practice, Frontier believes that many areas will ultimately be deemed sufficiently competitive to justify COLR withdrawal without the need to consider this alternative in detail.

³¹ The data is available at: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/broadband-implementation-for-california/bead-program/california-bead-final-proposal>.

Attachment C – Application Phase

1. **If the COLR intends to use availability of mobile providers as evidence of significant consumer choice within an area, the COLR shall provide documentation of the results of its own testing of mobile service availability and usability throughout the area utilizing the Commission’s CalSpeed app. What should the sample size and testing method be to verify coverage and usability of voice service indoors?**

Response: Frontier disputes the Staff Proposal’s claims that wireless coverage maps are not reliable. While wireless coverage maps are predictive of coverage, they reflect with reasonable certainty where wireless coverage can be obtained. The industry’s statements in the service quality proceeding countered proposals that would have required wireless coverage maps to “guarantee” coverage 100% of the time, which is not possible due to the inherently variable characteristics of the service.³²

The Staff Proposal also inaccurately asserts that the FCC maps reflect broadband coverage but do not reliably show wireless *voice* coverage.³³ The FCC collects both wireless voice and wireless data coverage maps from providers in addition to broadband coverage maps. The FCC’s wireless voice coverage maps *solely reflect wireless voice* and do not indicate wireless broadband data coverage.³⁴ In addition to mobile broadband maps, the major wireless carriers submit maps for in-vehicle and pedestrian *wireless voice coverage*, typically on a biannual and annual basis. Frontier is aware that Verizon conservatively reports its wireless voice coverage to avoid overstating coverage, so the FCC coverage maps are very good indicators of where Verizon’s coverage exists.

Frontier does not believe that the Staff Proposal to use CalSpeed tests to translate a Mean Opinion Score would be a reasonable method for determining wireless voice quality. Moreover, CalSpeed testing is focused on measuring parameters related to broadband traffic travelling to and from the internet, not mobile voice service availability or quality, and thus the tool is

³² R.22-03-016, *CTIA Comments on Phase One Staff Proposal* at 52-53; *Verizon Comments on Phase One Staff Proposal* at 44-46; *AT&T Comments on Phase One Staff Proposal* at 38.

³³ *Staff Proposal* at 70. The Staff Proposal asserts that “[m]obile coverage is typically represented for broadband on maps, so testing will be necessary to verify voice coverage and usability. ‘Usability’ means a reliable, sustained connection that supports voice communication rather than a ‘bursty’ internet connection that quickly sends and receives data.” *Id.*

³⁴ See *FCC Broadband Data Collection, Data Specifications for Biannual Submission of Subscription, Availability, and Supporting Data*, Section 8.2 (November 25, 2024), <https://www.fcc.gov/sites/default/files/bdc-availability-data-specifications.pdf> (describing the specifications for reporting mobile voice availability maps).

inapplicable for use related to mobile voice service.³⁵ For the purpose of determining wireless voice coverage in this proceeding, the FCC wireless maps are the best source for predicting such service³⁶ and Frontier urges the Commission not to adopt alternate complicated and untested processes.

Frontier also opposes any requirement that COLRs measure indoor service coverage *inside* a customer's premise. Accessing customer premises creates inconveniences for customers and would be extremely costly for carriers. As noted above, the FCC coverage maps are established and reliable; to the extent that consumers dispute such coverage, the Commission could employ a challenge process, as recommended in the Staff Proposal.

III. CONCLUSION

Frontier appreciates the opportunity to comment on the Staff Proposal and requests that the Commission circulate a revised proposed set of COLR withdrawal rules for further comment prior to issuing a proposed decision.

Executed on this 30th day of January 2026.

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³⁵ See <https://calspeed.org/about> (“The tool measures key internet performance metrics and keeps the history of previous test results in one place.”).

³⁶ The FCC has rules setting the parameters for how providers are to identify and submit coverage of their mobile voice and mobile broadband service. *See* 47 CFR § 1.7004(c)(3)-(7).