

BEFORE THE STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

In the Matter of a Request for Approval of
Reorganization of Frontier Communications
Corporation and its Subsidiaries.

PUC Docket No.
P405, P407, P5316 / PA-20-504

**SUPPLEMENTAL COMMENTS OF
COMMUNICATIONS WORKERS OF AMERICA
CONCERNING RECONSIDERATION OF DECEMBER 7, 2020, ORDER
APPROVING TRANSFER OF CONTROL**

On December 28, 2020, the Communications Workers of America - District 7 (“CWA”) submitted a Petition for Reconsideration of the Commission's December 7, 2020, Order Approving Transfer of Control of Minnesota Telecommunications Subsidiaries in the above-captioned proceeding. On February 10, 2020, Commission Staff filed its Briefing Papers in preparation for the Commission’s February 18, 2020, meeting at which the Commission will deliberate on CWA’s Petition.

CWA has reviewed the Briefing Papers and submits these Supplemental Comments to (1) update the Commission on developments related to Frontier’s reorganization in other states that occurred after December 28, and (2) notify the Commission of CWA’s position on the Decision Options presented in the Briefing Papers.

Initially, CWA would note three developments in other states related to Frontier’s bankruptcy reorganization that occurred after December 28, 2020. Specifically:

1. The Connecticut commitment made by Frontier in its reply brief to the Public Utilities Regulatory Authority (CT PURA) was adopted by CT PURA in its final decision dated February 3, 2021.¹
2. The California commitment made by Frontier in a settlement agreement is awaiting final approval by the California Public Utilities Commission (CPUC). On February 12, 2021, an administrative law judge at the CPUC issued a Proposed Decision that recommends adoption of the settlement agreement

¹*The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut Bankruptcy Proceeding and Change of Control*, Docket No. 20-04-31, Decision (Feb. 3, 2021), [http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/d2de0beecf2f2011852586710068b30b/\\$FILE/200431-020321.pdf](http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/d2de0beecf2f2011852586710068b30b/$FILE/200431-020321.pdf)

without changes. The matter is scheduled for a vote by the CPUC on March 18, 2021.²

3. On January 19, 2021, the Pennsylvania Public Utility Commission (PA PUC) issued a Secretarial Letter that approved the proposed reorganization subject to conditions. Those conditions are summarized in the approval letter as follows: “(1) \$50 million in capital expenditures by the end of 2024; (2) fiber based broadband access services to 15,000 locations by the end of 2027, and (3) numerous reporting and process-oriented changes regarding customer service as well as complaints.”³

CWA takes this opportunity to notify the Commission that CWA supports Decision Options 1.B (the Commission should grant reconsideration) and 2.B with one modification. Specifically, CWA would recommend amending Option 2.B to read as follows (double underline is added): “require Frontier to make significant additional investments in its network such that Frontier will expend \$50 million on capital improvements in its Minnesota network by the end of 2024, install fiber to the premises that pass a minimum of 15,000 additional locations in Minnesota no later than the end of 2027, maintain the total employee technician staffing level in Minnesota to the end of 2023, and offer and provide training for its employee technicians in Minnesota on mixed generation (e.g. fiber) technologies.”

The capital improvement and fiber to the premise requirements are the same requirements Frontier recommended to the PA PUC and that the PA PUC adopted on January 19. According to the Federal Communications Commission’s Form 477 data, Frontier’s networks in Pennsylvania and Minnesota are nearly identical in size. The data show that Frontier’s Minnesota service areas encompass 242,763 households, while its Pennsylvania service areas include 244,765 households.⁴ Thus, it is reasonable for this Commission to adopt the same requirements for Minnesota that Frontier agreed to in Pennsylvania.

The staffing level and training requirements are identical to commitments Frontier made in the settlement agreement awaiting final approval by the California Public Utilities Commission. These address operational issues identified by CWA members.

² *Application of Frontier Communications Corporation, Frontier California Inc., et al.*, A.20-05-010, Proposed Decision (Feb. 12, 2021), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M365/K312/365312888.PDF>

³ *Joint Application of Frontier Communications Corporation; Frontier Subsidiary Telco, LLC, et al.*, Docket Nos. A-2020-3020004, *et al.*, Secretarial Letter (Jan. 19, 2021), <https://www.puc.pa.gov/pcdocs/1691067.docx>

⁴ Fixed Broadband Deployment Data from FCC Form 477, available at: <https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477> (Dec. 31, 2019); Household counts matched from 2010 Decennial Census.

Respectfully submitted,



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