

5. Local exchange services provided by a local exchange carrier such as Frontier require: (a) Communications channels between a customer's location and a switching facility; (b) Switching or routing of customer calls; and (c) Connection of customers to the facilities of other carriers who provide calling outside of the customer's local calling area for both out-going calls and calls made to the customer.

6. Facilities of a local exchange carrier such as Frontier that are involved in providing Local Exchange Services include: (a) Lines between customers and local exchange switching facilities ("Subscriber Lines"), which may include a number of components; (b) Local switching facilities (formerly called "central offices"); (c) Toll connecting trunks that carry traffic from local switching facilities to the facilities of carriers providing calling outside of the customer's local calling area ("Toll Trunks"); and (d) Trunks, which connect exchanges in the local exchange carrier's network ("Interexchange Trunks").

Local Exchange Services

7. Local Exchange Services require only a limited frequency range to provide reliable voice service and meet applicable service quality requirements. This is demonstrated by prior and current experience in providing local exchange services using copper cable Subscriber Lines.

8. Frontier and other telephone companies in Minnesota and across the country have used for years and continue to provide voice telephone service using copper cable network facilities.

9. A network comprised of copper facilities can readily provide all of the frequency range needed to provide Local Exchange Services that provide reliable voice service and meet all service quality requirements.

Use of Fiber Facilities.

10. The terms “Fiber to the Premise” (“FTTP”) and “Fiber to the Home” (“FTTH”) refer to the use of entirely fiber optic facilities for the Subscriber Lines.

11. FTTP and FTTH is generally deployed to support the provision of Internet and Internet Access services associated with broadband services. Frontier’s FTTP in Minnesota has been deployed for the provision of expanded Internet and Internet Access services to support broadband services.

12. There is no need to use FTTP or FTTH for the Subscriber Lines in order to provide Local Exchange Services in Minnesota at service quality levels that meet applicable service quality requirements.

13. There is no need to add any new fiber facilities to provide Local Exchange Services in Minnesota at service quality levels that meet applicable service quality requirements.

Frontier network requirements to provide Local Exchange Services

14. The currently existing Frontier network in Minnesota would require no expansion or addition of fiber capacity in order to meet all current and anticipated demand for Local Exchange Services in Minnesota at service quality levels that meet applicable service quality requirements.

15. Specifically there would be no need for any additional fiber optic facilities in Frontier’s network in Minnesota (including Subscriber Lines, Toll Trunks, and Interexchange Trunks) in order to meet all current and anticipated demand for Local Exchange Services in Minnesota at service quality levels that meet all service quality requirements applicable requirements.

16. Maintenance and repair, including limited replacement of damaged facilities in Frontier’s network ((including Subscriber Lines, Toll Trunks, and Interexchange Trunks) would

be sufficient in order to meet all current and anticipated demand for Local Exchange Services in Minnesota at service quality levels that meet applicable service quality requirements.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

Dated: October 28, 2021

[Name]