STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of Petition of Frontier Communications of Minnesota, Inc., and Citizens Telecommunications Company of Minnesota, LLC, for Approval of Proposed Customer Transition Plan	MPUC Docket No. _________ **PETITION**

I. INTRODUCTION

Pursuant to Minnesota Statutes Chapter 237, Section 237.181 (the "Customer Transition Act"), Frontier Communications of Minnesota, Inc. ("Frontier Minnesota"), and Citizens Telecommunications Company of Minnesota, LLC ("Citizens Minnesota") (collectively "Frontier"), both Verizon companies, submit this Petition for Approval ("Petition") of a proposed Customer Transition Plan (**Exhibit 1**) to discontinue the provision of copper-based Plain Old Telephone Services ("POTS") where customers in the affected area have access to one or more providers for the telecommunications service provided by Frontier, as specified herein.

Through the newly effective Customer Transition Act,[1] the Minnesota Legislature established a new and detailed process for companies and carriers to rely on Federal Communications Commission ("FCC") approval of an "adequate replacement" service to discontinue legacy services and decommission the obsolete copper networks that underlie those

[1] Minn. Stat. § 237.181 (effective July 1, 2026) (2025).

outdated services. In this Petition, Frontier seeks to replace outdated copper-based POTS with Verizon fiber and/or wireless-based services that the FCC has confirmed are adequate replacements.[2] As detailed below and in the Customer Transition Plan, Frontier intends to make every customer's network transition as seamless as possible, and it plans to voluntarily take steps such as waiving Verizon device and activation fees (see Customer Transition Plan for details).

Today, Frontier is also submitting to the FCC an application ("FCC Application," attached hereto as **Exhibit 2**) pursuant to Section 214 of the federal Communications Act of 1934, as amended ("federal Communications Act"), to discontinue jurisdictionally mixed POTS-style services in the same portions of Minnesota addressed in the Petition. The FCC has already approved Verizon replacement services identified by the FCC Application and herein as "adequate replacements" in a proceeding concerning other states.[3] Eventual FCC approval of the FCC Application will provide the sole authority necessary to discontinue the specified jurisdictionally mixed telecommunications services, as established in the FCC's recent *Network Modernization Order*.[4] Nevertheless, in the spirit of collaboration and on the assumption that the Commission will reciprocate by promptly validating the FCC's process and not imposing additional conditions,

[2] For convenience, this Petition and the appended Customer Transition Plan refer to Frontier rather than Frontier Minnesota and Citizens Minnesota individually when referring to the certificated entities that provide POTS, and it refers to Verizon when discussing the provision of modern "adequate replacement" services.

[3] *See* Citizens Telecommunications Company of Tennessee L.L.C. et al., Section 63.71 Application of Verizon (filed May 15, 2026) ("*Five-State Application*"); *Comments Invited on Verizon's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, Public Notice, DA 26-508 (WCB rel. May 21, 2026); FCC, Electronic Comment Filing System, *Search Results for Proceeding No. 26-116,* https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2226-116%22)) (last visited July 1, 2026); *see also infra* n.26. Based on FCC procedures, the referenced discontinuance application was deemed granted on June 21, 2026.

[4] *Reducing Barriers to Network Improvements and Service Changes et al.*, Report and Order, FCC 26-19, ¶ 7 (rel. Mar. 27, 2026) ("*Network Modernization Order*") ("[A]fter a carrier obtains [FCC] authorization to discontinue a service, it need not obtain any additional authorizations before implementing that discontinuance of service."); *id.* ¶ 108 ("Once the [FCC] authorizes discontinuance, a carrier may discontinue the covered service 'without securing [other] approval.' Section 214 thus creates an exclusively federal discontinuance regime for interstate or jurisdictionally mixed telecommunications services." (quoting 47 U.S.C. § 214(c))).

Frontier completes this process through the Customer Transition Act to demonstrate that Verizon is a permissible "alternative provider" that can replace Frontier POTS in the locations at issue.[5]

Based on FCC approval of the Verizon services as adequate replacements and because the Petition satisfies the requirements of the Customer Transition Act, Frontier requests that the Commission promptly initiate the required notice and comment proceeding[6] and, upon its completion, grant the Petition expeditiously. Swift approval will benefit Minnesotans by freeing resources to invest in modern services and networks, reducing energy inefficiency, and curtailing copper theft and vandalism. Delaying approval of this Petition or imposing additional conditions would, in contrast, impermissibly "frustrate or add extra conditions to [FCC] decisions allowing discontinuance."[7]

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[5] *See* Minn. Stat. § 237.181, subd. 1(d) (defining "alternate providers" to include an FCC-approved adequate replacement provider).

[6] *Id.* at subd. 3.

[7] *Network Modernization Order* ¶ 110.

II. COMMISSION FILING REQUIREMENTS

Frontier provides the following information pursuant to Minnesota Rules 7829.1300, Subp. 3:

(1) Summary of Filing (Minn. R. 7829.1300, Subp. 1):

A one-paragraph summary is provided as **Exhibit 3**.

(2) Service on Other Parties (Minn. R. 7829.1300, Subp. 2):

Pursuant to Minn. Stat. § 216.17, Subd. 3 and Minn. R. 7829.1300, Subp. 2, Frontier has served this Application on the Department of Commerce and the Residential Utilities Division of the Office of the Attorney General. This filing is being served on all parties on Frontier Minnesota's and Citizens Minnesota's general service list.

(3) The name, address, and telephone number of the utility, without abbreviation (Minn. R. 7829.1300, Subp. 3(A)):

Frontier Communications of Minnesota, Inc.
Peter Saharko
Verizon
One Verizon Way
Basking Ridge, NJ 07920
peter.saharko@verizon.com
732-853-7470

Citizens Telecommunications Company of Minnesota
Peter Saharko
Verizon
One Verizon Way
Basking Ridge, NJ 07920
peter.saharko@verizon.com
732-853-7470

(4) The name, address, and telephone number of the attorneys for the utility (Minn. R. 7829.1300, Subp. 3(B)):

Ryan Barlow
Cozen O'Connor
150 S 5th St, Unit 1200
Minneapolis, MN 55402
(612) 260-9000
rbarlow@cozen.com

Daniel H. Kahn
Wilkinson Barker Knauer LLP
1800 M Street, NW, Suite 800N
Washington, DC 20036
(202) 783-4141
dkahn@wbklaw.com

(5) The date of the filing and the date the proposed rate or service change will go into effect (Minn. R. 7829.1300, Subp. 3(C)):

The Petition is being filed on July 7, 2026, and Frontier requests approval at the earliest possible date.

(6) The statute that the utility believes controls the time frame for processing the filing (Minn. R. 7829.1300, Subp. 3(D)):

Minn. Stat. § 237.181, Subd. 3 does not provide specific timing. The Minnesota Legislature intended for the Commission to approve petitions promptly upon completion of notice and comment where the statute is satisfied, given that swift action best supports the purposes of the legislation. Ultimately, federal law, specifically 47 U.S.C. § 214 and the Supremacy Clause of the U.S. Constitution, Art. VI § 2, controls here.

(7) The signature and title of the utility employee responsible for the filing (Minn. R. 7829.1300, Subp. 3(E)):

Peter Saharko is the Frontier representative authorizing this Petition. Please reference the Verification included with the Petition.

(8) A description of the filing, its impact on rates and services, its impact on the utility and affected ratepayers, and the reasons for the filing (Minn. R. 7829.1300, Subp. 3(F)):

Please reference Part III of this Petition.

(9) Service List (Minn. R. 7829.0700):

Please ensure the following individuals are included on the Service List for this matter:

Peter Saharko
Verizon
One Verizon Way
Basking Ridge, NJ 07920
peter.saharko@verizon.com
732-853-7470

Ryan Barlow
Cozen O'Connor
150 S 5th St, Unit 1200
Minneapolis, MN 55402
(612) 260-9000
rbarlow@cozen.com

Daniel H. Kahn
Wilkinson Barker Knauer LLP
1800 M Street, NW, Suite 800N
Washington, DC 20036
(202) 783-4141
dkahn@wbklaw.com

III. INFORMATION PROVIDED IN SUPPORT OF THE PETITION

In support of the Petition, Frontier states as follows:

(1) Factual Background

Consumers today have a plethora of options for voice services. In 2024, the FCC found that "[a]lthough the public switched telephone network was once the only means to connect, there now exists a multitude of other voice service options for consumers in the United States."[8] While consumers have many options, they overwhelmingly choose wireless voice. Almost four out of five U.S. adults choose wireless-only voice service, with less than 4% of U.S. adults identifying as landline-mostly or landline-only for phone calls.[9] According to the latest FCC data, over 83% of U.S. voice telephone connections are mobile.[10] In just three years, the number of POTS lines nationwide has declined by nearly half.[11] Those options are continuing to expand thanks to

[8] *Communications Marketplace Report*, 39 FCC Rcd 14116, 14232 ¶ 154 (2024), https://docs.fcc.gov/public/attachments/FCC-24-136A1.pdf ("*2024 Communications Marketplace Report*").

[9] Stephen J. Blumberg & Dr. Julian V. Lake, *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2024*, NAT'L CTR FOR HEALTH STATS., at 4–5 (June 2025), https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202506.pdf (2.3 percent of adults identifying as landline-mostly and 1.4 percent of adults identifying as landline-only).

[10] *Voice Telephone Services: Status as of June 30, 2025*, FCC, OFF. OF ECON. & ANALYTICS, INDUS. ANALYSIS DIVISION, at 2 (May 2026), https://docs.fcc.gov/public/attachments/DOC-421558A1.pdf.

[11] *Id.* at 2.

provider investment. Frontier, for instance, invested capital expenditures of $65M in Minnesota in 2025 and has budgeted over $90M for Minnesota in 2026.

Copper-based services are outdated. From 2014 to 2024, subscribers using copper last-mile connections fell 81%.[12] Copper is slow: the weighted mean *maximum* advertised download speed for residential DSL connections reported in December 2023 was approximately 33 Mbps[13]—a speed that is simply unsustainable in today's modern life where consumers expect a broadband subscription to support video calls, virtual doctor appointments, and more.[14] Copper is also energy inefficient,[15] difficult to maintain,[16] and prone to theft.[17] A declining customer base

[12] Eric Fruits & Brian Albrecht, *Paying to Stand Still: Legacy Copper Mandates in a Fiber World*, INT'L CTR. FOR L. & ECON. (Feb. 27, 2026), https://laweconcenter.org/resources/paying-to-stand-still-legacy-copper-mandates-in-a-fiber-world/ ("ICLE Report") (reporting that subscribers have decreased from nearly 66 million in 2014 to just 12.5 million in 2024); *see also* Jonathan Spalter, *Introducing America's Connected Future*, USTELECOM (Mar. 9, 2026), https://ustelecom.org/introducing-americas-connected-future/ ("USTelecom Article").

[13] *2024 Communications Marketplace Report* ¶ 16.

[14] *See Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, FCC, 39 FCC Rcd 3247, ¶ 22 (2024), https://docs.fcc.gov/public/attachments/FCC-24-27A1.pdf (adopting a speed benchmark of 100/20 Mbps "based on the current state of broadband needs, usage, and deployment").

[15] ICLE Report (finding that transitioning the remaining 12.5 million copper subscribers to modern alternatives would produce estimated energy-cost savings of $398 million to $830 million, and noting Verizon data highlighting that fiber-delivered broadband is at least 100 times more energy-efficient on a kWh-per-gigabyte basis than copper-delivered service).

[16] *Id.* ("Maintaining copper networks is economically unsustainable"); USTelecom Article ("Service restoration can often take weeks if not months because replacement parts are harder to find as manufacturers discontinue declining product lines.").

[17] *Protecting Critical Communications Infrastructure Report – Fall 2025*, USTELECOM (Oct. 9, 2025), https://ustelecom.org/research/protecting-critical-communication-infrastructure-report-fall-2025/ (reporting over 15,000 incidents of theft and vandalism between June 2024 – June 2025); Commissioner Oliva Britt Trusty, Remarks at the Copper Theft Crisis: Incident Management and Prosecutorial Collaboration Summit (Oct. 7, 2025), https://docs.fcc.gov/public/attachments/DOC-415046A1.pdf (citing Jasmine Mendez, *Copper thieves cut phone service to seniors in South L.A.*, L.A. TIMES (May 5, 2025), https://www.latimes.com/california/story/2025-05-05/copper-wire-thefts-are-leaving-seniors-in-south-l-a-without-phone-service (describing a copper theft incident in South Los Angeles that led to 82 arrests)); Edward J. Lopez, *The Real Costs of Communications Outages due to Infrastructure Threat or Vandalism*, NCTA (Oct. 2025), https://protectcci.org/wp-content/uploads/2025/10/Economic-Impact-Study_1001_2025.pdf (finding that between June and December 2024, outages caused by copper theft and vandalism cost society up to $188 million in forgone economic gain); Hannah Fry, *Copper thieves leave 6th Street Bridge — the 'Ribbon of Light' — completely in the dark*, L.A. TIMES (June 13, 2024), https://www.latimes.com/california/story/2024-06-13/sixth-street-bridge-no-lights-copper-wire-theft.

makes copper more expensive to maintain on a per-customer basis,[18] meaning as time goes by money invested into copper networks is wasted to an ever-greater degree. Finally, maintaining copper to serve telecommunications networks denies access to a critical domestic supply of the metal for emerging industries that would rely on it.[19]

Through this Petition, Frontier seeks to replace its outdated copper-based POTS with fiber-based and/or wireless Verizon services that are superior to the services to be discontinued. Customers who want a POTS-like experience can obtain it via Verizon's wireless POTS voice replacement services, which provide customers with highly reliable phone service for home or business using Verizon's state-of-the-art wireless network to carry customers' voice calls.[20] All consumers in the locations at issue will be able to continue to receive seamless 911 connectivity from Verizon, regardless of whether they can receive wireless or fiber services or both.

In addition to the alternative service offerings from Verizon, customers in these locations often have options for facilities-based voice service from other providers. These options can include, for instance, VoIP service from their cable company and mobile wireless service from other companies, including AT&T and T-Mobile.[21] This Petition does not expressly rely on the availability of these services, but in considering the Petition it is important for the Commission to recognize this reality, as other companies offer numerous voice options to many customers in the locations for which Frontier seeks discontinuance approval.

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[18] ICLE Report.

[19] *Copper in the Age of AI: Challenges of Electrification*, S&P GLOB. ENERGY & MKT. INTEL. (Jan. 2026), https://www.spglobal.com/content/dam/spglobal/global-assets/en/special-reports/copper-in-the-age-of-ai/Copper%20in%20the%20Age%20of%20AI_Full%20Report_January%202026.pdf; Letter from Linda Moore, President & CEO, TechNet, to H Comm. on Nat. Res., Subcomm. on Energy & Mineral Res. (Apr. 27, 2026), https://docs.house.gov/meetings/II/II06/20260429/119122/HHRG-119-II06-20260429-SD021.pdf

[20] *See* Customer Transition Plan.

[21] Consumers also can access over-the-top VoIP service options via broadband purchased from Verizon or another provider.

(2) State and Federal Legal Framework

Customer Transition Act. The Customer Transition Act establishes a framework for technology transition discontinuation of legacy telecommunications services. It provides that:

> A telephone company or telecommunications carrier may submit a petition to the commission for approval of a customer transition plan to discontinue telecommunications service in an area where the telephone company or telecommunications carrier has shown that customers in the affected area have access to one or more providers for the telecommunications service provided by the telephone company or telecommunications carrier.[22]

The statute requires the petition to "clearly identify the *alternative providers* available to customers in the affected area,"[23] and the Commission must subsequently confirm whether the company or carrier "has met [its] burden of demonstrating to the commission that customers in the affected area have *at least one alternative provider* available to those customers."[24] "Alternative provider" is a defined term that means either of two things: (1) "one or more providers the [FCC] has identified through Broadband Data Collection . . . as having a provider offering wireline broadband access service through fiber optic cable to the home capable of carrying VoIP of at least [25/3 Mbps] and offers VoIP services at a rate no more than 120 percent of the current rate for local flat-rated voice service"; or (2) "a [FCC]-approved adequate replacement provider if the requesting telephone company or telecommunications carrier meets the requirements of this section."[25] "Adequate replacement" is a term of art that specifically refers to a replacement service that the FCC has approved for streamlined treatment in the context of a federal application to discontinue legacy voice service.[26]

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[22] Minn. Stat. § 237.181, subd. 2, subs. (a).

[23] *Id.* subd. 2, subs. (b)(2) (emphasis added).

[24] *Id.* subd. 3, subs. (1) (emphasis added).

[25] *Id.* subd. 1, subs. (d).

[26] 47 C.F.R. §§ 63.71(f)(2)(i), 63.602(b); *Technology Transitions et al.*, Declaratory Ruling, Second Report and Order, and Order on Reconsideration, 31 FCC Rcd 8283 (2016); *Reducing Barriers to Network Improvements and*

Beyond the "alternative provider" showing discussed above, Subdivision 2 sets forth the remaining information the petitioner must provide in its Customer Transition Plan:

> (1) clearly identify the area and affected customers; . . .
> (3) provide for technical assistance to affected customers who request assistance with the transition to an alternate provider;
> (4) include draft consumer dispute forms for commission approval;
> (5) describe the public education meeting plans for affected customers when required by the commission;
> (6) provide onetime connection fees and device costs for households eligible for credit as defined in section 237.70, subdivision 4a; and
> (7) describe plans to transition or maintain critical government lines for which VoIP service is not a reasonable alternative.[27]

The Customer Transition Act requires definitive Commission action following notice and comment, stating that the Commission "must approve, modify, or reject a petition."[28] To approve a Customer Transition Plan, the Commission must find that the petitioner:

> (1) has met the telephone company's or telecommunications carrier's burden of demonstrating to the commission that customers in the affected area have at least one alternative provider available to those customers;
>
> (2) has demonstrated that it will put sufficient resources into assisting customers to transition to an alternate provider, including providing onetime connection fees and device costs for households eligible for credit as defined in section 237.70, subdivision 4a; and
>
> (3) has held a public meeting in the affected area and provided written notice of the meeting to customers 60 days in advance.[29]

Service Changes et al., Report and Order, FCC 26-19 (rel. Mar. 27, 2026), https://docs.fcc.gov/public/attachments/FCC-26-19A1.pdf ("*Network Modernization Order*"). The FCC's "Alternative Options Test" for VoIP replacement services provides an even "more streamlined option" than the Adequate Replacement Test and, like the Adequate Replacement Test, establishes eligibility for streamlined treatment. *Id.* ¶ 10 & n.27. The *Network Modernization Order* merged the Alternative Options Test and Adequate Replacement Test into a single, consolidated rule under the "adequate replacement" label. *Id.* ¶¶ 23, 26. Accordingly, FCC approval of Verizon fiber-based VoIP service via streamlined treatment under the Alternative Options Test constitutes a finding that Verizon fiber-based VoIP is an "adequate replacement." *See also Five-State Application* p.15 n.38.

[27] Minn. Stat. § 237.181, subd. 2, subs. (b).

[28] *Id.* subd. 3.

[29] *Id.*

Federal Law. Separately from the Customer Transition Act, the FCC has already developed a transition framework that meets the needs of consumers and promotes competition. Recognizing that "red tape" has both "required providers to keep aging copper lines in place and effectively prevented them from investing in the modern infrastructure that Americans want and deserve," the FCC unanimously, and on a bipartisan basis, adopted the *Network Modernization Order* in March 2026.[30] The FCC confirmed that section 214(c) of the federal Communications Act expressly preempts inconsistent state requirements: "[W]here the [FCC] has lawfully exercised its section 214 authority to allow discontinuance of a service within its regulatory sphere, section 214(c) expressly provides that carriers do not require any other 'approval' to discontinue the covered service."[31] As a consequence, "it is the [FCC] that has sole jurisdiction to decide whether a carrier's proposed discontinuance adversely affects the public convenience and necessity and whether it should be approved or rejected,"[32] and "after a carrier obtains [FCC] authorization to discontinue a service, it need not obtain any additional authorizations before implementing that discontinuance of service."[33]

As the FCC recognized, for legacy copper networks, even where nominally "local" and "long distance" services are being provided, "these services are provisioned over the same network using the same technology."[34] As a result, state commissions cannot prevent discontinuance of the intrastate component of the service without simultaneously preventing discontinuance of the

[30] *Network Modernization Order* ¶ 1 (citing 47 U.S.C. § 214).

[31] *Id.* ¶ 114; *see also id.* ¶ 113 (discussing impossibility and conflict preemption).

[32] *Id.* ¶ 110.

[33] *Id.* ¶ 7.

[34] *Id.* ¶ 107; *see also id*. ("[F]ew, if any, networks today operate on a purely local or even intrastate level.").

interstate component.[35] Thus, where the same facilities are used to provide intrastate and interstate service, state approval requirements "prevent a provider from discontinuing the interstate portion of a legacy voice service for which the [FCC] has already granted discontinuance authorization pursuant to section 214."[36] Such state requirements "negate a valid federal regulatory objective because the interstate impacts of the state or local requirements cannot be unbundled from the intrastate aspects of those requirements" and are therefore preempted.[37]

This Petition is congruent with Frontier's contemporaneous FCC discontinuance application appended at Exhibit 2 with respect to services and locations in Minnesota. Therefore, consistent with the *Network Modernization Order*'s articulation of federal law, FCC approval obviates the need for this Petition and proceeding, and it precludes any form of delay or conditions introduced in this proceeding. Nevertheless, Frontier submits this Petition as a gesture of goodwill in the hope that it can work collaboratively with the Commission to secure swift approval without any conditions beyond those the Customer Transition Act, as properly interpreted, directs. For the sake of completeness, Frontier notes that even conditions expressly mandated by the Customer Transition Act, such as the requirement to hold public education meetings, are preempted by FCC approval and therefore would have no force absent Frontier's voluntary acceptance of them. Frontier does not waive any rights or arguments through this Petition, and if necessary it will take steps to vindicate all rights the FCC confirmed in the *Network Modernization Order*.

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[35] *Cf. Minnesota Pub. Utilities Comm'n v. FCC*, 483 F.3d 570, 578 (8th Cir. 2007) ("Service providers are not required to develop a mechanism for distinguishing between interstate and intrastate communications merely to provide state commissions with an intrastate communication they can then regulate.").

[36] *Id.* ¶ 114.

[37] *Id.*

(3) Frontier's Proposed Customer Transition Plan

Frontier's proposed Customer Transition Plan (**Exhibit 1**) includes all of the information required by Minn. Stat. § 237.181, Subd. 2, Subs. (b) and fully satisfies the criteria for approval in Minn. Stat. § 237.181, Subd. 3.

First, it provides maps depicting its service territories and affected customers (i.e., current Frontier copper POTS customers for whom Verizon is an alternative provider). It also provides a spreadsheet listing affected customers.[38]

Second, it identifies the Verizon services that render it an "alternative provider" within the meaning of the Customer Transition Act at the locations for which Frontier seeks approval.[39] Specifically, it provides maps and a spreadsheet illustrating the availability of Verizon fiber-based service and/or Verizon wireless-based service at the locations in question. It also describes the Verizon fiber-based and wireless services that render it an "alternative provider."

Third, the proposed Customer Transition Plan shows that Frontier will meet the remaining requirements of Minn. Stat. § 237.181, Subd. 2, although these requirements exceed what is required under the FCC's discontinuance framework.[40] It provides details regarding how Frontier will make available technical assistance to affected customers.[41] It includes a draft consumer dispute form for Commission approval.[42] It describes reasonable and appropriate public education meetings that Frontier intends to hold for affected customers if ordered by the Commission.[43] It

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[38] Minn. Stat. § 237.181, subd. 2, subs. (b)(1).

[39] *Id.* subd. 2, subs. (b)(2).

[40] In conformity with FCC requirements, Verizon's FCC applications presents information on (among other things) 911 functionality, accessibility for individuals with disabilities, and pricing. *See* FCC Application.

[41] Minn. Stat. § 237.181, subd. 2, subs. (b)(3).

[42] *Id.*, subd. 2, subs. (b)(4).

[43] *Id.*, subd. 2, subs. (b)(5).

states that Frontier plans to go above and beyond what is required to comply with the requirement for onetime connection fees and device costs for households eligible for credit as defined in section 237.70, subdivision 4a[44]—specifically, Verizon plans to waive its device and activation fees for the eligible households covered by this section as well as all other copper POTS customers it migrates under the Customer Transition Plan at the locations where Frontier seeks to discontinue service. The Customer Transition Plan describes Frontier's plans to transition any critical government lines for which VoIP service is not a reasonable alternative.[45]

Through this Petition and the Customer Transition Plan, Frontier satisfies the specific Subdivision 3 requirements for approval. Specifically, Frontier has met its burden of demonstrating to the Commission that customers in the affected area have at least one alternative provider available to those customers; it has demonstrated that it will put sufficient resources into assisting customers to transition to an alternative provider, including satisfying the obligation to provide onetime connection fees and device costs for households eligible for credit as defined in section 237.70, subdivision 4a; and it states that Frontier intends to hold a public meeting in the affected area and provide written notice of the meeting to customers 60 days in advance.[46] As stated above, these Minnesota state law showings and commitments are not required based on federal preemption arising from FCC discontinuance approval, and Frontier may withdraw them at any time at its election, though it prefers to work cooperatively with the Commission toward swift approval of this Petition and implementation of the proposed Customer Transition Plan.

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[44] *Id.*, subd. 2, subs. (b)(6).

[45] *Id.*, subd. 2, subs. (b)(7).

[46] Frontier understands this provision to refer to the meetings referenced in subd. 2, subs. (b)(5).

IV. CONCLUSION

WHEREFORE, for all of the foregoing reasons, Frontier requests that the Commission promptly initiate a notice and comment proceeding and then promptly approve this Petition and the proposed Customer Transition Plan, and confirm that subject only to the specific limitations set forth in the Customer Transition Act, to which Frontier has acceded to the extent specified herein, Frontier may freely discontinue POTS and the outdated network facilities used therefor in the locations addressed in the Petition.

Respectfully submitted on July 7, 2026.

/s/ *Daniel H. Kahn*
Daniel H. Kahn
Wilkinson Barker Knauer LLP
1800 M Street, NW, Suite 800N
Washington, DC 20036
(202) 783-4141
dkahn@wbklaw.com

/s/ *Ryan P. Barlow*
Ryan P. Barlow
Cozen O'Connor
150 S 5th St, Suite 1200
Minneapolis, MN 55402
(612) 260-9000
rbarlow@cozen.com

Attorneys for Citizens Telecommunications Company of Minnesota, LLC and Frontier Communications of Minnesota, Inc.

Verification

I, Peter Saharko, state that I am an officer of Frontier Minnesota and Citizens Minnesota and that I am Senior Managing Associate General Counsel, Public Policy, for Verizon Communications Inc. I am authorized to represent the aforementioned entities in the foregoing Petition and to make this verification on their behalf. Pursuant to Minn. Stat. § 358.116, I declare under penalty of perjury that the foregoing Petition is true and correct to the best of my knowledge, information, and belief, which includes information provided to me by others.

Dated July 7, 2026

Peter Saharko
Senior Managing Associate General Counsel
Verizon Communications Inc.

Morris County, New Jersey
County and State of Signatory