
In the Matter of the Joint Application of Frontier Communications Corporation, Frontier Subsidiary Telco, LLC, Citizens Newtel, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Minnesota, LLC, and Frontier Communications of America, Inc. for Approval of a Transfer of Control due to a Chapter 11 Plan of Reorganization of Frontier Communications Corporation and its Subsidiaries

MPUC Docket Nos. P405,P407,
P5316/PA-20-504

**LIUNA MINNESOTA & NORTH DAKOTA RESPONSE TO
COMMUNICATIONS WORKERS OF AMERICA'S
PETITION FOR RECONSIDERATION**

JANUARY 7, 2020

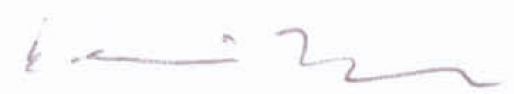
The Laborers District Council of Minnesota and North Dakota ("LIUNA") supports the December 28 petition for reconsideration filed by the Communications Workers of America ("CWA") in the matter of a bankruptcy reorganization plan proposed by Frontier Communications Corporation "Frontier".

LIUNA previously commented in this docket on July 8 to raise concerns about the potential impact of the proposed reorganization on the company's Minnesota customers, contractors, and contracted workforce. Our concerns were based in significant part on our past experience with the impacts that changes in ownership structure can have on operations, particularly when these changes imply efforts to significantly alter existing cost structures or increase a company's profitability.

In our experience, corporate reorganizations and changes in ownership can profoundly affect contracted operations, which can in turn undercut legal compliance, service quality and worker safety, not to mention socioeconomic impacts. In the company's response, Frontier declined to address the questions LIUNA raised, and instead asserted without further explanation or legal argument that the Commission has no legal authority to consider what impact the reorganization might have on the company's contracted operations and workforce.

On December 28, CWA filed new, relevant evidence not considered in the Commission's previous order, raising new doubts about Frontier's ability to meet its obligations in Minnesota under the proposed reorganization plan, and underscoring the concerns raised by LIUNA regarding potential downstream impacts. For the reasons cited by CWA and by the Department of Commerce in its Jan. 7 answer supporting reconsideration, we ask that the Commission grant the petition for reconsideration and consider taking additional steps to obtain additional information and potentially additional commitments to invest in Minnesota affiliates.

Respectfully,

A handwritten signature in dark ink, appearing to read "Kevin Pranis", is centered at the top of the page. The signature is fluid and cursive.

Kevin Pranis, Marketing Manager

Dated: January 7, 2021