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Randy Clarke
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July 7, 2026

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Section 63.71 Application of Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of Minnesota, LLC; Citizens Telecommunications Company of Nebraska; Citizens Telecommunications Company of Nevada; Frontier Communications of the Carolinas LLC; Frontier Communications of Indiana LLC; Frontier Communications of Minnesota, Inc.; Frontier Communications of the South, LLC; Frontier Communications of the Southwest Inc.; Frontier Communications of Thorntown LLC; Frontier Communications of Wisconsin LLC; Frontier Dallas TX Fiber 1 LLC; Frontier Florida LLC; Frontier Midstates Inc.; Frontier North Inc.; Frontier Southwest Incorporated; Frontier Tampa Bay FL Fiber 1 LLC; and Verizon South Inc.

Dear Ms. Dortch:

Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of Minnesota, LLC; Citizens Telecommunications Company of Nebraska; Citizens Telecommunications Company of Nevada; Frontier Communications of the Carolinas LLC; Frontier Communications of Indiana LLC; Frontier Communications of Minnesota, Inc.; Frontier Communications of the South, LLC; Frontier Communications of the Southwest Inc.; Frontier Communications of Thorntown LLC; Frontier Communications of Wisconsin LLC; Frontier Dallas TX Fiber 1 LLC; Frontier Florida LLC; Frontier Midstates Inc.; Frontier North Inc.; Frontier Southwest Incorporated; Frontier Tampa Bay FL Fiber 1 LLC; and Verizon South Inc., (collectively, "Verizon"), submit the enclosed application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to discontinue their legacy TDM-based voice service.

If you have any questions regarding this matter, please contact me at 202-684-5350.

Sincerely,

/s/ Randy Clarke

Attachment

cc: Department of Defense Chief Information Officer
Public Utility Commission for each affected state
Governor of each affected state
Tribal entities in each affected state

Randy Clarke
Associate General Counsel
Federal Regulatory Affairs

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Section 63.71 Application of

WC Docket No. 26-_____

Citizens Telecommunications Company of Illinois;
Citizens Telecommunications Company of Minnesota,
LLC; Citizens Telecommunications Company of
Nebraska; Citizens Telecommunications Company of
Nevada; Frontier Communications of the Carolinas
LLC; Frontier Communications of Indiana LLC;
Frontier Communications of Minnesota, Inc.; Frontier
Communications of the South, LLC; Frontier
Communications of the Southwest Inc.; Frontier
Communications of Thorntown LLC; Frontier
Communications of Wisconsin LLC; Frontier Dallas
TX Fiber 1 LLC; Frontier Florida LLC; Frontier
Midstates Inc.; Frontier North Inc.; Frontier Southwest
Incorporated; Frontier Tampa Bay FL Fiber 1 LLC;
and Verizon South Inc., all Verizon companies, for
Authority Pursuant to Section 214 of the
Communications Act of 1934, as Amended, to
Discontinue a Telecommunications Service

SECTION 63.71 APPLICATION OF VERIZON

With this application,¹ Verizon seeks authority to discontinue Plain Old Telephone Service (POTS) served by time-division multiplexing (TDM) technology over copper in portions of eight states. Verizon serves as an incumbent provider in 31 jurisdictions following its acquisition of Frontier Communications and its copper network now operates at a tiny fraction of its peak capacity. Utilization of Verizon's copper network and voice services offered over that network continues to decrease. Currently, Verizon's network could serve over 4.5 million

¹ The FCC Registration Number for this application is 0001855543.

locations in Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin with POTS. However, the overwhelming majority of consumers from these states who could subscribe to POTS service from Verizon do not—only approximately 140,000 residential and business legacy voice lines, or less than 4%, remain in use. This low number of legacy voice subscribers mirrors national trends with a loss of about 18 million legacy voice lines nationwide between June 2020 and June 2025,² following a loss of more than 70 million legacy voice lines over the prior 10 years.³

Copper infrastructure is many decades old, costly to maintain, and vulnerable to storm damage, flooding, and corrosion. It is highly susceptible to theft and physical degradation. And it is not capable of supporting the robust, data-intensive uses that today's customers demand. Maintaining a parallel copper network to serve a tiny and dwindling number of customers diverts resources away from modernizing infrastructure. Copper is expensive, and every dollar spent on it is a dollar that cannot be spent on modern networks. Decommissioning copper will allow the telecommunications industry to focus on the high-speed networks that Americans actually use. Decommissioning copper will reduce energy consumption and shrink the industry's carbon footprint. It will allow providers to recycle old copper and clean up utility poles, leaving more room for modern networks and releasing a critical source of domestic copper supply for emerging industries that rely on it. Taking steps to decommission legacy copper networks to

² Indus. Analysis Div., Office of Econ. & Analytics, FCC, *Voice Telephone Services: Status as of June 30, 2020*, at 2 fig. 1 (Aug. 2022), <https://docs.fcc.gov/public/attachments/DOC-385813A1.pdf>; Indus. Analysis Div., Office of Econ. & Analytics, *Voice Telephone Services: Status as of June 30, 2025*, at 2 fig. 1 (May 2026), <https://docs.fcc.gov/public/attachments/DOC-421558A1.pdf>.

³ Indus. Analysis & Tech. Div., Wireline Comp. Bur., FCC, *Local Telephone Competition: Status as of December 31, 2010*, at 5 fig. 4 (Oct. 2011), <https://docs.fcc.gov/public/attachments/DOC-310264A1.pdf>.

make way for more powerful, robust, and efficient fiber and wireless broadband networks has bipartisan support.⁴

Verizon would offer customers who currently have copper POTS lines, sold as “Home Phone Service,” an alternative service that meets or exceeds their expectations in network performance and availability. Critically, 911 and other emergency services will perform without interruption, and these networks will care for, and better serve, the needs of persons with disabilities. We credit the FCC with providing a straightforward, streamlined approach for Verizon and other providers to demonstrate their compliance with these critical principles. We also pledge to work very closely with our customers as we inform them of the network transition occurring, their options for communications services, and the path and timeline for their transition.

The alternative services available are as varied as consumer demands. For certain customers, wireline services over fiber will be embraced, not only through Verizon’s own ambitious network expansion agenda but through its partnership with federal and state governments through subsidized build programs. For many others, the wireless network will be the alternative, with customers able to embrace a solution that looks and acts like their existing home phone or this age’s more common mobile wireless device. There are also third-party alternative providers of both wired and wireless services to meet consumer needs.

⁴ See Report and Order, *Reducing Barriers to Network Improvements and Service Changes; Accelerating Network Modernization*, WC Docket Nos. 25-209, 25-208, FCC 26-19, at 77 (rel. Mar. 27, 2026) (“*Network Modernization Order*”) (“Our nation’s copper infrastructure is aging, costly to maintain, and increasingly vulnerable to theft and natural disaster. The future is IP-based, and our rules should facilitate, not obstruct, carriers’ ability to build it.”) (statement of Commissioner Anna M. Gomez).

Therefore, the following Verizon entities: Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of Minnesota, LLC; Citizens Telecommunications Company of Nebraska; Citizens Telecommunications Company of Nevada; Frontier Communications of the Carolinas LLC; Frontier Communications of Indiana LLC; Frontier Communications of Minnesota, Inc.; Frontier Communications of the South, LLC; Frontier Communications of the Southwest Inc.; Frontier Communications of Thorntown LLC; Frontier Communications of Wisconsin LLC; Frontier Dallas TX Fiber 1 LLC; Frontier Florida LLC; Frontier Midstates Inc.; Frontier North Inc.; Frontier Southwest Incorporated; Frontier Tampa Bay FL Fiber 1 LLC; and Verizon South Inc. (collectively, “Verizon”), apply for authority under 47 U.S.C. § 214(a) and 47 C.F.R. § 63.71 to discontinue their legacy TDM-based voice service throughout portions of Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin.

With this application, Verizon seeks to discontinue residential and business legacy voice service throughout these states at locations where existing POTS customers can obtain one or more of the following replacement voice services: (i) voice service over broadband in locations where Verizon has deployed fiber;⁵ (ii) Verizon’s fixed wireless voice replacement services that enable legacy POTS telephone equipment to operate over Verizon’s wireless network;⁶ and

⁵ Voice service over broadband replacement options include: Fios Home Phone, an advanced home phone service that works on Verizon’s 100% fiber-optic network and uses traditional corded or cordless landline phones connected to existing phone jacks; Frontier Digital Voice, built with digital technology to deliver excellent call quality and reliability; and Business Digital Voice, a professional communications solution that operates over a secure, cloud-based VoIP connection. See Verizon, *Fios Home Phone*, <https://www.verizon.com/home/phone/>; Frontier, a Verizon Company, *Frontier Digital Voice features and support*, <https://frontier.com/helpcenter/phone/frontier-digital-voice>; Verizon, *Business Digital Voice*, <https://www.verizon.com/business/products/voice-collaboration/voip/business-digital-voice/>.

⁶ Fixed wireless voice replacement services include Verizon Voice Gateway (formerly known as Wireless Home Phone) and Voice Connect, solutions that connect an existing landline

(iii) Verizon’s mobile wireless service.⁷ These are the services that Verizon relies on in this application to meet the requirements still in effect until the new Network Modernization rules the FCC adopted earlier this year take effect.⁸ Mobile service from other providers, including AT&T and T-Mobile, are also available in the areas subject to this application,⁹ as are voice services offered over broadband connections in areas where Spectrum, Comcast, Brightspeed, Mediacom, Nextlink, Ripple Fiber, Sparklight, TDS, and Vyve Broadband serve.

The Commission has granted streamlined approval for POTS service discontinuance applications covering broader geographies and larger customer bases.¹⁰ Customers currently subscribing to these services will have several options to buy voice service from Verizon.

phone to the Verizon 5G and 4G LTE network respectfully for reliable, high-quality voice service. *See* Verizon, *Verizon Wireless Home Phone LVP2*, <https://www.verizon.com/home-office-solutions/wireless-home-phone-lvp2/>; Verizon, *Voice Connect*, <https://www.verizon.com/support/residential/homephone/voice-connect>. These fixed services are incidental or ancillary to Verizon’s mobile services. *See* 47 U.S.C. § 332; Second Report and Order, *Implementation of Sections 3(n) and 332 of the Communications Act*, 9 FCC Rcd 1411, ¶ 6 (1994), *aff’d in Report and Order, Amendments To Harmonize and Streamline Part 20 of the Commission’s Rules*, 32 FCC Rcd 10731, ¶¶ 3, 6 (2017) (preserving statutory interpretation of “mobile services”).

⁷ Verizon’s 5G mobile network is available nationwide and continues to expand. Our 4G LTE network covers more than 99% of the U.S. population. Verizon has received numerous awards for our 5G network reliability and quality. *See* Verizon, *Find Home Internet and Cell Phone Coverage in Your Area*, <https://www.verizon.com/coverage-map/>.

⁸ *See generally Network Modernization Order*; *id.* App. A – Final Rules.

⁹ The FCC recently reconfirmed mobile wireless service as one category of “adequate replacement” services for legacy voice service in the context of technology transition discontinuances. *See Network Modernization Order* ¶¶ 23, 34.

¹⁰ *See* Section 63.71 Application of AT&T, WC Docket No. 25-228 (filed July 15, 2025) (requesting streamlined approval for 21,000 POTS customers across 17 states); Section 63.71 Application of AT&T, WC Docket No. 25-335 (filed Dec. 1, 2025) (requesting streamlined approval for 90,000 POTS customers across 18 states); Section 63.71 Application of AT&T, WC Docket No. 25-334 (filed Dec. 1, 2025); *see also* Section 63.71 Application of Verizon, WC Docket No. 26-116 (filed May 15, 2026) (requesting streamlined approval for 8,080 POTS customers across five states).

Verizon’s mobile wireless service is available in the discontinuance areas and provides high-quality voice service as well as 5 Mbps download / 1 Mbps upload broadband service at the vast majority of locations in the areas where service is being discontinued.¹¹ Verizon also provides voice service over broadband in the areas where Verizon fiber is present. And Verizon has a fixed wireless POTS voice replacement service for areas where fiber is not present.

Customers in these areas will have options for voice service available to them from other providers, such as VoIP service from their cable company and mobile wireless service from other companies, including AT&T and T-Mobile. Likewise, voice service over satellite broadband is widely available in the states subject to this application.¹² This application does not rest on the availability of these services, but they offer other voice options to customers in these areas.

As the application below demonstrates, Verizon offers mobile wireless service and legacy voice replacement service that meet the Commission’s “Adequate Replacement Test.”¹³ And, where Verizon has deployed fiber within its service area in the eight states covered by this

¹¹ Numerous other discontinuance applications identifying mobile wireless service as an adequate replacement service for POTS have been granted in recent years. *See, e.g.*, Section 63.71 Application of Qwest Corporation d/b/a CenturyLink QC, WC Docket No. 25-177 (filed May 16, 2025); Section 63.71 Application of AT&T, WC Docket No. 25-228 (filed July 15, 2025); Section 63.71 Application of Verizon, WC Docket No. 26-116 (filed May 15, 2026). And while these new rules are not yet in effect, the Commission found that a facilities-based mobile wireless service operating at speeds of at least 5 Mbps download and 1 Mbps upload, as reflected in the National Broadband Map, qualifies a discontinuance application for streamlined treatment. *See Network Modernization Order* ¶¶ 23, 34.

¹² The Commission found that identifying “a widely available alternative voice service that supports access to 911” also qualifies a discontinuance application for streamlined treatment. *See Network Modernization Order* ¶¶ 23, 34. While these new rules are not yet in effect, satellite broadband service is widely available and supports voice and 911 services in the same manner as any interconnected VoIP call, subject to Section 9.3 of the Commission’s rules. 47 C.F.R. § 9.3.

¹³ *See* 47 C.F.R. § 63.71(a), (f)(2).

application, voice service offered over that fiber, in combination with voice or broadband services offered in the same locations by other service providers, meets the Commission's "Alternate Options Test."¹⁴ The application also demonstrates that Verizon's services offer access to critical applications and functionalities including 911 and emergency services, secure communications, and service for individuals with disabilities.

APPLICATION

I. Verizon's Mobile Wireless Service and Fixed Wireless Legacy Voice Replacement Services Each Satisfy the Adequate Replacement Test

Verizon offers mobile wireless service and fixed wireless POTS voice replacement services in the areas covered by this application. These services are adequate replacements for POTS service. Verizon's mobile wireless service and fixed wireless POTS voice replacement services provide Verizon customers with highly reliable phone service for home or business using Verizon's state-of-the-art wireless network to carry customers' voice calls.

For the legacy voice replacement services, customers can continue to use their existing POTS corded or cordless phones. Customers using these services will receive all the standard features offered with POTS service, including caller ID, call waiting, call forwarding, and three-way calling, among others.¹⁵ Verizon's mobile wireless and fixed wireless POTS voice replacement services comply with all applicable federal requirements and industry standards for 911 services, communications security, and services for individuals with disabilities.¹⁶ Verizon

¹⁴ See *id.* § 63.71(f)(2)(ii).

¹⁵ See Verizon, *Voice Connect*, <https://www.verizon.com/support/residential/homephone/voice-connect>; Verizon, *Verizon Wireless Home Phone (LVP2) FAQs*, <https://www.verizon.com/support/wireless-home-phone-lvp2-faqs/>.

¹⁶ See Verizon, *E911 Compliance FAQs*, <https://www.verizon.com/support/e911-compliance-faqs/>.

currently has approximately 46,000 customers using fixed wireless POTS voice replacement services nationwide and approximately 115 million wireless connections (which include fixed wireless) nationwide. And Verizon’s wireless network provides mobile wireless coverage throughout the United States — reaching more than 95 percent of households.

A. Verizon’s Mobile Wireless and Fixed Wireless POTS Voice Replacement Services Offer Substantially Similar Levels of Network Performance and Availability as POTS

Based on the totality of the circumstances, Verizon’s mobile wireless and fixed wireless POTS voice replacement services have substantially similar network performance and availability as the POTS service Verizon would discontinue.

1. Verizon’s Network Performance

Under the “network performance” prong of the Adequate Replacement Test, an applicant seeking to discontinue service can make “a demonstration, based on the totality of the circumstances,” that the network on which a replacement service will run provides substantially similar performance and availability.¹⁷ The totality of the circumstances demonstrates that users can rely on Verizon’s mobile wireless network for mobile wireless service and fixed wireless POTS voice replacement services to replace the legacy voice services Verizon seeks to discontinue. Verizon offers a 4G LTE and 5G NR (“New Radio”) mobile broadband and voice service in these eight states: that service is available and qualifies as a legacy POTS replacement service at the vast majority of locations in Verizon’s service areas in Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin. Verizon seeks to discontinue copper-based service at these locations. This same mobile wireless network enables Verizon’s fixed

¹⁷ See Declaratory Ruling, Second Report and Order, and Order on Reconsideration, *Technology Transitions*, 31 FCC Rcd 8283, ¶ 91 (2016) (“*2016 Technology Transitions Order*”).

wireless POTS voice replacement services. Voice traffic carried over Verizon’s wireless network — whether mobile voice service or fixed wireless POTS voice services — does not travel over the public internet but, instead, travels on Verizon’s private IP network. And, for these services, voice calls are transmitted using VoLTE — that is, VoIP over LTE, which involves transmission of “packetized” data.

While the voice communications are packetized, they are not transported over the public internet like other non-voice IP packets carried over Verizon’s wireless network. Instead, Verizon’s wireless voice services use a secure Verizon network designed and managed to reduce the possibility of congestion, and to mitigate packet loss and delay. Verizon applies a quality-of-service class identifier (QCI) to VoLTE traffic that gives it priority over internet traffic. Accordingly, the latency and packet loss for VoLTE calls — including mobile wireless calls and fixed wireless legacy voice replacement calls — will be no worse, and often better, than those measured for internet traffic traversing the same parts of the network at the same time.

In addition, as part of its ordinary course of operations, Verizon evaluates and reports network performance measures, including wireless network latency aggregated by Ookla from hundreds of thousands of mobile phone user speed tests carried out each month throughout the United States. Verizon also publishes mobile broadband latency results from user speed tests of its mobile wireless network.¹⁸ Based on these current published user tests, Verizon expects network-to-device (round trip) latency of 35-55 ms on its 5G Ultra Wideband network and 49-75 ms on its 4G LTE network.¹⁹

¹⁸ Verizon, *Network Performance*, <https://www.verizon.com/about/our-company/network-performance>.

¹⁹ *Id.*

These latency and packet loss results are backed up by real world results. Verizon's mobile voice and wireless service has consistently demonstrated exceptional performance, as evidenced by its strong track record in independent, third-party testing and analysis.

In the second half of 2025, Verizon was awarded America's Best Overall Mobile Network Performance and America's Most Reliable Mobile Network awards from RootMetrics®, while capturing America's Best Mobile Coverage from Ookla.²⁰ Verizon also retained last year's top honors from RootMetrics as America's Best 5G Network, America's Most Reliable 5G Network, and America's Fastest 5G Speeds.²¹ In the states that are included in this application, Verizon's network won JD Power's 2025 Network Quality Study – Volume 2 award in Florida and North Carolina and shared honors with USCellular for the same top award in Indiana, Minnesota, Nebraska, Texas, and Wisconsin.²² Verizon's wireless network earned first place from RootMetrics for Overall Performance statewide in Florida, Indiana, Minnesota, Nebraska and Wisconsin, and shared this top honor in Nevada and North Carolina.²³ In addition

²⁰ See Ookla, *State of the Mobile Union Report* (Jan. 2026) (“*RootMetrics Report*”), <https://www.ookla.com/research/reports/rootmetrics-us-state-of-mobile-union-2h-2025>; Telecompaper, *Verizon dominates US rivals to collect seven national RootMetric awards in H2* (Jan. 26, 2026), <https://www.telecompaper.com/news/verizon-dominates-us-rivals-to-collect-seven-national-rootmetric-awards-in-h2--1560246>.

²¹ See *RootMetrics Report* (“Verizon overtakes AT&T to win national awards for overall performance and reliability, along with Best 5G Experience”).

²² Press Release, J.D. Power, *As Wireless Network Quality Competition Increases, Customers Benefit, J.D. Power Finds* (July 17, 2025), https://www.jdpower.com/sites/default/files/file/2025-07/2025073%20U.S.%20Wireless%20Network%20Quality%20Vol.%202_0.pdf.

²³ RootMetrics, *Florida 2H 2025 RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/florida/2025/2H>; *Indiana 2H 2025 RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/indiana/2025/2H>; *Michigan 2H 2025 RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/michigan/2025/2H>; *Minnesota 2H 2025 RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/minnesota/2025/2H>; *Nebraska 2H 2025 RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/nebraska/2025/2H>; *Wisconsin 2H 2025*

to earning more top state and local market rankings than any other carrier overall,²⁴ Verizon collected multiple awards for its network performance in several regional metropolitan areas surveyed by RootMetrics, including #1 Network Speed or Data Performance in Bonita Springs, Fort Myers, Kissimmee, Orlando, Palm Bay, Pensacola, Port St. Lucie and Sarasota, Florida;²⁵ and Overall Performance in Fort Wayne, Indiana;²⁶ Reno, Nevada;²⁷ Durham, Greensboro, and

RootScore Report, <https://rootmetrics.com/en-US/rootscore/map/state/wisconsin/2025/2H>; Nevada 2H 2025 *RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/nevada/2025/2H>; North Carolina 2H 2025 *RootScore Report*, <https://rootmetrics.com/en-US/rootscore/map/state/north-carolina/2025/2H>. Tested with the best commercially available smartphones on three national mobile networks across all available network types. User experience may vary. RootMetrics rankings are not an endorsement of Verizon.

²⁴ “Verizon topped both state and metro testing as well, earning 329 state awards and 801 metro awards — more than any other carrier.” *RootMetrics Report*.

²⁵ See RootMetrics, *RootScore Report*, Bonita Springs, FL, <https://rootmetrics.com/en-US/rootscore/map/metro/bonita-springs-fl/2025/2H>; RootMetrics, *RootScore Report*, Fort Myers, FL, <https://rootmetrics.com/en-US/rootscore/map/metro/fort-myers-fl/2025/2H>; RootMetrics, *RootScore Report*, Miami, FL, <https://rootmetrics.com/en-US/rootscore/map/metro/miami-fl/2025/2H>; RootMetrics, *RootScore Report*, Palm Bay, FL, <https://rootmetrics.com/en-US/rootscore/map/metro/palm-bay-fl/2025/2H>; RootMetrics, *RootScore Report*, Port St. Lucie, FL, <https://rootmetrics.com/en-US/rootscore/map/metro/port-st-lucie-fl/2025/2H>; RootMetrics, *RootScore Report*, Sarasota, FL, <https://rootmetrics.com/en-US/rootscore/map/metro/sarasota-fl/2025/2H>.

²⁶ See RootMetrics, *RootScore Report*, Fort Wayne, IN, <https://rootmetrics.com/en-US/rootscore/map/metro/fort-wayne-in/2025/2H>.

²⁷ See RootMetrics, *RootScore Report*, Reno, NV, <https://rootmetrics.com/en-US/rootscore/map/metro/reno-nv/2025/2H>.

Winston-Salem, North Carolina;²⁸ McAllen, Texas;²⁹ and Madison, Wisconsin.³⁰ Verizon shared awards for top network speed and reliability in Corpus Christi, Dallas, El Paso, and The Woodlands, Texas;³¹ and Milwaukee, Wisconsin.³²

In these states, customers who select Verizon's mobile wireless or fixed wireless POTS replacement services will benefit from the same wireless network and technology that powers these outstanding results covering nearby cities and areas.

2. Verizon's Service Availability

The Adequate Replacement Test's network performance requirements also consider service availability.³³ The Commission adopted a standard of 99.99% service availability, although carriers may also meet the service availability prong through a totality of circumstances

²⁸ See RootMetrics, *RootScore Report*, Durham, NC, <https://rootmetrics.com/en-US/rootscore/map/metro/durham-nc/2025/2H>; RootMetrics, *RootScore Report*, Greensboro, NC, <https://rootmetrics.com/en-US/rootscore/map/metro/greensboro-nc/2025/2H>; RootMetrics, *RootScore Report*, Winston-Salem, NC, <https://rootmetrics.com/en-US/rootscore/map/metro/winston-salem-nc/2025/2H>.

²⁹ See RootMetrics, *RootScore Report*, McAllen, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/mcallen-tx/2025/2H>.

³⁰ See RootMetrics, *RootScore Report*, Madison, WI, <https://rootmetrics.com/en-US/rootscore/map/metro/madison-wi/2025/2H>.

³¹ See RootMetrics, *RootScore Report*, Corpus Christi, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/corpus-christi-tx/2025/2H>; RootMetrics, *RootScore Report*, Dallas, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/dallas-tx/2025/2H>; RootMetrics, *RootScore Report*, Denton, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/denton-tx/2025/2H>; RootMetrics, *RootScore Report*, El Paso, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/el-paso-tx/2025/2H>; RootMetrics, *RootScore Report*, McKinney, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/mckinney-tx/2025/2H>; RootMetrics, *RootScore Report*, San Antonio, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/san-antonio-tx/2025/2H>; RootMetrics, *RootScore Report*, The Woodlands, TX, <https://rootmetrics.com/en-US/rootscore/map/metro/the-woodlands-tx/2025/2H>.

³² See RootMetrics, *RootScore Report*, Milwaukee, WI, <https://rootmetrics.com/en-US/rootscore/map/metro/milwaukee-wi/2025/2H>.

³³ See 2016 Technology Transitions Order ¶ 94.

showing, which, as explained below, Verizon does.³⁴ The Commission’s National Broadband Map demonstrates that Verizon offers sufficient coverage to support voice service throughout the discontinuance areas in these states where it offers mobile wireless service and fixed wireless POTS voice replacement service.³⁵

Verizon has not received any challenges through the Commission’s National Broadband Map challenge process disputing the availability of 4G LTE and 5G NR services in these areas. The awards from RootMetrics, and the rigorous testing behind them, demonstrate that Verizon’s wireless network provides performance and availability similar to POTS. Because Verizon’s fixed wireless POTS voice replacement service customers’ calls are carried using the same network and equipment as Verizon’s wireless customers’ VoLTE calls, they will experience the same service availability. In addition, Verizon’s legacy voice replacement customer premise devices can remain positioned in the optimal area of a customer’s residence or premises, which means Verizon’s legacy voice replacement services provide reliable wireless voice service that, in some cases, exceeds the performance of mobile wireless services.

3. Verizon’s Replacement Service Coverage

Finally, the Commission’s Adequate Replacement Test requires that an application for streamlined treatment demonstrate that either: “(i) a single replacement service reaches the entire geographic footprint of the service area subject to discontinuance; or (ii) there are multiple providers who collectively cover the entirety of the [discontinuance] area.”³⁶ As reflected in both

³⁴ *Id.* ¶ 116.

³⁵ FCC, *National Broadband Map*, <https://broadbandmap.fcc.gov/home>.

³⁶ *2016 Technology Transitions Order* ¶ 123. In March 2026, the Commission replaced the Adequate Replacement test with “one simple rule” allowing applications for discontinuance that identify the presence of one of five categories of services as available to receive “streamlined” treatment. While these new rules are not yet effective, the services identified in

the National Broadband Map and Verizon's coverage map, Verizon's LTE network is widely available in the portions of these states subject to this application.³⁷ This network enables Verizon's mobile wireless services as well as its fixed wireless legacy voice replacement services. Verizon seeks to discontinue POTS service at every location where a replacement service is offered. Those locations define the scope of this POTS discontinuance application.

Additionally, other mobile wireless carriers, including AT&T and T-Mobile, offer voice service in these areas, and customers also have the option to select broadband services from multiple providers with bandwidth sufficient to support reliable voice services.

B. Verizon Offers Access to Critical Applications and Functionalities³⁸

1. 911 and Emergency Services

Verizon certifies that its mobile wireless and fixed wireless POTS voice replacement services comply with all applicable regulations regarding the availability and required functionality of 911 service.³⁹ Verizon's mobile wireless service does not require a backup battery to remain operational during electric power outages of several hours or less,⁴⁰ and

this application would meet the requirements of the Adequate Replacement or Alternative Options test and will also meet the newly adopted POTS replacement requirements.

³⁷ FCC, *National Broadband Map*, <https://broadbandmap.fcc.gov/home>; Verizon, *Find Home Internet and Cell Phone Coverage in Your Area* (coverage map), <https://www.verizon.com/coverage-map/>.

³⁸ In 2016, when adopting the Adequate Replacement Test, the Commission identified a list of "key applications and functionalities" that were associated with legacy voice service at that time. *2016 Technology Transitions Order* ¶¶ 157-158. The Commission specified that the 2016 list of functionalities sunset in 2025, so Verizon does not address them here. *Id.* ¶ 170.

³⁹ *See id.* ¶¶ 128-129.

⁴⁰ U.S. Energy Info. Admin., *U.S. Electricity Customers Averaged Five and One-Half Hours of Power Interruptions in 2022* (Jan. 25, 2024), <https://www.eia.gov/todayinenergy/detail.php?id=61303#> ("Since 2013, the average duration of electricity interruptions each year has remained consistently around two hours after excluding major events.").

modern cell phones can go without a charge for more than 24 hours when kept in standby mode. For longer outages, modern cell phones can be recharged in a car, with a laptop, or with a power bank, which is inexpensive and available online and at various retail stores. The customer premises equipment for Verizon's fixed wireless POTS voice replacement service includes battery backup using commercially available rechargeable batteries.⁴¹ Verizon also certifies that its mobile wireless and fixed wireless POTS voice replacement services comply with all applicable 911 network reliability requirements.⁴²

2. Communications Security

Verizon maintains a comprehensive and mature cybersecurity program designed to protect the confidentiality, integrity, and availability of its systems, networks, and information, including for its wireless services, through administrative, technical, and physical safeguards. Grounded in the National Institute of Standards and Technology (NIST) Cybersecurity Framework, the enterprise-wide program incorporates robust policies, strategic planning, cutting-edge technology, comprehensive training, and a culture of continuous improvement to proactively identify and protect against cybersecurity risks, and to enable rapid detection, response, and recovery from incidents. Verizon employs more than one thousand cybersecurity professionals who establish and oversee security strategies and policies; and partner with business units to implement appropriate security measures and protect customer data. Verizon's cybersecurity ecosystem — subject to review with key stakeholders at least once every year to

⁴¹ Both the Voice Connect and Verizon Voice Gateway devices use widely available “AA” batteries. When fully charged, Voice Connect batteries will provide up to three talk hours, or up to 23 standby hours of backup power and Verizon Voice Gateway batteries provide up to 4 talk hours and 24 standby hours, both enabling voice services, including 911 service, when the power goes out.

⁴² See *2016 Technology Transitions Order* ¶ 134; 47 C.F.R. § 9.19.

ensure alignment with current regulations and business practices — reflects its commitment to providing effective protections against cyber threats.

Verizon therefore certifies that its network security management practices are enterprise-wide and that it safeguards the availability, integrity, and confidentiality of the network without differentiation between services, geographic areas, or service-providing affiliates.

3. Service for Individuals with Disabilities

Verizon certifies that its mobile wireless services and its fixed wireless legacy voice replacement services comply with all accessibility, usability, and compatibility requirements governing services benefiting individuals with disabilities.⁴³

II. Verizon Satisfies the Alternative Options Test in the Areas in Which It Has Overbuilt Fiber

Verizon has deployed fiber optics to portions of its previous copper footprint in Florida, Indiana, Minnesota, North Carolina, Texas, and Wisconsin and offers VoIP service over that network. In each such area with fiber, this service satisfies the Alternative Options Test.⁴⁴ It meets the first prong of the Alternative Options test as it offers “interconnected VoIP services . . . throughout the affected service area.”⁴⁵ As for the second prong of the test, as described above,

⁴³ 2016 *Technology Transitions Order* ¶ 146.

⁴⁴ 47 C.F.R. § 63.71(f)(2)(ii) (setting out the Commission’s “Alternative Options” test). In March 2026, the Commission replaced the Alternative Options test and the related “Adequate Replacement” test with “a single consolidated technology transitions discontinuance rule” such that any application that can establish the availability of at least one of five categories of replacement services will qualify to receive “streamlined” treatment. *Network Modernization Order* ¶ 23. While these new rules are not yet effective, we note that the services identified in this application would meet the requirements of the Adequate Replacement or Alternative Options test and will also meet the newly adopted POTS replacement requirements.

⁴⁵ 47 C.F.R. § 63.71(f)(2)(ii)(A). Under the Commission’s waiver, Verizon is no longer required to offer its service on a stand-alone basis in order to discontinue a legacy service. *See Order, Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, 40 FCC Rcd 1999 (Wireline Comp. Bur. 2025).

there are multiple offerings from unaffiliated providers — including mobile wireless service from AT&T and T-Mobile, VoIP services and broadband service sufficient to support VoIP from multiple service providers offered throughout the discontinuance area.⁴⁶ Accordingly, this application qualifies for treatment under the streamlined grant procedures set forth in Section 63.71(f)(1).⁴⁷

III. Additional Information Required by 47 C.F.R. §§ 63.71, 63.505, and 63.602

1. Name and Address of Carrier

Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of Minnesota, LLC; Citizens Telecommunications Company of Nebraska; Citizens Telecommunications Company of Nevada; Frontier Communications of the Carolinas LLC; Frontier Communications of Indiana LLC; Frontier Communications of Minnesota, Inc.; Frontier Communications of the South, LLC; Frontier Communications of the Southwest Inc.; Frontier Communications of Thorntown LLC; Frontier Communications of Wisconsin LLC; Frontier Dallas TX Fiber 1 LLC; Frontier Florida LLC; Frontier Midstates Inc.; Frontier North Inc.; Frontier Southwest Incorporated; Frontier Tampa Bay FL Fiber 1 LLC; Verizon South Inc.

The following address can be used to contact each of the applicants:

Frontier Communications Holdings LLC
1 Verizon Way, Legal Department

⁴⁶ Charter provides cable/fiber broadband service offering bandwidth sufficient to support VoIP services in every state where Verizon seeks to discontinue its legacy POTS service. Charter also offers VoIP services. In Florida, Comcast and Rapid Systems also provide cable/fiber service in the discontinuance area. In Indiana, Comcast, Mercury Broadband, Mediacom, and Brightspeed, serve large portions of the discontinuance area, among others. In Nebraska, Lumen, Rise Internet, and Vyve Broadband operate in the discontinuance area. In Nevada, Hotspot Broadband dba Skyfiber, Rise Internet, and others also provide service. In North Carolina, providers include Skyrunner Fiber and Blue Ridge Mountain Electric Membership Corp. In Texas, Nextlink, Rise Internet, Optimum, Cable One, and others provide service. In Wisconsin, TDS, Bertram Communications, and Brightspeed serve the discontinuance area.

⁴⁷ See 47 C.F.R. § 63.71(f)(1).

Basking Ridge NJ 07920

2. Date of Planned Discontinuance

Effective on or after September 8th, 2026, pending regulatory approval,⁴⁸ Verizon will discontinue residential and business legacy voice service in the geographic areas detailed below.

3. Points of Geographic Areas of Service Affected and Description of the Affected Service Area

Verizon plans to discontinue its residential and business legacy POTS service throughout the former Frontier telephone service areas in Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin in locations where Verizon either offers mobile wireless service, has overbuilt fiber, or offers fixed wireless POTS voice replacement services that qualify as legacy POTS replacement services.⁴⁹

4. Brief Description of Type of Service Affected

Verizon's residential and business POTS services are TDM-based exchange access line services that consist of the serving central office line equipment and all outside plant facilities needed to connect the serving central office with the network interface at the demarcation point of the customer premises. The service includes optional custom calling features and the End User Common Line service, which allows the line to facilitate local exchange, intrastate interexchange, and interstate voice calling.

⁴⁸ To the extent that additional state requirements apply to discontinuing POTS, Verizon will satisfy those requirements prior to effectuating the discontinuance.

⁴⁹ The former Frontier telephone service areas in Florida, Indiana, Minnesota, Nevada, Nebraska, North Carolina, Texas, and Wisconsin are depicted in maps in Exhibit B, below. This application also includes the legacy POTS service offered in the Knotts Island wire center in North Carolina, which is a Verizon, rather than a former Frontier telephone service area.

5. Brief Description of the Dates and Method of Notice to All Affected Customers

Customer notices were sent by U.S. Mail on July 6th, 2026, to customers of Verizon's legacy voice service located in the discontinuance area. Representative examples of the customer notices are attached as Exhibit A.⁵⁰

Copies of this application are being sent via first-class U.S. Mail to the governor, public utility commission, federally recognized tribes in the discontinuance areas, and to the Chief Information Officer of the Department of Defense, as required by Section 63.71(a) of the Commission's rules.⁵¹

6. Regulatory Classification of Carrier

Verizon offers POTS pursuant to non-dominant carrier regulation.

7. Statement Identifying the Application as a Technology Transition (47 C.F.R. § 63.602(a)(2))

The proposed discontinuance constitutes a technology transition under the Commission's rules. Verizon's remaining POTS customers in the areas at issue in this application will be required to replace their TDM-based voice service with a different technology or transmission medium when Verizon discontinues legacy voice service in these areas, as there is no other TDM-based voice service available to them.

⁵⁰ Frontier Communications of Michigan, Inc. was listed as an entity in the July 6, 2026 customer notice, but Verizon will file a separate application seeking authority to discontinue legacy TDM-based voice services covering locations in Michigan.

⁵¹ Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. We understand from a review of prior applications that Commission staff has advised that a copy of the application should instead be sent to the Department of Defense Chief Information Officer.

8. Information Regarding the Price of the Service for Which Discontinuance Authority Is Sought and the Price of the Proposed Replacement Service (47 C.F.R. § 63.602(a)(3))

The version of Verizon's legacy TDM-based voice service that is most comparable to Verizon mobile wireless service, Verizon's fixed wireless POTS voice replacement service, and Verizon's VoIP over fiber service costs \$20.00 to \$30.00 per month, plus taxes, surcharges, and fees.

Verizon's fixed wireless POTS voice replacement services are available for as little as \$15.00 to \$30.00 per month, plus taxes, surcharges, and fees, and Verizon's post-paid mobile wireless subscriptions are available for \$55.00 per month, plus taxes, surcharges, and fees.⁵² Prepaid mobile wireless service through Visible by Verizon is available for \$20.00 per month.⁵³ Additionally, voice service over Verizon's fiber, where available, costs \$25.00 per month in addition to the cost of Verizon fiber broadband.⁵⁴ Cable and fiber services from other providers are available in the areas covered by this application at prices ranging from \$30.00 to \$60.00 per month plus taxes and fees.⁵⁵

⁵² See Verizon, *Unlimited Plans*, <https://www.verizon.com/plans/unlimited/>.

⁵³ See Visible, <https://www.visible.com/>.

⁵⁴ See Frontier, *Fiber Internet Plans*, <https://www.frontierspecials.com/fiber>.

⁵⁵ See, e.g., Spectrum, *Spectrum Internet*, <https://www.spectrum.com/internet>; Xfinity, *Xfinity Broadband and Mobile Facts*, <https://www.xfinity.com/broadband-labels>; Nextlink, *Home Internet Service from a Top Rated Provider in your area*, <https://nextlinkinternet.com/top-rated-home-internet-service-provider/>; Optimum, *Standard Pricing and Packages*, <https://www.optimum.com/rate-card>; Vyve, *Vyve Broadband Labels*, <https://www.vyvebroadband.com/broadband-labels/>; Brightspeed, *FCC Broadband Fact Labels*, <https://www.brightspeed.com/business-solutions/legal-resources/fcc-broadband-fact-labels/>; Wi-Fiber, *Residential Internet*, <https://www.wi-fiber.io/residential-internet>; TDS, *Broadband Label Data*, https://broadbandlabels.prod.apigw.tds.net/broadband_labels/download/; Bertram Communications, *Bertram Residential Internet Broadband Labels*, <https://www.gobertram.com/broadband-labels-residential-internet/>; Ripple Fiber, *Brighter, faster internet for the speed of life*, <https://ripplefiber.com/current-broadband-facts>; Blue Ridge Mountain EMC, *Blazing-Fast Internet, Right at Home*, <https://www.brmemc.com/fiber/>;

9. Certification That the Information Submitted in This Application Is True and Accurate (47 C.F.R. § 63.602(a)(4))

See the attached certification of Michael Altland at Exhibit C.

10. Applicable Tariff Listing (47 C.F.R. § 63.505(e))

Verizon's mobile wireless, voice over fiber, and fixed wireless POTS voice replacement services are not tariffed services. Accordingly, there are no new tariff listings for them. The differences in prices between Verizon's POTS service to be discontinued and its mobile wireless, voice over fiber, and fixed wireless POTS voice replacement services are set out in Part III(8), above.

11. Name of Any Other Carrier or Carriers Providing Telephone Service to the Community (47 C.F.R. § 63.505(g))

No other providers offer legacy TDM-based voice service in the areas at issue in this application. However, as set forth above, a number of competitors offer voice services to the individuals in the portions of the states where Verizon is discontinuing POTS service via mobile wireless, cable, and fiber services.

12. Description of Any Previous Discontinuance, Reduction, or Impairment of Service (47 C.F.R. § 63.505(j))

Verizon has not discontinued, reduced, or impaired residential or business POTS services to any locations in the discontinuance areas.

13. Number of Toll Messages (47 C.F.R. § 63.505(l))

While Verizon does not track the monthly number of toll messages or toll revenues in the discontinuance areas, the amount of toll traffic on Verizon's network has steadily decreased as

Skyrunner, *Broadband Facts*, <https://skyrunner.net/planinformation.html>; Balsam West, *Balsam West Broadband Labels*, <https://www.balsamwest.net/broadbandlabels>; Valley Communications Association, *Residential Fiber*, <https://www.valleycom.com/for-home/residential-fiber>.

the vast majority of Verizon's former legacy voice customers have migrated to other wireline and wireless voice service providers.

* * *

Questions about this application can be addressed to Randy Clarke, c/o Verizon, 1300 I Street, N.W., Suite 500E, Washington, D.C. 20005, or randolph.clarke@verizon.com.

CONCLUSION

For the reasons identified above, the public convenience and necessity will not be adversely affected by the discontinuance of Verizon's legacy POTS in the areas at issue in this application. Verizon respectfully requests the Commission approve this Section 63.71 application to discontinue service.

Respectfully submitted,

/s/ Randy Clarke
Randy Clarke
Verizon
1300 I Street, N.W., Suite 500E
Washington, D.C. 20005
(202) 684-5350 (Office)

William H. Johnson
Of Counsel

July 7, 2026

Exhibit A:
Example Customer Notices

**1919 McKinney Avenue
Dallas, TX 75201**

Date

Customer Name
Address 1
Address 2
City, State ZIP

Telephone Number: [Telephone number]

Important Update About Your Home Phone Service

Dear [Customer Name],

We're pleased to inform you about updates to the home phone service in your area, to provide more consistent performance and reliability. As part of our ongoing network improvements, service will be delivered using modern fiber or wireless technology where available. Traditional copper-based home phone service will be discontinued, and we're here to support you through this transition.

What This Means for You

You don't need to take action right now. There's no change or interruption to your service today. If you want to explore your options early or have questions, give us a call at **888.791.9197**.

What's Changing and When

- **On or after September 14, 2026:** We will begin contacting customers whose services will be discontinued, by letter, with more details and next steps to support you as you transition your services.
- **On or after November 16, 2026:** Copper-based home phone services will be discontinued, subject to Federal Communications Commission (FCC) approval.
- You will receive advance notice by letter with your specific disconnection date.

Service Affected

Home Phone Service: copper-based dial tone phone service.

Your Options

When it's time to make a change, you'll have several options – including moving to a modern solution that:

- Lets you keep your current phone number
- Supports essential services like 911, alarm systems and many medical devices
- Delivers a reliable, modern service
- Provides battery backup¹

¹ See Attachment A for battery backup information for home phone services.

You can also choose to transfer your home phone or internet service to another provider.

Additional Information

- Starting August 28, 2026, subject to FCC approval, we will stop accepting new orders for Frontier copper-based home phone service in your area. Customers may be eligible for service over our wireless networks.
- All changes are subject to any applicable contractual obligations and regulatory approvals.
- If you've already received a different disconnection notice with an earlier date, that date will still apply.

Thank you for being a Frontier customer. We're committed to making this transition as simple and smooth as possible.

Sincerely,

Frontier, a Verizon Company

On behalf of

State	Company
Florida	Frontier Communications of the South, LLC Frontier Florida LLC Frontier Tampa Bay FL Fiber 1 LLC
Indiana	Frontier Communications of Indiana LLC Frontier Communications of Thorntown LLC Frontier North Inc. Frontier Midstates Inc.
Michigan	Frontier Communications of Michigan, Inc.
Minnesota	Citizens Telecommunications Company of Minnesota, LLC Frontier Communications of Minnesota, Inc.
Nevada	Citizens Telecommunications Company of Nevada Frontier Communications of the Southwest Inc.
Nebraska	Citizens Telecommunications Company of Nebraska
North Carolina	Frontier Communications of the Carolinas LLC
Texas	Frontier Dallas TX Fiber 1 LLC Frontier Southwest Incorporated
Wisconsin	Frontier Communications of Wisconsin LLC Frontier North Inc. Citizens Telecommunications Company of Illinois

The address is Frontier Communications Holdings LLC, 1 Verizon Way, Legal Department, Basking Ridge NJ 07920

FCC Notice

The following notice applies to the services in this notification, is required by the Federal Communications Commission ("FCC" or "Commission"), and is applicable to the communications services listed in this letter:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Frontier Communications of the South, LLC, Frontier Florida LLC, Frontier Tampa Bay FL Fiber 1 LLC, Frontier Communications of Indiana LLC, Frontier Communications of Thorntown LLC, Frontier North Inc., Frontier Midstates Inc., Frontier Communications of Michigan, Inc., Citizens Telecommunications Company of Minnesota, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Nevada, Frontier Communications of the Southwest Inc., Citizens Telecommunications Company of Nebraska, Frontier Communications of the Carolinas LLC, Frontier Dallas TX Fiber 1 LLC, Frontier Southwest Incorporated, Frontier Communications of Wisconsin LLC, Verizon South Inc., Frontier North Inc. and Citizens Telecommunications Company of Illinois. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Attachment A - Additional Information for Home Phone Services

Home Phone Over the Wireless Network

These devices include battery backup capability.

- Under typical conditions for current solutions, the battery provides up to 24 hours of backup power during a power outage.
- Actual battery life may vary depending on network conditions, features in use, call frequency and usage patterns.

Important Notes:

- The device does not provide line power to your home telephones.
- Different models may include either a rechargeable battery or replaceable AA batteries.
- Replacement batteries are widely available.
- If the device has no electrical power or battery power, it will not function, including for 911 emergency calls.

Steps to take to ensure safe usage and security responsibilities:

- You must enter the US address where you want emergency services to be sent if you call 911, before voice service can be activated. If you move your equipment, you must update your service address with us immediately.
- You are responsible for obtaining and maintaining a backup battery or rechargeable batteries for your equipment, to ensure service continuity.
- To ensure service during an outage, a charged battery must be installed.
- The device must be properly connected to power when not in use.

Unlimited Digital Voice (a Frontier fiber-based service)

These devices include battery backup capability.

- Under typical conditions for current solutions, fully charged batteries in the battery backup unit provide 24 hours of backup power during a power outage.
- Actual battery life may vary depending on network conditions, features in use, call frequency, usage patterns.
- Replacement batteries are widely available: the backup battery unit uses 12 D cell batteries.

Important Notes:

- Unlimited Digital Voice service is delivered over fiber and does not supply power through the phone line.
- Battery backup units are provided to consumers who migrate from a copper-based phone service, providing up to 24 hours of backup power during power outages.
- If the device has no electrical power or battery power, it will not function, including for 911 emergency calls.

Steps to take to ensure safe usage and security responsibilities:

- To maintain power during a power outage, you will need a battery backup unit. This allows you to continue making and receiving calls, including emergency and 911 calls.
- If you move you must update your service address with us immediately.
- You are responsible for obtaining and maintaining a backup battery and rechargeable batteries for your equipment to ensure service continuity.
- To ensure service during an outage charged batteries must be installed.
- You are responsible for obtaining replacement "D" cell batteries for continued use during an extended power outage.
- The device must be properly connected to power when not in use.

Landline Phones and Power Requirements

Some phones - especially cordless models - require electricity to operate.

- If your phone requires external power, it will not work during a power outage, even if your service has battery backup.
- This includes the ability to make or receive 911 calls.

For maximum reliability during power outages, consider using a corded phone that does not require external power.

Mobile Wireless Services

Verizon mobile wireless voice service does not provide line power to keep it operational during an extended electrical power outage, beyond a single charge of the mobile phone battery. However, Verizon's mobile wireless service does not require a backup battery to remain operational during electric power outages of several hours or less.

Steps to take to ensure safe usage and security responsibilities:

- To maintain phone service during these times, you will have to arrange for an alternative source of power for your Verizon mobile phone.
- Modern cell phones can go without a charge for more than 24 hours when kept in standby mode.
- For longer outages, cell phones can be recharged in a car, with a laptop, or with a power bank, which is inexpensive and available online and at various retail stores. You can purchase a backup battery online or from a retail electronics store to maintain your wireless phone service in the event of an extended electrical power outage at your home. Such devices typically start at approximately \$20.
- Cell phones will not operate without backup power in the event of an extended power outage. In that situation, you will not be able to make or receive calls, including emergency 911 calls, unless you recharge the phone with a backup battery.
- Since wireless phones are mobile, they are not associated with one fixed location or address. If you make an emergency 911 call with your mobile phone, you should provide the emergency operator the location of your emergency and your wireless phone number, so if the call gets disconnected, the operator can call you back. Additional information is available on the FCC's website (<https://www.fcc.gov/consumers/guides/wireless-911-service>).

Customer Name
Service Address
City, State ZIP

Date

Telephone Number: Telephone number

Important Information About Your Communications Network

Dear [Customer Name],

We're pleased to inform you about updates to traditional copper-based services in Knotts Island, North Carolina, to enable access to newer service options that offer faster speeds and more consistent performance.

As part of our transition to more advanced technologies, services will be delivered using modern wireless technology where available.

What This Means for You

You don't need to take action right now. There's no change or interruption to your service today. If you want to explore your options early or have questions, give us a call at **800.837.4966**.

What's Changing and When

- **On or after September 14, 2026:** We will begin contacting customers whose services will be discontinued, by letter, with more details and next steps to support you as you transition your services.
- **On or after November 16, 2026:** Copper and TDM services will be discontinued, subject to Federal Communications Commission (FCC) approval.
- You will receive advance notice with your specific disconnection date.

Services Affected

The following copper-based and TDM services are affected:

- Business Dial Tone Line - copper-based dial tone phone service.

Any long-distance, IVR, WATS (Wide Area Telephone Service), or toll-free solutions currently using this service will need to migrate to an IP-based or switched solution to avoid disruption.

Your Options

When it's time to make a change, you'll have several options – including moving to a modern solution that:

- Lets you keep your current phone number
- Supports essential services like 911, alarm systems and faxes
- Delivers a reliable, modern service

At any time, you can also choose to transfer your phone service to another provider.

Additional Information

- Starting August 28, 2026: We plan to stop accepting new orders for copper services in your area, subject to FCC approval. New voice service orders will be fulfilled using solutions over our wireless networks.¹
- This letter shall serve as notice that all affected services subject to automatic-renewal are not being renewed. After the end of the existing term, we will continue to provide service on a month-to-month basis until the discontinuance date, at our then current month-to-month pricing.
- All changes are subject to any applicable contractual obligations and regulatory approvals.
- If you've already received a different disconnection notice with an earlier date, that date will still apply.
- For existing federal, state, and local government agencies and educational institutions, modifications to service offerings will continue to be subject to the terms of their contract, the tariff, or product guide as applicable.

Thank you for being a Verizon customer. We're committed to making this transition as simple and smooth as possible.

Sincerely

Verizon Support Team

On behalf of Verizon South Inc. 22201, Loudon County Parkway, Ashburn, Virginia, 20147.

The following notice applies to the services in this notification, is required by the Federal Communications Commission ("FCC" or "Commission"), and is applicable to the communications services listed in this letter:

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Frontier Communications of the South, LLC, Frontier Florida LLC, Frontier Tampa Bay FL Fiber 1 LLC, Frontier Communications of Indiana LLC, Frontier Communications of Thorntown LLC, Frontier North Inc., Frontier Midstates Inc., Frontier Communications of Michigan, Inc., Citizens Telecommunications Company of Minnesota, LLC, Frontier Communications of Minnesota, Inc., Citizens Telecommunications Company of Nevada, Frontier Communications of the Southwest Inc., Citizens Telecommunications

¹ See Attachment A for battery backup information for voice services.

Company of Nebraska, Frontier Communications of the Carolinas LLC, Frontier Dallas TX Fiber 1 LLC, Frontier Southwest Incorporated, Frontier Communications of Wisconsin LLC, Verizon South Inc., Frontier North Inc. and Citizens Telecommunications Company of Illinois. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service

Attachment A - Additional Information for Voice Services

Voice Services Over the Wireless Network

These devices include battery backup capability.

- Under typical conditions for current solutions, the battery provides up to 24 hours of backup power during a power outage.
- Actual battery life may vary depending on network conditions, features in use, call frequency, usage patterns.

Important Notes:

- The device does not provide line power to your home telephones.
- Different models may include either a rechargeable battery or replaceable AA batteries.
- Replacement batteries are widely available.
- If the device has no electrical power or battery power, it will not function, including for 911 emergency calls.

Steps to take to ensure safe usage and security responsibilities:

- You must enter the US address where you want emergency services to be sent if you call 911, before voice service can be activated. If you move your equipment, you must update your service address with us immediately.
- You are responsible for obtaining and maintaining a backup battery or rechargeable batteries for your equipment, to ensure service continuity.
- To ensure service during an outage, a charged battery must be installed.
- The device must be properly connected to power when not in use.

Landline Phones and Power Requirements

Some phones - especially cordless models - require electricity to operate.

- If your phone requires external power, it will not work during a power outage, even if your service has battery backup.
- This includes the ability to make or receive 911 calls.

For maximum reliability during power outages, consider using a corded phone that does not require external power.

Mobile Wireless Services

Verizon mobile wireless voice service does not provide line power to keep it operational during an extended electrical power outage, beyond a single charge of the mobile phone

battery. However, Verizon's mobile wireless service does not require a backup battery to remain operational during electric power outages of several hours or less.

Steps to take to ensure safe usage and security responsibilities:

- To maintain phone service during these times, you will have to arrange for an alternative source of electrical power for your Verizon mobile phone.
- Modern cell phones can go without a charge for more than 24 hours when kept in standby mode.
- For longer outages, cell phones can be recharged in a car, with a laptop, or with a power bank, which is inexpensive and available online and at various retail stores. You can purchase a backup battery online or from a retail electronics store to maintain your wireless phone service in the event of an extended electrical power outage at your home. Such devices typically start at approximately \$20.
- Cell phones will not operate without backup power in the event of an extended power outage. In that situation, you will not be able to make or receive calls, including emergency 911 calls, unless you recharge the phone with a backup battery.
- Since wireless phones are mobile, they are not associated with one fixed location or address. If you make an emergency 911 call with your mobile phone, you should provide the emergency operator the location of your emergency and your wireless phone number, so if the call gets disconnected, the operator can call you back. Additional information is available on the FCC's website.
(<https://www.fcc.gov/consumers/guides/wireless-911-service>)

Interconnected VoIP Services

If your power is out or your internet connection is down, be aware that your VoIP service may not work. Consider installing a backup power supply or having a wireless phone as a backup.

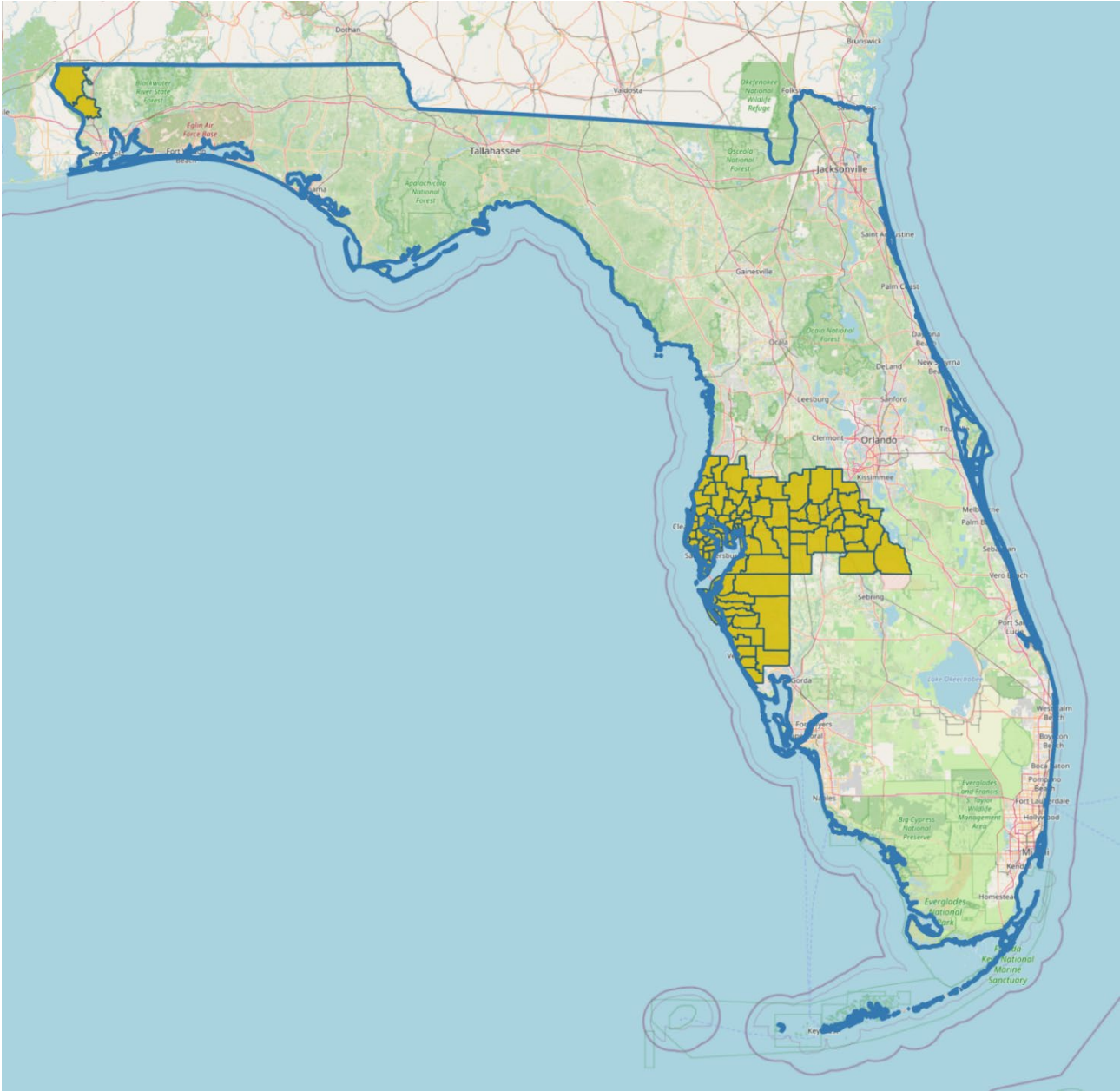
Steps to take to ensure safe usage and security responsibilities:

- Portable interconnected Voice over Internet Protocol (VoIP) services can be used from virtually any internet connection anywhere; however, VoIP 911 calls may not connect to the 911 call center serving your current location.
- VoIP customers may need to provide location or other information to their VoIP providers, and update this information each time they change locations for their VoIP 911 service to function properly.
- VoIP service may not work during a power outage or when the internet connection fails or becomes overloaded. Additional information is available on the FCC's website (<https://www.fcc.gov/consumers/guides/voip-and-911-service>).

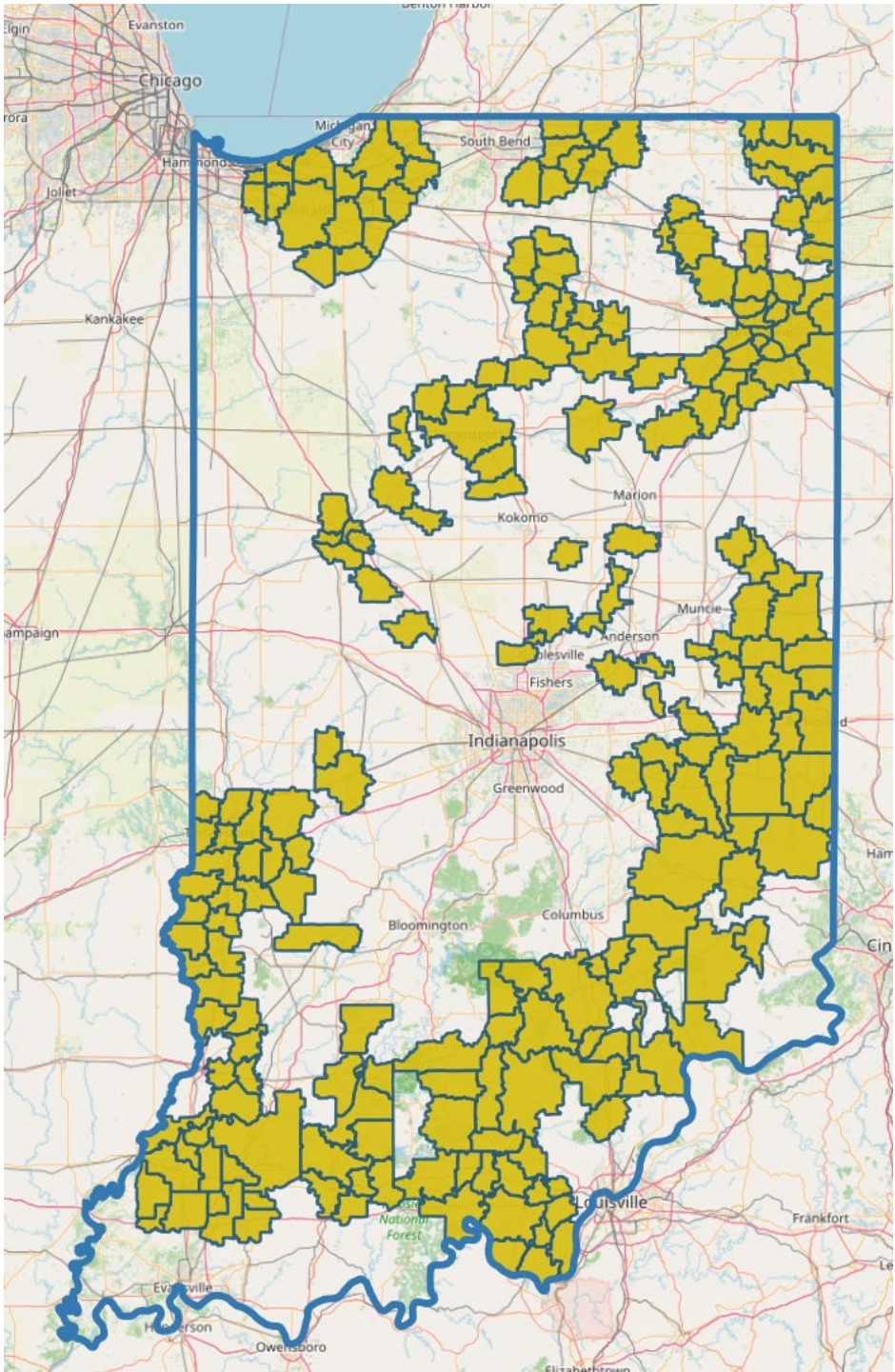
Exhibit B:

**Maps Showing the Borders of Frontier's ILEC Service
Areas in the States Subject to This Application**

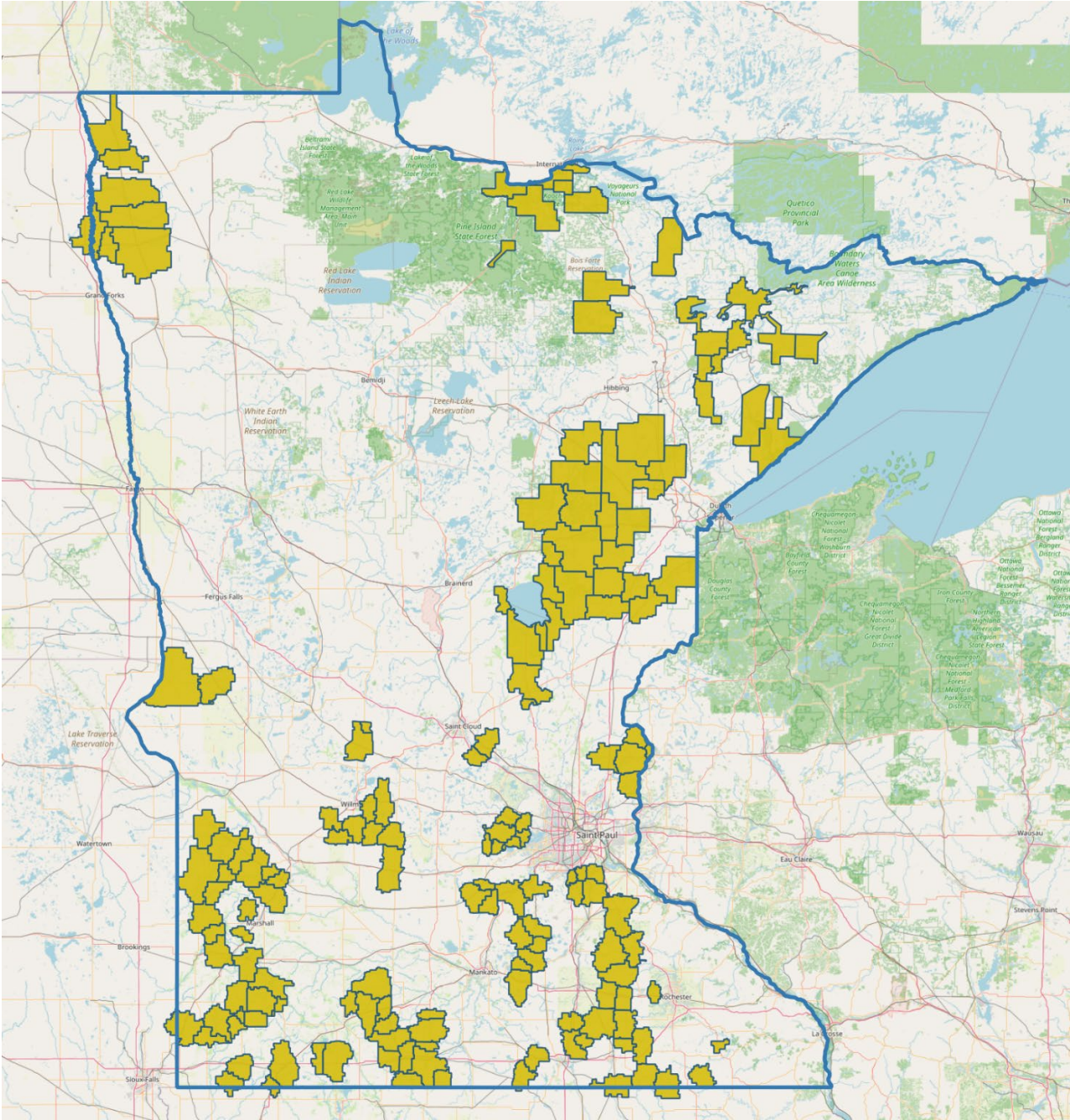
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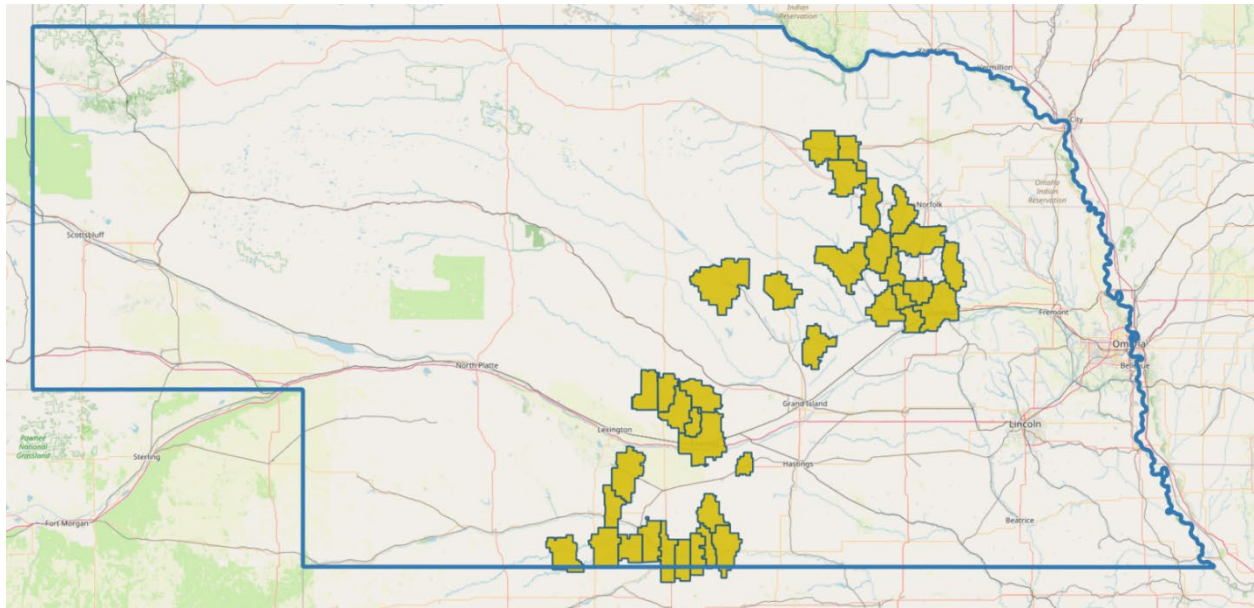
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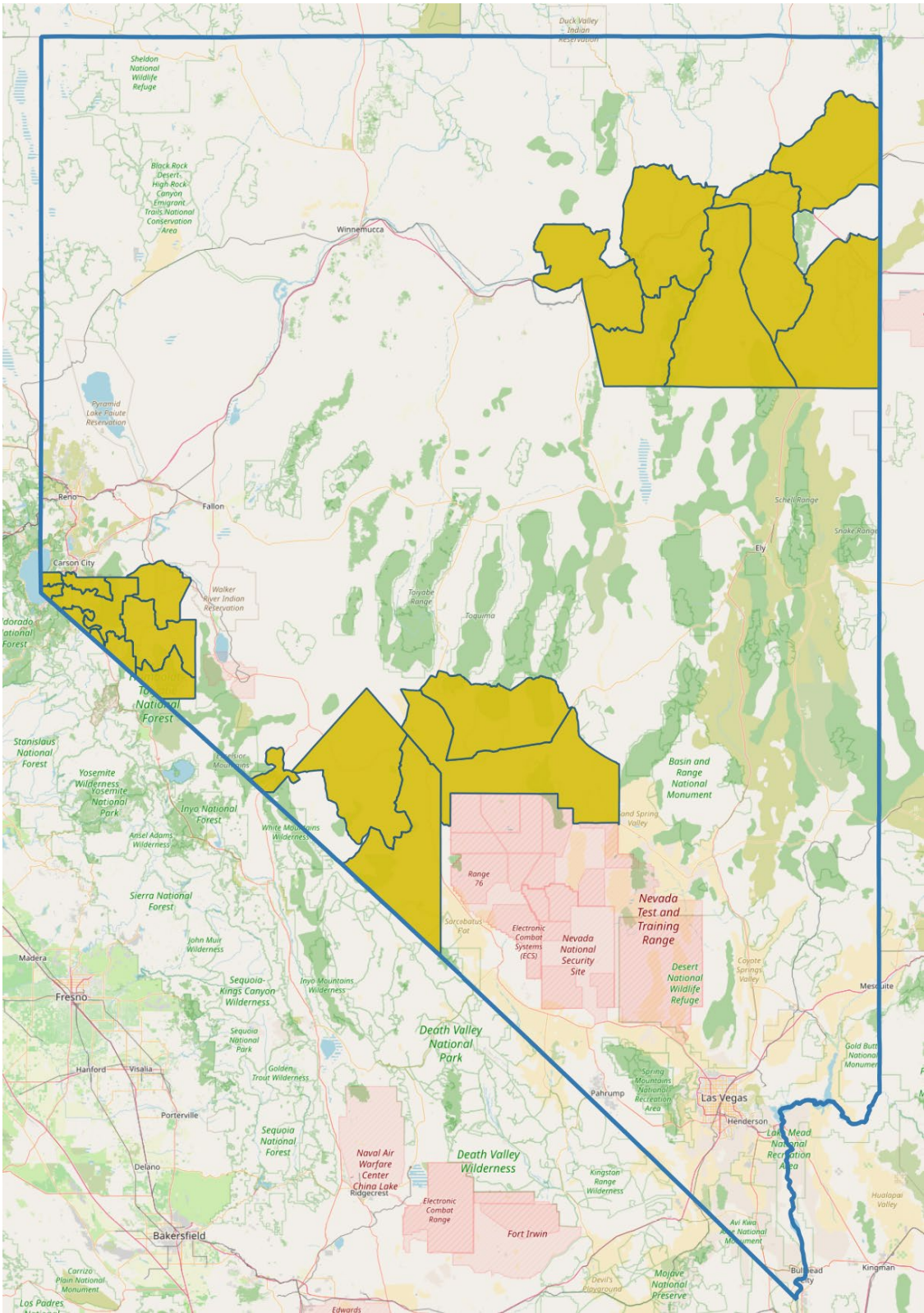
Minnesota



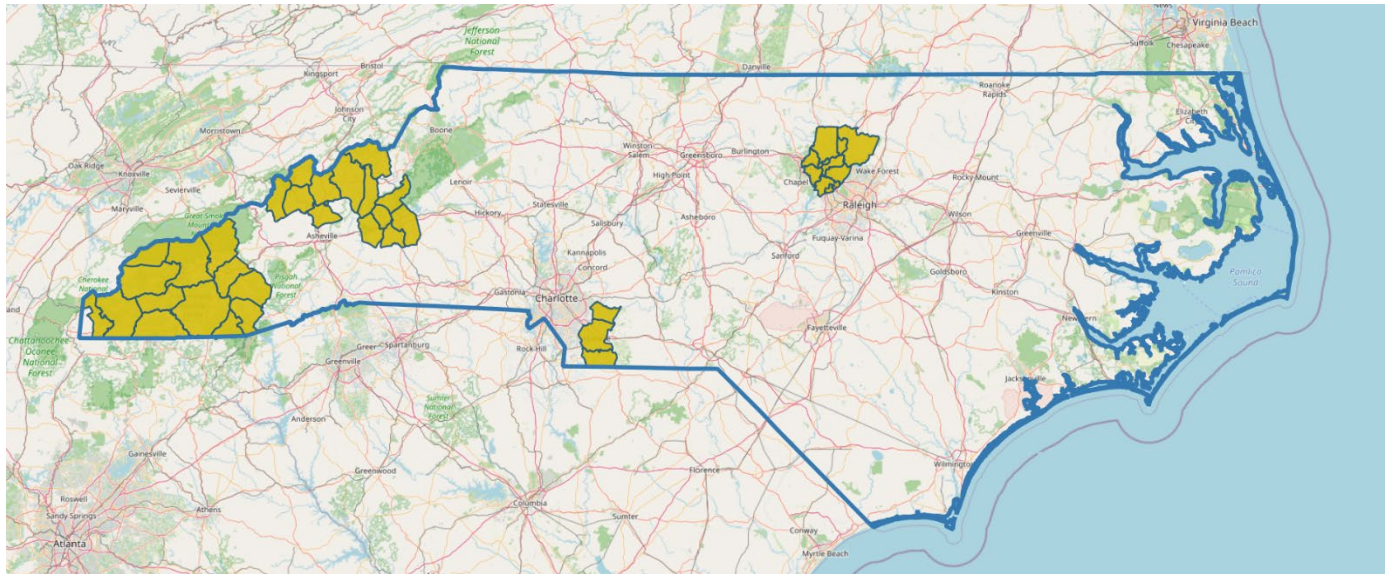
Nebraska



Nevada

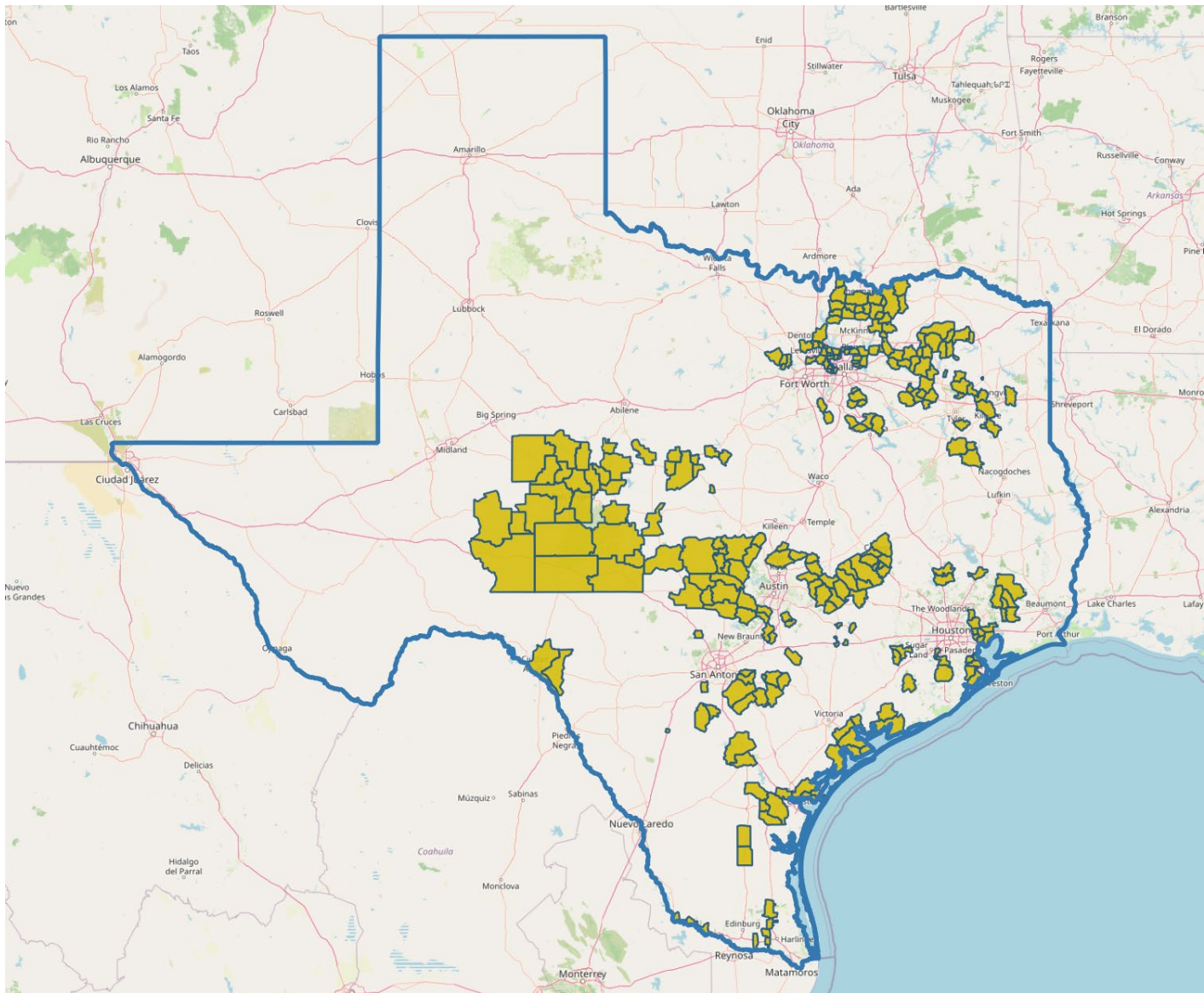


North Carolina*



* The Knotts Island wirecenter in northeastern North Carolina is also subject to this application.

Texas



Wisconsin

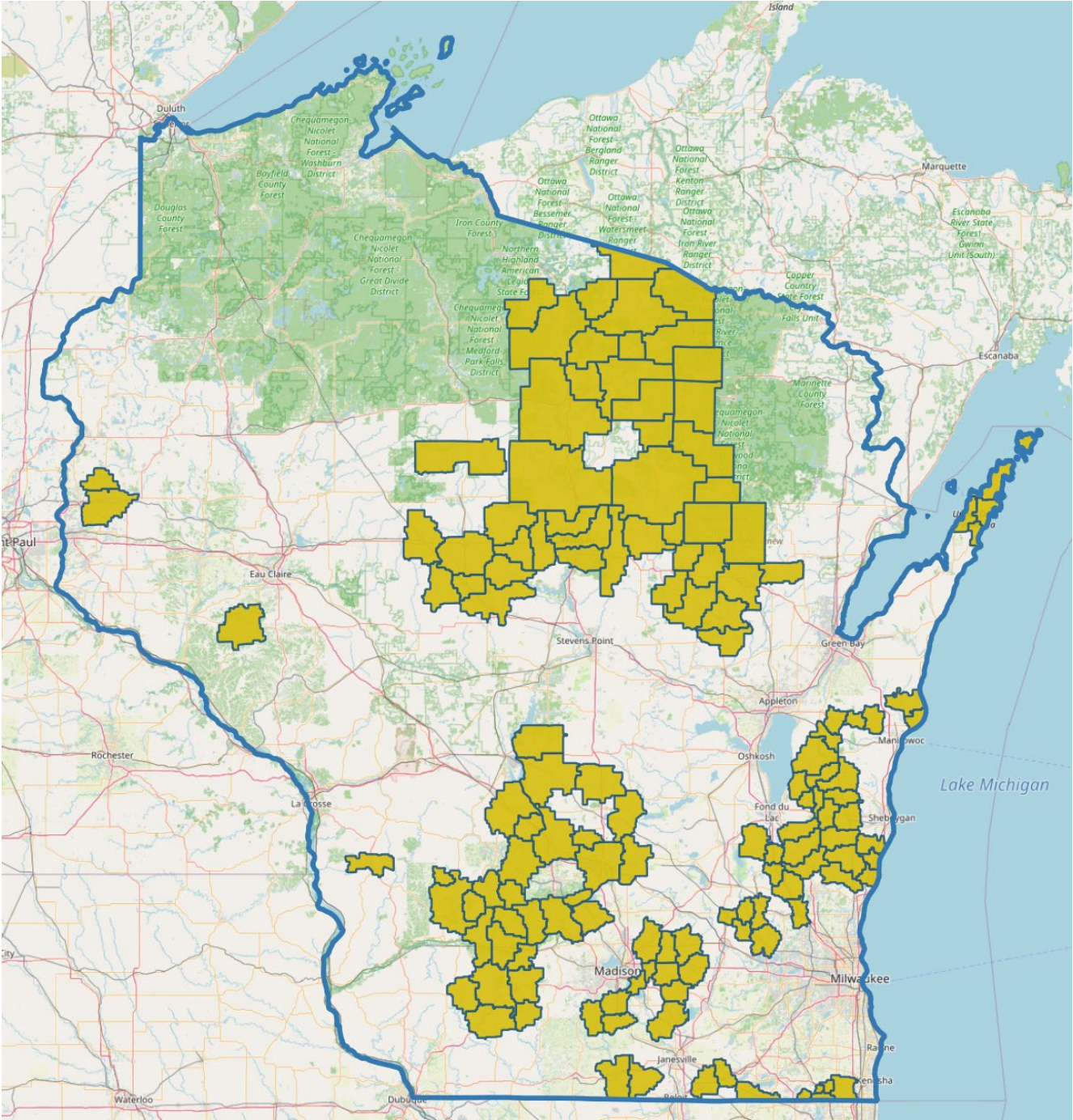


Exhibit C:
Section 63.602(a)(4) Certification

SECTION 63.602(a)(4) CERTIFICATION

I, Michael Altland, Vice President of Network Engineering, am employed by Verizon.
I certify under penalty of perjury that, to the best of my knowledge, information, and belief, the
information required by 47 C.F.R. § 63.602 submitted in the Section 63.71 application of
Verizon is true and correct.



Dated: July 7, 2026

Michael Altland

CERTIFICATE OF SERVICE

I, Abigail DeHart, certify that I have, on July 7, 2026, served a copy of the foregoing
Section 63.71 application of Verizon by U.S. Mail, postage prepaid, to the addresses below:

/s/ Abigail DeHart

Department of Defense
Chief Information Officer
6000 Defense Pentagon
Washington, D.C. 20301

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St. Paul, MN 55101

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Reservation, Nevada
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Yerington Paiute Tribe of the Yerington
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Yomba Shoshone Tribe of the Yomba
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