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Filed For: Frontier Communications of the Southwest Inc

In accordance with NRS Chapter 719,
this filing has been electronically signed and filed
by: /s Darren Lee

By electronically filing the document(s),
the filer attests to the authenticity of the electronic signature(s) contained therein.

This filing has been electronically filed and deemed to be signed by an authorized
agent or
representative of the signer(s) and
Frontier Communications of the Southwest Inc



492 9th Street, Suite 220, Oakland, CA 94607 | (510) 955-1081 | patrick@brblawgroup.com

October 22, 2026

Via Electronic Mail Only

Trisha Osborne
Assistant Commission Secretary
Public Utilities Commission of Nevada
1150 East William Street
Carson City, Nevada 89701

Re: Docket No. 26-10XXX: Application of Frontier Communications of the Southwest Inc. for Full Relief from Provider of Last Resort Obligations

Dear Ms. Osborne:

With this letter, and pursuant to Nevada Revised Statutes 704.68886, Frontier Communications of the Southwest Inc. ("Frontier") hereby submits this application seeking full relief from the Nevada Provider of Last Resort Obligations. This filing includes the Application, the accompanying \$200 application fee, and Draft Notice Form. This Application is being served on Regulatory Operations Staff, and the Bureau of Consumer Protection.

Should you have any questions regarding this filing, please feel free to contact me at (510) 955-1081 or patrick@brblawgroup.com.

Very truly yours,

A handwritten signature in dark blue ink that reads 'Patrick M. Rosvall'.

Patrick M. Rosvall

cc: Donald Lomoljo, Staff Counsel
Staff Counsel Support
Anne-Marie Preisach, Regulatory Operations Staff
Ernest Figueroa, Bureau of Consumer Protection

BEFORE THE PUBLIC UTILITIES COMMISSION OF NEVADA

Application of Frontier Communications of
the Southwest Inc. for a Change in its
Provider of Last Resort Service Area
Pursuant to NRS 704.68886

Docket No. 26-_____

**APPLICATION OF
FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC.
FOR FULL RELIEF FROM PROVIDER OF LAST RESORT OBLIGATIONS**

PATRICK M. ROSVALL
Nevada State Bar No. 9902
MARK P. SCHREIBER
Nevada State Bar No. 9904
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October 22, 2026

Pursuant to Nevada Revised Statutes (“NRS”) 704.68886, Frontier Communications of the Southwest Inc. (“Frontier Southwest”), a Verizon company, respectfully submits this application for full relief from its Provider of Last Resort (“PLR”) obligations (the “Application”) throughout its service territory in Nevada. This Application satisfies all prerequisites to PLR relief, and the requested change in Frontier Southwest’s designation should be approved efficiently through this proceeding.

I. INTRODUCTION

Frontier Southwest hereby applies to the Public Utilities Commission of Nevada (“Commission”) for relief from its obligations and status as a PLR in all portions of its service territory in Nevada, which are located in Carson City and in Douglas, Esmeralda, Lyon, and Mineral Counties.¹ The exchange areas impacted by this request are as follows: Gardnerville, Gardnerville-Ranchos, Glenbrook, Jacks Valley, Montgomery Pass, Smith Valley, Stateline, Sweetwater, Topaz Lake and Yerington.

Relief is sought under NRS 704.68886 on the basis that two or more providers that utilize a wireless or satellite technology are capable of providing alternative voice services to all current and potential customer locations within Frontier Southwest’s service territory in Nevada.²

¹ This Application does not seek any changes to the regulatory status of Frontier Southwest’s affiliate, Citizens Telecommunications Company of Nevada (“Citizens”), which serves separate areas of the state and remains a PLR. To the extent that Citizens wishes to seek relief from its PLR obligations, it will pursue such changes through separate filings. Frontier Southwest notes that Citizens serves other parts of Esmeralda County not served by Frontier Southwest, but this county is included here because some locations served by Frontier Southwest in the Montgomery Pass exchange are in Esmeralda County.

² Section 1(b) of Assembly Bill (AB) 174 enacted by the 2025 session of the Nevada legislature amended NRS 704.68886 to allow a competitive supplier applying for PLR relief to utilize alternative voice service provided through satellite, as well as alternative service provided through wireless technology, to support its application. AB 174 became effective October 1, 2025.

As described in detail below, this Application meets all the necessary requirements of NRS 704.68886 by providing: (i) a map that shows accurate and sufficient detail to identify the exact boundaries of the PLR area and street level maps of the PLR area; (ii) coverage maps demonstrating the presence of multiple Commercial Mobile Radio Service (“CMRS”) providers and satellite providers capable of providing alternative voice service in the PLR area for which Frontier Southwest seeks relief, as required by NRS 704.68886(1)(b); and (iii) a draft of the written notice which Frontier Southwest will timely provide within 30 days of this application to all of its Nevada residential and business customers and to each public safety answering point (“PSAP”) within its service territory, as required by NRS 704.68886(2)(b). Frontier Southwest has already conducted the required meetings with the Commission’s Regulatory Operations (“Staff”) and members of the Nevada Attorney General’s Bureau of Consumer Protection (“BCP”), as required by NRS 704.68886(6)(a) and NRS 704.68886(6)(b). Likewise, within 30 days of the filing date of this Application, Frontier Southwest will meet with representatives from each PSAP and each local law enforcement agency within its service territory, as necessary to satisfy NRS 704.68886(6)(c) and NRS 704.68886(6)(d). Frontier Southwest will participate in duly-noticed consumer sessions under NRS 704.68886(7) at a time determined by the Commission.

This Application is part of a broader effort by Frontier Southwest and other Verizon-affiliated companies nationwide to transition legacy networks toward modern technologies and a diversity of service platforms. Granting this Application will not result in a discontinuance of voice service to any Nevada customer. Rather, the requested relief will give Frontier Southwest the flexibility to phase out copper-based Plain Old Telephone Service (“POTS”) and rely increasingly on Voice over Internet Protocol (“VoIP”) provided over fiber, as well as wireless

options for meeting customers' needs. Prior to filing this Application, Frontier Southwest already received authority from the Federal Communications Commission ("FCC") under 47 U.S.C. Section 214 to discontinue POTS in Nevada,³ but no steps will be taken to pursue this transition until resolution of this PLR relief proceeding. As POTS is phased out, all current POTS customers will be provided with voice service options over alternative technology platforms so that no customer is left behind.

II. FRONTIER SOUTHWEST IS ELIGIBLE FOR PLR RELIEF UNDER NRS 704.68886

Frontier Southwest meets the statutory standard for PLR relief in Nevada. Frontier Southwest is classified by the Commission as a "competitive supplier" with PLR obligations.⁴ NRS 704.68886(1)(b) provides that a competitive supplier that is a PLR may submit an application for relief from its obligations and status as a PLR where alternative voice service is provided by "two or more providers that utilize a wireless or satellite technology and that are capable of providing alternative voice service to the entire area for which relief is sought." Additionally, NRS 704.68886(15)(a) defines "alternative voice service" as "a retail voice service made available through any technology or service arrangement that provides: (1) [v]oice-grade access to the public switched telephone network; and (2) [a]ccess to emergency

³ See *Citizens Telecommunications Company of Illinois et al., Section 63.71 Application of Verizon* (filed July 7, 2026); *Comments Invited on Verizon's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, Public Notice, DA 26-763 (WCB rel. Jul. 21, 2026). Frontier Southwest's Application was granted by operation of law on August 21, 2026...

⁴ See *Application of Frontier Communications of the Southwest Inc. for authority to operate as a competitive supplier of telecommunication service within the State of Nevada and to amend certificate CPC 2 Sub 12 to authorize Frontier to be regulated as a competitive supplier pursuant to NRS 704.68861 to 704.68887, inclusive*, Docket No. 13-11030, Order (Mar. 28, 2014); Nevada PUC, "Competitive Supplier – Incumbent Local Exchange Carrier/Provide of Last Resort," pucweb1.state.nv.us/PUC2/Telecomm/TeleRegList.aspx?Util=UTI.

911 service.” Based on recent clarifications from the Nevada Legislature, a qualifying “alternative voice service” can include wireless and satellite alternatives.⁵

III. MULTIPLE WIRELESS AND SATELLITE PROVIDERS SERVE THE ENTIRE AREA IN WHICH FRONTIER SOUTHWEST SEEKS PLR RELIEF

A. The FCC’s National Broadband Map Identifies the Availability of Wireless Broadband and Voice Services in the PLR Area.

The FCC’s National Broadband Map⁶ and corresponding publicly-available datasets⁷ reflect mobile wireless voice and broadband coverage availability in geographic areas across Nevada, as reported by facilities-based wireless service providers in the FCC’s Broadband Data Collection (“BDC”) system on a biannual basis.⁸ These filings and associated availability data are subject to the FCC’s public challenge process,⁹ as well as FCC verification inquiries and audits. Facilities-based mobile wireless providers are required to submit data for each distinct technology where they make mobile service available, including coverage maps for 3G, 4G LTE, 5G-NR, and voice technologies.¹⁰ Wireless providers report mobile broadband coverage data with propagation maps and propagation model details for each network technology as well as signal strength heat maps.¹¹ The coverage areas reflect where consumers should be able to connect to the mobile network to access broadband and voice services. As a result, the National

⁵ See AB 174 (2025).

⁶ See <https://broadbandmap.fcc.gov/home>.

⁷ <https://broadbandmap.fcc.gov/data-download/nationwide-data?version=dec2025&pubDataVer=dec2025>.

⁸ See “What do I need to file?” <https://www.fcc.gov/BroadbandData/filers>.

⁹ See <https://help.bdc.fcc.gov/hc/en-us/articles/10476040597787-How-to-Submit-an-Availability-Challenge>.

¹⁰ See FCC, *Broadband Data Collection, Data Specifications for Biannual Submission of Subscription, Availability, and Supporting Data*, at 50 (May 22, 2026), <https://us-fcc.app.box.com/v/bdc-availability-spec> (“BDC Data Specifications”).

¹¹ *Id.*

Broadband Map enables users to identify wireless service availability down to a specific street address or latitude/longitude coordinate level.

B. The National Broadband Map Also Identifies the Availability of Satellite Services in the PLR Area.

The National Broadband Map and parallel downloadable datasets also include satellite broadband availability, as reported by ISPs through the BDC system. In accordance with BDC’s data specifications, ISPs utilizing satellite technology biannually submit and certify service availability data at fixed locations.¹²

Unlike wireless broadband and voice services that are displayed through the “Mobile Broadband” map across wireless providers’ entire coverage area, the FCC’s “Fixed Broadband” map displays satellite broadband coverage at Broadband Serviceable Locations (“BSLs”). The definition of “BSL” is driven by the FCC’s designated vendor, CostQuest, which describes BSLs as areas with business or residential structures that either receive—or are capable of receiving— mass-market broadband internet service.¹³ The definition of BSL excludes land uses involving parcels that lack habitable structures, secondary structures such as garage/sheds, buildings subscribing to enterprise-grade broadband (*e.g.* corporate campuses, warehouses), schools/libraries, temporary or non-residential structures, and recreational vehicles. As a result, the FCC “Fixed Broadband” map identifies low earth orbit (“LEO”) and geostationary satellite broadband service only in locations that generally contain traditional residential or business structures and does not provide coverage information for rural areas that are unpopulated or lack traditional residences or commercial buildings.

¹² See, *e.g.*, *BDC Data Specifications* at 12.

¹³ See <https://help.bdc.fcc.gov/hc/en-us/articles/16842264428059-About-the-Fabric-What-a-Broadband-Serviceable-Location-BSL-Is-and-Is-Not>.

C. Satellite Provider Maps Serve as an Alternative Source for Identifying Provider Coverage in Areas Outside FCC-defined BSLs.

Satellite broadband service availability at a given location can also be verified by visiting the provider's coverage map and entering a specific address. Satellite provider coverage maps are reliable sources for identifying broadband access in outlying locations and low-density regions that would not meet the FCC's definition of a BSL.

Portions of Frontier Southwest's PLR area have no known inhabitants, given the lack of residential or commercial structures. As such, the FCC "Fixed Broadband" map cannot confirm the presence or absence of broadband service for those unpoulated Frontier Southwest's PLR area, as it does not collect data outside of BSLs. Therefore, satellite provider coverage maps serve as an additional tool for verifying service availability in the remote areas that are the subject of this Application.

D. FCC Maps and Service Provider Data Demonstrate that PLR Relief Should be Granted by the Commission.

This Application is based on the presence of alternative voice services provisioned by and/or through at least two providers of wireless and satellite technologies. **Exhibits 1-3** include maps of Frontier Southwest's PLR area on a statewide, county, and street-level basis. In compliance with NRS 704.68886(2)(a), these exhibits collectively cover the entire area for which relief is sought, which is equivalent to Frontier Southwest's entire exchange area in Nevada. The maps in **Exhibit 4** identify at least one facility-based wireless provider and at least one wireless reseller for the area where PLR relief is sought based on data downloaded

directly from the National Broadband Map.¹⁴ These providers, which are registered with the Commission as CMRS providers, provision or otherwise support voice services that offer access to emergency 911 and the public switched telephone network across their entire coverage areas:

1. Verizon¹⁵
2. AT&T Mobility¹⁶
3. T-Mobile¹⁷
4. Verizon Value, Inc. d/b/a Tracfone Wireless¹⁸
5. Consumer Cellular¹⁹
6. Mint Mobile²⁰
7. Cricket Wireless²¹

In addition, **Exhibit 5** identifies three satellite providers²² capable of provisioning or otherwise supporting voice services that offer access to emergency 911 and the public switched telephone network for the PLR area that is the subject of this Application:

1. Starlink
2. Hughesnet
3. Viasat

¹⁴ More specifically, the data in the FCC Mobile Map presents information by provider and technology type for each state in the U.S. and displays mobile broadband coverage data using a standardized lattice of hexagonal polygons with a length of approximately 700 feet on each side.

¹⁵ Facilities-based provider, CMRS 20, 39 Sub 4, 31, 32, 120, 198 (Airtouch Cellular, AllTel Corporation, Sacramento Valley Limited Partnership, Celco Partnership, Rural Cellular Corporation, and Bell Atlantic Mobile Systems d/b/a Verizon Wireless).

¹⁶ Facilities-based provider, CMRS 47 Sub 2 (New Cingular Wireless PCS, LLC d/b/a AT&T Mobility).

¹⁷ Facilities-based provider, CMRS 37 Sub 4 (T-Mobile West LLC d/b/a T-Mobile).

¹⁸ Resale provider, CMRS 95 Sub 2. TracFone provisions resold wireless service using Verizon's network.

¹⁹ Resale Provider, CMRS 55. See <https://www.consumercellular.com/coverage>. Consumer Cellular provisions resold wireless service using AT&T's network.

²⁰ Resale provider, CMRS 194. See <https://www.mintmobile.com/coverage/>. Mint Mobile provisions resold service using T-Mobile's network.

²¹ Resale provider, CMRS 144 Sub 1. See <https://www.cricketwireless.com/map.html>. Cricket Wireless provisions resold service using AT&T's network.

²² These providers are registered with the FCC and hold multiple authorizations for satellite operations and services.

Each map in **Exhibit 5** overlays FCC “Fixed Broadband” map data and the respective satellite provider’s coverage maps, using 180-acre hexagonal grids, to show satellite availability within the PLR area.

The Declaration of Hardik Gandhi, Associate Director, Broadband Planning, is attached as **Exhibit 6**. This Declaration describes how the data used to produce Exhibits 4 and 5 was obtained, explains how the maps were created, and confirms the conclusions reflected in the maps.

IV. NOTIFICATION AND MEETING REQUIREMENTS

A. Notification Requirements.

NRS 704.68886(4) requires the applicant to provide written notice of this docket to all current landline customers located in the area for which relief is sought within 30 days of filing this Application. Frontier Southwest’s customer notifications are attached as **Exhibit 7**. These notifications initiated as bill messages to residential customers on or before November 23, 2026, and will be initiated as bill messages for all business customers on or before November 23, 2026. Notifications will be made electronically to those customers who receive their bills in electronic format.

NRS 704.68886(4) also requires the applicant to provide a similar written notice of this docket to each PSAP located in the area for which relief is sought within 30 days of filing this Application. The draft notice to the PSAPs located in Frontier Southwest’s service territory is attached as **Exhibit 8**. This notice will also be provided to each PSAP no later than November 21, 2026.

NAC 703.162 requires the applicant to file a draft public notice with its application that includes information about its filing and a description of the relief being requested. Frontier Southwest’s draft notice is attached as **Exhibit 9**.

B. Consumer Sessions.

NRS 704.68886(7) requires the applicant, in collaboration with the Commission, to schedule and conduct at least one consumer session in each county in which applicant seeks relief. Frontier Southwest seeks relief in four counties and Carson City, which does not reside in any county and which is instead its own county equivalent. Frontier Southwest will work with the Commission to schedule and conduct public meetings in these counties within 120 days of filing this Application.

C. Meetings with Government Representatives and Consumer Advocates.

NRS 704.68886(6) specifies the categories of government representatives and consumer advocates with whom the applicant must meet concerning this docket. Frontier Southwest met with Commission Staff on August 11, 2026 and again on October 12, 2026, and it met the Bureau of Consumer Protection as part of the same Staff meeting on October 12, 2026. Frontier Southwest is also reaching out to and preparing to meet with PSAP and local enforcement agency representatives and it expects these meetings to take place within 30 days of filing this Application with respect to Douglas, Esmeralda, Lyon, and Mineral counties, and Carson City, which is a county equivalent.

V. DESIGNATED CONTACTS

Correspondence or communications regarding this Application should be addressed to:

Carey Gagnon
Associate General Counsel
Verizon
10000 Park Meadows Dr,
Lone Tree, CO 80124
(303) 913-9843
carey.gagnon@verizon.com

Patrick M. Rosvall
Outside Counsel to Frontier Southwest
BRB Law LLP
492 9th Street, Suite 220
Oakland, CA 94607
(510) 955-1081
patrick@brblawgroup.com

VI. CONCLUSION

Frontier Southwest respectfully requests Commission approval of this Application upon completion of all required meetings as set forth in NRS 704.68886(6) and the duly-noticed consumer sessions required by NRS 704.68886(7) on the basis that it has satisfied the requirements of NRS 704.68886 and has shown that at least two providers that utilize wireless and satellite technologies are capable of providing alternative voice service throughout the entire area for which PLR relief is sought.

Respectfully submitted this 22nd of October, 2026.

PATRICK M. ROSVALL, ESQ.
Nevada State Bar No. 9902
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Nevada State Bar No. 9904
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By: *Patrick M. Rosvall*

Attorneys for
Frontier Communications of the Southwest Inc.

Exhibit 1

Map of PLR area at a Statewide Level

Frontier Southwest Wire Center Boundaries — Nevada

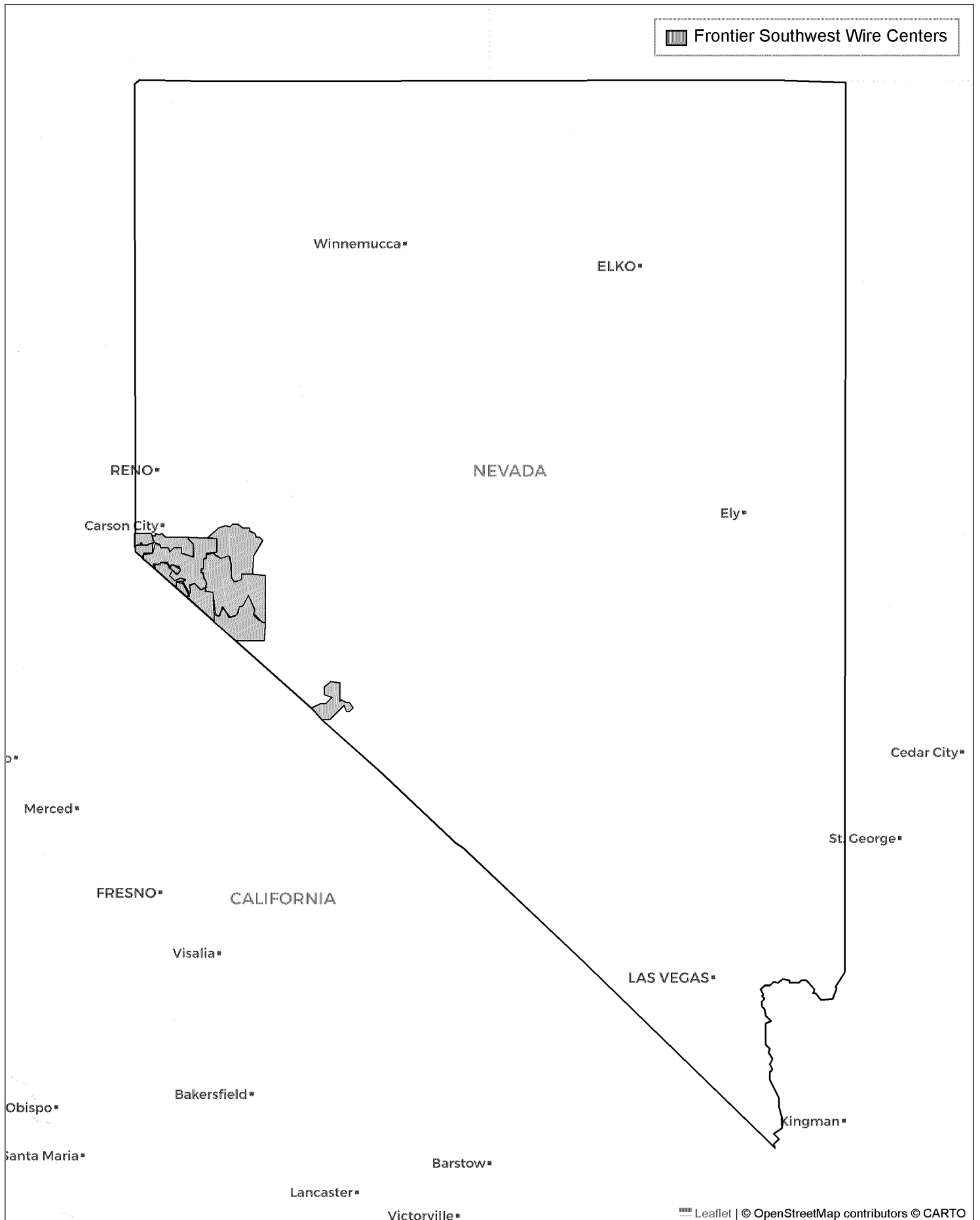
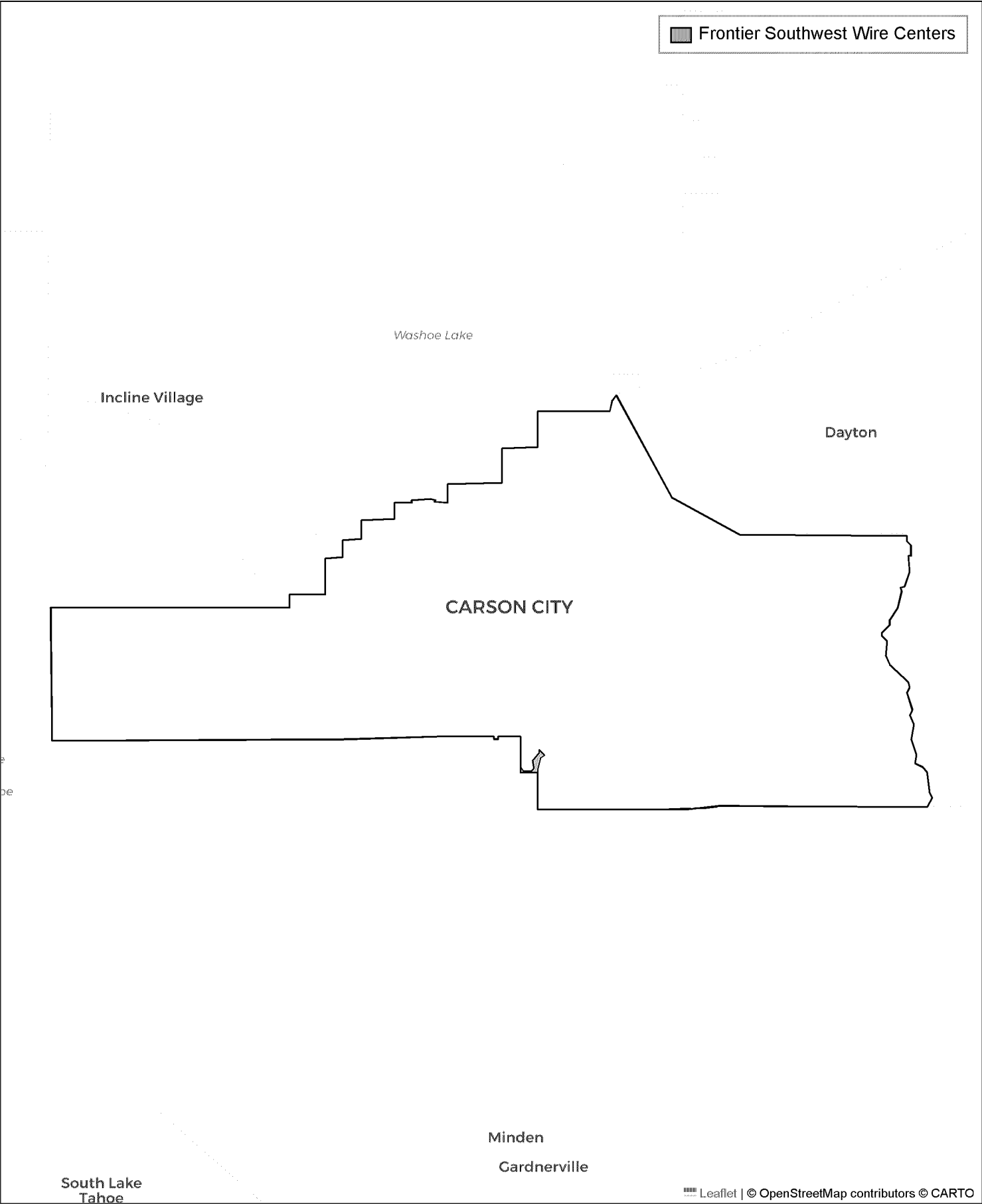


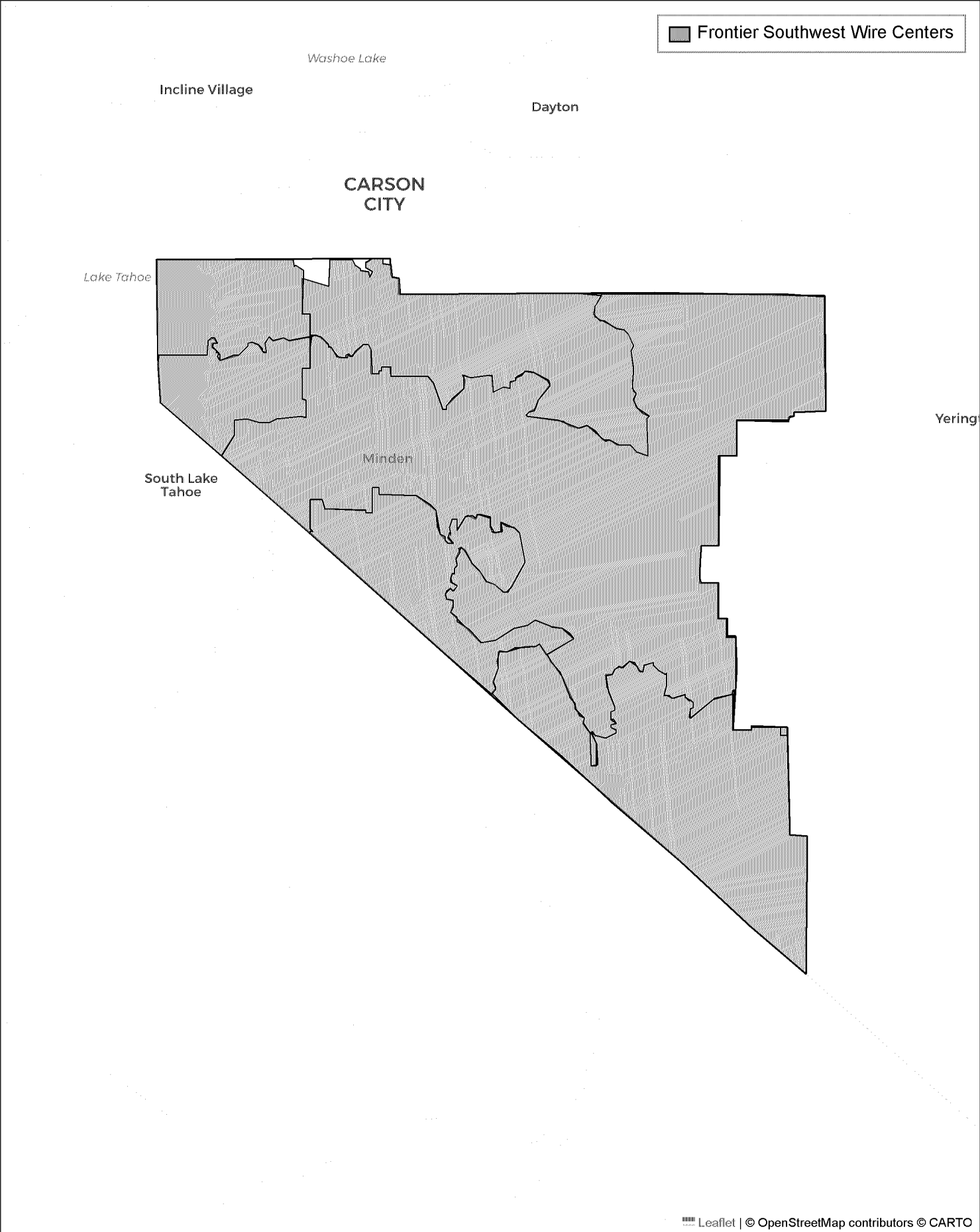
Exhibit 2

Maps of PLR area at the County Level

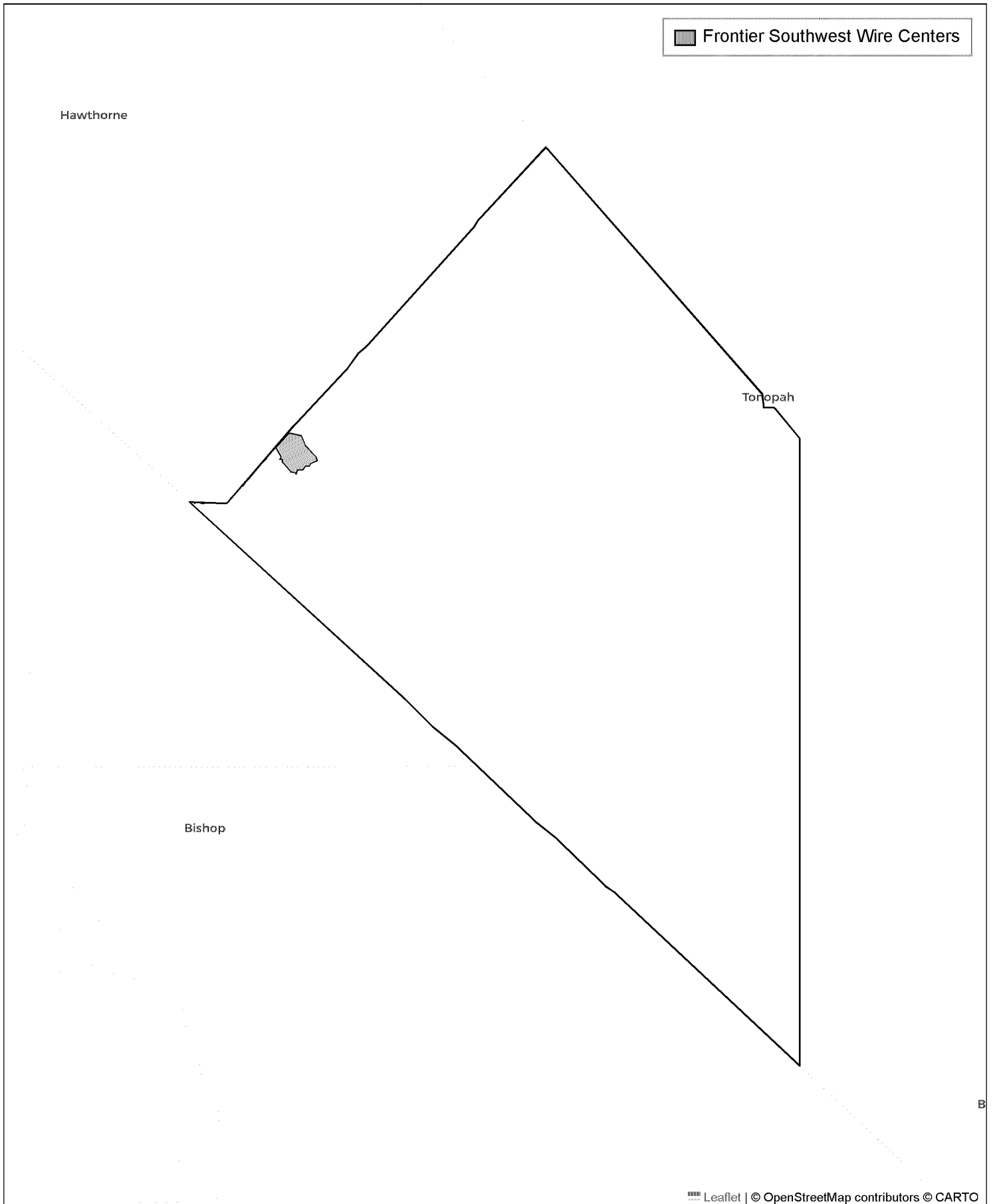
Frontier Southwest Wire Center Boundaries — Carson City County, Nevada



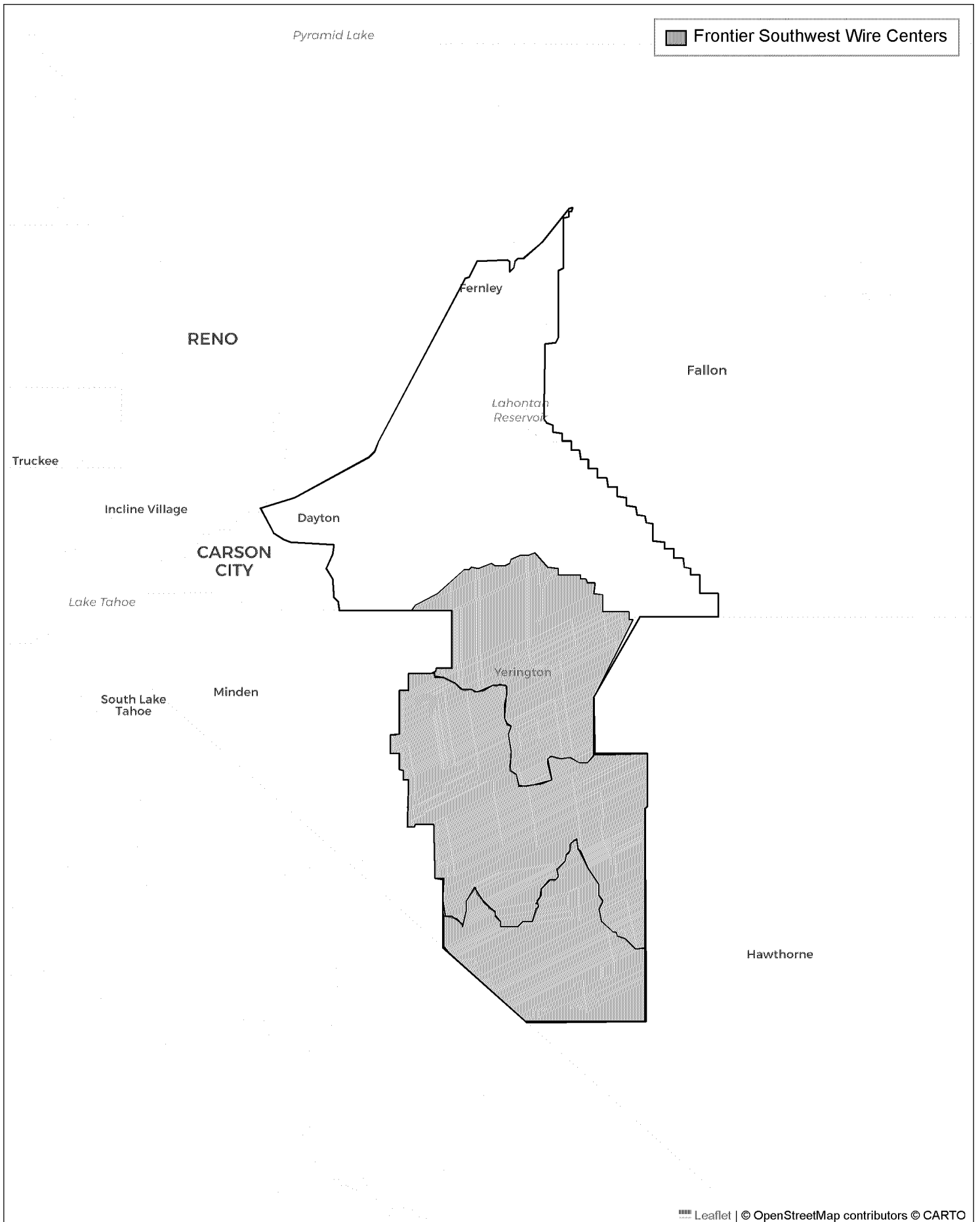
Frontier Southwest Wire Center Boundaries — Douglas County, Nevada



Frontier Southwest Wire Center Boundaries — Esmeralda County, Nevada



Frontier Southwest Wire Center Boundaries — Lyon County, Nevada



Frontier Southwest Wire Center Boundaries — Mineral County, Nevada

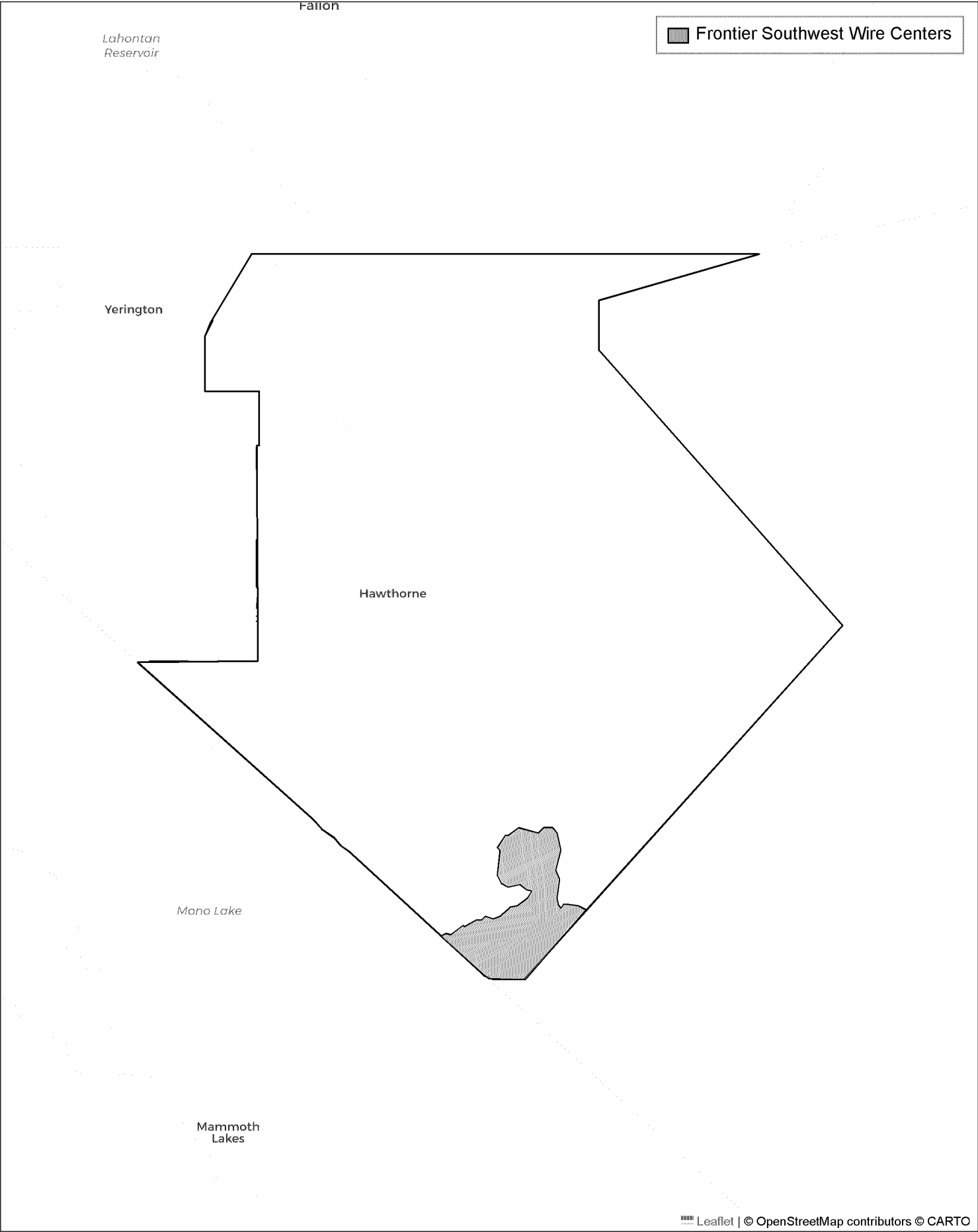


Exhibit 3

Street Level Maps of PLR Area

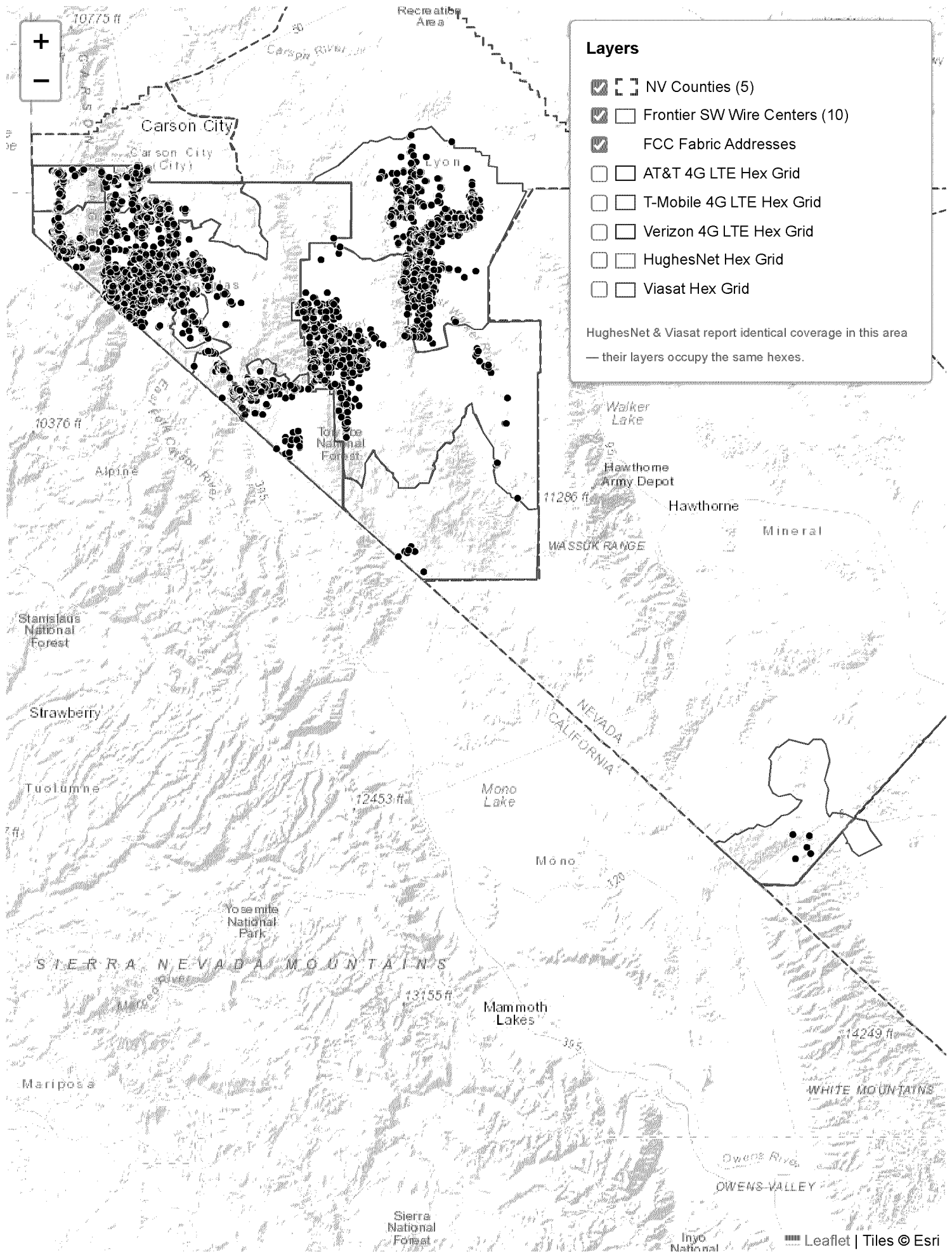
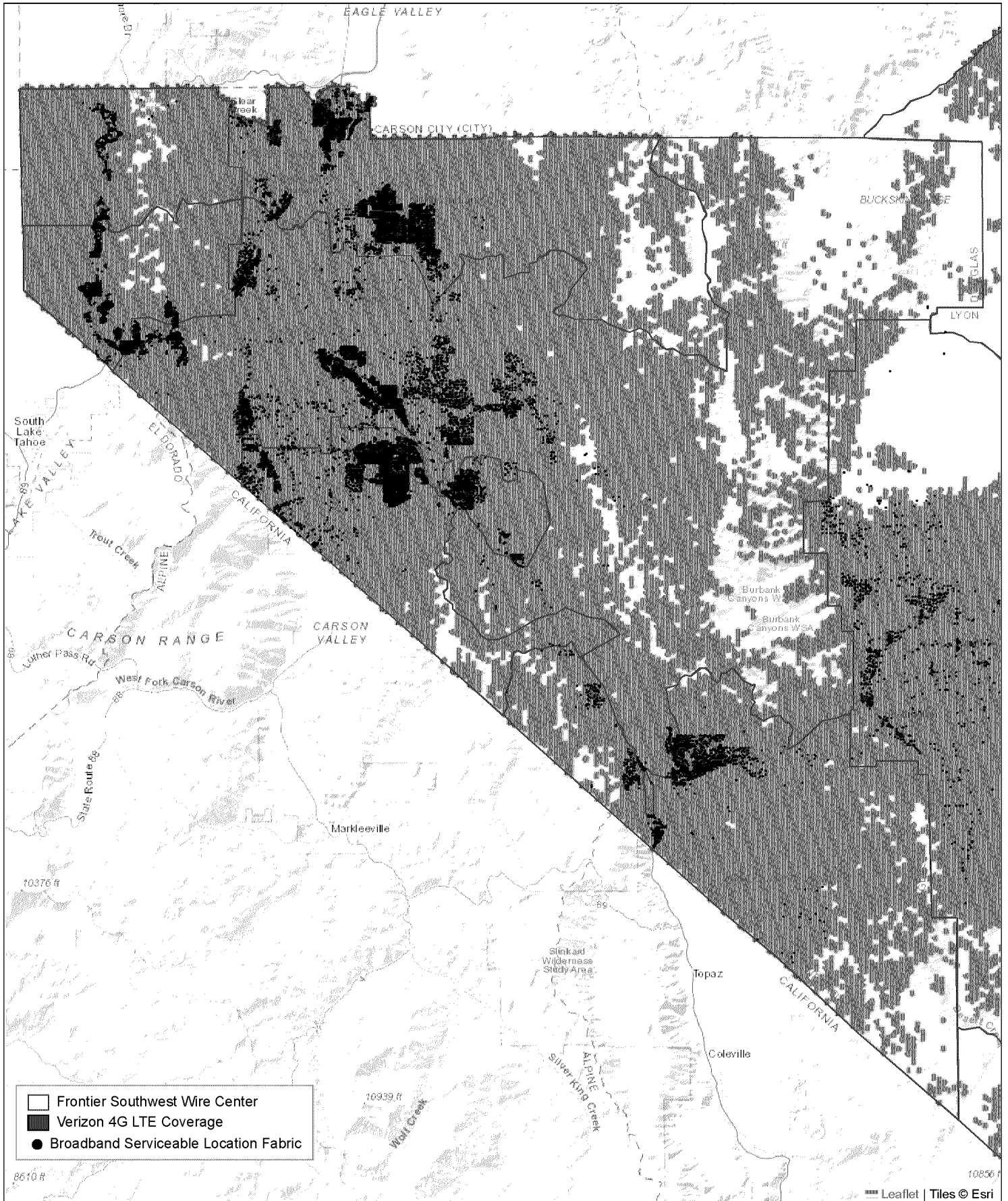


Exhibit 4

**Coverage Maps of Alternative Wireless Voice Service Providers
in Requested PLR Relief Area**

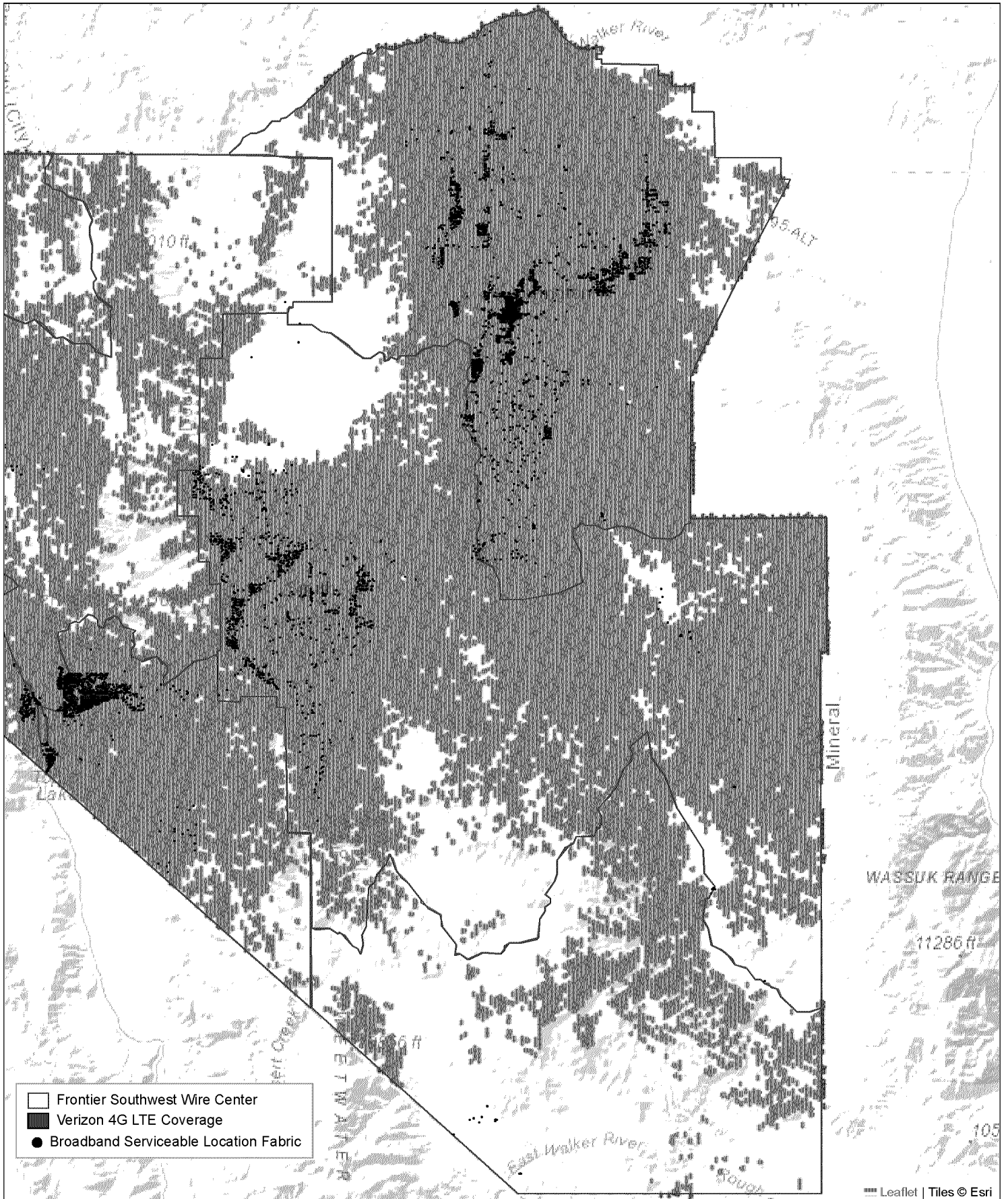
Frontier Southwest Wire Centers with Verizon 4G LTE Coverage — Nevada

Page 1 of 3 — Glenbrook, Stateline, Jacks Valley, Gardnerville, Gardnerville Ranchos & Topaz Lake — 4G LTE coverage shown only where it overlaps a Frontier Southwest wire center



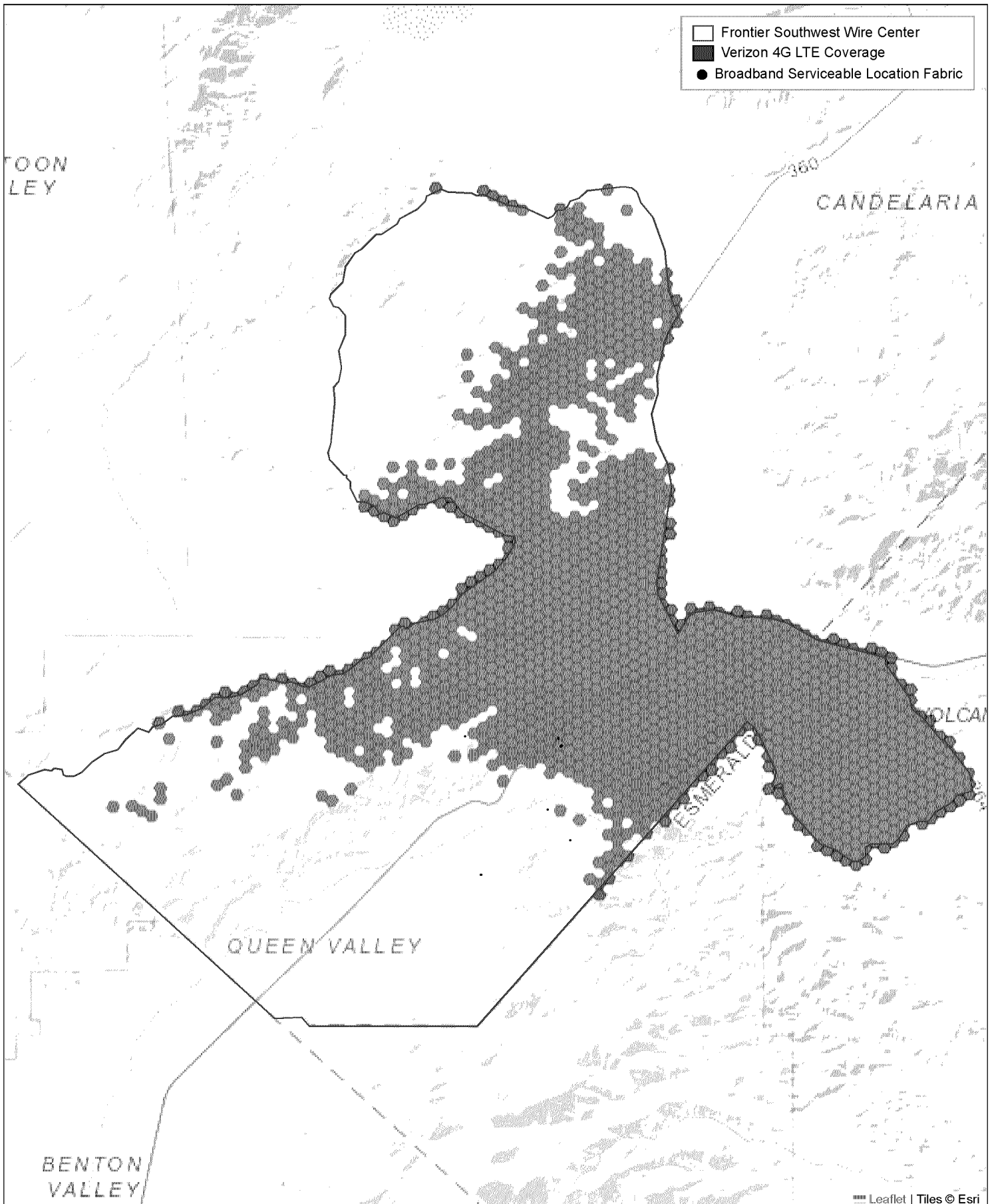
Frontier Southwest Wire Centers with Verizon 4G LTE Coverage — Nevada

Page 2 of 3 — Yerington, Smith Valley & Sweetwater — 4G LTE coverage shown only where it overlaps a Frontier Southwest wire center



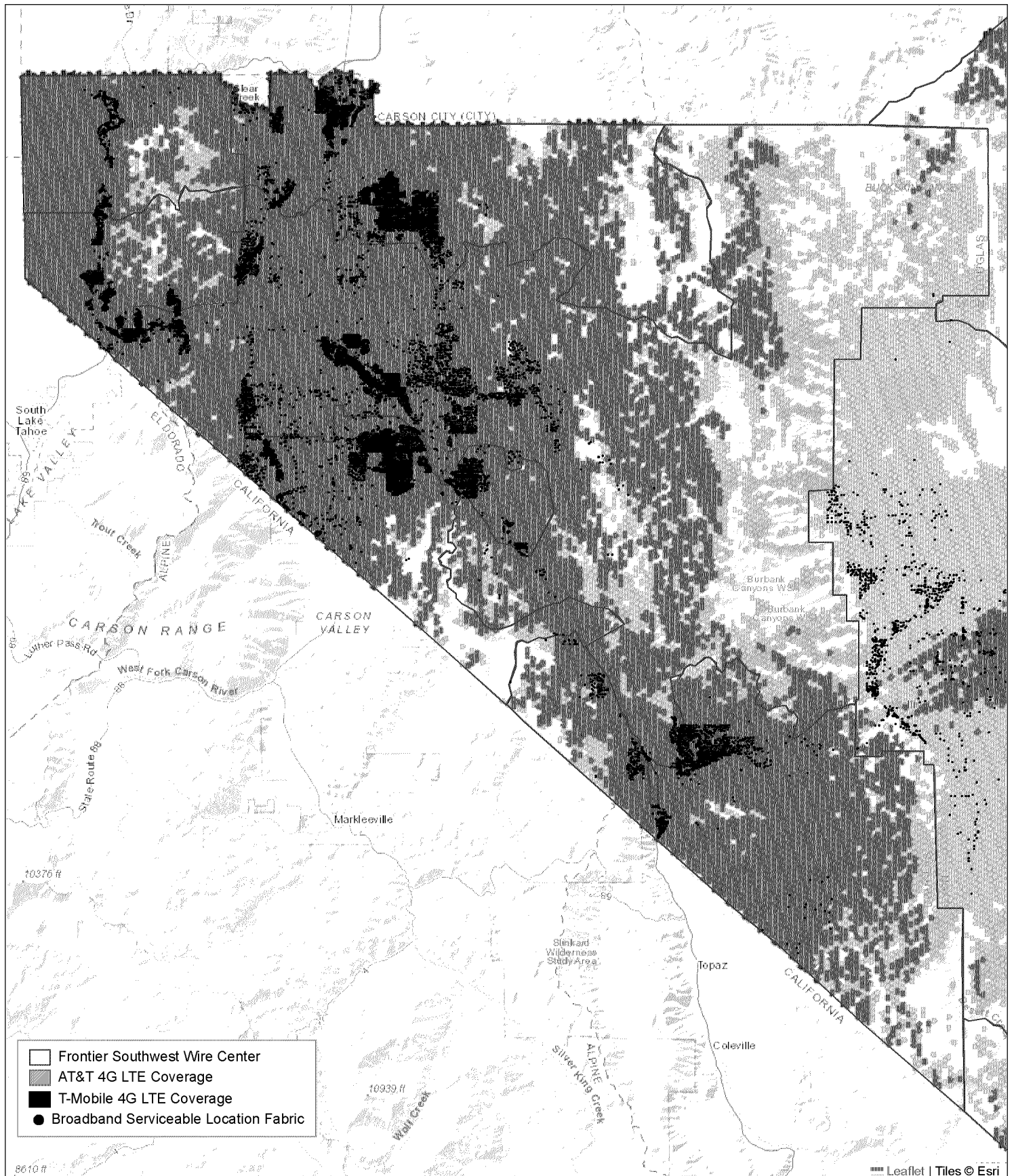
Frontier Southwest Wire Centers with Verizon 4G LTE Coverage — Nevada

Page 3 of 3 — Montgomery Pass — 4G LTE coverage shown only where it overlaps a Frontier Southwest wire center



Frontier Southwest Wire Centers with AT&T & T-Mobile 4G LTE Coverage — Nevada

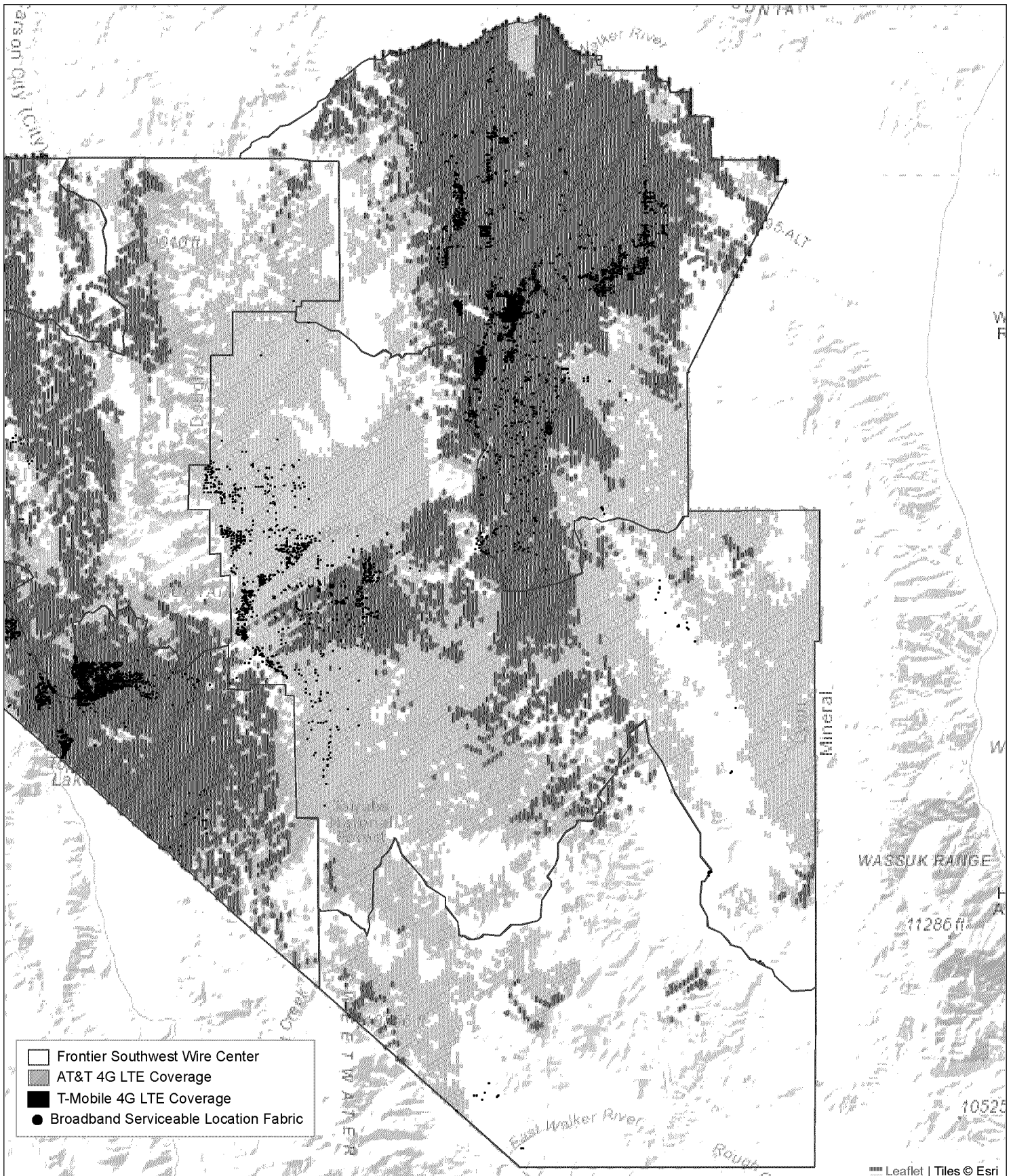
Page 1 of 3 — Glenbrook, Stateline, Jacks Valley, Gardnerville, Gardnerville Ranchos & Topaz Lake — 4G LTE coverage shown only where it overlaps a Frontier Southwest wire center



Cricket Wireless and Consumer Cellular are AT&T resellers. Mint Mobile is a T-Mobile reseller.

Frontier Southwest Wire Centers with AT&T & T-Mobile 4G LTE Coverage — Nevada

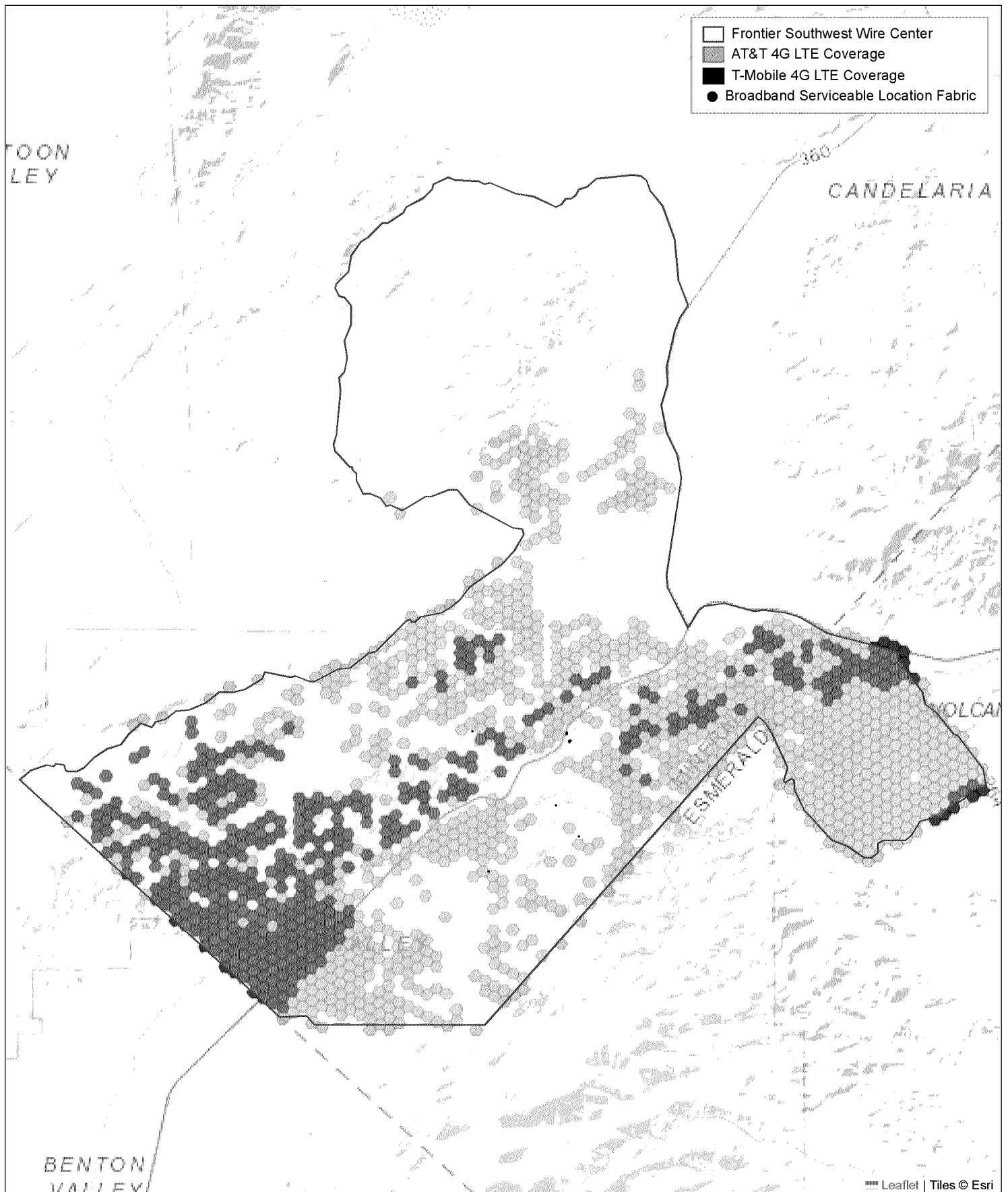
Page 2 of 3 — Yerington, Smith Valley & Sweetwater — 4G LTE coverage shown only where it overlaps a Frontier Southwest wire center



Cricket Wireless and Consumer Cellular are AT&T resellers. Mint Mobile is a T-Mobile reseller.

Frontier Southwest Wire Centers with AT&T & T-Mobile 4G LTE Coverage — Nevada

Page 3 of 3 — Montgomery Pass — 4G LTE coverage shown only where it overlaps a Frontier Southwest wire center



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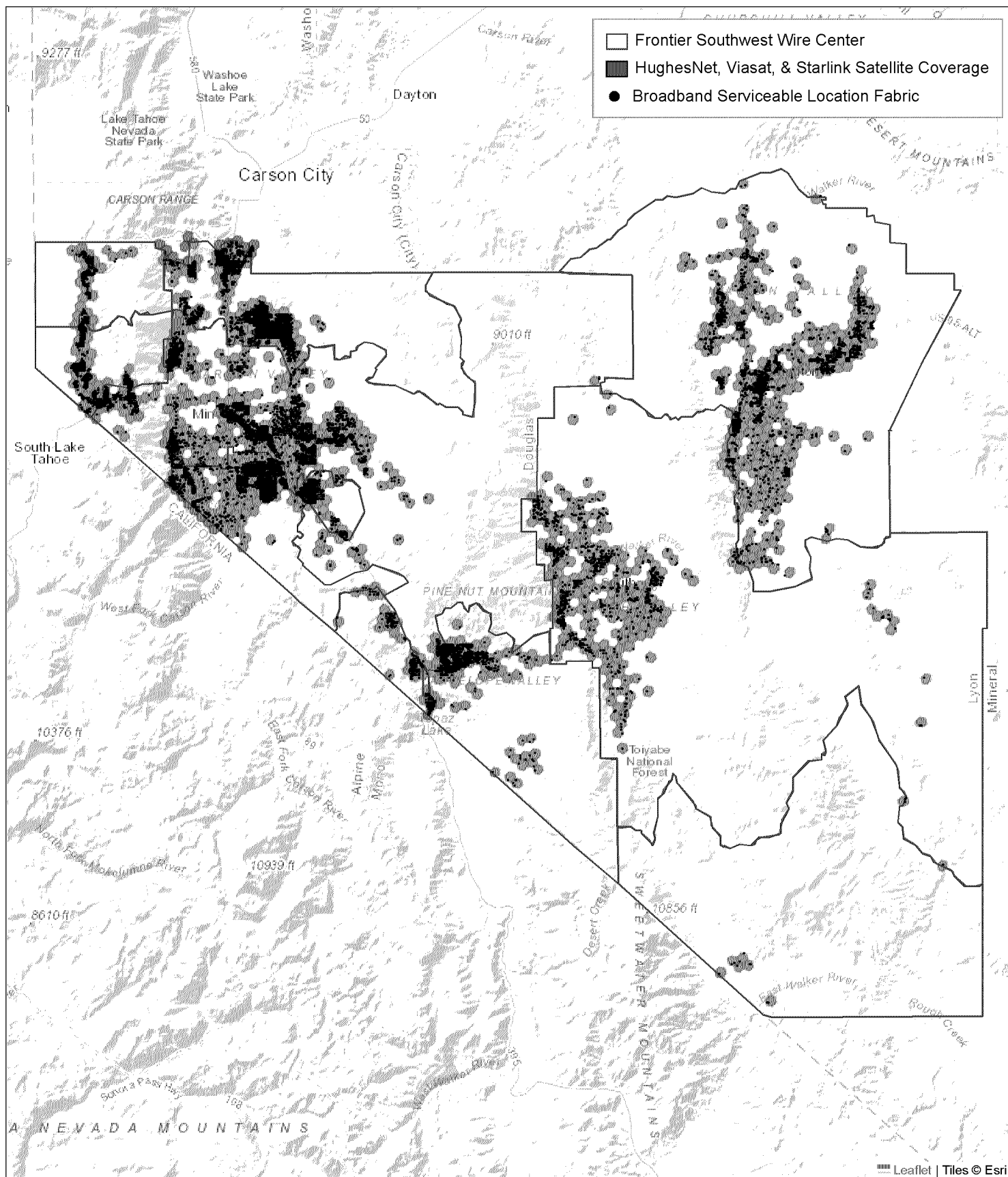
Exhibit 5

**Coverage Maps of Alternative Satellite Voice Service Providers
in Requested PLR Relief Area**

Frontier Southwest Wire Centers with HughesNet, Viasat, & Starlink Satellite Broadband Coverage — Nevada

Fixed satellite broadband coverage shown only where it overlaps a Frontier Southwest wire center — HughesNet, Viasat, and Starlink report identical coverage in this area

Page 1 of 2 — Stateline, Yerington, Topaz Lake, Jacks Valley, Sweetwater, Gardnerville, Smith Valley, Gardnerville Ranchos, Glenbrook



Frontier Southwest Wire Centers with HughesNet, Viasat, & Starlink Satellite Broadband Coverage — Nevada

Fixed satellite broadband coverage shown only where it overlaps a Frontier Southwest wire center — HughesNet, Viasat, and Starlink report identical coverage in this area

Page 2 of 2 — Montgomery Pass

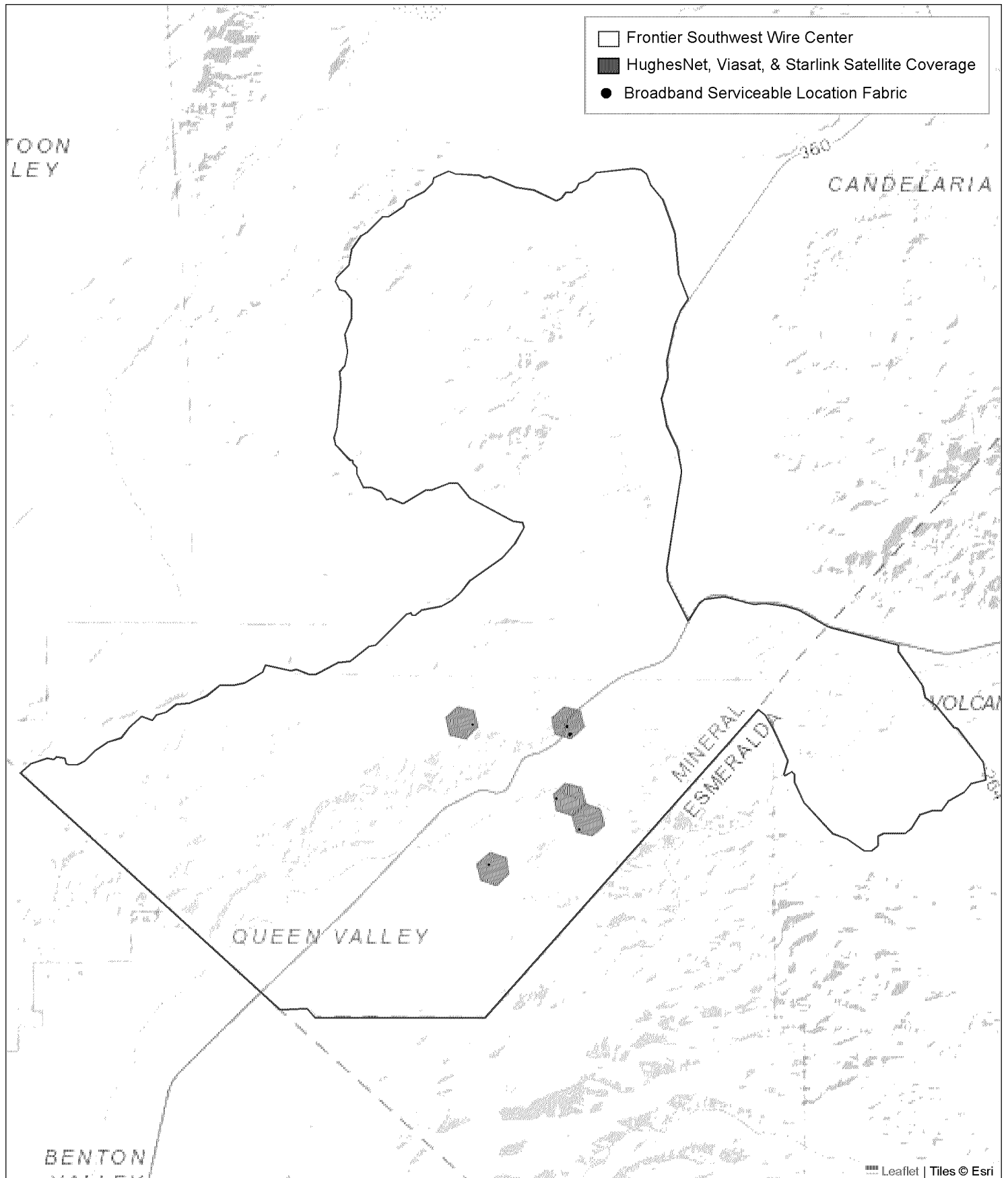


Exhibit 6

Declaration of Hardik Gandhi, Distinguished Engineer for Verizon

DECLARATION OF HARDIK GANDHI
ON BEHALF OF FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC.

I, Hardik Gandhi, declare and affirm as follows:

1. My name is Hardik Gandhi. I am employed by Verizon as an Associate Director, Broadband Planning. My work address is One Verizon Way, Basking Ridge, New Jersey, 07920. I am fully competent to make this declaration and I have knowledge, upon information and belief, of the facts stated in this declaration.
2. My work responsibilities include overseeing data analytics related to broadband planning initiatives.
3. Specifically, Frontier Communications of the Southwest Inc. (“Frontier Southwest”) requested maps of wireless and satellite service coverage in Douglas, Esmeralda, Lyon, and Mineral Counties and in Carson City for use in Frontier Southwest’s Application for Full Relief from Its Provider of Last Resort Obligations (“Application”) in Nevada.
4. In preparing **Exhibits 1-5**, my team relied on (a) Esri World Topographic Map, a base map for GIS Professionals¹; (b) internal company information regarding Frontier Southwest’s wire center boundaries; (c) mobile and satellite service coverage data available on the Federal Communications Commission’s (“FCC”) National Broadband Map, which is broken down by provider and technology type for each

¹ More information regarding this base layer is available at:
<https://www.arcgis.com/home/item.html?id=7dc6cea0b1764a1f9af2e679f642f0f5#overview>

state in the United States; and (d) the FCC's Broadband Serviceable Location Fabric dataset for the National Broadband Map.

5. For the mobile broadband coverage analysis, from the FCC's National Broadband Map Data Download page, my team downloaded the shapefile data for Verizon Communications Inc., AT&T, Inc., and T-Mobile USA, Inc. focused on the 4G LTE technology type, which enables wireless voice service. The mobile broadband coverage data from the National Broadband Map is displayed using a standardized lattice of hexagonal polygons with a length of 663-688 feet per side. My team also downloaded the data of the Broadband Serviceable Location Fabric sourced from an internal Verizon database which is based on which is derived from the FCC's Broadband Serviceable Location Fabric (Fabric) V8, which was released in December 2025.
6. My team prepared **Exhibit 4** by overlaying the shapefile data onto a map of Frontier Southwest's Wire Center Boundaries to determine wireless coverage availability across all Broadband Serviceable Locations identified by the FCC. Frontier Southwest's wire center boundaries have been sourced from internal company information.
7. For the satellite broadband coverage analysis, my team downloaded availability data for Starlink, HughesNet and Viasat in the form of .csv files listing each Broadband Serviceable Location ("BSL") the provider could serve. These lists include an "ID" code for the Resolution 8 H3 hexagon in which they are located. Using Claude (an Artificial Intelligence coding assistant) to write and run the queries, they used this ID code to decode a Resolution 8 H3 hexagon grid via the PostGIS H3 extension in a

PostgreSQL database. Using information specific to each provider, my team was able to create a hexagon coverage showing service from the three satellite providers (Starlink, HughesNet and Viasat). This allowed my team to display areas enabled for redundant satellite service. The satellite broadband coverage data from the National Broadband Map is displayed using a standardized lattice of hexagonal polygons with an area of about 0.7 square kilometers. My team also downloaded the data of the Broadband Serviceable Location Fabric sourced from an internal Verizon database which is based on Fabric V8, which was released in December 2025.

8. My team prepared **Exhibit 5** by first overlaying the hexagon data onto a map of Frontier Southwest's Wire Center Boundaries to show satellite availability across all Broadband Serviceable Locations identified by the FCC.
9. **Exhibits 1-5** collectively demonstrate that all Broadband Serviceable Locations in Frontier Southwest's service area are serviced by two or more wireless or satellite providers.
10. To the best of my knowledge the maps attached as **Exhibits 1-5** to the Application accurately reflect Frontier Southwest's Wire Center Boundaries, the wireless and satellite availability data downloaded from the FCC's National Broadband Map site.

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.



Hardik Gandhi
Associate Director, Broadband Planning.

Dated: 10/21/2026

Exhibit 7

Draft Customer Notice

[CUSTOMER BILL MESSAGE]

Important Notice for Frontier Customers

Frontier Communications of the Southwest Inc. (Frontier Southwest), a Verizon company, has filed an application with the Public Utilities Commission of Nevada (PUCN) requesting modification to its regulatory designation as a provider of last resort (PLR) in its service territory located in Carson City and Douglas, Esmeralda, Lyon, and Mineral Counties. Frontier Southwest's application requests this change in PLR status based on the widespread availability of wireless and satellite voice alternatives.

Note: No changes are being made to your existing voice service (including 911 and emergency services), pricing, features, or payment methods as a result of this filing, and no action is required on your part.

The PUCN will hold consumer sessions in connection with this application, where you can ask questions or share your comments about the application. The PUCN will issue a public notice with the details of the consumer sessions, including the time, date and location.

For more information, go to: <https://frontier.com/resources/copper-discontinuance>

Exhibit 8

Sample of Letter Being Sent to PSAPs



DATE

PSAP CONTACT

PSAP ADDRESS

PSAP CITY STATE ZIP

Dear PSAP CONTACT:

Frontier Communications of the Southwest (“Frontier Southwest”), a Verizon company, has filed an application with the Public Utilities Commission of Nevada (“PUCN”) requesting relief from its designation as a provider of last resort (“PLR”) in its service territory in Carson City and Douglas, Esmeralda, Lyon, and Mineral Counties.

Frontier Southwest is required by law to conduct a meeting regarding the application with each Public Safety Answering Point (“PSAP”) and law enforcement agency located within the area where relief is sought. We will be contacting you soon to schedule a meeting.

Frontier Southwest looks forward to continuing to serve Nevada, including the areas where it seeks PLR relief, with high quality voice and internet services. The application filed with the PUCN simply seeks to remove a regulatory designation that was placed on Frontier Southwest, but which does not apply to its competitors.

The PUCN will be conducting consumer sessions in connection with the application. Customers may attend the consumer sessions to make inquiries or comments concerning the application. The PUCN will issue a public notice identifying the time, date, and location of the consumer sessions.

Maps showing detail where relief is being requested, an explanation of POLR, and a copy of the complete filing, can be found at <https://frontier.com/resources/copper-discontinuance>.

If you have any questions concerning this matter please call me to discuss. I can be reached at (XXX) XXX-XXXX.

Sincerely,

[Name]

[Title]

Exhibit 9

Draft Public Notice

PUBLIC UTILITIES COMMISSION OF NEVADA
DRAFT NOTICE
(Applications, Tariff Filings, Complaints, and Petitions)

Pursuant to Nevada Administrative Code (“NAC”) 703.162, the Commission requires that a draft notice be included with all applications, tariff filings, complaints and petitions. Please complete and include **ONE COPY** of this form with your filing. (Completion of this form may require the use of more than one page.)

A title that generally describes the relief requested (see NAC 703.160(4)(a)):

**Application of Frontier Communications of the Southwest Inc. for a Change in its
Provider of Last Resort Service Area Pursuant to NRS 704.68886**

The name of the applicant, complainant, petitioner or the name of the agent for the applicant, complainant or petitioner (see NAC 703.160(4)(b)):

Frontier Communications of the Southwest Inc.

A brief description of the purpose of the filing or proceeding, including, without limitation, a clear and concise introductory statement that summarizes the relief requested or the type of proceeding scheduled **AND** the effect of the relief or proceeding upon consumers (see NAC 703.160(4)(c)):

Pursuant to Nevada law, Frontier Communications of the Southwest Inc. filed an application with the PUCN requesting relief from its regulatory designation as a provider of last resort in its service territory in in Carson City and Douglas, Esmeralda, Lyon, and Mineral Counties. Frontier Communications of the Southwest Inc. will continue to provide consumers with high-quality voice and internet services.

A statement indicating whether a consumer session is required to be held pursuant to Nevada Revised Statute (“NRS”) 704.069(1)¹:

The PUCN will be conducting consumer sessions regarding the application pursuant to NRS 704.68886.

If the draft notice pertains to a tariff filing, please include the tariff number **AND** the section number(s) or schedule number(s) being revised.

N/A.

¹ NRS 704.069 states in pertinent part:

1. The Commission shall conduct a consumer session to solicit comments from the public in any matter pending before the Commission pursuant to NRS 704.061 to 704.110 inclusive, in which:
 - (a) A public utility has filed a general rate case application, an application to recover the increased cost of purchased fuel, purchased power, or natural gas purchased for resale or an application to clear its deferred accounts; and
 - (b) The changes proposed in the application will result in an increase in annual gross operating revenue, as certified by the applicant, in an amount that will exceed \$50,000 or 10 percent of the applicant’s annual gross operating revenue, whichever is less.

PROOF OF SERVICE

I hereby certify that I have on this day served the foregoing document upon all parties of record in this proceeding by electronic mail to the recipients' current electronic mail addresses.

DATED at Oakland, California on the 22nd day of October 2026.

/s/ Darren Lee

Operations Manager at BRB Law LLP