

**PUBLIC UTILITIES COMMISSION OF NEVADA
MEMORANDUM**

DATE: October 2, 2026

TO: The Commission
Via: Anne-Marie Preisach, DRO

FROM: Kellie Nichols, Senior Compliance Investigator, Consumer Complaint Resolution Division

SUBJECT: Agenda 19-26; Item No. 4A; Docket No. 26-09017
John Roberts vs. Frontier Communications of the Southwest Inc. Complaint regarding = discontinuation of copper-based dial tone telephone service.

I. Summary

John Roberts, a residential customer of Frontier Communications of the Southwest Inc. ("Frontier") submitted a written complaint to the Consumer Complaint Resolution Division ("Division") of the Public Utilities Commission of Nevada ("Commission") Regulatory Operations Staff ("Staff") regarding Mr. Roberts' landline telephone account in Genoa, NV.

The Division has completed its investigation and recommends that the Commission find that no probable cause exists to set the matter for hearing or further proceedings and that an order to dismiss Mr. Roberts' complaint be issued.

II. Background

On July 28, 2026, Mr. Roberts submitted a written complaint to the Division against Frontier to have Frontier not terminate landline service in Nevada's rural communities like Genoa. Exhibit A.

On July 31, 2026, the Division opened a written complaint designated as File No. 55-2636-KN. The complaint was then forward to Frontier for investigation and response.

On August 24, 2026, the Division received a written response from Frontier. Exhibit B.

On September 1, 2026, the Division emailed its written response to Mr. Roberts advising of the Division's findings and provided Frontier's written response. Exhibit C.

On September 5, 2026, and September 9, 2026, the Division received two letters from Mr. Roberts. Exhibit D and Exhibit E. Pursuant to Nevada Administrative Code ("NAC") 703.636, the Division transmitted the unresolved complaint to the Commission for review.

III. Investigation

Based on the information provided by Mr. Roberts and Frontier, the Division recommends that no probable cause exists to set the matter for hearing and that an order to dismiss Mr. Roberts' complaint be issued.

Mr. Roberts' formal complaint raised the following concerns.

- The lack of reliability in Rural areas, such as Genoa, especially when needing reliable service for calling 911. Mr. Roberts states that Verizon has inadequate cell tower coverage in Genoa, during high volume traffic either at Lake Tahoe or in the Carson Valley. One example of high-volume traffic Mr. Roberts' provided is the annual Genoa Candy Dance held at the end of September.
- Internet Service Providers, such as Spectrum, cannot handle high traffic volume either, which again makes cellphones useless for 911 calls.
- Nevada Power Company d/b/a NV Energy ("NV Energy") plans frequent outages, also known as, Public Safety Outage Management ("PSOM") when certain environmental conditions are met. This helps prevent power lines and other equipment from causing a wildfire. During these PSOM events, Genoa may be without power for hours or days until the environmental conditions have changed.
- The implementation and reliability of battery back-up for fiber-based systems. A copper-based landline phone will function during a prolonged outage.
- Mr. Roberts requests that the Commission prevent Frontier from terminating landline service in Nevada's rural communities like Genoa.

Frontier states in its response that it will work with the remaining copper-served customers to transition to another Federal Communications Commission ("FCC")-approved replacement voice option, which includes voice service over fiber, fixed wireless voice replacement service that supports legacy telephone equipment and mobile wireless service, together with other alternatives available in the market.

Emergency 911 service continues to be supported over these alternatives.

The fiber and fixed wireless equipment includes battery backup using commercially available batteries.

Frontier states that it will not discontinue Mr. Roberts' service on November 16, 2026. Mr. Roberts will receive another notice with a specific disconnection date.

Frontier is the Provider of Last Resort ("POLR") and will continue to meet its POLR obligation to furnish basic network service, as defined by Nevada Law (Nevada Revised Statute ("NRS") 704.006), after the retirement of its copper facilities. Exhibit F¹

Frontier's application to discontinue existing copper voice was approved by the FCC on August 21, 2026.²

¹ Frontier will remain the POLR unless they file an application with the PUCN requesting to relinquish its duties as a POLR.

² Comments objecting to this application were due on or before August 5, 2026. (Attachment 3, FCC Notice at 2.) Frontier states that no such comments were received from Mr. Roberts as of the date of Frontier's response. (Attachment 1, Frontier Response at 5.)

If a fixed wireless replacement service from Frontier is available, a technician will be available to install and test the device and to confirm the adequacy of the signal at your location before service over copper wire is discontinued.

Frontier will continue to work with Mr. Roberts directly to ensure continuity of service.

Mr. Roberts claims that he submitted comments to the FCC during the public comment period. Mr. Roberts raised specific concerns about the inadequacy of Frontier/Verizon's proposed replacement of copper-based landlines owing to factors unique to Genoa. Mr. Roberts states that he also raised important national security concerns regarding the FCC's policy. Any comment made by Mr. Roberts are a matter of public record, as is Mr. Roberts' column in the August 11th edition of The Washington Examiner's Beltway Confidential section, "To Protect National Security, Trump Should Ensure the FCC Retains Landlines." Exhibit G.

IV. Analysis

Frontier applied with the FCC to discontinue domestic legacy voice service in certain areas. The Wireline Competition Bureau (WCB") has accepted Frontier's Section 214 application to discontinue domestic legacy voice service as part of a technology transition. This application covers eight states and focuses on legacy copper-based voice service. Frontier argues that its wireless fiber replacement service will continue to operate even during power outages, citing the FCC's Network Modernization Order as evidence of modern alternatives.

The FCC's Public Notice has been included with this memo. See Exhibit H

The Division has completed its investigation and recommends that the Commission find that no probable cause exists to set the matter for hearing or further proceedings and that an order to dismiss Mr. Roberts' complaint be issued.

IV. Notice and Subsequent Action

The Division filed this Memorandum with the Commission, thereby transmitting Mr. Roberts' complaint to the Commission for review, along with information required by NAC 703.636. This item has been duly noticed for Commission consideration at this agenda meeting. In addition to the usual public notice required for items on the Commission's Agenda, both Mr. Roberts and Frontier have been notified that the Commission will consider the complaint at its regularly scheduled Agenda Meeting on October 14, 2026, and copies of the Memorandum and associated correspondence have been provided to Mr. Roberts and Frontier.

V. Conclusions and Recommendations

Based on the foregoing, the Division believes that Frontier Communications of the Southwest Inc. has not acted contrary to any of its tariffs or relevant Nevada statutes or regulations over which the Commission has jurisdiction. The Division recommends that the Commission find that no probable cause exists to set the matter for further proceedings and determine the matter to be closed.



JOE LOMBARDO
Governor

**STATE OF NEVADA
PUBLIC UTILITIES COMMISSION**

HAYLEY WILLIAMSON
Chair

TAMMY CORDOVA
Commissioner

RANDY J. BROWN
Commissioner

STEPHANIE MULLEN
Executive Director

WRITTEN COMPLAINT

RECD - PUCN CC
JUL 25 11 29 AM 2026

Date: July 24, 2026

Name: John B. Roberts II

Service Address: [REDACTED]

City: Genoa State: NV Zip: [REDACTED]

Home Phone: [REDACTED] Work Phone: ext: Cell: [REDACTED]

Account Number: 775-[REDACTED]-5

Company/Utility Name: Frontier Communications/Citizens Telecommunications Company of Nevada

Type of Service (i.e. gas, electric): Copper-based landline telephone service

Description of your Complaint (Please include copies of all supporting documents including bills, letters, photos or other material):

PLEASE SEE ATTACHMENTS

Desired Outcome (What do you want done?):

PLEASE SEE ATTACHMENTS

[Signature]
Signature

July 24, 2026

Date

ATTACHMENT TO WRITTEN COMPLAINT
FROM JOHN B. ROBERTS II RE: FRONTIER COMMUNICATIONS
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Description of Complaint:

Frontier Communications notified landline customers in a letter dated July 6, 2026 that it will file a Section 63.71 application with the FCC to terminate landline telephone service on Nov. 16, 2026. Frontier is offering VOIP or fiber-based alternatives, but in my area (as in much of rural Nevada) a copper-based landline is essential for consistent and reliable ability to call 911 in an emergency. Both alternatives offered by Frontier have weaknesses making reliable service impossible in Genoa at times.

This is an issue which affects many Nevadans. The Reno Gazette Journal estimates that between 40,000 and 42,000 Nevadans rely solely on landlines. The majority of them live in the state's rural areas. According to the newspaper, 23% are age 65 or older, making their likelihood of needing reliable phone access for 911 calls much higher than for the population in general.

Two main infrastructure factors contribute to this lack of reliability in rural areas like Genoa. Verizon (which now owns Frontier) has inadequate cell tower coverage in Genoa, especially during periods of high volume traffic either at Lake Tahoe or here in the Carson Valley, especially during special events like the annual Genoa Candy Dance.

During the Candy Dance cellphone service doesn't work for days, and vendors and customers are forewarned by the town to bring cash or checks because credit card payment systems and digital wallets will not work. That makes cellphones useless for 911 calls.

The second factor is that locally-available Internet Service Providers like Spectrum cannot handle high-volume traffic either, rendering VOIP (Voice Over Internet Phone) service not consistently reliable for 911 calls.

I am currently a customer of Verizon for cell service and Spectrum for Internet access and know firsthand that both have frequent outages or service transmission problems. Last year a call from a pathologist regarding my wife's breast biopsy and suspected cancer went somewhere in Verizon's system and was delayed a full week before it came through to our cellphones! I sent an email about Frontier's impending landline termination to our HOA members, and 10% responded that they rely on landlines and are concerned about the termination, while 40% reported intermittent service problems with Verizon and Spectrum. These are infrastructure issues which limit capacity for cell calls and Internet traffic in our community.

There is a second major, statewide infrastructure problem with the alternatives to landlines proposed by Frontier in the July 6 notification letter. Namely, Nevada Energy's frequent planned power cut-offs in the Carson and Washoe Valley communities.

The fiber-based digital voice system Frontier proposes as an alternative depends on electrical power not only at the home where calls originate but also in the company's facilities. Frontier proposes to give customers whose landlines are terminated battery back-ups which the

ATTACHMENT TO WRITTEN COMPLAINT
FROM JOHN B. ROBERTS II RE: FRONTIER COMMUNICATIONS
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company says last 24 hours under optimal conditions. If a consumer's battery back-up is not fully charged or it has aged it will not provide service for a full 24 hours, and digital voice or VOIP won't work. Google AI reports that the actual battery power duration is not the 24 hours Frontier maintains to be the case, but only 4-8 hours. Nevada Energy's outages in our area to date have exceeded both the advertised battery back-up capacity and its actual capacity as reported by AI.

Moreover, if a wildfire breaks out in or near the Carson Valley Nevada Energy's unplanned cut-off of power can easily extend far beyond even the most optimistic projected battery capacity, thus limiting 911 access precisely during an emergency!

A copper-based landline phone will function during a prolonged power outage. When we lived in the Florida panhandle we had two separate Category 4/5 hurricanes strike our home and community. In both hurricanes, cellphone service went down entirely for days and power was off for a week. But our landline enabled us to call friends and family (happily we didn't need to call 911) and to allow our neighbors to do so as well. Despite Frontier's claims about battery-based backups lasting 24 hours in a power outage, independent studies cite a much shorter life span of 4-8 hours. All the above are reasons to object to the FCC allowing Frontier to terminate its landline services.

Desired Outcome:

Specifically, I would like the Nevada Public Utility Commission will exercise all the powers in its possession to prevent Frontier/Verizon from terminating landline service in Nevada's rural communities like Genoa. The FCC states on its website that if there is no reliable alternative to landlines available in a given geographic area, landline service must be provided. That is the case here, and I hope the PUC will intervene with Frontier/Verison and the FCC to make the case that rural Nevada needs continued landline service for assured access to 911 until such time as consistently reliable alternatives to landlines are developed.



**1919 McKinney Avenue
Dallas, TX 75201**

July 6, 2026

L1-*****AUTO**ALL FOR AADC 894 T440 P1 PAL 11 87487

John Roberts



Genoa, NV



Telephone Number:

Important Update About Your Home Phone Service

Dear John Roberts,

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

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,

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>).



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

August 24, 2026

By E-mail to:

Kellie Nichols
Senior Compliance Investigator
Division of Consumer Complaint Resolution
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, Nevada 89701-3109

Re: *Roberts v. Frontier Communications* (File No. 55-2636-KN) - Response of Frontier Communications of the Southwest Inc. to Written Complaint

Dear Ms. Nichols:

Our firm represents Frontier Communications of the Southwest Inc. (hereinafter “Frontier Southwest”) in the above-referenced matter. Pursuant to NAC 703.626, Frontier Southwest submits this Response to the written Complaint of John B. Roberts II (the “Complaint”). Frontier responds as follows:

1. The regulated telephone service at the Complainant’s location in Genoa, Nevada, is provided by Frontier Southwest, which is the proper Respondent. The Complaint form names “Frontier Communications/Citizens Telecommunications Company of Nevada.” The Complainant receives telephone service at 208 Kinsey Way, Genoa, Nevada. This location lies within the Gardnerville exchange served by Frontier Southwest.
2. Frontier Southwest is a competitive supplier within the meaning of NRS 704.011, and a Provider of Last Resort (“PLR”) within the meaning of NRS 704.018. For as long as it remains a PLR, Frontier Southwest will continue to satisfy its PLR obligations in the Gardnerville exchange, including furnishing basic network service, notwithstanding the retirement of its copper network facilities and the associated transition of customers to other network facilities.

II. Statement of Facts (NAC 703.626(2)(b))

3. Complainant John B. Roberts II is a residential customer of Frontier Southwest at [REDACTED] ([REDACTED]), Genoa, Nevada, telephone [REDACTED]. (Complaint at 1; July 6, 2026 Letter at 1; Worksheet at 1.)
4. On July 6, 2026, Frontier mailed a letter to legacy voice customers in Nevada, including Mr. Roberts, advising that, subject to Federal Communications Commission (“FCC”) approval, it plans to discontinue copper-based dial tone telephone service in the affected areas on or after November 16, 2026. (July 6, 2026 Letter at 1.) The letter states that customers “don’t need to take action right now,” that there is “no change or interruption to your service today,” and that each affected customer “will receive advance notice by letter with your specific disconnection date.” (July 6, 2026 Letter at 1.) A copy of the July 6, 2026 Letter, including its section entitled FCC Notice and Attachment A, is attached as **Exhibit 1** hereto.
5. The July 6, 2026 Letter is the customer notice the FCC requires in connection with an application under Section 63.71 of the FCC’s rules to discontinue, reduce, or impair service.¹ (47 C.F.R. § 63.71; July 6, 2026 Letter.) The July 6, 2026 Letter, in the section entitled “FCC Notice” explains how a customer may file comments in the FCC proceeding. (July 6, 2026 Letter at 3.)
6. Many customers have already transitioned to fiber or other platforms, over which they can receive voice, broadband, and other services. Frontier Southwest will work with the remaining copper-served customers in its service territory to identify FCC-approved replacement voice options, which include voice service over fiber, fixed wireless voice replacement service that supports legacy telephone equipment, and mobile wireless service, together with other alternatives available in the market. (July 6, 2026 Letter at 1-2 and Attachment A.) Emergency 911 service continues to be supported over these alternatives, and the fiber and fixed wireless replacement equipment includes battery backup using commercially available batteries. (July 6, 2026 Letter, Attachment A.)
7. On July 24, 2026, Mr. Roberts filed the Complaint with the PUCN, objecting to the planned copper retirement and requesting that the Commission act to prevent Frontier from terminating copper landline-base service in rural communities such as Genoa until “consistently reliable alternatives” are developed. (Complaint, Attachment at 1-2.) The Division of Consumer Complaint Resolution transmitted

¹ See Citizens Telecommunications Company of Illinois et al., Section 63.71 Application of Verizon (filed July 7, 2026), FCC Docket 26-170, Attachment A.P.

the Complaint to Frontier Southwest by letter dated July 31, 2026, setting a response deadline of August 24, 2026. (PUCN Letter at 1.)

III. Admissions and Denials of Each Material Allegation (NAC 703.626(2)(b))

8. Frontier Southwest admits that Complainant John B. Roberts II is a residential customer of Frontier Southwest. (July 6, 2026 Letter at 1; Complaint at 1 (Account No. 775- [REDACTED]-5).)
9. Frontier Southwest admits that on July 6, 2026, it sent letters to customers in Nevada, including Mr. Roberts, informing them that, subject to FCC approval, it plans to discontinue copper-based dial tone phone service to certain locations in the state. A copy of the July 6, 2026 letter is attached as Exhibit 1. (July 6, 2026 Letter at 1.)
10. Frontier Southwest denies that Mr. Roberts's copper-based dial tone phone service will be automatically discontinued on November 16, 2026. (July 6, 2026 Letter at 1.) It will not be. The July 6, 2026 Letter states that customers whose services will be discontinued will receive advance notice by letter with a specific disconnection date.
11. Frontier Southwest objects to the allegation that Verizon Wireless has "inadequate cell tower coverage" in Genoa as vague and ambiguous, and on that basis denies the same. (Complaint, Attachment at 1.)
12. Frontier Southwest does not have information sufficient to admit or deny the informal survey results referenced in the Complaint and denies the allegations regarding the survey results on that basis. Frontier Southwest further denies that such a survey can constitute credible evidence of the alleged lack of wireless coverage. (Complaint, Attachment at 1.)
12. Frontier Southwest states that Verizon Wireless did not receive any complaints regarding service degradation within the historic downtown area of Genoa during the two days of the town's 2025 "Candy Dance," and therefore is without sufficient information to state whether customers experienced service issues. Frontier Southwest therefore denies the allegation. Even if a customer experienced service issues, however, Frontier Southwest denies that any such degradation impacted customers' ability to call 911. (Complaint, Attachment at 1.) Again, Verizon Wireless did not receive any complaints of 911 calls not completing, and even when service speeds may be lower than customers normally experience, this does not mean that customers are unable to complete 911 calls.

13. With respect to the allegation that Internet Service Providers such as Spectrum cannot handle a high-volume of voice traffic, Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other companies, and on that basis denies the same. (Complaint, Attachment at 1.) Moreover, Frontier Southwest's FCC application expressly states that the company is not relying on third-party Internet Service Providers to meet the FCC discontinuance tests.
14. Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning the Reno Gazette Journal article referenced in the Complaint, and, on that basis, denies the allegations. (Complaint, Attachment at 1.)
15. Frontier Southwest lacks sufficient information from the Complaint to determine the cause of the alleged delay of a Verizon Wireless voicemail message described in the Complaint, and therefore denies the same. (Complaint, Attachment at 1.)
16. Frontier Southwest admits that the power sources for copper and alternatives to copper, such as fiber/VoIP and wireless, are different. Frontier Southwest denies that alternatives to copper are unreliable during extended power outages. Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth about the Complainant's allegations concerning independent studies of battery-based backup, and, on that basis, it denies these allegations. (Complaint, Attachment at 1-2.)
17. With respect to the allegation that NV Energy's customers in Genoa and the Carson and Washoe Valleys have experienced planned power shutoffs and unplanned wildfire-related outages, Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning NV Energy service interruptions, and on that basis denies the allegation. (Complaint, Attachment at 2.)

IV. Matters of Law Relied Upon as a Defense (NAC 703.626(2)(b))

- A. **Frontier Southwest's application seeks authorization for a technology transition, not a discontinuance of basic network service, and the merits of that transition are for the FCC.**
18. For as long as it remains a PLR, Frontier Southwest will continue to meet its provider of last resort obligation to furnish basic network service, as defined by Nevada law (NRS 704.006), after the retirement of its copper facilities. Frontier Southwest's FCC application seeks authorization only to transition from its legacy

copper network to more modern network infrastructure; it does not seek to discontinue its provision of basic network service. This is a technology transition in the facilities used to deliver service, not a discontinuance of the offering of basic network service. Because Frontier Southwest will continue to offer basic network service over other facilities, the provisions governing a provider of last resort's discontinuance of basic network service (NRS 704.68885(2)(b); NAC 704.744) are not implicated.

19. The relief Mr. Roberts seeks, an order preventing the planned copper retirement, is raised in the wrong forum. The transition is the subject of an application to the FCC under Section 63.71 of the FCC's rules, and the FCC is the body that determines whether to authorize it. (47 C.F.R. § 63.71; July 6, 2026 Letter.) The FCC will typically authorize a proposed discontinuance unless it determines that customers would be unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity would otherwise be adversely affected. (July 6, 2026 Letter.) The July 6, 2026 Letter told Mr. Roberts how to present these concerns to the FCC, including by filing comments in the FCC proceeding. As of the date of this Response, Mr. Roberts has not filed comments in the FCC proceeding. His objections to whether the FCC should authorize the transition, including his contentions regarding the adequacy of alternatives, are properly raised in that federal proceeding. (FCC WC Docket 26-170, Comments invited on Verizon's section 214 application to discontinue domestic legacy voice service as part of a technology transition, public notice, Public No. DA 26-763, rel Jul 21, 2026; *see also* Footnote 1.)
20. In its recent *Network Modernization Order*, the FCC enacted rules governing the retirement of legacy copper facilities and the transition to modern fiber and wireless infrastructure, clarifying the respective roles of federal and state authorities. (*Network and Services Modernization Order*, Report and Order, WC Docket Nos. 25-208 & 25-209, FCC 26-19 (adopted Mar. 26, 2026, released Mar. 27, 2026), 91 Fed. Reg. 20913 (Apr. 20, 2026)). Specifically, the Order establishes that where state laws or regulations conflict with federal policy—or purport to prevent a carrier from discontinuing copper/legacy services for which the FCC has granted approval—such state action would be subject to federal preemption.

B. Frontier Southwest's service is not deficient and the Complaint's grievances regarding non-Frontier Southwest services are not properly directed at Frontier Southwest.

21. Separate and apart from the FCC transition question, the Complaint's service-quality allegations do not establish any deficiency in the telephone service Frontier Southwest provides or in the replacement service it will make available. Further, Frontier Southwest will not discontinue a customer's existing copper voice service until it has verified that an FCC-approved replacement voice service is available at that customer's location, and it will work directly with the customer to complete the transition. (July 6, 2026 Letter at 1-2 and Attachment A.) If a fixed wireless replacement service from Verizon is available, a technician will be available to install and test the device and to confirm the adequacy of the signal at his location before service over copper is discontinued.
23. Many of the Complaint's grievances concern services that Frontier Southwest does not provide. The Complaint's allegations about the reliability of the Complainant's Internet service (provided by Spectrum) and about the coverage and performance of mobile wireless service are directed at services furnished by other providers (potentially including Verizon Wireless), not at the regulated landline telephone service furnished by Frontier Southwest. (Complaint, Attachment at 1-2.)
24. Frontier Southwest's copper retirement is part of a managed transition intended to replace aging copper facilities with modern fiber and wireless alternatives that are more capable, resilient, and secure, and emergency 911 functionality is supported on those alternatives. (July 6, 2026 Letter, Attachment A.)
25. For informational purposes, Frontier Southwest on information and belief states that wireless service of its affiliate Verizon Wireless in the Genoa area is not deficient. Further, efforts to further enhance coverage have been constrained by factors outside Verizon Wireless's control, including community opposition to additional wireless installations.

V. Conclusion and Requested Relief

26. Frontier Southwest has admitted or denied each material allegation of the Complaint and has set forth the facts and matters of law relied upon as a defense, as required by NAC 703.626(2)(b). The Complaint does not establish that Frontier Southwest's regulated telephone service is inadequate. The Complainant's objections to the planned technology transition from copper facilities have been properly addressed by the FCC, which granted Frontier

Southwest's Application on August 21, 2026. Frontier Southwest respectfully requests that the Division find no basis to proceed, decline to transmit the Complaint to the Commission, and dismiss the Complaint without further proceedings. Frontier Southwest will continue to work directly with Mr. Roberts to ensure continuity of service.

27. In compliance with NAC 703.626(3)(b), the full name, address, and telephone number of the appropriate contact within Frontier Southwest, is as follows:

Carey Gagnon
Associate General Counsel
5055 North Point Parkway
Alpharetta, GA 30022
303.913.9843

Sincerely yours,

/s/ Patrick M. Rosvall
Patrick M. Rosvall
BRB Law LLP
patrick@brblawgroup.com

*Counsel for Frontier Communications of the
Southwest Inc.*

cc: Donald Lomoljo, Staff Counsel

Enclosure: Exhibit 1 (Letter from Frontier to John Roberts, July 6, 2026, with section entitled FCC Notice and Attachment A)

Exhibit 1



**1919 McKinney Avenue
Dallas, TX 75201**

July 6, 2026

L1-*****AUTO**ALL FOR AADC 894 T440 P1 PAL 11 87487

John Roberts



Genoa, NV



Telephone Number:

Important Update About Your Home Phone Service

Dear John Roberts,

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

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,

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>).



JOE LOMBARDO
Governor

STATE OF NEVADA
PUBLIC UTILITIES COMMISSION

HAYLEY WILLIAMSON
Chair

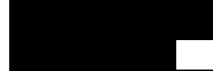
TAMMY CORDOVA
Commissioner

RANDY J. BROWN
Commissioner

STEPHANIE MULLEN
Executive Director

September 1, 2026

John B. Roberts II



Genoa, NV

Email: 

Re: Roberts vs. Frontier Communications

File: 55-2636-KN

Dear Mr. Roberts,

This letter is in response to your written complaint to the Public Utilities Commission of Nevada ("PUCN" or "Commission") received on July 28, 2026, against Frontier Communications ("Frontier"). In your complaint, you stated that Frontier has notified landline customers in Genoa that it plans to terminate landline telephone service on November 16, 2026. Thank you for taking the time to contact us and express your concerns.

The Commission's Consumer Complaint Resolution Division ("Division") conducted an investigation and forwarded a copy of your complaint to Frontier for additional information. Please see the attached response from Frontier received on August 24, 2026. (Attachment 1.) The Division performed a thorough review of the documentation you and Frontier provided.

Based on the analysis below, the Division recommends your complaint be closed. Frontier states that it will continue to service its legacy customers through alternatives to copper wire, including continuing to provide access to emergency 911 service.

Summary of Requested Relief

In your formal complaint you raise the following concerns:

- The lack of reliability in Rural areas, such as Genoa, especially when needing reliable service for calling 911. You state that Verizon has inadequate cell tower coverage in

Genoa, during high volume traffic either at Lake Tahoe or in the Carson Valley. One example of high-volume traffic you provide is the annual Genoa Candy Dance held at the end of September.

- Internet Service Providers, such as Spectrum, cannot handle high traffic volume either, which again makes cellphones useless for 911 calls.
- NV Energy plans frequent outages, also known as, Public Safety Outage Management (“PSOM”) where certain environmental conditions are met. This helps prevent power lines and other equipment from causing a wildfire. During these PSOM events, Genoa may be without power for hours or days until the environmental conditions have changed.
- The implementation and reliability of battery back-up for fiber-based systems. A copper-based landline phone will function during a prolonged outage.
- You request that the PUCN prevent Frontier from terminating landline service in Nevada’s rural communities like Genoa.

Summary of Frontier’s Response

Frontier states in its response that they will work with the remaining copper-served customers to transition to another Federal Communications Committee (“FCC”)-approved replacement voice option, which includes voice service over fiber, fixed wireless voice replacement service that supports legacy telephone equipment and mobile wireless service, together with other alternatives available in the market.

Emergency 911 service continues to be supported over these alternatives.

The fiber and fixed wireless equipment includes battery backup using commercially available batteries.

Frontier states that it is not going to discontinue your service on November 16, 2026. You will receive another notice with a specific disconnection date.

Frontier is the Provider of Last Resort (“POLR”) and will continue to meet its POLR obligation to furnish basic network service, as defined by Nevada Law (Nevada Revised Statute (“NRS”) 704.006), after the retirement of its copper facilities. (See Attachment 2.)¹

Frontier’s application to discontinue existing copper voice was approved by the FCC on August 21, 2026.²

¹ Frontier will remain the POLR unless they file an application with the PUCN requesting to relinquish their duties as a POLR.

² Comments objecting to this application were due on or before August 5, 2026. (Attachment 3, FCC Notice at 2.) Frontier states that no such comments were received from Mr. Roberts as of the date of Frontier’s response. (Attachment 1, Frontier Response at 5.)

If a fixed wireless replacement service from Frontier is available, a technician will be available to install and test the device and to confirm the adequacy of the signal at your location before service over copper wire is discontinued.

Frontier will continue to work with you directly to ensure continuity of service.

Division Analysis and Recommendation

Frontier applied with the FCC to discontinue domestic legacy voice service in certain areas. The Wireline Competition Bureau (WCB”) has accepted Frontier’s Section 214 application to discontinue domestic legacy voice service as part of a technology transition. This application covers eight states and focuses on legacy copper-based voice service. Frontier argues that is wireless fiber replacement service will continue to operate even during power outages, citing the FCC’s Network Modernization Order as evidence of modern alternatives.

I have attached the FCC’s Public Notice. (Attachment 3)

Please note that AT&T is also removing their copper-wire to their landline customers. I have attached Nevada Bell Telephone Company, LLC d/b/a AT&T Nevada’s letter that was sent to its customers on August 17, 2026. (See Attachment 4)

As such, the Division recommends your complaint be closed. The decision was based on applicable rules, regulations, and tariffs, and the facts and circumstances surrounding your complaint.

Concluding Information

If you disagree with the Division’s recommendation and wish to have the full Commission review it, then you must advise me in writing that you wish to have this matter considered by the Commission and state the reasons why you believe the Division’s recommendation should not be sustained. You may submit your request via U.S. Mail, fax, email, or hand delivery.

Once the information is received, the Division shall transmit the complaint, the results of its investigation, and its recommendation to the Commission, and place the matter on the Commission’s Agenda at the earliest date possible in accordance with NRS 703.310.

During the Agenda meeting, you will have an opportunity to speak at the beginning of the Agenda regarding your item and at the end of the Agenda regarding anything jurisdictional to the Commission. Public comments are limited to 3 minutes per speaker. At the Agenda meeting, if the Commission determines that probable cause exists for the complaint, it shall order a hearing, give notice of it, and conduct it as it would any other hearing. If a hearing is ordered, the Division, you,

and Frontier will be treated as separate parties that may appear before the Commission. The Commission may dismiss the complaint if it determines that no probable cause exists or the complaint settles.

I hope the issues you have brought forth have been addressed. Please note, once your complaint goes to the Commission all documentation in the complaint file becomes part of the public record and is subject to disclosure. Your comments and concerns will remain on file with the Division for three years.

Attachment(s): Attachment 1 Frontier Response

Attachment 2 NRS 704.006

Attachment 3 FCC Notice

Attachment 4 AT&T Letter

Sincerely,

/s/ Kellie Nichols

Kellie Nichols

Senior Compliance Investigator

CC: Frontier Communications



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

August 24, 2026

By E-mail to:

Kellie Nichols
Senior Compliance Investigator
Division of Consumer Complaint Resolution
Public Utilities Commission of Nevada
1150 E. William Street
Carson City, Nevada 89701-3109

Re: *Roberts v. Frontier Communications* (File No. 55-2636-KN) - Response of Frontier Communications of the Southwest Inc. to Written Complaint

Dear Ms. Nichols:

Our firm represents Frontier Communications of the Southwest Inc. (hereinafter "Frontier Southwest") in the above-referenced matter. Pursuant to NAC 703.626, Frontier Southwest submits this Response to the written Complaint of John B. Roberts II (the "Complaint"). Frontier responds as follows:

1. The regulated telephone service at the Complainant's location in Genoa, Nevada, is provided by Frontier Southwest, which is the proper Respondent. The Complaint form names "Frontier Communications/Citizens Telecommunications Company of Nevada." The Complainant receives telephone service at 208 Kinsey Way, Genoa, Nevada. This location lies within the Gardnerville exchange served by Frontier Southwest.
2. Frontier Southwest is a competitive supplier within the meaning of NRS 704.011, and a Provider of Last Resort ("PLR") within the meaning of NRS 704.018. For as long as it remains a PLR, Frontier Southwest will continue to satisfy its PLR obligations in the Gardnerville exchange, including furnishing basic network service, notwithstanding the retirement of its copper network facilities and the associated transition of customers to other network facilities.

II. Statement of Facts (NAC 703.626(2)(b))

3. Complainant John B. Roberts II is a residential customer of Frontier Southwest at [REDACTED], Genoa, Nevada, telephone [REDACTED]. (Complaint at 1; July 6, 2026 Letter at 1; Worksheet at 1.)
4. On July 6, 2026, Frontier mailed a letter to legacy voice customers in Nevada, including Mr. Roberts, advising that, subject to Federal Communications Commission (“FCC”) approval, it plans to discontinue copper-based dial tone telephone service in the affected areas on or after November 16, 2026. (July 6, 2026 Letter at 1.) The letter states that customers “don’t need to take action right now,” that there is “no change or interruption to your service today,” and that each affected customer “will receive advance notice by letter with your specific disconnection date.” (July 6, 2026 Letter at 1.) A copy of the July 6, 2026 Letter, including its section entitled FCC Notice and Attachment A, is attached as **Exhibit 1** hereto.
5. The July 6, 2026 Letter is the customer notice the FCC requires in connection with an application under Section 63.71 of the FCC’s rules to discontinue, reduce, or impair service.¹ (47 C.F.R. § 63.71; July 6, 2026 Letter.) The July 6, 2026 Letter, in the section entitled “FCC Notice” explains how a customer may file comments in the FCC proceeding. (July 6, 2026 Letter at 3.)
6. Many customers have already transitioned to fiber or other platforms, over which they can receive voice, broadband, and other services. Frontier Southwest will work with the remaining copper-served customers in its service territory to identify FCC-approved replacement voice options, which include voice service over fiber, fixed wireless voice replacement service that supports legacy telephone equipment, and mobile wireless service, together with other alternatives available in the market. (July 6, 2026 Letter at 1-2 and Attachment A.) Emergency 911 service continues to be supported over these alternatives, and the fiber and fixed wireless replacement equipment includes battery backup using commercially available batteries. (July 6, 2026 Letter, Attachment A.)
7. On July 24, 2026, Mr. Roberts filed the Complaint with the PUCN, objecting to the planned copper retirement and requesting that the Commission act to prevent Frontier from terminating copper landline-base service in rural communities such as Genoa until “consistently reliable alternatives” are developed. (Complaint, Attachment at 1-2.) The Division of Consumer Complaint Resolution transmitted

¹ See Citizens Telecommunications Company of Illinois et al., Section 63.71 Application of Verizon (filed July 7, 2026), FCC Docket 26-170, Attachment A.P.

the Complaint to Frontier Southwest by letter dated July 31, 2026, setting a response deadline of August 24, 2026. (PUCN Letter at 1.)

III. Admissions and Denials of Each Material Allegation (NAC 703.626(2)(b))

8. Frontier Southwest admits that Complainant John B. Roberts II is a residential customer of Frontier Southwest. (July 6, 2026 Letter at 1; Complaint at 1 (Account No. 775- [REDACTED]-5).)
9. Frontier Southwest admits that on July 6, 2026, it sent letters to customers in Nevada, including Mr. Roberts, informing them that, subject to FCC approval, it plans to discontinue copper-based dial tone phone service to certain locations in the state. A copy of the July 6, 2026 letter is attached as Exhibit 1. (July 6, 2026 Letter at 1.)
10. Frontier Southwest denies that Mr. Roberts's copper-based dial tone phone service will be automatically discontinued on November 16, 2026. (July 6, 2026 Letter at 1.) It will not be. The July 6, 2026 Letter states that customers whose services will be discontinued will receive advance notice by letter with a specific disconnection date.
11. Frontier Southwest objects to the allegation that Verizon Wireless has "inadequate cell tower coverage" in Genoa as vague and ambiguous, and on that basis denies the same. (Complaint, Attachment at 1.)
12. Frontier Southwest does not have information sufficient to admit or deny the informal survey results referenced in the Complaint and denies the allegations regarding the survey results on that basis. Frontier Southwest further denies that such a survey can constitute credible evidence of the alleged lack of wireless coverage. (Complaint, Attachment at 1.)
12. Frontier Southwest states that Verizon Wireless did not receive any complaints regarding service degradation within the historic downtown area of Genoa during the two days of the town's 2025 "Candy Dance," and therefore is without sufficient information to state whether customers experienced service issues. Frontier Southwest therefore denies the allegation. Even if a customer experienced service issues, however, Frontier Southwest denies that any such degradation impacted customers' ability to call 911. (Complaint, Attachment at 1.) Again, Verizon Wireless did not receive any complaints of 911 calls not completing, and even when service speeds may be lower than customers normally experience, this does not mean that customers are unable to complete 911 calls.

13. With respect to the allegation that Internet Service Providers such as Spectrum cannot handle a high-volume of voice traffic, Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning other companies, and on that basis denies the same. (Complaint, Attachment at 1.) Moreover, Frontier Southwest's FCC application expressly states that the company is not relying on third-party Internet Service Providers to meet the FCC discontinuance tests.
14. Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning the Reno Gazette Journal article referenced in the Complaint, and, on that basis, denies the allegations. (Complaint, Attachment at 1.)
15. Frontier Southwest lacks sufficient information from the Complaint to determine the cause of the alleged delay of a Verizon Wireless voicemail message described in the Complaint, and therefore denies the same. (Complaint, Attachment at 1.)
16. Frontier Southwest admits that the power sources for copper and alternatives to copper, such as fiber/VoIP and wireless, are different. Frontier Southwest denies that alternatives to copper are unreliable during extended power outages. Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth about the Complainant's allegations concerning independent studies of battery-based backup, and, on that basis, it denies these allegations. (Complaint, Attachment at 1-2.)
17. With respect to the allegation that NV Energy's customers in Genoa and the Carson and Washoe Valleys have experienced planned power shutoffs and unplanned wildfire-related outages, Frontier Southwest states that it lacks knowledge or information sufficient to form a belief as to the truth of the allegations concerning NV Energy service interruptions, and on that basis denies the allegation. (Complaint, Attachment at 2.)

IV. Matters of Law Relied Upon as a Defense (NAC 703.626(2)(b))

- A. **Frontier Southwest's application seeks authorization for a technology transition, not a discontinuance of basic network service, and the merits of that transition are for the FCC.**
18. For as long as it remains a PLR, Frontier Southwest will continue to meet its provider of last resort obligation to furnish basic network service, as defined by Nevada law (NRS 704.006), after the retirement of its copper facilities. Frontier Southwest's FCC application seeks authorization only to transition from its legacy

copper network to more modern network infrastructure; it does not seek to discontinue its provision of basic network service. This is a technology transition in the facilities used to deliver service, not a discontinuance of the offering of basic network service. Because Frontier Southwest will continue to offer basic network service over other facilities, the provisions governing a provider of last resort's discontinuance of basic network service (NRS 704.68885(2)(b); NAC 704.744) are not implicated.

19. The relief Mr. Roberts seeks, an order preventing the planned copper retirement, is raised in the wrong forum. The transition is the subject of an application to the FCC under Section 63.71 of the FCC's rules, and the FCC is the body that determines whether to authorize it. (47 C.F.R. § 63.71; July 6, 2026 Letter.) The FCC will typically authorize a proposed discontinuance unless it determines that customers would be unable to receive service or a reasonable substitute from another carrier, or that the public convenience and necessity would otherwise be adversely affected. (July 6, 2026 Letter.) The July 6, 2026 Letter told Mr. Roberts how to present these concerns to the FCC, including by filing comments in the FCC proceeding. As of the date of this Response, Mr. Roberts has not filed comments in the FCC proceeding. His objections to whether the FCC should authorize the transition, including his contentions regarding the adequacy of alternatives, are properly raised in that federal proceeding. (FCC WC Docket 26-170, Comments invited on Verizon's section 214 application to discontinue domestic legacy voice service as part of a technology transition, public notice, Public No. DA 26-763, rel Jul 21, 2026; *see also* Footnote 1.)
20. In its recent *Network Modernization Order*, the FCC enacted rules governing the retirement of legacy copper facilities and the transition to modern fiber and wireless infrastructure, clarifying the respective roles of federal and state authorities. (*Network and Services Modernization Order*, Report and Order, WC Docket Nos. 25-208 & 25-209, FCC 26-19 (adopted Mar. 26, 2026, released Mar. 27, 2026), 91 Fed. Reg. 20913 (Apr. 20, 2026)). Specifically, the Order establishes that where state laws or regulations conflict with federal policy—or purport to prevent a carrier from discontinuing copper/legacy services for which the FCC has granted approval—such state action would be subject to federal preemption.

B. Frontier Southwest's service is not deficient and the Complaint's grievances regarding non-Frontier Southwest services are not properly directed at Frontier Southwest.

21. Separate and apart from the FCC transition question, the Complaint's service-quality allegations do not establish any deficiency in the telephone service Frontier Southwest provides or in the replacement service it will make available. Further, Frontier Southwest will not discontinue a customer's existing copper voice service until it has verified that an FCC-approved replacement voice service is available at that customer's location, and it will work directly with the customer to complete the transition. (July 6, 2026 Letter at 1-2 and Attachment A.) If a fixed wireless replacement service from Verizon is available, a technician will be available to install and test the device and to confirm the adequacy of the signal at his location before service over copper is discontinued.
23. Many of the Complaint's grievances concern services that Frontier Southwest does not provide. The Complaint's allegations about the reliability of the Complainant's Internet service (provided by Spectrum) and about the coverage and performance of mobile wireless service are directed at services furnished by other providers (potentially including Verizon Wireless), not at the regulated landline telephone service furnished by Frontier Southwest. (Complaint, Attachment at 1-2.)
24. Frontier Southwest's copper retirement is part of a managed transition intended to replace aging copper facilities with modern fiber and wireless alternatives that are more capable, resilient, and secure, and emergency 911 functionality is supported on those alternatives. (July 6, 2026 Letter, Attachment A.)
25. For informational purposes, Frontier Southwest on information and belief states that wireless service of its affiliate Verizon Wireless in the Genoa area is not deficient. Further, efforts to further enhance coverage have been constrained by factors outside Verizon Wireless's control, including community opposition to additional wireless installations.

V. Conclusion and Requested Relief

26. Frontier Southwest has admitted or denied each material allegation of the Complaint and has set forth the facts and matters of law relied upon as a defense, as required by NAC 703.626(2)(b). The Complaint does not establish that Frontier Southwest's regulated telephone service is inadequate. The Complainant's objections to the planned technology transition from copper facilities have been properly addressed by the FCC, which granted Frontier

Southwest's Application on August 21, 2026. Frontier Southwest respectfully requests that the Division find no basis to proceed, decline to transmit the Complaint to the Commission, and dismiss the Complaint without further proceedings. Frontier Southwest will continue to work directly with Mr. Roberts to ensure continuity of service.

27. In compliance with NAC 703.626(3)(b), the full name, address, and telephone number of the appropriate contact within Frontier Southwest, is as follows:

Carey Gagnon
Associate General Counsel
5055 North Point Parkway
Alpharetta, GA 30022
303.913.9843

Sincerely yours,

/s/ Patrick M. Rosvall
Patrick M. Rosvall
BRB Law LLP
patrick@brblawgroup.com

*Counsel for Frontier Communications of the
Southwest Inc.*

cc: Donald Lomoljo, Staff Counsel

Enclosure: Exhibit 1 (Letter from Frontier to John Roberts, July 6, 2026, with section entitled FCC Notice and Attachment A)

Exhibit 1



**1919 McKinney Avenue
Dallas, TX 75201**

July 6, 2026

L1-*****AUTO**ALL FOR AADC 894 T440 P1 PAL 11 87487

John Roberts



Genoa, NV



Telephone Number:

Important Update About Your Home Phone Service

Dear John Roberts,

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.

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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**.

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- **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.

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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

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,

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>).

NRS 704.006 “Basic network service” defined. “Basic network service” means the provision of stand-alone telephone service furnished to a residential customer that:

1. Is not:

- (a) Part of a package of services;
- (b) Sold in a promotion;
- (c) Purchased pursuant to a contract; or
- (d) Otherwise offered at a discounted price; and

2. Provides to the customer:

- (a) Voice-grade access to the public switched telephone network;
- (b) Access to:
 - (1) Telephone relay services;
 - (2) Interexchange service; and
 - (3) Emergency 911 service;
- (c) The first single-line directory listing; and
- (d) Universal lifeline service for those eligible for such service.

(Added to NRS by 2007, 685; A 2013, 1947)



PUBLIC NOTICE

Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

News Media Information 202 / 418-0500
Internet: <http://www.fcc.gov>

DA 26-763
Released: July 21, 2026

COMMENTS INVITED ON VERIZON'S SECTION 214 APPLICATION TO DISCONTINUE DOMESTIC LEGACY VOICE SERVICE AS PART OF A TECHNOLOGY TRANSITION

WC Docket No. 26-170

Comments Due: August 5, 2026

Unless otherwise specified, the following procedures and dates apply to the application(s) (the Section 214 Discontinuance Application(s)) listed in the Appendix.

The Wireline Competition Bureau (Bureau), upon initial review, has found the Section 214 Discontinuance Application(s) listed herein to be acceptable for filing and subject to the procedures set forth in Section 63.71 of the Commission's rules.¹ The application(s) request authority, under section 214 of the Communications Act of 1934, as amended,² and section 63.71 of the Commission's rules,³ to discontinue, reduce, or impair certain domestic telecommunications service(s) (Affected Service(s)) in specified geographic areas (Service Area(s)) as applicable and as fully described in each application.

In accordance with section 63.71(f) of the Commission's rules, the Section 214 Discontinuance Application(s) listed in the Appendix will be deemed granted automatically on **August 21, 2026**, the 31st day after the release date of this public notice, unless the Commission notifies any applicant(s) that their grant will not be automatically effective.⁴ We note that the date on which an application for Commission authorization is deemed granted may be different from the date on which applicants are authorized to discontinue service ("Authorized Date"). Any applicant whose application has been deemed granted may

¹ 47 CFR § 63.71.

² 47 U.S.C. § 214.

³ 47 CFR § 63.71.

⁴ See 47 CFR § 63.71(f)(1) (stating, in relevant part, that an application filed by a non-dominant carrier "shall be automatically granted on the 31st day... unless the Commission has notified the applicant that the grant will not be automatically effective"); see also 47 CFR § 63.71(f)(2)(i) (stating that "[a]n application to discontinue, reduce, or impair an existing retail service as part of a technology transition, as defined in § 63.60(i), may be automatically granted... if: The applicant provides affected customers with the notice required under paragraph (a)(6) of this section, and the application contains the showing or certification described in § 63.602(b)"); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Order, DA 25-248, para. 6 (WCB Mar. 20, 2025) (waiving the Adequate Replacement Test's "single replacement service" requirement for a period of two years when a carrier seeks to discontinue a legacy voice service pursuant to section 214(a), thereby allowing carriers to satisfy all three prongs of the Adequate Replacement Test with a bundled service); *Technology Transitions*, GN Docket No. 13-5, Order on Clarification, DA 25-250, para. 6 (WCB Mar. 20, 2025) (clarifying the applicability of the testing methodology and parameters required for meeting the streamlining criteria when a carrier submits a technology transition discontinuance application relying on the "totality of the circumstances" under the Adequate Replacement Test)).

discontinue their Affected Service(s) in their Service Area(s) on or after the authorized discontinuance date(s) specified in the Appendix, in accordance with their filed representations. Accordingly, pursuant to section 63.71(f), and the terms outlined in each application, absent further Commission action, each applicant may discontinue the Affected Service(s) in the Service Area(s) described in their application on or after the authorized discontinuance date(s) listed in the Appendix for that application. For purposes of computation of time when filing a petition for reconsideration, application for review, or petition for judicial review of the Commission's decision(s), the date of "public notice" shall be the later of the auto grant date stated above in this Public Notice, or the release date(s) of any further public notice(s) or order(s) announcing final Commission action, as applicable. Should no petitions for reconsideration, applications for review, or petitions for judicial review be timely filed, the proceeding(s) listed in this Public Notice shall be terminated, and the docket(s) will be closed.

Comments objecting to the application listed in the Appendix must be filed with the Commission on or before **August 5, 2026**. Comments should refer to the specific WC Docket No. and Comp. Pol. File No. listed in the Appendix for the Section 214 Discontinuance Application. Comments should include specific information about the impact of the proposed discontinuance on the commenter, including any inability to acquire reasonable substitute service. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). *Electronic Filers:* Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs>. Filers should follow the instructions provided on the Web site for submitting comments. Generally, only one copy of an electronic submission must be filed. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number.

Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. **All filings must be addressed to the Secretary, Federal Communications Commission.** Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building. Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701. Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

This proceeding shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.⁵ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of

⁵ 47 CFR § 1.1200 *et seq.*

electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530.

For further information, please see the contact(s) for the specific discontinuance proceeding you are interested in as listed in the Appendix. For further information on procedures regarding section 214 please visit <https://www.fcc.gov/general/domestic-section-214-discontinuance-service>.

- FCC -

Appendix

- 1) **Applicant(s):** 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 (Verizon)
- WC Docket No. 26-170, Comp. Pol. File No. 2159**
- Link -** [https://www.fcc.gov/ecfs/search/search-filings/results?q=\(proceedings.name:\(%2226-170%22\)\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2226-170%22)))
- Affected Service(s)** - residential and business legacy TDM-based voice service
- Service Area(s)** - throughout the former Frontier telephone service areas in Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin, as specified in the application
- Authorized Date(s)** - on or after November 16, 2026
- Contact(s)** - Kimberly Jackson, (202) 418-7393 (voice), Kimberly.Jackson@fcc.gov, of the Competition Policy Division, Wireline Competition Bureau
- Note:** Counsel for Verizon has confirmed that the proposed discontinuance date is November 16, 2026 as stated in the customer notice and that Frontier Communications of Michigan, Inc. is not an applicant as inadvertently stated in the customer notice.



Phone number ending in: <<XXXX>>

«FIRST NAME» «LAST NAME»
«STREET ADDRESS»
«CITY», «STATE» «ZIP»

Important Update About Your AT&T Home Phone Service

August 17, 2026

Hi <First Name>, or Hi there, (if no first name available)

At AT&T, we are always working to bring you the best connectivity in the industry. That's why we're upgrading home phone service in your area to a new, enhanced solution that's more reliable and affordable.

Upgrading your home phone service:

Our customers are asking for faster and more reliable service, so we're upgrading our network to give you connectivity you can count on for everyday needs. AT&T's aging copper network doesn't deliver the same level of service, quality and reliability as newer technology. Now, we have more ways to connect than ever before with newer, faster technology that is more reliable, energy efficient, and affordable. As we upgrade our network across the country, we're doing the same in your area and delivering better technology for our customers.

As part of this transition, the home phone service¹ you're currently using will be discontinued on or after September 1, 2027. We know how important it is to keep your phone number and stay connected, and we're here to make this transition as easy as possible for you.

We want to work with you to upgrade your home phone service to **AT&T Phone – Advanced**, which is designed to better support your essential needs and help keep your calling experience seamless. Visit www.att.com/home-phone/phone-advanced to learn more. Key benefits include:

- Keep your current home number
- Works with most existing home phones
- Comparable or in some cases less expensive than traditional home phone service
- Unlimited nationwide calling at no extra cost
- 911 location detection for added peace of mind
- Better reliability during power outages with 24-hour battery back up
- AT&T Call Protect, a service that helps block unwanted calls, including spam and fraud

Here's what you can expect over the next year:

- We'll send additional information over the coming months regarding this transition and how you can upgrade to AT&T Phone – Advanced or AT&T Wireless.
- You will continue to be able to make phone calls using your existing service until on or after **September 1, 2027**, when we will stop providing service, pending FCC approval.

What are my next steps?

We're ready to help you upgrade your AT&T service at any time before **September 1, 2027**, so you continue to have access to home phone service and 911. Please call **800.288.2020 Monday through Friday, 8:00 AM – 8:00 PM CT, and Saturday, 9:00 AM – 7:00 PM CT** to understand your options for phone service from AT&T – often for less than you pay today.

Thank you for being a loyal AT&T customer. We look forward to continuing to serve you and providing a better and more reliable experience for your home phone service.



Your AT&T Team

AT&T
1 AT&T Way
Bedminster, NJ 07921-2693
www.att.com

¹ In the areas impacted by this notice, AT&T Residential Local Service is provided by BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee; Indiana Bell Telephone Company, LLC, d/b/a AT&T Indiana; Michigan Bell Telephone Company, LLC, d/b/a AT&T Michigan; Nevada Bell Telephone Company, LLC, d/b/a AT&T Nevada; The Ohio Bell Telephone Company, LLC, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, LLC, d/b/a AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, LLC, d/b/a AT&T Wisconsin. A full list of AT&T wire centers affected by this notice is attached.

We're required by the FCC to provide the following statement:

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 section 63.71 application of BellSouth Telecommunications, LLC, d/b/a AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, and AT&T Tennessee; Indiana Bell Telephone Company, LLC, d/b/a AT&T Indiana; Michigan Bell Telephone Company, LLC, d/b/a AT&T Michigan; Nevada Bell Telephone Company, LLC, d/b/a AT&T Nevada; The Ohio Bell Telephone Company, LLC, d/b/a AT&T Ohio; Southwestern Bell Telephone Company, LLC, d/b/a AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma, and AT&T Texas; and Wisconsin Bell, LLC, d/b/a AT&T Wisconsin. 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.

From: [John Elizabeth ROBERTS](#)
To: [Kellie Nichols](#)
Subject: Re: Roberts vs. Frontier Communications 55-2636-KN Response
Date: Saturday, September 5, 2026 1:04:07 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Ms. Nichols:

Frontier's response to the concerns I raised is risible.

There are many inaccuracies in Mr. Rosvall's response, so many that I will confine my rebuttal to some of the most egregious.

Counter to Mr. Rosvall's claim, I did in fact submit comments to the FCC during the public comment period. In addition to the specific concerns I raised about the inadequacy of Frontier/Verizon's proposed replacement of copper-based landlines owing to factors unique to Genoa, I also raised important national security concerns regarding the FCC's policy. My comments are a matter of public record, as is my column in the Aug. 11 edition of The Washington Examiner's Beltway Confidential section, "To Protect National Security, Trump Should Ensure the FCC Retains Landlines." If requested I will be happy to provide the Public Utilities Commission with documentation.

Mr. Rosvall denies that Verizon provides poor coverage in Genoa, when in fact it is a matter of public record that the company sought to position a cell tower in the town limits to improve its spotty and sporadic coverage. Because the proposed design did not meet the Town of Genoa's historic district standards, no cell tower has yet been erected. I assume Mr. Rosvall could easily have gotten this information from Frontier's parent corporation, Verizon, had he inquired.

Similarly, these matters of public record ought to be available to the Public Utilities Commission. This is especially so in the case of Nevada Energy's frequent planned outages, most recently during the Hawk fire. Because Frontier/Verizon's proffered replacement for copper-based landlines is a fiber-based system reliant on external energy sources, extended planned or unplanned outages will have a direct effect on service.

In response to my inquiries, Frontier's Executive Office informed me that the fiber phones they will install will have a Power Tec Solutions PSL Li-36 Micro BSU battery pack back-up to provide power during outages. These battery packs provide at most 24 hours of back-up power. Last year Nevada Energy had outages lasting more than 24 hours. Basic service would be disrupted during such outages.

Replacement batteries for the packs are expensive. They will cost almost three hundred dollars for a pack lasting 24 hours. Moreover, the lithium batteries in these packs are exclusively available from China. Given rising international tensions, it is highly conceivable that China could cut off supplies at

any time. As existing battery packs reached the end of their product life, basic service would be cut off to any households solely reliant on the fiber-based phones.

Mr. Rosvall contends that the FCC policy's preemption clause limits the State of Nevada's ability to make exceptions to the Federal policy of decommissioning copper landlines. If the Public Utilities Commission concurs that decommissioning copper landlines poses a threat to the health and safety of Nevadans, this question of State versus Federal powers could be determined in court.

Finally, Mr. Rosvall notes that there is an absence of complaints regarding cellphone and Internet service during the Candy Dance. I submit that this is due to the Town's pride in this annual event, as well as the fact that it is a main source of revenue for our local government, and because many of us in Genoa have copper-based landlines which function during the event.

Please do submit my comments in rebuttal and my request that this be made an agenda item. At a minimum, I believe our Commissioners should be on the record with regard to this important public policy matter.

Very best regards,

John B. Roberts II

From: Kellie Nichols <kdnichols@puc.nv.gov>

Sent: Tuesday, September 1, 2026 5:04 PM

To: [REDACTED] <[REDACTED]>

Subject: Roberts vs. Frontier Communications 55-2636-KN Response

Is attached.



Kellie Nichols
Senior Compliance Investigator

Public Utilities Commission of Nevada
1150 E. William Street, Carson City, NV 89701-3109
P: 775-684-6117 **F:** 775-684-6164
puc.nv.gov | kdnichols@puc.nv.gov



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From: John Elizabeth ROBERTS
To: Kellie Nichols
Subject: Roberts V. Frontier Addendum
Date: Wednesday, September 9, 2026 5:18:07 PM

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

From: John Elizabeth ROBERTS
Sent: Wednesday, September 9, 2026 6:15 PM
To: Kdnichols@puc.nv.gov
Subject: Roberts V. Frontier Addendum

Dear Ms. Nichols:

In view of Mr. Rosvall's questioning of Nevada Energy's planned outages, please include this email in my complaint. I received it today. As can be noted, the planned outage is for 24 hours and NV Energy warns this could be longer or shorter.

Twenty-four hours is the maximum lifespan of the Power Tec Solutions Li-36 battery pack Frontier says it will provide along with its fiber-based phone as a replacment for copper-wire landline service. Consumers may purchase additional batteries for the power pack, but that is a substantial expense.

If this planned outage lasts 24 hours or more and were to happen concurrently with a Verizon interruption in cell service in Genoa, the only consumers who would be left with working phone communications would be Starlink customers. Otherwise there would be no way to contact 911 in an emergency or to report a wildfire.

Tomorrow I will forward additional evidence regarding my assertions about the inadequacy of Frontier/Verizon's proposed replacement for copper-wire landlines in Genoa. I will also include a link to my column on this issue.

As a bit of background about me, I was formerly Associate Director of the White House Office of Planning and Evaluation and my experience includes domestic and foreign policy.

I hope you had an enjoyable Labor Day weekend.

Best regards,
John B. Roberts II

From: NVEnergy <donotreply@alerts.nvenergy.com>

Sent: Wednesday, September 9, 2026 4:08 PM

To: [REDACTED] <[REDACTED]>

Subject: Public Safety Power Outage Possible in your Area



Important: Public Safety Power Outage Possible in your Area

September 9, 2026

Dear NV Energy Customer,

A Public Safety Outage Management (PSOM) WATCH is in effect due to current fire weather forecasts. This means NV Energy may proactively shut off power to prevent equipment from causing wildfires under extreme risk conditions. Safety is NV Energy's highest priority, and PSOM is a key measure to protect the community and environment.

A PSOM WATCH means a power shut off is possible. We will continue to monitor conditions and provide updates as conditions change.

- **Impacted Premise:** [REDACTED], GENOA, NV [REDACTED]
- PSOM Start Time: **Saturday, September 12** at approximately **11:00 a.m.**
- PSOM End Time: **Sunday, September 13** at approximately **11:00 a.m.**

This outage duration is estimated based on current weather and work conditions. These times may change, be prepared.

Here is what you need to know:

- Assess your needs and prepare an emergency plan in case we need to turn off power for public safety.
- Learn how to prepare for a PSOM outage on our website [Outage Preparation Tips | NV Energy](#)
- The PSOM WATCH may be canceled if weather conditions change.
- If there is an outage, we will work to restore service as soon as it is safe to do so.
- If you see a downed power line, assume it is energized and extremely dangerous and report it immediately by calling 911.

For more information, including outage preparedness tips and PSOM criteria, please visit nvenergy.com/psom or call 775-834-4444.

Thank you,

The NV Energy Team

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This email was sent to twoauthors@msn.com [<%asm_group_unsubscribe_raw_url%>]

NRS 704.006 “Basic network service” defined. “Basic network service” means the provision of stand-alone telephone service furnished to a residential customer that:

1. Is not:

- (a) Part of a package of services;
- (b) Sold in a promotion;
- (c) Purchased pursuant to a contract; or
- (d) Otherwise offered at a discounted price; and

2. Provides to the customer:

- (a) Voice-grade access to the public switched telephone network;
- (b) Access to:
 - (1) Telephone relay services;
 - (2) Interexchange service; and
 - (3) Emergency 911 service;
- (c) The first single-line directory listing; and
- (d) Universal lifeline service for those eligible for such service.

(Added to NRS by 2007, 685; A 2013, 1947)

Washington Examiner

Washington Examiner

BELTWAY CONFIDENTIAL

To protect national security, Trump should ensure the FCC retains landlines

By John Roberts

Published August 11, 2026 6:00am ET

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Iran launches cyberattacks against the U.S. and successfully impacts water supplies in 12 states. China sends Iran 400 shoulder-fired rocket launchers to down U.S. airplanes. Russian diplomats threaten Europe that support for Ukraine is an act of war. Moscow greenlights

Russian jets invading European airspace, and its navy fires live artillery in the English Channel. Underwater cables are severed by Russia's trawler fleet while its GRU agents coordinate violent, including lethal, sabotage campaigns across the continent.

Last week the CIA cautioned, as had been predicted, that President Vladimir Putin may challenge NATO by staging attacks in the Baltics or Poland. Putin calculates he can undermine NATO's credibility by taking action, which would bring the alliance to the brink of invoking Article 5, the mutual defense provision that means an attack on one member state is an attack on all. He's counting on NATO's nervous nellies refusing to honor Article 5 if his target is Eastern Europe and his offensive is limited in scope. Making NATO appear toothless in the face of Russian provocation will splinter its cohesion and simultaneously make Europe's leaders fearful of supplying Ukraine with weapons.

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Also last week, an explosives-laden drone thought to be Russian unsuccessfully attacked a German airport. Across the globe, China prepares to invade Taiwan by conducting military drills and cutting underwater cables the island relies on for commerce and communications. Taiwan will hold its own defense exercises this week, including a novel component of intentionally disrupting its own internet access. Cutting internet service through cyberattacks or destroying infrastructure is a feature of modern war. Taiwan wants its populace to start finding other ways of keeping in

contact with one another when cellphones, texts, emails, and social media are cut off.



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Will that really happen? Are we close to a major war?

I don't know, but we need to act as if we might be.

The U.S. could benefit from Taiwan's realization that defense requires a whole-of-society approach and not just military preparedness. With the sole exception of the Cuban Missile Crisis, the world is more volatile now than it has ever been in my lifetime. Despite this sobering reality, the federal government's civilian agencies are making policy as if a third world war is impossible. Case in point: The Federal Communications Commission declared in the spring that America's telecommunications companies should terminate landline telephones. The FCC views this as opening the way for "21st century" phone technology.

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Never mind that VoIP and the fiber-optic-based digital voice service, which the FCC proposes to replace landlines, are actually 20th-century technology. Both rely on internet access and externally supplied power. Phone companies such as Verizon, which recently merged with Frontier, have already notified consumers across the country that their landlines will go dead in November.

This is a grave error.

Copper-based landlines still function when cellphones, internet-based VoIP, or fiber-based digital voice fail. The 19th-century technology is dated but robust. Landlines are critical during natural disasters such as hurricanes,

when cell towers are destroyed and electrical power is lost. I went through two Category 4/5 hurricanes in Florida that knocked out electrical power and cellphone coverage for days. My landline was the only working link to the outside world.

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In a war with China and Russia, landlines would be essential. As the conflicts in Ukraine and Iran reveal, it takes more than military might to win a major war. It also takes a functioning economy and civil society. Cellphone service is particularly vulnerable to cyberattack. So is America's energy grid. If these two are attacked simultaneously, society would grind to a virtual (no pun intended) halt. America needs reliable landlines now more than ever as a backup system in the event of war.

Guess how the FCC proposes we power our fiber-based phones when the electrical service gets cut? Back-up lithium batteries made exclusively in China that last at most 24 hours before requiring recharging!

Starlink has given Ukraine a communications lifeline, but satellite-based systems, including GPS, would absolutely also be targets in a global conflict. China has openly admitted it is fielding a satellite fleet designed to cripple Starlink and U.S. space-based communications in a war. The Pentagon is preparing for that threat. Civilians must do the same.

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Fifty-five million Americans still have landlines. In a crisis, the service can be easily expanded to more businesses and households. In contrast, internet-based communications are extremely vulnerable to cyberattack and sabotage. Yet despite well-documented business

and personal safety risks, the ostriches leading the FCC still want to strip America of its most resilient telecommunications.



This FCC folly needs to be stopped immediately, before irreparable damage is done to America's national security through overreliance on vulnerable telecommunications. In an ideal world, the FCC would reverse itself and rescind the policy.

STEVE HILTON TARGETS FCC'S CALIFORNIA LANDLINE PLAN IN RARE ALLIANCE WITH DEMOCRATS

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But as we learned during the COVID crisis, even in the face of countervailing evidence that their policies are misguided, federal bureaucrats are reluctant to acknowledge error and change course. Congress is too fractious and focused on the midterm elections to take action in time. It falls to the White House and our **national security** agencies to compel the FCC to abide by its core statutory mandate of preserving life-safety communications infrastructure in the case of a national crisis.

President Donald Trump, please pick up that telephone and order the FCC to keep landlines!

John B. Roberts II served in the Reagan White House and was an international political strategist and executive producer of The McLaughlin Group. He is an author and artist.

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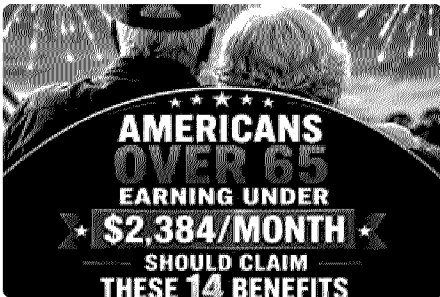
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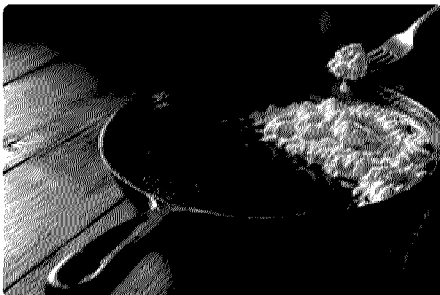
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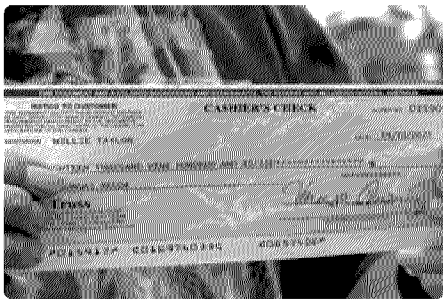
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DA 26-763
Released: July 21, 2026

COMMENTS INVITED ON VERIZON'S SECTION 214 APPLICATION TO DISCONTINUE DOMESTIC LEGACY VOICE SERVICE AS PART OF A TECHNOLOGY TRANSITION

WC Docket No. 26-170

Comments Due: August 5, 2026

Unless otherwise specified, the following procedures and dates apply to the application(s) (the Section 214 Discontinuance Application(s)) listed in the Appendix.

The Wireline Competition Bureau (Bureau), upon initial review, has found the Section 214 Discontinuance Application(s) listed herein to be acceptable for filing and subject to the procedures set forth in Section 63.71 of the Commission's rules.¹ The application(s) request authority, under section 214 of the Communications Act of 1934, as amended,² and section 63.71 of the Commission's rules,³ to discontinue, reduce, or impair certain domestic telecommunications service(s) (Affected Service(s)) in specified geographic areas (Service Area(s)) as applicable and as fully described in each application.

In accordance with section 63.71(f) of the Commission's rules, the Section 214 Discontinuance Application(s) listed in the Appendix will be deemed granted automatically on **August 21, 2026**, the 31st day after the release date of this public notice, unless the Commission notifies any applicant(s) that their grant will not be automatically effective.⁴ We note that the date on which an application for Commission authorization is deemed granted may be different from the date on which applicants are authorized to discontinue service ("Authorized Date"). Any applicant whose application has been deemed granted may

¹ 47 CFR § 63.71.

² 47 U.S.C. § 214.

³ 47 CFR § 63.71.

⁴ See 47 CFR § 63.71(f)(1) (stating, in relevant part, that an application filed by a non-dominant carrier "shall be automatically granted on the 31st day... unless the Commission has notified the applicant that the grant will not be automatically effective"); see also 47 CFR § 63.71(f)(2)(i) (stating that "[a]n application to discontinue, reduce, or impair an existing retail service as part of a technology transition, as defined in § 63.60(i), may be automatically granted... if: The applicant provides affected customers with the notice required under paragraph (a)(6) of this section, and the application contains the showing or certification described in § 63.602(b)"); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Order, DA 25-248, para. 6 (WCB Mar. 20, 2025) (waiving the Adequate Replacement Test's "single replacement service" requirement for a period of two years when a carrier seeks to discontinue a legacy voice service pursuant to section 214(a), thereby allowing carriers to satisfy all three prongs of the Adequate Replacement Test with a bundled service); *Technology Transitions*, GN Docket No. 13-5, Order on Clarification, DA 25-250, para. 6 (WCB Mar. 20, 2025) (clarifying the applicability of the testing methodology and parameters required for meeting the streamlining criteria when a carrier submits a technology transition discontinuance application relying on the "totality of the circumstances" under the Adequate Replacement Test)).

discontinue their Affected Service(s) in their Service Area(s) on or after the authorized discontinuance date(s) specified in the Appendix, in accordance with their filed representations. Accordingly, pursuant to section 63.71(f), and the terms outlined in each application, absent further Commission action, each applicant may discontinue the Affected Service(s) in the Service Area(s) described in their application on or after the authorized discontinuance date(s) listed in the Appendix for that application. For purposes of computation of time when filing a petition for reconsideration, application for review, or petition for judicial review of the Commission's decision(s), the date of "public notice" shall be the later of the auto grant date stated above in this Public Notice, or the release date(s) of any further public notice(s) or order(s) announcing final Commission action, as applicable. Should no petitions for reconsideration, applications for review, or petitions for judicial review be timely filed, the proceeding(s) listed in this Public Notice shall be terminated, and the docket(s) will be closed.

Comments objecting to the application listed in the Appendix must be filed with the Commission on or before **August 5, 2026**. Comments should refer to the specific WC Docket No. and Comp. Pol. File No. listed in the Appendix for the Section 214 Discontinuance Application. Comments should include specific information about the impact of the proposed discontinuance on the commenter, including any inability to acquire reasonable substitute service. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS). *Electronic Filers:* Comments may be filed electronically using the Internet by accessing the ECFS: <https://www.fcc.gov/ecfs>. Filers should follow the instructions provided on the Web site for submitting comments. Generally, only one copy of an electronic submission must be filed. In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket number.

Paper Filers: Parties who choose to file by paper must file an original and one copy of each filing. Filings can be sent by hand or messenger delivery, by commercial courier, or by the U.S. Postal Service. **All filings must be addressed to the Secretary, Federal Communications Commission.** Hand-delivered or messenger-delivered paper filings for the Commission's Secretary are accepted between 8:00 a.m. and 4:00 p.m. by the FCC's mailing contractor at 9050 Junction Drive, Annapolis Junction, MD 20701. All hand deliveries must be held together with rubber bands or fasteners. Any envelopes and boxes must be disposed of before entering the building. Commercial courier deliveries (any deliveries not by the U.S. Postal Service) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701. Filings sent by U.S. Postal Service First-Class Mail, Priority Mail, and Priority Mail Express must be sent to 45 L Street NE, Washington, DC 20554.

This proceeding shall be treated as a "permit-but-disclose" proceeding in accordance with the Commission's *ex parte* rules.⁵ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter's written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of

⁵ 47 CFR § 1.1200 *et seq.*

electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (e.g., .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission's *ex parte* rules.

People with Disabilities: To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer & Governmental Affairs Bureau at 202-418-0530.

For further information, please see the contact(s) for the specific discontinuance proceeding you are interested in as listed in the Appendix. For further information on procedures regarding section 214 please visit <https://www.fcc.gov/general/domestic-section-214-discontinuance-service>.

- FCC -

Appendix

- 1) **Applicant(s):** 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 (Verizon)
- WC Docket No. 26-170, Comp. Pol. File No. 2159**
- Link -** [https://www.fcc.gov/ecfs/search/search-filings/results?q=\(proceedings.name:\(%2226-170%22\)\)](https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2226-170%22)))
- Affected Service(s)** - residential and business legacy TDM-based voice service
- Service Area(s)** - throughout the former Frontier telephone service areas in Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin, as specified in the application
- Authorized Date(s)** - on or after November 16, 2026
- Contact(s)** - Kimberly Jackson, (202) 418-7393 (voice), Kimberly.Jackson@fcc.gov, of the Competition Policy Division, Wireline Competition Bureau
- Note:** Counsel for Verizon has confirmed that the proposed discontinuance date is November 16, 2026 as stated in the customer notice and that Frontier Communications of Michigan, Inc. is not an applicant as inadvertently stated in the customer notice.