

COMMONWEALTH OF PENNSYLVANIA



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November 13, 2024

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Verizon Frontier Merger (FCC and PUC);  
Docket Nos. A-2024-3051925,  
A-2024-3051926, A-2024-3051927,  
A-2024-3051929, A-2024-3051931,  
A-2024-3051932, A-2024-3051933,  
A-2024-3051934, A-2024-3051935,  
A-2024-3051936

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Appearance and Public Statement in the captioned proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Barrett C. Sheridan  
Barrett C. Sheridan, Esq.  
Assistant Consumer Advocate  
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Enclosures

cc: Office of Administrative Law Judge (email only: crainey@pa.gov)  
Paul Diskin, TUS (email only: pdiskin@pa.gov)  
Office of Special Assistants (email only: ra-OSA@pa.gov)  
Certificate of Service

CERTIFICATE OF SERVICE

Joint Application of Frontier	:	
Communications Parent, Inc.,	:	Docket Nos. A-2024-3051925
Commonwealth Telephone Enterprises	:	A-2024-3051926
LLC, Commonwealth Telephone Company	:	A-2024-3051927
LLC d/b/a Frontier Communications	:	A-2024-3051929
Commonwealth Telephone Company,	:	A-2024-3051931
Frontier Communications of Breezewood,	:	A-2024-3051932
LLC, Frontier Communications of Canton,	:	A-2024-3051933
LLC, Frontier Communications of	:	A-2024-3051934
Lakewood, LLC, Frontier Communications	:	A-2024-3051935
of Oswayo River LLC, Frontier	:	A-2024-3051936
Communications of Pennsylvania, LLC,	:	
Citizens Telecommunications Company of	:	
New York, Inc., CTSI, LLC d/b/a Frontier	:	
Communications CTSI, LLC, CTE	:	
Telecom, LLC, d/b/a Frontier	:	
Communications CTE Telecom Company,	:	
Frontier Communications of America, Inc.	:	
And Verizon Communications Inc., France	:	
Merger Sub Inc., For any Approvals	:	
Required Under the Public Utility Code for	:	
a Transfer of Control of Frontier	:	
Communications Parent, Inc. and its	:	
Pennsylvania subsidiaries to Verizon	:	
Communications Inc.”	:	
	:	

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following Office of Consumer Advocate’s Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 13th day of November 2024.

SERVICE BY E-MAIL ONLY

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Consumer Advocate

Barrett C. Sheridan, Esq.  
Assistant Consumer Advocate  
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Dated: November 13, 2024



participate in this proceeding to protect the interests of the consumers of the named utilities. A copy of all correspondence and notices, documents, orders or other communications with respect to the captioned proceeding should be addressed to the undersigned counsel on behalf of the OCA.

Respectfully submitted,

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Dated: November 13, 2024

PUBLIC STATEMENT OF THE  
OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Notice of Intervention and participate in this proceeding before the Commission involving the application of Frontier Communications and Verizon Communications for Commission approval pursuant to Section 1102 of the proposed acquisition by Verizon Communications of Frontier Communications, including Frontier's Pennsylvania certificated incumbent local exchange carriers (ILECs) and competitive carriers.

The Frontier ILECs provide important telephone service and access to 911 in their service territories. Frontier Commonwealth, Frontier Breezewood, Frontier Canton, Frontier Lakewood, Frontier Oswayo River, and Frontier Pennsylvania each have an obligation under Chapter 30 of the Public Utility Code to make broadband service available to their customers. Citizens Telephone of New York provides telephone service and access 911 to a small group of Pennsylvania consumers. The Frontier ILECs provide service in all or parts of Bedford, Berks, Bradford, Bucks, Carbon, Chester, Columbia, Dauphin, Fulton, Lackawanna, Lancaster, Lehigh, Luzerne, Lycoming, McKean, Monroe, Northampton, Potter, Schuylkill, Sullivan, Susquehanna, Tioga, and York counties. The Frontier competitive affiliates are authorized to provide local or long-distance telephone services in the Verizon Pennsylvania and Verizon North service areas, as well as other parts of the Commonwealth.

The two Verizon ILECs, Verizon Pennsylvania and Verizon North, also provide important telephone service and access to 911 to their customers. The Verizon ILECs also have an obligation under Chapter 30 of the Public Utility Code to make broadband service available to their customers. The Verizon ILECs provide local exchange and other services in the majority of Pennsylvania counties. The Verizon ILEC service territories are contiguous to each Frontier ILEC service territory, as shown in Exhibit B to the Application.

The Verizon ILECs and Frontier ILECs each have an obligation to offer telephone service as a “carrier of last resort.” Additionally, the Verizon ILECs and Frontier ILECs each have an obligation to provide adequate, safe, and reliable utility service within their respective service territories. How each ILEC provides that service, including the network technology – whether copper lines or fiber, may vary within each ILEC service area.

The Application, if approved by the Commission, would result in the expansion of Verizon Communications’ footprint to include the Frontier ILEC service territories. The Application suggests that Frontier customers in Pennsylvania will benefit from Verizon Communications’ proposed acquisition.

The Consumer Advocate has determined that it is necessary to participate in this proceeding to protect the interests of the Frontier customers, the Verizon customers, and the public. The Office of Consumer Advocate will investigate the Application, to ensure compliance with applicable statutes, regulations, and Commission orders. The Office of Consumer Advocate will seek to ensure that the proposed public benefits proposed by the Applicants are significant, realizable, and will benefit all Frontier customers, Verizon customers, and the public.