



COMMONWEALTH OF PENNSYLVANIA

November 26, 2024

E-FILED

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

Re: Joint Application of Frontier Communications Parent, Inc., Commonwealth Telephone Enterprises LLC, Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company, Frontier Communications of Breezewood, LLC, Frontier Communications of Canton, LLC, Frontier Communications of Lakewood, LLC, Frontier Communications of Oswayo River LLC, Frontier 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. / 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:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Frontier	:	Docket No. A-2024-3051925
Communications Parent, Inc.,	:	A-2024-3051926
Commonwealth Telephone Enterprises	:	A-2024-3051927
LLC, Commonwealth Telephone	:	A-2024-3051929
Company LLC d/b/a Frontier	:	A-2024-3051931
Communications Commonwealth	:	A-2024-3051932
Telephone Company, Frontier	:	A-2024-3051933
Communications of Breezewood, LLC,	:	A-2024-3051934
Frontier Communications of Canton,	:	A-2024-3051935
LLC, Frontier Communications of	:	A-2024-3051936
Lakewood, LLC, Frontier	:	
Communications of Oswayo River LLC,	:	
Frontier 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.	:	

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the *Joint Application of Frontier Parent, Inc. and its Regulated Subsidiaries and Verizon Communications Inc. for any Approvals Required under the Public Utility Code for a*

Transfer of Control that was filed with the Pennsylvania Public Utility Commission (“Commission”) on October 31, 2024. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.
2. Representing the OSBA in this proceeding is:

Steven Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
sgray@.pa.gov

Respectfully submitted,

/s/ Steven Gray

Steven Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538

For: NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: November 26, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Frontier	:	Docket No. A-2024-3051925
Communications Parent, Inc.,	:	A-2024-3051926
Commonwealth Telephone Enterprises	:	A-2024-3051927
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LLC, Frontier Communications of	:	A-2024-3051936
Lakewood, LLC, Frontier	:	
Communications of Oswayo River LLC,	:	
Frontier 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.	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small

Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention (“NOI”) in the Joint Application of Frontier Parent, Inc. and its Regulated Subsidiaries and Verizon Communications Inc. for any Approvals Required under the Public Utility Code for a Transfer of Control (“Joint Application”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on October 31, 2024.

The Small Business Advocate files this NOI to protect the interests of the small business customers that could be adversely affected by the change of control proposed by the Joint Application.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the Joint Application. The Small Business Advocate will ask the Commission to deny any aspect of the Joint Application that is not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: November 26, 2024

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: November 26, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Frontier	:	Docket No. A-2024-3051925
Communications Parent, Inc.,	:	A-2024-3051926
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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.	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant)

The Honorable Charles E. Rainey
Chief Administrative Law Judge
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Barrett Sheridan, Esquire
Ryan Morden, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101
BSheridan@paoca.org
RMorden@paoca.org

Suzan D. Paiva, Esquire
Verizon
900 Race St., 6th Floor
Philadelphia, PA 19107
Suzan.d.paiva@verizon.com

Nancy J. Victory, Esquire
Michael B. Hazzard, Esquire
DLA Piper LLP (US)
500 Eighth Street NW
Washington, DC 20004
Nancy.Victory@us.dlapiper.com
Mike.Hazzard@us.dlapiper.com

Norman J. Kennard, Esquire
Bryce R. Beard, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8" Floor
Harrisburg, PA 17101
Nkennard@eckertseamans.com
Bbeard@eckertseamans.com

DATE: November 26, 2024

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538