

STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

The Southern New England Telephone :
Company d/b/a Frontier Communications of : Docket No. 20-04-31
Connecticut (SNET) Bankruptcy Proceeding :
and Change of Control :

**MAIN BRIEF
OF
COMMUNICATIONS WORKERS OF AMERICA**

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Dated: November 23, 2020

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1. Summary of Argument

As PURA well knows, 2020 has been a very challenging year for Connecticut, the country, and the entire world. The pandemic has wreaked havoc on life as we know it. If we learn nothing else from this tragedy, there should be no doubt that a high-quality telecommunications network is absolutely essential to public health and safety; the education of our children; and the very economic vitality of the state.

This case presents an opportunity for the Authority to undo some of the harm caused by Frontier's failed 2016 acquisition of utilities in California, Florida, and Texas. That harm cannot be undone, however, unless the Authority requires SNET to provide complete and accurate information about the proposed new owners of its parent company, and require the new company to operate in the best interests of Connecticut's consumers.

If PURA finds that Frontier and SNET have provided the basic information required under Conn. Gen. Stat. § 16-47, then PURA should impose conditions designed to ensure that SNET's network remains a vital and indispensable part of Connecticut's telecommunications infrastructure. This should include conditions that require SNET's profits and cash flow to be reinvested in Connecticut, coupled with enforceable commitments concerning the quality of service provided to customers and the number of in-state employees.

2. Introduction

On July 1, 2020, Frontier Communications Corp. ("Frontier") and the Southern New England Telephone Company ("SNET") filed this Joint Petition with the Public Utility Regulatory Authority ("PURA" or "Authority"). The Joint Petition seeks approval of the

transfer of control of Frontier to an as-yet unnamed entity identified in the Joint Petition only as “Reorganized Frontier.”

If approved by all of the relevant regulatory agencies, including the Authority, the transfer of control would facilitate the resolution of Frontier’s reorganization under Chapter 11 of the U.S. Bankruptcy Code.¹ The effect of the proposed transaction would be to transfer the ownership of Frontier to a group of investors that own Frontier’s debt. Frontier’s existing common stockholders would have no interest in the new company.

Importantly, for purposes of this case, four of Frontier’s noteholders collectively own between 20% and 28% of Frontier’s debt and, thus, would exercise significant control over the new company. As discussed more fully below, those noteholders have been working together since before Frontier even sought protection from the Bankruptcy Court, and they have continued to work together to direct the future operations of both Frontier and the new company.

The Communications Workers of America (“CWA”) was granted the right to intervene in this matter to protect the interests of its members who are employees and customers of SNET. CWA represents more than 1,600 employees of SNET.²

By participating in this case, CWA seeks to ensure that the proposed transaction would do more than compensate Frontier’s noteholders. Specifically, CWA is asking the Authority to impose conditions that would actually improve the financial condition of SNET; enhance SNET’s ability to invest in Connecticut’s future; enable SNET to maintain and improve the safety, quality, and reliability of service it offers to homes and businesses in Connecticut; and maintain SNET as a provider of high-quality, family-supporting jobs in Connecticut.

¹ 11 U.S.C. §§ 1101, *et seq.*

² Tr. 10.

3. Standards for approval of a change in control

In Docket No. 17-06-30, the Authority reviewed the relevant statutory provisions that govern its general review of a transaction that would result in a change in control of any type of public utility.³ In that decision, the Authority provided the following summary:

The Authority's review of the present merger Joint Petition is set forth, in part, in Conn. Gen. Stat. §16-47:

(d) The Public Utilities Regulatory Authority shall investigate and hold a public hearing on the question of granting its approval with respect to any Joint Petition made under subsection (b) or (c) of this section and thereafter may approve or disapprove any such Joint Petition in whole or in part and upon such terms and conditions as it deems necessary or appropriate. . . . [T]he authority shall, in a manner which treats all parties to the proceeding on an equal basis, take into consideration (1) the financial, technological and managerial suitability and responsibility of the applicant, [and] (2) the ability of the gas, electric distribution, water, telephone or community antenna television company or holding company which is the subject of the Joint Petition to provide safe, adequate and reliable service to the public through the company's plant, equipment and manner of operation if the Joint Petition were to be approved

Additionally, the Authority is charged with ensuring that the transfer of ownership is in the public interest as set forth in Conn. Gen. Stat. §16-22, which states in relevant part:

At any hearing involving a rate or the transfer of ownership of assets or a franchise of a public service company, the burden of proving that said rate under consideration is just and reasonable or that said transfer of assets or franchise is in the public interest shall be on the public service company.

Further, Conn. Gen. Stat. §16-11 states that:

The general purposes of this section and sections 16-19, 16-25, 16-43 and 16-47 are to assure to the state of Connecticut its full powers to regulate its public service companies, to increase the powers of the Public Utilities Regulatory Authority and to promote local control of the public service companies of this state, and said sections shall be so construed as to effectuate these purposes.

³ *Joint Petition of Eversource Energy and Macquarie Utilities Inc. for Approval of a Change of Control*, Docket No. 17-06-30 (CT PURA, Oct. 27, 2017).

The statutes, taken together, provide the scope and standard for the Authority's review of the transaction.⁴

In addition to those general requirements, Conn. Gen. Stat. § 16-47 contains an additional requirement for transactions involving a telecommunications utility. Specifically, Section 16-47(d)(3) requires PURA to take into consideration “the effect of approval on the location and accessibility of management and operations and on the proportion and number of state resident employees.”

In doing so, however, the Authority must be mindful of the restriction in Conn. Gen. Stat. § 16-42 which provides: “Nothing in this title shall be construed to authorize the Public Utilities Regulatory Authority to interfere in any manner with contracts between public service companies and their employees.”

Consistent with these statutory requirements, CWA has not raised any issues associated with its collective bargaining agreement with SNET, and it is not asking the Authority to interfere with that agreement in any manner.

4. SNET has not met its burden of proving that the transfer is in the public interest

As discussed above, SNET and Frontier have the burden of proving that the proposed transaction is in the public interest.⁵ The Joint Petitioners have not met that burden.

A. The Joint Petitioners Have Not Identified the New Owners of the Company

The first step in considering whether a proposed transfer is in the public interest is to identify the proposed acquiring company. The Joint Petitioners have not done so. The Joint

⁴ *Id.*, p. 5.

⁵ Conn. Gen. Stat. § 16-22.

Petition was filed by Frontier and SNET. The proposed new company is not a party to the Joint Petition, and it is only identified in the Joint Petition as “Reorganized Frontier.”⁶ CWA understands that given the complexities of a bankruptcy reorganization, it may not be feasible to have the new company in existence months before the expected reorganization.

It is vitally important, however, before approving the Petition, that the Authority understand who will own and control the new company, and whether those people or entities have the requisite financial, technical, and managerial expertise to own and control a public utility in Connecticut. Indeed, the Authority’s regulations concerning the filing of a petition under Section 16-47 specifically require the petitioners to provide the following information (among others):

(m) The proposed table of organization of the management of the applicant, and of the affected company, *after giving effect to the proposed transaction(s)*, including the name of each executive officer on each such proposed table of organization;

(n) The names of the proposed members of the board of directors of the applicant, and of the affected company, *after giving effect to the proposed transaction(s)*;

* * *

(p) A description of the *experience of each of the applicants in the operation, management or control of any public service company*, and, to the extent not otherwise provided, a statement as to the *suitability of the applicants* to control the affected company ...⁷

Here, too, the Joint Petition -- indeed the record as a whole -- is sorely lacking.

The Joint Petition fails to identify the entities that will own a controlling interest in the new company. In fact, Frontier and SNET went to great lengths to keep the identity of the new owners from the Authority. In the Updated Joint Petition on July 1, Exhibit FTR-JP-1 contains

⁶ Updated Joint Petition, p. 3.

⁷ Conn. Agencies Regs. § 16-47-2 (emphases added).

the initial agreement between Frontier and the “Consenting Noteholders” (the group that will become the common stockholders of the new company). The agreement was signed by Mr. Nielsen on behalf of Frontier (page 38), but the identities of the noteholders are redacted (page 39).

Thus, the Joint Petition refers to the “Consenting Noteholders” only as a group comprised of “approximately 200 Senior Noteholders that have executed the RSA [Restructuring Support Agreement] and have agreed to support the Plan, and that hold over 75% of the Senior Notes through more than 40 different investment funds. The Consenting Noteholders are primarily comprised of large, U.S.-based financial investment funds with experience in investing in U.S. telecommunications and technology companies.”⁸

That does not provide a complete and accurate picture of either the ownership of the new company or the entities that will control it. In fact, the response to OCC-3 identifies just four companies that will own between 20% and 28% of the new company: Elliott Management, Franklin Mutual, Golden Tree Asset Management, and HG Vora.⁹

Frontier and SNET have not provided any information about those companies, their expertise, qualifications, plans, or intentions for Frontier. There is absolutely nothing in the record to indicate whether these four companies have the financial, managerial, and technical expertise to own and control SNET, whether they have any “experience in the operation, management or control of any public service company” as required by PURA’s regulations, or whether they even understand the obligations of a public utility providing essential services like

⁸ *Id.*, p. 2, note 4.

⁹ While SNET asserts that these four are the largest owners of Senior Notes, it has not provided data about the holdings of the other noteholders, and disclaims any knowledge of any joint plans they have made about the future of the company. See Frontier’s responses to OCC-3 and CWA-12.

a statewide E-911 network and vital landline connections to police and fire stations, hospitals, and other essential businesses.

Even during the hearings, the witnesses for the Joint Petitioners feigned ignorance about the new owners. Tr. 367-369. Mr. Nielsen testified that he did not know anything about the business or expertise of any of these companies, and no other witness on the panel offered a contrary (or more informed) opinion. This strains credulity, to say the least. Frontier has been working with the noteholders for more than a year. Mr. Adrianopoli's initial declaration to the Bankruptcy Court stated: "in October 2019, Frontier embarked on a proactive engagement with an ad hoc creditor group holding a substantial portion of Frontier's senior unsecured notes."¹⁰

Mr. Nielsen even claimed he was surprised to hear Mr. Weidlich refer to Elliott Management as a hedge fund manager.¹¹ Even the most basic research into the company, such as reviewing its public website, would show that Elliott Management describes itself as using "a multi-strategy trading approach that encompasses a broad range of strategies, including, without limitation: distressed securities, equity-oriented, hedge/arbitrage, commodities trading, other debt, portfolio volatility protection, private equity and private credit, and real-estate-related securities."¹²

This level of ignorance from a senior executive is shocking, but beside the point. What matters is that the Authority has absolutely no information about the proposed owners of the new company. The expertise, goals, and resources of those owners is absolutely vital to the success or failure of the new company because those owners will set the strategic direction of the new company.

¹⁰ Exhibit FTR-JP-2(b), pp. 3-4.

¹¹ Tr. 13 (Weidlich); Tr. 367-368 (Nielsen).

¹² Elliott Management Co. website, <https://www.elliottmgmt.com/what-we-do/>.

B. The Unidentified New Owners Will Appoint the Board of Directors

The proposed new owners will appoint the board of directors of the new company. This is made clear in Joint Plan of Reorganization which states: “As of the Effective Date, the terms of the current members of the board of directors of Frontier shall expire, and, without further order of the Bankruptcy Court, the New Board of Reorganized Frontier shall be appointed. The New Board will initially consist of directors who shall be determined by the Required Consenting Noteholders.”¹³ Technically, the new board needs to be appointed by the old board, but the Plan of Reorganization addresses that by providing as follows: “For the avoidance of doubt, the existing board of directors of Frontier will approve the appointment of the New Board.”¹⁴

C. The Unidentified New Board of Directors Will Control SNET and Determine SNET’s Future

That new board, which will be appointed by and controlled by the new owners, will have substantial control over both the parent company and the subsidiaries, including SNET. For example:

- A “key responsibility” of the new board will be to “review each of the [management] positions and come to its own conclusion about whether to retain that person or identify someone new.”¹⁵
- The new owners and the new board “are I’m sure considering the company’s post-emergence strategy.”¹⁶
- The new board “will have the opportunity to revisit the decisions that have been made previously.”¹⁷

¹³ Exhibit FTR-JP-4, pp. 36-37; see also Tr. 366, lines 9-24.

¹⁴ Exhibit FTR-JP-4, p. 37; see also Tr. 366, lines 17-24.

¹⁵ Tr. 47.

¹⁶ Tr. 48.

¹⁷ Tr. 49.

- The executive chairman of the new board will be in charge of “the development of the company’s overarching strategic vision.”¹⁸
- The directors of SNET will be selected from the new officers of the corporation who will be named by the new board.¹⁹

Other than the new executive chairman of the board, the new owners have not announced any of the board members of the new company.²⁰ Neither has there been any announcement of who the management team will be after the new board takes over.²¹

D. The Authority Cannot Make an Informed Decision About Whether the Proposed Transaction is in the Public Interest

The Authority cannot make an informed judgment about the new company’s “financial, technological and managerial suitability and responsibility.” The Joint Petitioners refuse to provide even the most basic information about the new owners -- whether they have any expertise whatsoever in owning, managing, and setting the “strategic vision” (in Mr. Nielsen’s words) for a public utility providing essential services.

E. The Information in the Record About the New Owners Raises Serious Concerns About Their Commitment to Serving the Public Interest

The only information about the new owners, other than their names, was provided by Mr. Weidlich, CWA’s local president in Connecticut, and it raises far more questions than it answers.

Specifically, Mr. Weidlich testified as follows:

We are concerned because one of the hedge funds that will control Frontier is Elliott Management. Last year Elliott Management launched a campaign at AT&T with an agenda of asset sales, eliminating jobs, and sending work to low wage contractors. We are seeing the results this month at AT&T. Two weeks ago AT&T announced hundreds of retail stores closing putting 1,600 jobs at risk as

¹⁸ Tr. 360.

¹⁹ Tr. 365.

²⁰ Tr. 45.

²¹ Tr. 38.

part to shift to increased outsourced operations. The hedge fund agenda will be a disaster for Frontier customers and employees in Connecticut.²²

The Joint Petitioners' only response was to claim, in Mr. Nielsen's words, "I scratched my head when I heard that" -- claiming he had no idea Elliott Management was a hedge fund.²³ And while he was aware Elliott was an investor in AT&T, he didn't know anything else about that company or what they were doing with their voting power at AT&T.²⁴

While Mr. Nielsen and the rest of the current management team may not be interested in the business strategy, vision, tactics, or goals of the new owners, the Authority should be vitally concerned because it matters greatly to the future of SNET.

F. The Unidentified New Board of Directors Will Decide How Much Capital Will Be Invested in Connecticut

One important way this manifests itself is through the new company's plans for investing capital in Connecticut's network and operations. Those investment decisions will be made by the new parent company. Frontier's reorganization plan includes three options for capital investment, known as the Base Case, Reinvestment Case, and Alternative Reinvestment Case.²⁵ The scenarios differ significantly in the amount of capital that will be available to improve service in Connecticut and other states.

Specifically, the Base Case assumes a **25.4% decrease** in capital spending from 2020 to 2021, with spending remaining at approximately that level through 2023.²⁶ The Reinvestment Case assumes a **9.8% decrease** in 2021 compared to 2020, followed by a 43.6% increase in 2022, then a decline of 19.9% in 2023.²⁷ The Alternative Reinvestment Case has a **10.2% decrease** in

²² Tr. 13-14.

²³ Tr. 367-368.

²⁴ Tr. 368.

²⁵ Exh. FTR-JP-4, pp. 280-294.

²⁶ *Id.*, p. 281.

²⁷ *Id.*, p. 287.

2021, then an increase of 37.3% in 2022, followed by a 20.0% decrease in 2023.²⁸ Figure 1 takes the figures from these three options and displays them graphically.

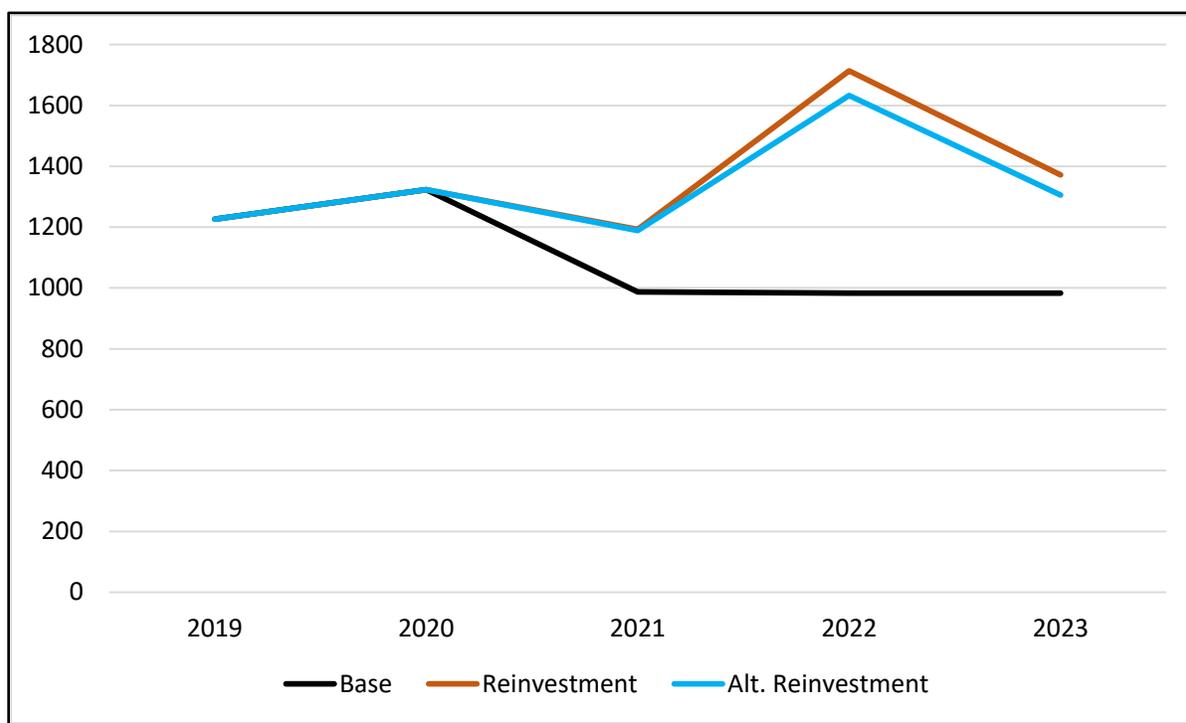


Figure 1: Frontier Capital Investment Options (x \$million)²⁹

To be clear, all three options under consideration by the board of the new company result in decreased capital spending in 2021 compared to 2020. The only question seems to be how much spending will decline compared to the current level. The options then diverge in 2022, but even in the options where capital spending increases, it is followed the next year by a substantial decline.

Importantly, we have no idea which option the board of the new company will pursue. Indeed, we don't even know who will be on that board and whether their priorities will be to pull cash out of the company (similar to the Base Case) or undertake at least some level of capital

²⁸ *Id.*, p. 291.

²⁹ 2019 actual from Exh. FTR-JP-6(a), p. 67; 2020-2023 from Exh. FTR-JP-4, pp. 284 (Base), 289 (Reinvestment), and 293 (Alternative Reinvestment).

spending to improve service, safety, reliability, and customer satisfaction. Those decisions have not been made, and will not be made until the new board of directors is selected and seated.

It is worth noting that, even though there has been considerable discussion about the potential deployment of fiber to the premises in Connecticut, Ms. Ellis testified that there are “portions of Connecticut where ... it would not be financially feasible for Frontier to provide fiber to the home.”³⁰ Thus, Frontier's plans to invest in and maintain its copper-based network also are meaningful for Connecticut.

Frontier's ability and willingness to invest in Connecticut are of vital importance to the state's future, but the record contains no answers. In fact, Mr. Nielsen emphasized that all decisions about capital investment in Connecticut will be made at the parent-company level, as he explained in the following colloquy:

MR. RUBIN: ... [W]ill someone other than SNET management control where money is invested to expand the fiber network in Connecticut?

MR. NIELSEN: The fiber investments in Connecticut are strategically important, and so the management of the corporate parent, Frontier Communications, would be involved in those investment decisions.

MR. RUBIN: Okay. Will net revenues from the Connecticut operations be able to just be reinvested in Connecticut or will those reinvestment decisions be made at the parent-company level?

MR. NIELSEN: Those decisions are made at the parent company level.

MR. RUBIN: ... If the Connecticut operation is successful in generating net revenues, essentially those revenues will be controlled by the parent company, and may not end up being reinvested in Connecticut; is that correct?

MR. NIELSEN: Those decisions will be made by the parent company.³¹

³⁰ Tr. 393.

³¹ Tr. 371-372.

G. Connecticut Will Compete for Capital with California, Florida, Texas, and Other Frontier States -- the Very Problem that Led to Drastic Declines in Investment and Employment in Connecticut

The process explained by Mr. Nielsen will mean that Connecticut will be competing for capital with high-growth areas like California, Florida, and Texas -- the very same areas that decimated investment in Connecticut after Frontier acquired them in 2016. Indeed, as Mr. Nielsen stated, the new board will decide whether profits earned in Connecticut can even be reinvested in-state or whether they will be used to support investment in California, Florida, Texas, or other states.

Mr. Weidlich described the effect on Connecticut operations and investment of the California-Florida-Texas acquisition, as follows:

Over the past four years after Frontier took on billions of debt to buy telecom companies in other states, Frontier set a new course of reduced investment in Connecticut network and workforce. The failed strategy has taken its toll on the quality of service we're able to offer Connecticut customers. It was also one of the major factors that contributed to the bankruptcy reorganization that is now before you. Significant cuts in staffing have meant fewer technicians in the field to provide critical maintenance and respond to customer issues. It has meant fewer local customer service reps to take customer calls.

In April of 2016 at the time Frontier acquired California, Texas and Florida properties, CWA represented 2,397 employees in Connecticut. Over the last four years, 740 representative positions have been cut, a full 30 percent of the unit.³²

This is fully reflected in Frontier's level of capital spending in Connecticut. Frontier acquired SNET in late 2014. In its order approving that acquisition, PURA noted that SNET's capital spending in 2014 was approximately \$147 million.³³ In-state capital spending increased to \$198 million in 2015, then declined precipitously from there, as shown in Figure 2.

³² Tr. 11-12.

³³ *Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change of Control*, Docket No. 14-01-46 (Oct. 15, 2014), p. 11.

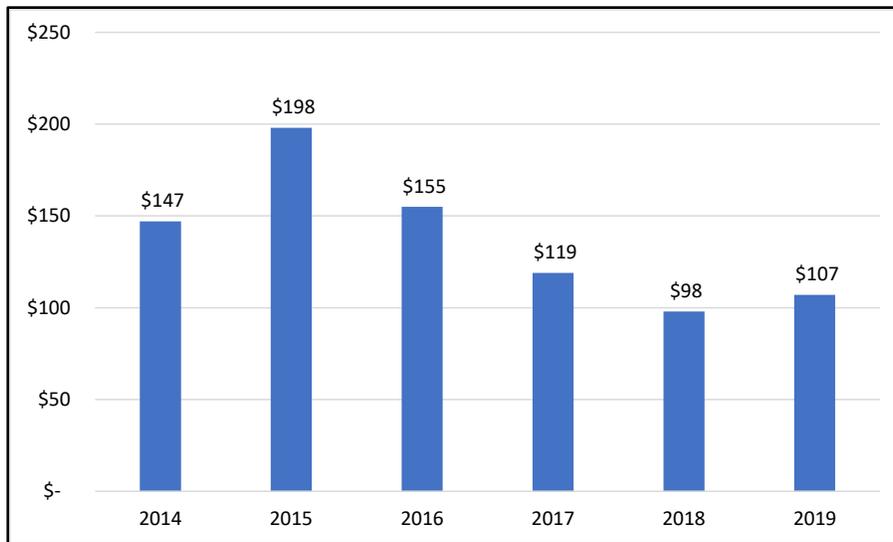


Figure 2: SNET Capital Spending 2014-2019 (x \$million)³⁴

5. PURA Must Protect Connecticut Businesses and Consumers, and SNET Employees

Four years after Frontier’s disastrous acquisition of California, Florida, and Texas, the Company’s executives come before the Authority asking for blanket, unconditional approval of a bankruptcy reorganization that they hope will put the company back on sound financial footing. But there are no guarantees.

There are no guarantees any of the benefits will flow to Connecticut.

There are no guarantees the transaction will result in increased capital investment in Connecticut.

There are no guarantees the transaction will save the jobs of any SNET employees whose ranks have been devastated since 2016.

There are no guarantees the transaction will result in any improvement in the safety, quality, and reliability of SNET’s network.

³⁴ 2014 from decision in Docket No. 14-01-46 cited above. All figures after 2014 from Attachment FI-39, p. 2.

There are only two things we know for certain. First, the new company will be largely controlled by four Wall Street investment companies. We do not know what strategy they will pursue. The restructuring documents present a range of options. One option treats the new company as if it were a giant ATM -- generating cash flow that can be siphoned out of the business to allow the investors to reap profits on the distressed debt they purchased in Frontier. Other options include increasing the level of capital investment for a year or two, or perhaps an even more modest reinvestment case.

Second, we know that without strictly enforced conditions, nothing will prevent the new owners from directing capital investment -- even the cash flow generated in Connecticut -- to high-growth areas where they can earn the most profits. Some of those areas might be in Connecticut, but it is just as likely they could be in California or Texas or Florida or in one of the other two dozen states Frontier serves.

The proposed restructuring has the potential to free up capital for investment in Connecticut. CWA submits, however, that the only way to ensure this will occur is for PURA to reject the transaction as proposed and either (1) require the Joint Petitioners to file a new petition that includes the new owners of the company, so that their fitness can be evaluated as required by law; or (2) impose strict, enforceable conditions that require the profits and cash flow generated in Connecticut to be reinvested in Connecticut's network. If the Authority selects the second option, it should be coupled with service quality and employment requirements to ensure no further deterioration in SNET's services, and that SNET has adequate personnel to serve its customers and properly maintain and upgrade its facilities.

Connecticut cannot experience another nearly halving of SNET's capital spending in the state or the more than 30% reduction in staffing (both of which occurred after Frontier's 2016

acquisition of California, Florida, and Texas utilities). CWA respectfully submits that the Authority must act to ensure this cannot and will not happen again.

At a minimum, SNET should be required to main the current level of capital spending and in-state employment at least through 2024 (the period covered by the financial projections that are part of the restructuring plan).³⁵

Finally, PURA also may want to consider imposing a condition that requires Authority approval of any acquisitions or divestitures by Frontier in other jurisdictions. The history of this company is clear: what it does in other states has a direct (and often negative) impact on Connecticut operations. The 2016 acquisitions had a decidedly negative impact on SNET, its employees, and customers. The “virtual separation” process Fronter is undertaking as part of its reorganization is designed to help it determine which states will be designated “InvestCo” states, and be targeted for additional fiber investments, and which will be designated “ImproveCo” states, and only be target for improved copper plant investments.³⁶ In addition, it is designed to help it identify the increased costs that SNET and other operations remaining with Frontier would bear if Frontier sells operations in other states.³⁷ Indeed, that is exactly what SNET experienced earlier this year when Frontier sold its utilities in the Pacific Northwest.³⁸

6. Conclusion

The Communications Workers of America, therefore, respectfully requests the Authority to either (1) require the Joint Petitioners to file a new petition that includes the new owners of the

³⁵ The current level of capital spending, which is allegedly confidential, can be found in the attachment to FI-003. Mr. Weidlich stated that the current level of SNET in-state CWA-represented employment is 1,657 (2,397 in 2016 less 740 positions lost). Tr. 12.

³⁶ Tr. 68-71 and 330-333.

³⁷ Tr. 380-381 (discussing the potential for increased costs for network support, and shared services, and potentially other costs if there is a divestiture).

³⁸ Tr. 634-635 (a confidential discussion addressing the specific impact of the Pacific Northwest sale).

company, so that their fitness can be evaluated as required by law; or (2) impose strict, enforceable conditions that require the profits and cash flow generated in Connecticut to be reinvested in Connecticut's network. If the Authority selects the second option, it should be coupled with service quality and employment requirements to ensure no further deterioration in SNET's services, and that SNET has adequate personnel to serve its customers and properly maintain and upgrade its facilities.

In particular, SNET should be required to main the current level of capital spending and in-state employment at least through 2024 (the period covered by the financial projections that are part of the restructuring plan). The Authority also should consider requiring approval of any acquisitions or divestitures by Frontier in other jurisdictions.

CWA submits that it is only through these types of conditions that the proposed transaction can be considered to be consistent with the public interest, as required by law.

Respectfully submitted,

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I hereby certify that I have this day served a true copy of the foregoing upon the parties listed on the attached Service List to this proceeding by electronic mail.

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Dated: November 23, 2020



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05/12/2020 Party	Allison M. Ellis Vice President, Regulatory Affairs Frontier Communications Corporation 3833 South Alston Avenue Durham, NC 27713	Yes	AE4862@ftr.com	SNET/Frontier	20-04-3
05/12/2020 Party	Tyra Anne Peluso Office of Consumer Counsel Ten Franklin Square New Britain, CT 06051	Yes	tyra.peluso@ct.gov	OCC	20-04-3
05/12/2020 Party	Andrew Minikowski Office of Consumer Counsel 10 Franklin Square New Britain, CT 06051	Yes	Andrew.Minikowski@ct.gov	OCC	20-04-3