

**Communications  
Workers of America**  
AFL-CIO

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**Edward F. Mooney**  
International Vice-President  
District 2-13



December 22, 2020

Chairman Ajit Pai  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Dear Chairman Pai,

The Communications Workers of America (“CWA”) represents approximately 8,000 employees of Frontier and its subsidiaries nationwide, and 1,200 employees in West Virginia. Many CWA members are also customers of Frontier and have an interest in ensuring a robust future for Frontier with fiber services across West Virginia. CWA has actively participated in the Frontier restructuring reviews at the FCC, the Bankruptcy Court, and at state commissions, and in parallel state commission service quality dockets.

Beyond the recent bankruptcy proceedings, CWA has been a long-time leader in advocating for expanded broadband access, improvements to Frontier’s services quality in West Virginia, and accountability for customers. CWA does not, however, agree with the concerns expressed in the December 9, 2020 letter from Senator Shelley Moore Capito and the December 16, 2020 letter from a group of state legislators urging the Commission to reject Frontier’s long-form application in the Rural Digital Opportunity Fund (RDOF) auction.

Frontier is a major broadband provider in West Virginia and has the resources and experienced workforce necessary to deploy service to additional locations. It would be unrealistic to achieve large scale build-out of broadband in the state without Frontier.

In addition, it is wrong to assert that Frontier’s recent Chapter 11 bankruptcy should be a cause of concern. Frontier’s reorganization under Chapter 11 will reduce its debt obligation by over \$10 billion and its annual interest expense by \$1 billion. This will put Frontier on stronger financial footing to invest in broadband deployment. As a part of the West Virginia Public Service Commission proceeding to approve the bankruptcy plan, Frontier management announced that West Virginia will be designated an “InvestCo” area post-restructuring, meaning Frontier’s business plan will prioritize new investment in fiber deployment for West Virginia. In addition, CWA believes that the December 18, 2020 Joint Settlement to resolve the

PSC proceeding overseeing the bankruptcy imposes meaningful commitments on Frontier that will lead to large-scale upgrade of the Frontier plant in West Virginia. The conclusion of the bankruptcy case coupled with the "InvestCo" designation will result in a financially stronger company that is capable of making investments in West Virginia.

Broadband is essential infrastructure for the 21st century, and especially so during an infectious disease crisis. Expedited transition to tele-work, tele-medicine, and tele-education requires a timely deployment of RDOF funds. Rejection of Frontier's long-form application over these unfounded concerns would delay disbursement of funds until the Commission decides through rulemaking whether these blocks will be included in Phase II of the RDOF auction. This could slow much needed broadband deployment in West Virginia by several years.

CWA believes in accountability for all recipients of federal funds, including audits and oversight to ensure deployment provides the promised speeds, quality service, and the minimum number of connected households. Frontier has met the requirements for Phase I of the RDOF auction. CWA members have worked hard with regulators at the state and federal level to hold Frontier accountable and will continue to do so to ensure that all West Virginia customers receive the high-quality telecommunications services they deserve.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Mooney", with a large, sweeping flourish underneath.

Edward F. Mooney, International Vice-President  
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