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**Randy Clarke
Associate General Counsel
Federal Regulatory Affairs**

September 9, 2026

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Section 63.71 Application of Citizens Telecommunications Company of California Inc.; Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier California Inc.; Frontier Communications – Midland, Inc.; Frontier Communications – Prairie, Inc.; Frontier Communications – Schuyler, Inc.; Frontier Communications of AuSable Valley, Inc.; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of the Carolinas LLC; Frontier Communications of Depue, Inc.; Frontier Communications of Illinois, Inc.; Frontier Communications of Lakeside, Inc.; Frontier Communications of Lakewood, LLC; Frontier Communications of Michigan, Inc.; Frontier Communications of Mt. Pulaski, Inc.; Frontier Communications of New York, Inc.; Frontier Communications of Orion, Inc.; Frontier Communications of Oswayo River, LLC; Frontier Communications of Pennsylvania, LLC; Frontier Communications of Seneca-Gorham, Inc.; Frontier Communications of the Southwest Inc.; Frontier Communications of Sylvan Lake, Inc.; Frontier Midstates Inc.; Frontier North Inc.; Frontier Telephone of Rochester, Inc.; Frontier West Virginia Inc.; Ogden Telephone Company d/b/a Frontier Ogden Telephone Company; The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut; Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon North LLC; Verizon Pennsylvania LLC; Verizon Washington, DC Inc., all Verizon companies

Dear Ms. Dortch:

The Verizon incumbent local exchange companies captioned above submit the enclosed application for authority under Section 214(a) of the Communications Act and Section 63.71 of the Commission's rules to discontinue legacy TDM-based voice service.

If you have any questions regarding this matter, please contact me at 202-684-5350.

Respectfully submitted,

/s/ Randy Clarke

Randy Clarke

Associate General Counsel

Federal Regulatory Affairs

Attachment

cc: Department of Defense Chief Information Officer
Public Utility Commission for each affected state
Governor of each affected state
Tribal entities in each affected state

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
	)	
Section 63.71 Application of	)	WC Docket No. 26-_____
	)	
Citizens Telecommunications Company of	)	
California Inc.; Citizens Telecommunications	)	
Company of Illinois; Citizens	)	
Telecommunications Company of New York,	)	
Inc. d/b/a Frontier Communications of New	)	
York; Citizens Telecommunications	)	
Company of West Virginia d/b/a Frontier	)	
Communications of West Virginia;	)	
Commonwealth Telephone Company LLC	)	
d/b/a Frontier Communications	)	
Commonwealth Telephone Company;	)	
Frontier California Inc.; Frontier	)	
Communications – Midland, Inc.; Frontier	)	
Communications – Prairie, Inc.; Frontier	)	
Communications – Schuyler, Inc.; Frontier	)	
Communications of AuSable Valley, Inc.;	)	
Frontier Communications of Breezewood,	)	
LLC; Frontier Communications of Canton,	)	
LLC; Frontier Communications of the	)	
Carolinas LLC; Frontier Communications of	)	
Depue, Inc.; Frontier Communications of	)	
Illinois, Inc.; Frontier Communications of	)	
Lakeside, Inc.; Frontier Communications of	)	
Lakewood, LLC; Frontier Communications	)	
of Michigan, Inc.; Frontier Communications	)	
of Mt. Pulaski, Inc.; Frontier	)	
Communications of New York, Inc.; Frontier	)	
Communications of Orion, Inc.; Frontier	)	
Communications of Oswayo River, LLC;	)	
Frontier Communications of Pennsylvania,	)	
LLC; Frontier Communications of Seneca-	)	
Gorham, Inc.; Frontier Communications of	)	
the Southwest Inc.; Frontier Communications	)	
of Sylvan Lake, Inc.; Frontier Midstates Inc.;	)	
Frontier North Inc.; Frontier Telephone of	)	
Rochester, Inc.; Frontier West Virginia Inc.;	)	
Ogden Telephone Company d/b/a Frontier	)	

Ogden Telephone Company; The Southern	)
New England Telephone Company d/b/a	)
Frontier Communications of Connecticut;	)
Verizon Maryland LLC; Verizon New	)
England Inc.; Verizon New York Inc.;	)
Verizon North LLC; Verizon Pennsylvania	)
LLC; Verizon Washington, DC Inc., all	)
Verizon companies	)
	)
For Authority Pursuant to Section 214 of the	)
Communications Act of 1934, as Amended,	)
To Discontinue the Provision of Service	)

SECTION 63.71 APPLICATION OF VERIZON

I. INTRODUCTION.

With this Application,¹ Verizon seeks authority to discontinue Plain Old Telephone Service (“POTS”) served by time-division multiplexing (“TDM”) technology over copper in portions of California, Connecticut, the District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia. Currently, Verizon’s network could serve over 28 million locations in these states with POTS. However, the overwhelming majority of consumers from these states who could subscribe to POTS service from Verizon do not—only approximately 750,000 residential and business locations, or 2.7%, still subscribe to legacy voice services. Copper infrastructure is too slow to meet modern needs, many decades old, costly to maintain, and vulnerable to damage and theft. As detailed below, granting this Application will advance the Build America Agenda by allowing Verizon to direct investments toward the high-speed networks that Americans want and away from maintaining the legacy copper networks that they are abandoning, while ensuring that consumers continue to have reliable access to voice

¹ The FCC Registration Number for this application is 0003628971.

service and 911. Grant of this Application also is consistent with Commission and Wireline Competition Bureau (“Bureau”) precedent.

Specifically, with this Application, Verizon seeks to discontinue copper-based residential and business legacy voice service in the nine states listed above and in the District of Columbia at locations where existing POTS customers can obtain from Verizon—or at least one of ten third parties, including AT&T, T-Mobile, Comcast, and Charter—one or more of the following facilities-based replacement voice services: (i) interconnected Voice over Internet Protocol (“VoIP”) provisioned over broadband using fiber or cable (i.e., coaxial cable or hybrid fiber-coaxial cable); (ii) Verizon fixed wireless voice replacement services that enable legacy POTS telephone equipment to operate over Verizon’s wireless network;² or (iii) mobile wireless service.³ These replacement services from Verizon and other well-established providers are the services that Verizon relies on in this Application to meet the requirements still in effect until the new *Network Modernization Order* rules the Commission adopted earlier this year take effect.⁴ As detailed below, Verizon’s fiber-based voice service satisfies the Alternative Options Test,⁵ and Verizon’s fixed wireless voice replacement and mobile wireless service—as well as the other replacements on which Verizon relies—satisfy the Adequate Replacement Test.⁶ By

² Verizon seeks approval based on its own fixed wireless service; it does not rely on third-party fixed wireless services in this Application.

³ “Discontinuance area” refers to locations within the scope of this Application.

⁴ See *Reducing Barriers to Network Improvements and Service Changes; Accelerating Network Modernization*, WC Docket Nos. 25-209, 25-208, Report and Order, FCC 26-19, App. A – Final Rules (rel. Mar. 27, 2026) (“*Network Modernization Order*”).

⁵ See 47 C.F.R. § 63.71(f)(2)(ii). Verizon relies on the Alternative Options Test for expediency because of the simpler showing required.

⁶ See 47 C.F.R. § 63.71(a), (f)(2)(i); see also *id.* § 63.602(b) (permitting applicants to show that “one or more replacement service(s) satisfies all of the following criteria”). In the *Network Modernization Order*, the Commission replaced the Alternative Options Test and Adequate Replacement Test with “one simple rule” allowing applications for discontinuance that identify

showing that locations in the discontinuance area have an available replacement that meets the Commission's requirements for streamlined treatment, we ensure that the 2.7% of Verizon subscribers who still receive copper-based POTS in the ten jurisdictions at issue will be well-served.

Therefore, the following Verizon entities: Citizens Telecommunications Company of California Inc.; Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier California Inc.; Frontier Communications – Midland, Inc.; Frontier Communications – Prairie, Inc.; Frontier Communications – Schuyler, Inc.; Frontier Communications of AuSable Valley, Inc.; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of the Carolinas LLC; Frontier Communications of Depue, Inc.; Frontier Communications of Illinois, Inc.; Frontier Communications of Lakeside, Inc.; Frontier Communications of Lakewood, LLC; Frontier Communications of Michigan, Inc.; Frontier Communications of Mt. Pulaski, Inc.; Frontier Communications of New York, Inc.; Frontier Communications of Orion, Inc.; Frontier Communications of Oswayo River, LLC; Frontier Communications of Pennsylvania, LLC; Frontier Communications of Seneca-Gorham, Inc.; Frontier Communications of the Southwest Inc.; Frontier Communications of Sylvan Lake, Inc.; Frontier Midstates Inc.; Frontier North Inc.;

the presence of one of five categories of services as available to receive streamlined treatment. The services identified in this Application, which meet the requirements of the Adequate Replacement or Alternative Options Test, will also meet the newly adopted POTS replacement requirement.

Frontier Telephone of Rochester, Inc.; Frontier West Virginia Inc.; Ogden Telephone Company d/b/a Frontier Ogden Telephone Company; The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut; Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon North LLC; Verizon Pennsylvania LLC; and Verizon Washington, DC Inc., all Verizon companies, (collectively, “Verizon”), apply for authority under 47 U.S.C. § 214(a) and 47 C.F.R. § 63.71 to discontinue their legacy TDM-based voice service over copper throughout portions of California, Connecticut, District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia as specified herein.

II. GRANTING THE APPLICATION ADVANCES THE BUILD AMERICA AGENDA.

The Commission’s Build America Agenda is making it easier and faster for providers to retire copper and modernize U.S. communications infrastructure.⁷ Approval of this Application will advance the Build America Agenda and serve the public interest in multiple ways.

First, approval will drive investment toward networks of the future and reduce the need to devote resources to infrastructure of the past. Investment is essential to the Build America Agenda, which aims to “free up billions of dollars for new networks, instead of forcing providers to keep investing in old ones.”⁸ Keeping resources locked up in old copper-based POTS networks will thwart unleashing that investment.

⁷ See Remarks of FCC Chairman Brendan Carr, “A Build Agenda for America,” Sioux Falls, South Dakota, (July 2, 2025), <https://docs.fcc.gov/public/attachments/DOC-412663A1.pdf> (“Build America Agenda”); see also Brendan Carr, *Now Is the Time to Build*, FCC BLOG (July 2, 2025), <https://www.fcc.gov/news-events/blog/2025/07/02/now-time-build>; *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, 2026 Section 706 Report, FCC 26-55, ¶¶ 65-67 (rel. Aug. 14, 2026) (“2026 Section 706 Report”).

⁸ Build America Agenda at 3.

In its *Network Modernization Order*, a unanimous, bipartisan Commission found that “the expansion of [] modern networks, and the benefits they afford, have been hindered by the need for carriers to divert important resources to the maintenance of aging and deteriorating legacy networks that deliver outdated services to an ever-decreasing number of subscribers.”⁹ This includes copper-based networks, which the Commission recognized are “no longer sufficient to meet the bandwidth-hungry needs of modern communications and thus ha[ve] been rendered obsolete by more advanced networks.”¹⁰

The cost of maintaining POTS networks has skyrocketed in recent years. Verizon spends billions of dollars each year to maintain its legacy copper network. These costs are enormous because of, among other things, rising costs of copper and the need for replacement parts that are increasingly difficult to procure as obsolete equipment is discontinued.¹¹ Copper is also prone to theft,¹² and a declining customer base makes copper more expensive to maintain on a per-

⁹ *Network Modernization Order* ¶ 2.

¹⁰ *Id.* ¶ 9.

¹¹ See, e.g., Eric Fruits & Brian Albrecht, *Paying to Stand Still: Legacy Copper Mandates in a Fiber World*, INTERNATIONAL CENTER FOR LAW & ECONOMICS, at 12-13 (Feb. 27, 2026), <https://laweconcenter.org/wp-content/uploads/2026/02/Copper-Retirement-Economics-v2-2026.pdf> (“ICLE Report”); Jonathan Spalter, *Introducing America’s Connected Future*, USTELECOM (Mar. 9, 2026), <https://ustelecom.org/introducing-americas-connected-future/> (“USTelecom Article”) (“Service restoration can often take weeks if not months because replacement parts are harder to find as manufacturers discontinue declining product lines.”).

¹² See *Protecting Critical Communications Infrastructure from Theft & Vandalism*, USTELECOM, at 8 (Oct. 9, 2025), <https://ustelecom.org/research/protecting-critical-communication-infrastructure-report-fall-2025/> (reporting over 15,000 incidents of theft and vandalism between June 2024 – June 2025); Remarks of Commissioner Oliva Britt Trusty, “Copper Theft Crisis: Incident Management and Prosecutorial Collaboration Summit,” El Segundo, California (Oct. 7, 2025), <https://docs.fcc.gov/public/attachments/DOC-415046A1.pdf>; *Surveillance video shows two suspects after over \$4,700 in copper cable, telecommunications equipment stolen*, WSLs NEWS 10, <https://www.wsls.com/news/local/2026/07/27/law-enforcement-searching-for-two-suspects-after-over-4700-in-copper-cable-telecommunications-equipment-stolen/> (Aug. 3, 2026) (describing copper theft in Campbell County, Virginia); see also Sean Mahoney, *New safeguards aren’t stopping copper thieves in Arizona*, 13 NEWS (July 16, 2026),

customer basis¹³—meaning as time goes by each copper customer consumes disproportionately more resources. Every dollar Verizon spends maintaining aging, little-used copper infrastructure diverts critical investment away from future-ready networks that customers across the country demand.

By granting this Application, the Commission will help Verizon “transition [away] from legacy TDM-based networks,”¹⁴ allowing us to “invest more resources toward modernizing [our] networks so [] consumers can access more advanced communications services.”¹⁵ And granting this Application will allow the Commission to fulfill its goal of “accelerat[ing] the transition from aging copper” voice service “to the modern, high-speed” services “that Americans want and deserve.”¹⁶ This is a win for states and consumers alike, and it is fully consistent with Section 214, which Congress enacted to “protect Americans’ continued access to the nation’s communications networks while also preserving carriers’ ability to upgrade their services without the interruption of federal micromanaging.”¹⁷

Second, granting this Application will allow Verizon to move away from the slow, inefficient copper-based services customers no longer want. Last-mile copper connections to customer premises were designed for phone calls, not today’s heavy Internet usage. As the Commission has recognized, copper-based networks’ “limited data bandwidth is no longer

<https://www.kold.com/2026/07/16/new-safeguards-arent-stopping-copper-thieves-arizona/> (describing string of copper thefts from street lights in South Tucson, Arizona).

¹³ ICLE Report at 5, 14.

¹⁴ *Network Modernization Order* ¶¶ 1, 3.

¹⁵ *Id.* ¶ 2.

¹⁶ Build America Agenda at 3.

¹⁷ *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking, 32 FCC Rcd 11128, ¶ 133 (2017).

sufficient to meet the bandwidth-hungry needs of modern communications.”¹⁸ Copper is also energy inefficient, particularly when compared to modern alternatives.¹⁹

Not surprisingly, consumers have made clear that they do not want copper-based voice services anymore. From 2014 to 2024, subscribers using copper last-mile connections fell nationwide by 81%.²⁰ Almost four out of five U.S. adults use wireless-only for voice, with less than 4% of U.S. adults preferring landlines for phone calls.²¹ Today, wireless services account for roughly 83% of voice phone lines nationwide, with VoIP provided over modern broadband networks capturing most of the remainder.²² And the emergence of 5G home broadband and low-Earth orbit satellite services has led to meaningful new choices, including in areas that are difficult to reach by wired connections.²³ Indeed, the Commission has found that “[h]igh-speed

¹⁸ *Network Modernization Order* ¶ 9.

¹⁹ See e.g., Comments of USTelecom – The Broadband Association, WC Docket Nos. 25-208, 25-209, at 17-18 (filed Sept. 29, 2025); Comments of the International Center for Law & Economics, WC Docket Nos. 25-208, 25-209, at 6 (filed Aug. 22, 2025) (“ICLE Comments”); see also ICLE Report at 10 (finding that transitioning the remaining 12.5 million copper subscribers to modern alternatives would produce estimated energy-cost savings of \$398 million to \$830 million, and noting Verizon data highlighting that fiber-delivered broadband is at least 100 times more energy-efficient on a kWh-per-gigabyte basis than copper-delivered service).

²⁰ ICLE Report at 1, 4 (reporting that subscribers have decreased from nearly 66 million in 2014 to just 12.5 million in 2024); see also USTelecom Article.

²¹ Stephen J. Blumberg & Julian V. Lake, *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2024*, NATIONAL CENTER FOR HEALTH STATISTICS, at 4–5 (June 2025), <https://www.cdc.gov/nchs/data/nhis/earlyrelease/wireless202506.pdf> (2.3 percent of adults identifying as landline-mostly and 1.4 percent of adults identifying as landline-only).

²² *Voice Telephone Services: Status as of June 30, 2025*, FCC, INDUSTRY ANALYSIS DIVISION, OFFICE OF ECONOMICS & ANALYTICS, at 2 & fig. 1 (May 2026), <https://docs.fcc.gov/public/attachments/DOC-421558A1.pdf> (“Voice Telephone Services Report”).

²³ *Modernizing Spectrum Sharing for Satellite Broadband*, Report and Order, FCC 26-26, at Statement of Chairman Brendan Carr (rel. May 1, 2026), <https://docs.fcc.gov/public/attachments/DOC-421308A2.pdf> (observing that “Americans today benefit from increased competition for their broadband dollars” because “[w]ireless carriers are

residential broadband—whether cable, fiber, or fixed wireless—has become more widely available” than ever before, and when factoring in satellite services, “appears to be virtually universally available to all Americans.”²⁴

In particular, consumers now regularly turn to fixed wireless service. For example, in 2024, 99% of new home broadband subscribers chose 5G for the third year in a row, with 3.7 million additional 5G home subscriptions.²⁵ And across the United States, fixed wireless access customers—particularly Verizon’s millions of wireless home customers—are the happiest with their service, while DSL copper customers are the unhappiest.²⁶

Just as copper voice reliance is small and declining nationwide, the same is true in the ten jurisdictions specifically at issue here.²⁷ In Verizon’s case, use of its copper-based voice services continues to decrease, consistent with broader trends. The overwhelming majority of consumers from the nine discontinuance states and the District of Columbia who could subscribe to POTS service from Verizon do not. Of the consumers in these ten jurisdictions who could subscribe to Verizon’s POTS service, only 2.7% do.

now competing for in-home subscribers” and “satellite is competing with both [existing providers] and wireless”); *see also, e.g.*, News Release, Verizon, AT&T, T-Mobile, and Verizon Plan to launch new joint venture that helps end dead zones (May 14, 2026), <https://www.verizon.com/about/news/feed/att-t-mobile-verizon-plan-launch-joint-venture-helps-end-dead-zones>.

²⁴ 2026 Section 706 Report ¶ 2.

²⁵ 2025 CTIA Annual Survey Highlights, CTIA, at 6 (2025), <https://api.ctia.org/wp-content/uploads/2025/09/2025-Annual-Survey-Highlights.pdf>.

²⁶ *Fixed Wireless Access*, VERIZON, <https://www.verizon.com/about/fixed-wireless-access> (last visited Sept. 8, 2026).

²⁷ For instance, ILEC POTS lines represent 3.2% of voice lines nationwide, and similarly, they represent 3.25% of voice lines in the ten jurisdictions at issue. *See* Voice Telephone Services Report at 2; FCC, Voice Telephone Services Report, Table S.1, Voice Subscriptions (in Thousands), https://www.fcc.gov/sites/default/files/VTS_State_Subscriptions_J24_to_J25.xlsx.

Third, granting the Application will allow Verizon to advance its commitment to award-winning service and America’s best networks. By allowing Verizon to decommission its legacy copper networks in the discontinuance area, the Commission will help make way for the more powerful, robust, and efficient high-speed networks that Americans actually use—a goal that has bipartisan support.²⁸ These investments in our wireless and fiber networks include jurisdictions in the discontinuance area.²⁹ Our strategy requires significant capital investments to maintain and grow these advanced networks as well as to acquire spectrum. These investments included \$17.0 billion for capital expenditures in 2025, and we expect to invest between \$16.0 billion and \$16.5 billion in 2026.³⁰

²⁸ See *Network Modernization Order* at Statement of Commissioner Anna M. Gomez (“Our nation’s copper infrastructure is aging, costly to maintain, and increasingly vulnerable to theft and natural disaster. The future is IP-based, and our rules should facilitate, not obstruct, carriers’ ability to build it.”).

²⁹ See, e.g., News Release, Verizon, Verizon lights up 5G Ultra Wideband across Arizona (May 18, 2023), <https://finance.yahoo.com/news/verizon-lights-5g-ultra-wideband-130000818.html?guccounter=1>; News Release, Delaware Department of Technology & Information, Delaware Department of Technology and Information, Delaware Approved to Begin Fiber Broadband Connections to 5,700 Homes and Businesses (Jan. 14, 2025), <https://news.delaware.gov/2025/01/14/delaware-approved-to-begin-fiber-broadband-connections-to-5700-homes-and-businesses/>; News Release, Verizon, Verizon lights up 5G Ultra Wideband across Ohio (May 18, 2023), <https://finance.yahoo.com/news/verizon-lights-5g-ultra-wideband-130000990.html>; Kimberly Redmond, *Verizon expands 5G in New Jersey*, NJBIZ (Mar. 17, 2023), <https://njbiz.com/verizon-expands-5g-in-new-jersey/>; *Verizon Expands Fios Fiber Service to Underserved Areas in Rhode Island*, TELECOMTALK (Oct. 9, 2024), https://telecomtalk.info/verizon-expands-fiber-access-underserved-areas-rhodeisland/982885/#google_vignette; Jacquelyn Voghel, *Verizon expanding 5G footprint in R.I.*, PROVIDENCE BUSINESS NEWS (Aug. 8, 2023), <https://pbn.com/verizon-expanding-5g-footprint-in-r-i/>; News Release, Verizon, Verizon gives beach goers a boost with expanded 5G service in Myrtle Beach and Hilton Head, SC (June 18, 2024), <https://www.verizon.com/about/news/verizon-boost-expanded-5g-service-myrtle-beach-hilton-head-sc>.

³⁰ Verizon Communications Inc., Annual Report (Form 10-K), at 23, 37 (Feb. 17, 2026), <https://www.sec.gov/Archives/edgar/data/732712/000073271226000007/vz-20251231.htm> (“Verizon Form 10-K”).

Competition is driving this investment. Verizon faces competition from a host of providers that have deployed modern communications technologies, including wireless and wireline, mobile and fixed, terrestrial and satellite, facilities-based and over-the-top.³¹ But we cannot invest optimally to modernize our networks and compete while continuing to devote huge sums of money to sustaining copper-based POTS.

Last, Verizon will not leave customers behind. Because it makes no sense to maintain a ubiquitous, costly legacy network that consumers have largely abandoned, we seek to transition customers to modern services provided by Verizon or another provider. We will work to ensure that this is a smooth transition for copper-based POTS customers in the discontinuance area. Most affected customers who currently have copper POTS lines, sold as “Home Phone Service,” will have the option to buy voice service from Verizon that meets or exceeds their expectations in network performance and availability. We are proud to have built the nation’s best wireless network, setting the highest bar for quality and reliability.³² Verizon’s award-winning national wireless network covers 99% of the U.S. population and supports approximately 147 million wireless retail connections,³³ supporting mobile and fixed wireless services.³⁴ Notably, Verizon’s mobile wireless service provides high-quality voice service as well as mobile broadband service at the vast majority of locations in the discontinuance area.³⁵ Verizon also has

³¹ See generally *Communications Marketplace Report*, 2024 Communications Marketplace Report, 39 FCC Rcd 14116 (2024) (“*Communications Marketplace Report*”).

³² News Release, Verizon, Verizon remains America’s Best Wireless Network, Setting the Highest Bar for Quality and Reliability (Sept. 18, 2025), <https://www.verizon.com/about/news/verizon-remains-americas-best-wireless-network>.

³³ *Id.*; Verizon Form 10-K at 6.

³⁴ Verizon Form 10-K at 8.

³⁵ The Commission has found that a facilities-based mobile wireless service operating at speeds of at least 5 Mbps download and 1 Mbps upload, as reflected in the National Broadband Map,

a fixed wireless POTS voice replacement service (“Voice Connect”),³⁶ and, in areas where Verizon fiber is present, we operate wireline broadband services—including voice service over broadband—over our 100% fiber-optic network through our Verizon fiber (“Fios”) product portfolio.³⁷

In this Application, we seek authority to discontinue copper services only where customers can obtain facilities-based service from Verizon, one of our two nationwide mobile carrier competitors, or eight sizeable cable and/or fiber providers that compete significantly with us in the discontinuance area. All ten of the third-party providers on which we rely offer voice service and, as detailed below, satisfy the Adequate Replacement Test. Thus, all affected customers will be able to select, at minimum, facilities-based voice service from Verizon or another top provider. Most customers will have multiple options for facilities-based voice service (e.g., mobile wireless from AT&T, T-Mobile, and/or Verizon, interconnected VoIP from Comcast, etc.). Although Verizon does not rely on over-the-top options in this Application, it bears noting that customers would have the opportunity to subscribe to broadband and select one of many over-the-top voice options, including voice service over satellite broadband, which is widely available in the states subject to this Application.³⁸

qualifies a discontinuance application for streamlined treatment. *See Network Modernization Order* ¶¶ 23, 34.

³⁶ *See Voice Connect*, VERIZON, <https://www.verizon.com/support/residential/homephone/voice-connect> (last visited Sept. 8, 2026); *see also Verizon Voice Gateway*, VERIZON, <https://www.verizon.com/home-office-solutions/verizon-voice-gateway/?skuid=sku6042698> (last visited Sept. 8, 2026).

³⁷ *See Verizon Form 10-K* at 6.

³⁸ The Commission found that identifying “a widely available alternative voice service that supports access to 911” qualifies a discontinuance application for streamlined treatment under its new rules. *See Network Modernization Order* ¶¶ 23, 38. While these new rules are not yet in effect, satellite broadband service is widely available and supports voice and 911 services in the

In sum, this transition will leave voice customers well-served while unlocking resources for investment to expand and improve Verizon's modern fiber and wireless networks.

III. APPLICATION.

Verizon seeks streamlined treatment and approval to discontinue copper-based POTS in the discontinuance area based on three showings. *First*, as the Bureau has already found, Verizon mobile wireless service and fixed wireless legacy voice replacement services satisfy the Adequate Replacement Test. *Second*, as the Bureau has recognized, the Alternative Options Test is satisfied in areas where Verizon Fios is available (i.e., where Verizon has deployed fiber). *Third*, consistent with precedent, the Adequate Replacement Test is satisfied in areas where any of ten leading third-party providers, such as AT&T, T-Mobile, Comcast, or Charter, offer facilities-based mobile wireless voice or cable- or fiber-based interconnected VoIP.³⁹ Collectively, these showings establish that Verizon is entitled to streamlined treatment and discontinuance authority for the entire discontinuance area, as defined above (i.e., qualifying locations in the ten jurisdictions at issue).⁴⁰

same manner as any interconnected VoIP call, subject to Section 9.3 of the Commission's rules. 47 C.F.R. § 9.3.

³⁹ See *Technology Transitions et al.*, Declaratory Ruling, Second Report and Order, and Order on Reconsideration, 31 FCC Rcd 8283, ¶ 123 (2016) (“*2016 Technology Transitions Order*”) (stating that “the applicant must demonstrate that either: (i) a single replacement service reaches the entire geographic footprint of the service area subject to discontinuance; or (ii) there are multiple providers who collectively cover the entirety of the affected service area”).

⁴⁰ See *supra* note 3.

A. Verizon’s Mobile Wireless Service and Fixed Wireless Legacy Voice Replacement Services Satisfy the Adequate Replacement Test.

As detailed below, Verizon mobile wireless service⁴¹ and fixed wireless POTS voice replacement services⁴² are adequate replacements for Verizon POTS. Verizon currently has approximately 46,000 customers using fixed wireless POTS voice replacement services and approximately 147 million wireless retail connections nationwide. Verizon’s wireless network provides mobile wireless coverage throughout the United States—reaching more than 99% of the U.S. population. Verizon’s mobile wireless and fixed wireless POTS voice replacement services comply with all applicable federal requirements and industry standards for 911 services, communications security, and services for individuals with disabilities.⁴³ Verizon legacy voice replacement service customers can continue to use their existing POTS corded or cordless

⁴¹ Verizon’s 5G mobile network is available nationwide and continues to expand. Verizon has received numerous awards for our 5G network reliability and quality. *See Find Home Internet and Cell Phone Coverage in Your Area*, VERIZON, <https://www.verizon.com/coverage-map/> (last visited Sept. 8, 2026).

⁴² Verizon’s wireless voice replacement services include Verizon Voice Connect, a solution that connects an existing landline phone to Verizon’s 4G/5G LTE network using the Verizon Voice Gateway for reliable, high-quality voice service. *See Voice Connect*, VERIZON, <https://www.verizon.com/support/residential/homephone/voice-connect> (last visited Sept. 8, 2026); *Verizon Voice Gateway*, VERIZON, <https://www.verizon.com/home-office-solutions/verizon-voice-gateway/?skuid=sku6042698> (last visited Sept. 8, 2026). These fixed services are incidental or ancillary to Verizon’s mobile services. *See* 47 U.S.C. § 332; *Implementation of Sections 3(n) and 332 of the Communications Act; Regulatory Treatment of Mobile Services*, Second Report and Order, 9 FCC Rcd 1411, ¶¶ 35-36 (1994); *see also* *Amendments to Harmonize and Streamline Part 20 of the Commission’s Rules Concerning Requirements for Licensees to Overcome a CMRS Presumption*, Report and Order, 32 FCC Rcd 10731, ¶¶ 3, 6 (2017) (preserving statutory interpretation of “mobile services”).

⁴³ *See E911 Compliance FAQs*, VERIZON, <https://www.verizon.com/support/e911-compliance-faqs/> (last visited Sept. 8, 2026).

phones. Customers using these services will receive all the standard features offered with POTS service, including caller ID, call waiting, call forwarding, and three-way calling, among others.⁴⁴

It bears emphasis that the Bureau has already concluded that Verizon mobile wireless and fixed wireless POTS replacement services are adequate replacements for copper-based POTS. Specifically, the Bureau approved via streamlined treatment Verizon's technology transition applications to discontinue copper-based POTS in favor of Verizon mobile wireless and Verizon fixed wireless in portions of (1) Alabama, Georgia, Iowa, Mississippi, and Tennessee;⁴⁵ and (2) Florida, Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin.⁴⁶ Accordingly, it is consistent with precedent to find that these services constitute adequate replacements.⁴⁷

⁴⁴ See *Voice Connect*, VERIZON, <https://www.verizon.com/support/residential/homephone/voice-connect> (last visited Sept. 8, 2026); *Verizon Voice Gateway*, VERIZON, <https://www.verizon.com/home-office-solutions/verizon-voice-gateway/> (last visited Sept. 8, 2026).

⁴⁵ See Section 63.71 Application of Verizon, WC Docket No. 26-116 (May 15, 2026), <https://www.fcc.gov/ecfs/document/10515068977832/1> ("Five-State Application") (setting forth such services as adequate replacements); *Comments Invited on Verizon's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, WC Docket No. 26-116, Public Notice, DA 26-508 (WCB rel. May 21, 2026) (accepting application for streamlined processing and providing a deemed granted date of June 21, 2026).

⁴⁶ See Section 63.71 Application of Verizon, WC Docket No. 26-170 (July 7, 2026), <https://www.fcc.gov/ecfs/document/26109998545/1> ("Eight-State Application") (setting forth such services as adequate replacements); *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, Public Notice, DA 26-763 (WCB rel. July 21, 2026) (accepting application for streamlined processing and providing a deemed granted date of August 21, 2026).

⁴⁷ See *2016 Technology Transitions Order* ¶ 83 ("We agree that an application should be eligible for an automatic grant where a substantially similar showing made by that same applicant has satisfied our public interest considerations.").

1. Verizon’s Mobile Wireless and Fixed Wireless POTS Voice Replacement Services Offer Substantially Similar Levels of Network Performance and Availability as POTS.

Based on the totality of the circumstances, Verizon’s mobile wireless and fixed wireless POTS voice replacement services have substantially similar network performance and availability as the POTS Verizon would discontinue.

a. Verizon’s Network Performance.

Under the “network performance” prong of the Adequate Replacement Test, an applicant seeking to discontinue service can make “a demonstration, based on the totality of the circumstances,” that the network on which a replacement service will run provides substantially similar performance and availability.⁴⁸ The totality of the circumstances shows that users can rely on Verizon’s mobile wireless network for mobile wireless service and fixed wireless POTS voice replacement services to replace the legacy voice services Verizon seeks to discontinue. Verizon offers a 4G LTE and 5G NR (“New Radio”) mobile broadband and voice service at the vast majority of locations in Verizon’s service areas in California, Connecticut, District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia. This same mobile wireless network enables Verizon’s fixed wireless POTS voice replacement services.

In its recently approved discontinuance applications, Verizon detailed the technical analysis, third-party measurements, and nationwide awards demonstrating that its wireless network performs exceptionally well.⁴⁹ These technical facts and measurements have not changed, they apply here, and Verizon incorporates them into this Application. Awards specific

⁴⁸ *See id.* ¶ 91.

⁴⁹ Five-State Application at 7-9; Eight-State Application at 10-12.

to the ten jurisdictions at issue here only reinforce Verizon’s prior showings and Bureau precedent confirming that Verizon’s wireless network provides similar performance and availability to legacy copper-based POTS. In the jurisdictions that are included in this application, Verizon’s network won JD Power’s 2026 U.S. Wireless Network Quality Performance Study – Volume 2 award in the District of Columbia, Illinois, Maryland, Michigan, Pennsylvania, and West Virginia and shared honors with T-Mobile for the same top award in California, Connecticut, Massachusetts, and New York.⁵⁰

In addition to earning more top state and local market rankings than any other provider overall,⁵¹ Verizon collected multiple awards for its network performance in several regional metropolitan areas surveyed by RootMetrics, including #1 Overall Performance in Oxnard,⁵² and

⁵⁰ Press Release, JD Power, Wireless Network Quality Returns to Record High, JD Power Finds (July 16, 2026), <https://www.jdpower.com/business/press-releases/2026-u-s-wireless-network-quality-performance-study-volume-2/>. Verizon’s wireless network earned first place from RootMetrics for Overall Performance statewide in both Michigan and New York, and shared this top honor in California, Illinois, and Pennsylvania. *State RootScore Report – 1st Half 2026: Michigan*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/state/michigan/2026/1H> (last visited Sept. 8, 2026); *State RootScore Report – 1st Half 2026: New York*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/state/new-york/2026/1H> (last visited Sept. 8, 2026); *State RootScore Report – 1st Half 2026: California*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/state/california/2026/1H> (last visited Sept. 8, 2026); *State RootScore Report – 1st Half 2026: Illinois*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/state/illinois/2026/1H> (last visited Sept. 8, 2026); *State RootScore Report – 1st Half 2026: Pennsylvania*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/state/pennsylvania/2026/1H> (last visited Sept. 8, 2026).

⁵¹ “Verizon won outright or shared six U.S. RootScore Awards in 1H 2026, the highest total in our national testing, including a share of the United States Overall RootScore Award. . . . Moreover, Verizon won our Best 5G Experience prize and took home honors for delivering the Most Reliable 5G. Verizon improved its higher-end download speeds. . . .” Mike Dano, *United States: State of the Mobile Union Report*, OOKLA (2026), <https://www.ookla.com/research/reports/rootmetrics-us-state-of-mobile-union-1h-2026>.

⁵² *Metro Area RootScore Report – 1st Half 2026: Oxnard, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/oxnard-ca/2026/1H> (last visited Sept. 8, 2026).

Victor Valley, CA;⁵³ Bridgeport–Stamford, CT;⁵⁴ Springfield, MA;⁵⁵ Detroit, MI;⁵⁶ New York City NY and the Tri-State Area;⁵⁷ and Scranton, PA.⁵⁸ Verizon shared awards for Overall Best

⁵³ *Metro Area RootScore Report – 1st Half 2026: Victor Valley, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/victor-valley-ca/2026/1H> (last visited Sept. 8, 2026).

⁵⁴ *Metro Area RootScore Report – 1st Half 2026: Bridgeport and Stamford, CT*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/bridgeport-and-stamford-ct/2026/1H> (last visited Sept. 8, 2026).

⁵⁵ *Metro Area RootScore Report – 1st Half 2026: Springfield, MA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/springfield-ma/2026/1H> (last visited Sept. 8, 2026).

⁵⁶ *Metro Area RootScore Report – 1st Half 2026: Detroit, MI*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/detroit-mi/2026/1H> (last visited Sept. 8, 2026).

⁵⁷ *Metro Area RootScore Report – 1st Half 2026: New York City and Tri-State Area*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/new-york-city-and-tri-state-area/2026/1H> (last visited Sept. 8, 2026).

⁵⁸ *Metro Area RootScore Report – 1st Half 2026: Scranton, PA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/scranton-pa/2026/1H> (last visited Sept. 8, 2026).

Performance in Antioch,⁵⁹ Bakersfield,⁶⁰ Concord,⁶¹ Fresno,⁶² Los Angeles,⁶³ Mission Viejo,⁶⁴ Modesto,⁶⁵ Riverside,⁶⁶ Sacramento,⁶⁷ San Diego,⁶⁸ San Jose,⁶⁹ and Temecula, CA;⁷⁰ New

⁵⁹ *Metro Area RootScore Report – 1st Half 2026: Antioch, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/antioch-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁰ *Metro Area RootScore Report – 1st Half 2026: Bakersfield, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/bakersfield-ca/2026/1H> (last visited Sept. 8, 2026).

⁶¹ *Metro Area RootScore Report – 1st Half 2026: Concord, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/concord-ca/2026/1H> (last visited Sept. 8, 2026).

⁶² *Metro Area RootScore Report – 1st Half 2026: Fresno, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/fresno-ca/2026/1H> (last visited Sept. 8, 2026).

⁶³ *Metro Area RootScore Report – 1st Half 2026: Los Angeles, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/los-angeles-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁴ *Metro Area RootScore Report – 1st Half 2026: Mission Viejo, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/mission-viejo-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁵ *Metro Area RootScore Report – 1st Half 2026: Modesto, CA*, RootMetrics, <https://www.rootmetrics.com/en-US/rootscore/map/metro/modesto-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁶ *Metro Area RootScore Report – 1st Half 2026: Riverside, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/riverside-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁷ *Metro Area RootScore Report – 1st Half 2026: Sacramento, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/sacramento-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁸ *Metro Area RootScore Report – 1st Half 2026: San Diego, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/san-diego-ca/2026/1H> (last visited Sept. 8, 2026).

⁶⁹ *Metro Area RootScore Report – 1st Half 2026: San Jose, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/san-jose-ca/2026/1H> (last visited Sept. 8, 2026).

⁷⁰ *Metro Area RootScore Report – 1st Half 2026: Temecula, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/temecula-ca/2026/1H> (last visited Sept. 8, 2026).

Haven, CT;⁷¹ Albany,⁷² Rochester,⁷³ and Syracuse, NY;⁷⁴ and Allentown,⁷⁵ Harrisburg,⁷⁶ Lancaster,⁷⁷ Philadelphia,⁷⁸ and Pittsburgh, PA.⁷⁹ Verizon also shared first-place awards for Network Reliability and Network Speed in San Francisco⁸⁰ and Antelope Valley, CA,⁸¹ Buffalo,

⁷¹ *Metro Area RootScore Report – 1st Half 2026: New Haven, CT*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/new-haven-ct/2026/1H> (last visited Sept. 8, 2026).

⁷² *Metro Area RootScore Report – 1st Half 2026: Albany, NY*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/albany-ny/2026/1H> (last visited Sept. 8, 2026).

⁷³ *Metro Area RootScore Report – 1st Half 2026: Rochester, NY*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/rochester-ny/2026/1H> (last visited Sept. 8, 2026).

⁷⁴ *Metro Area RootScore Report – 1st Half 2026: Syracuse, NY*, RootMetrics, <https://www.rootmetrics.com/en-US/rootscore/map/metro/syracuse-ny/2026/1H> (last visited Sept. 8, 2026).

⁷⁵ *Metro Area RootScore Report – 1st Half 2026: Allentown, PA*, RootMetrics, <https://www.rootmetrics.com/en-US/rootscore/map/metro/allentown-pa/2026/1H> (last visited Sept. 8, 2026).

⁷⁶ *Metro Area RootScore Report – 1st Half 2026: Harrisburg, PA*, RootMetrics, <https://www.rootmetrics.com/en-US/rootscore/map/metro/harrisburg-pa/2026/1H> (last visited Sept. 8, 2026).

⁷⁷ *Metro Area RootScore Report – 1st Half 2026: Lancaster, PA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/lancaster-pa/2026/1H> (last visited Sept. 8, 2026).

⁷⁸ *Metro Area RootScore Report – 1st Half 2026: Philadelphia, PA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/philadelphia-pa/2026/1H> (last visited Sept. 8, 2026).

⁷⁹ *Metro Area RootScore Report – 1st Half 2026: Pittsburgh, PA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/pittsburgh-pa/2026/1H> (last visited Sept. 8, 2026).

⁸⁰ *Metro Area RootScore Report – 1st Half 2026: San Francisco, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/san-francisco-ca/2026/1H> (last visited Sept. 8, 2026).

⁸¹ *Metro Area RootScore Report – 1st Half 2026: Antelope Valley, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/antelope-valley-ca/2026/1H> (last visited Sept. 8, 2026).

NY;⁸² Chicago, IL;⁸³ and Worcester, MA,⁸⁴ shared first place for Network Reliability in Stockton, CA,⁸⁵ and shared first place for Network Speed in Grand Rapids, MI,⁸⁶ and Baltimore, MD.⁸⁷

In these jurisdictions, customers who select Verizon's mobile wireless or fixed wireless POTS replacement services will benefit from the same wireless network and technology that powers these outstanding results covering nearby cities and areas.

b. Verizon's Service Availability.

The Adequate Replacement Test's network performance requirements also consider service availability.⁸⁸ Carriers may meet the service availability prong through a totality of circumstances showing, which, as explained below, Verizon wireless service does.⁸⁹ The Commission's National Broadband Map demonstrates that Verizon offers sufficient coverage to

⁸² *Metro Area RootScore Report – 1st Half 2026: Buffalo, NY*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/buffalo-ny/2026/1H> (last visited Sept. 8, 2026).

⁸³ *Metro Area RootScore Report – 1st Half 2026: Chicago, IL*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/chicago-il/2026/1H> (last visited Sept. 8, 2026).

⁸⁴ *Metro Area RootScore Report – 1st Half 2026: Worcester, MA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/worcester-ma/2026/1H> (last visited Sept. 8, 2026).

⁸⁵ *Metro Area RootScore Report – 1st Half 2026: Stockton, CA*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/stockton-ca/2026/1H> (last visited Sept. 8, 2026).

⁸⁶ *Metro Area RootScore Report – 1st Half 2026: Grand Rapids, MI*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/grand-rapids-mi/2026/1H> (last visited Sept. 8, 2026).

⁸⁷ *Metro Area RootScore Report – 1st Half 2026: Baltimore, MD*, ROOTMETRICS, <https://www.rootmetrics.com/en-US/rootscore/map/metro/baltimore-md/2026/1H> (last visited Sept. 8, 2026).

⁸⁸ See 2016 Technology Transitions Order ¶ 94.

⁸⁹ *Id.* ¶ 90.

support voice service throughout the discontinuance areas in these states where it offers mobile wireless service and fixed wireless POTS voice replacement service.⁹⁰ As Verizon has explained, the National Broadband Map frequently will understate voice availability because, for instance, 4G LTE (5 Mbps downlink / 1 Mbps uplink) far surpasses the network requirements to support a mobile voice call.⁹¹ The awards from RootMetrics, and the rigorous testing behind them, demonstrate that Verizon's wireless network provides availability similar to POTS. Because customer calls made with Verizon's fixed wireless POTS voice replacement service are carried using the same network and equipment as Verizon's wireless customers' VoLTE calls, they will experience the same service availability. In addition, Verizon's legacy voice replacement customer premises devices can remain positioned in the optimal area of a customer's residence or premises, which means Verizon's legacy voice replacement services provide reliable wireless voice service that, in some cases, exceeds the performance of mobile wireless services.

c. Verizon's Replacement Service Coverage.

Finally, the Commission's Adequate Replacement Test requires that an application for streamlined treatment demonstrate that either: "(i) a single replacement service reaches the entire geographic footprint of the service area subject to discontinuance; or (ii) there are multiple providers who collectively cover the entirety of the [discontinuance] area."⁹² As reflected in both the National Broadband Map and Verizon's coverage map, Verizon's LTE network is

⁹⁰ *National Broadband Map*, FCC, <https://broadbandmap.fcc.gov/home> (last visited Sept. 8, 2026).

⁹¹ Comments of Verizon Communications Inc., WC Docket No. 26-125, at 11 (filed July 7, 2026); *see also infra* Sec. III.C.1.

⁹² *2016 Technology Transitions Order* ¶ 123 (footnote omitted).

widely available in the discontinuance area.⁹³ This network enables Verizon’s mobile wireless services as well as its fixed wireless legacy voice replacement services. The Broadband Data Collection (“BDC”) did not exist when the Commission devised the Adequate Replacement Test, and it provides a level of detail that may have previously required additional sources.

2. Verizon Offers Access to Critical Applications and Functionalities.⁹⁴

a. 911 and Emergency Services.

Verizon certifies that its mobile wireless and fixed wireless POTS voice replacement services comply with all applicable regulations regarding the availability and required functionality of 911 service.⁹⁵ Verizon’s mobile wireless service does not require a backup battery to remain operational during electric power outages of several hours or less,⁹⁶ and modern cell phones can go without a charge for more than 24 hours when kept in standby mode. For longer outages, modern 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. The customer premises equipment for Verizon’s fixed wireless POTS voice replacement service includes

⁹³ *National Broadband Map*, FCC, <https://broadbandmap.fcc.gov/home> (last visited Sept. 8, 2026); Verizon, *Find Home Internet and Cell Phone Coverage in Your Area* (coverage map), <https://www.verizon.com/coverage-map/> (last visited Sept. 8, 2026). As discussed elsewhere, Verizon relies on its fiber facilities and certain third-party services in the remainder of the discontinuance area.

⁹⁴ In 2016, when adopting the Adequate Replacement Test, the Commission identified a list of “key applications and functionalities” that were associated with legacy voice service at that time. *2016 Technology Transitions Order* ¶¶ 157-58. The Commission specified that the 2016 list of functionalities sunset in 2025, so Verizon does not address them here. *Id.* ¶ 170.

⁹⁵ *See id.* ¶¶ 128-129.

⁹⁶ *U.S. Electricity Customers Averaged Five and One-Half Hours of Power Interruptions in 2022*, U.S. ENERGY INFORMATION ADMINISTRATION (Jan. 25, 2024), <https://www.eia.gov/todayinenergy/detail.php?id=61303> (“Since 2013, the average duration of electricity interruptions each year has remained consistently around two hours after excluding major events.”).

battery backup using commercially available rechargeable batteries.⁹⁷ Verizon also certifies that its mobile wireless and fixed wireless POTS voice replacement services comply with all applicable 911 network reliability requirements.⁹⁸

b. Communications Security.

Verizon maintains a comprehensive and mature cybersecurity program designed to protect the confidentiality, integrity, and availability of its systems, networks, and information, including for its wireless services, through administrative, technical, and physical safeguards. Grounded in the National Institute of Standards and Technology Cybersecurity Framework, the enterprise-wide program incorporates robust policies, strategic planning, cutting-edge technology, comprehensive training, and a culture of continuous improvement to proactively identify and protect against cybersecurity risks, and to enable rapid detection, response, and recovery from incidents. Verizon employs more than one thousand cybersecurity professionals who establish and oversee security strategies and policies and partner with business units to implement appropriate security measures and protect customer data. Verizon’s cybersecurity ecosystem—subject to review with key stakeholders at least once every year to ensure alignment with current regulations and business practices—reflects its commitment to providing effective protections against cyber threats. Verizon therefore certifies that its network security management practices are enterprise-wide and that it safeguards the availability, integrity, and confidentiality of the network without differentiation between services, geographic areas, or

⁹⁷ Both the Voice Connect and Verizon Voice Gateway devices use widely available “AA” batteries. When fully charged, Voice Connect batteries will provide up to three talk hours, or up to 23 standby hours of backup power, and Verizon Voice Gateway batteries provide up to 4 talk hours and 24 standby hours, both enabling voice services, including 911 service, when the power goes out.

⁹⁸ See *2016 Technology Transitions Order* ¶ 134; 47 C.F.R. § 9.19.

service-providing affiliates.

Beyond Verizon’s specific practices, the proposed transition is consistent with communications security generally because, among other things, “TDM cannot support many software-based cybersecurity tools that protect modern data and voice infrastructure.”⁹⁹ Further, “for TDM networks . . . in many cases, parts in use today have been running since the 1990s and are reaching the end of their lifespan. OEMs have also stopped producing certain parts, so when replacements are needed, operators [such as Verizon] must turn to the resale market. . . . [I]t is difficult to track the origin of resale equipment and verify whether it meets security standards.”¹⁰⁰ And “[a]dvanced ‘frontier’ AI models have raised the threat level of reliance on TDM network architectures drastically” because “TDM networks do not have the agility to defend against” those threats in the same manner as modern networks.¹⁰¹ In sum, “the replacement service offers comparably effective protection”—indeed, better protection—“from network security risks.”¹⁰²

c. Service for Individuals with Disabilities.

Verizon certifies that its mobile wireless services and its fixed wireless legacy voice replacement services comply with all accessibility, usability, and compatibility requirements governing services benefiting individuals with disabilities.¹⁰³ Further, at Verizon, we are

⁹⁹ Clete Johnson & Evelyn Remaley, *Modernizing and Securing U.S. Government Networks*, LIBERTY BELL PROJECT, at 2 (Aug. 20, 2026), <https://libertybellproject.us/wp-content/uploads/2026-08-20-modernizing-and-securing-us-government-networks.pdf> (“Liberty Bell Project Paper”).

¹⁰⁰ *Id.* at 4.

¹⁰¹ *Id.*

¹⁰² *2016 Technology Transitions Order* ¶ 136.

¹⁰³ *Id.* ¶ 146.

striving to make our products and services accessible, moving our world forward through compliance and beyond.¹⁰⁴ Verizon provides a wide range of innovative accessibility solutions and technologies for its products and services.¹⁰⁵ Verizon's partnership with the Valuable 500, an organization dedicated to ending disability exclusion, demonstrates its commitment to go above and beyond what the Commission's rules and orders require.¹⁰⁶

B. The Alternative Options Test Is Satisfied in the Areas in Which Verizon Has Overbuilt Fiber.

Verizon has deployed fiber-optics Fios service to portions of its previous copper footprint in California, Connecticut, District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia and offers interconnected VoIP service over that network.¹⁰⁷ In each such area with fiber, this service satisfies the Alternative Options Test.¹⁰⁸ The Bureau agreed in recently approving Verizon's discontinuance application for Florida,

¹⁰⁴ See *Welcome to your Accessibility Resource Center*, Verizon, <https://www.verizon.com/accessibility/> (last visited Sept. 8, 2026).

¹⁰⁵ See *Accessible resources and support*, Verizon, <https://www.verizon.com/about/accessibility/resources-support> (last visited Sept. 8, 2026).

¹⁰⁶ See *Verizon, Valuable 500*, <https://www.thevaluable500.com/companies/verizon/> (last visited Sept. 8, 2026).

¹⁰⁷ Verizon's voice service over broadband replacement options include: Fios Home Phone, an advanced home phone service that works on Verizon's 100% fiber-optic network and uses traditional corded or cordless landline phones connected to existing phone jacks; Frontier Digital Voice, built with digital technology to deliver excellent call quality and reliability; and Business Digital Voice, a professional communications solution that operates over a secure, cloud-based VoIP connection. See *Fios Home Phone*, VERIZON, <https://www.verizon.com/home/phone/> (last visited Sept. 8, 2026); *Frontier Digital Voice features and support*, FRONTIER, A VERIZON COMPANY, <https://frontier.com/helpcenter/phone/frontier-digital-voice> (last visited Sept. 8, 2026); *Business Digital Voice*, VERIZON, <https://www.verizon.com/business/products/voice-collaboration/voip/business-digital-voice/> (last visited Sept. 8, 2026).

¹⁰⁸ 47 C.F.R. § 63.71(f)(2)(ii) (setting out the Commission's Alternative Options Test).

Indiana, Minnesota, Nebraska, Nevada, North Carolina, Texas, and Wisconsin, where Verizon made such a demonstration.¹⁰⁹

Verizon's Fios service meets the first prong of the Alternative Options test as it offers "interconnected VoIP services . . . throughout the affected service area."¹¹⁰ As for the second prong of the test, in the portions of the discontinuance area where Fios is available, there are multiple service offerings available from unaffiliated providers—including mobile wireless service from AT&T and T-Mobile and broadband service sufficient to support VoIP provisioned over cable or fiber from multiple providers.¹¹¹ Accordingly, the portion of the discontinuance area served by Verizon Fios qualifies for treatment under the streamlined grant procedures set forth in Section 63.71(f)(1).¹¹²

C. Leading Third-Party Fiber, Cable, and Mobile Wireless Services Satisfy the Adequate Replacement Test.

Beyond locations in which Verizon offers its own wireless or fiber-based replacement service, Verizon also seeks approval to discontinue provision of copper-based POTS at locations where a specified third party offers interconnected VoIP service over their fiber-based or cable-

¹⁰⁹ See Eight-State Application at 16-18.

¹¹⁰ *Id.* § 63.71(f)(2)(ii)(A). Verizon is no longer required to offer its service on a stand-alone basis in order to discontinue a legacy service. See *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment et al.*, Order, 40 FCC Rcd 1999 (WCB 2025).

¹¹¹ Comcast provides both VoIP services and cable/fiber broadband service offering bandwidth sufficient to support VoIP services in certain areas in every state and territory where Verizon seeks to discontinue its legacy POTS, and Spectrum provides both services in every jurisdiction where Verizon seeks to discontinue its legacy POTS except the District of Columbia. Beyond Comcast and Spectrum, the following is a non-exhaustive list of providers that offer both VoIP and cable/fiber broadband service with bandwidth sufficient to support VoIP in parts of the discontinuance areas in each of the following states: California: Mediacom and Optimum; Connecticut: Breezeline, and Optimum; Illinois: Sparklight; Maryland: Armstrong, Breezeline, and Shentel; New York: Breezeline and Optimum; Pennsylvania: Armstrong, Breezeline, and Optimum; West Virginia: Armstrong, Breezeline, Optimum, and Shentel.

¹¹² See 47 C.F.R. § 63.71(f)(1).

based (or hybrid fiber-coaxial-based) networks,¹¹³ or mobile wireless voice service (i.e., commercial mobile radio service or CMRS). The *2016 Technology Transitions Order* established that discontinuance applicants may show that a third-party replacement service constitutes an adequate replacement and that applicants may rely on public information in making that showing.¹¹⁴

To ensure high quality service, Verizon limits the third parties it puts forward as adequate replacements to ten facilities-based providers with the largest amount of unique overlaps with its copper network in the areas in question: AT&T Inc. (“AT&T”); T-Mobile US, Inc. (“T-Mobile”); Comcast Corp. (“Xfinity”); Charter Communications, Inc. (“Spectrum”);¹¹⁵ Cogeco Communications (“Breezeline”); Mediacom Communications Corp. (“Mediacom”); Optimum Communications, Inc. (“Optimum”); Shenandoah Telecommunications Co. (“Shentel”); Cable One, Inc. (“Sparklight”); and Armstrong Utilities Inc. (“Armstrong”). Verizon specifically seeks discontinuance authority where the BDC reveals that one of the aforementioned “top ten” providers makes available fiber or cable or 4G LTE (5/1 Mbps) or better mobile coverage at the same location as Verizon POTS, and where public information indicates that the cable or fiber provider offers interconnected VoIP or the mobile provider offers mobile voice (each such

¹¹³ At some locations some Providers may rely on third-party inputs to offer facilities-based interconnected VoIP or they may offer resold facilities-based interconnected VoIP service over fiber or cable, and any such locations are within the scope of this Application. *See Network Modernization Order* ¶ 23 n.84 (stating that a facilities-based service includes “facilities that the provider has obtained the right to use from other entities”).

¹¹⁴ *2016 Technology Transitions Order* ¶¶ 84, 86.

¹¹⁵ Spectrum recently closed its acquisition of Cox Communications, Inc. (“Cox”). *Charter Acquires Cox: A New Era in Connectivity*, SPECTRUM (Aug. 20, 2026), <https://corporate.charter.com/charter-cox-transaction>. Spectrum therefore includes Cox for purposes of this Application. Nevertheless, we present details regarding Cox in addition to Spectrum given that integration may be ongoing. *See generally Cox is Now Spectrum*, COX, <https://www.cox.com/residential/cox-is-now-spectrum.html> (last visited Sept. 8, 2026).

provider, in its provision of voice at the locations in question, a “Provider”). As detailed below, this Application demonstrates based on the totality of the circumstances, using publicly available information, that each of the Providers satisfies the Adequate Replacement Test.

Commission precedent supports this conclusion. While the discontinuance rules and associated information collections adopted in the *Network Modernization Order* are not yet effective,¹¹⁶ the order text, including the Commission’s conclusions regarding adequate replacements, is effective.¹¹⁷ Accordingly, the Bureau may rely on those Commission conclusions. The *Network Modernization Order* found that “facilities-based interconnected VoIP service is an adequate replacement” and that “facilities-based mobile wireless service operating at speeds of at least 5/1 Mbps” is “an adequate replacement.”¹¹⁸ The Commission reiterated, consistent with the preexisting Adequate Replacement Test, that “[p]ermitting a discontinuing carrier to rely on the availability of an adequate replacement service offered by a third party to support a technology transitions discontinuance application and to rely on publicly available information to make the requisite showing is consistent with previous Commission action.”¹¹⁹

The recent *Network Modernization Order* represents the Commission’s definitive, unanimous, and bipartisan view on the topic of adequate replacements. Nevertheless, it is far from the only precedent supporting the conclusion that the Providers’ fiber, cable, and mobile wireless-based voice services constitute adequate replacements for copper-based POTS. Fiber,

¹¹⁶ See Information Collection Being Submitted for Review and Approval to Office of Management and Budget, 91 Fed. Reg. 44843 (July 17, 2026).

¹¹⁷ See Reducing Barriers to Network Improvements and Service Changes, 91 Fed. Reg. 20913 (Apr. 20, 2026).

¹¹⁸ *Network Modernization Order* ¶¶ 32, 34 (footnotes omitted).

¹¹⁹ *Id.* ¶ 38 (footnotes omitted).

coaxial cable, and hybrid fiber-coaxial cable all provide reliable wireline connections that are more than fast enough for VoIP,¹²⁰ and Commission precedent confirms that facilities-based VoIP over these connections meet consumer needs.¹²¹ The Commission also has brought interconnected VoIP services into significant regulatory parity with traditional telecommunications services, including with respect to, among other things, robocall requirements, 911, disability access, customer privacy/CPNI, and law enforcement/CALEA.¹²²

¹²⁰ See *Broadband Speed Guide*, FCC (July 2022), <https://www.fcc.gov/consumers/guides/broadband-speed-guide> (minimum download speed for a VoIP call is less than 0.5 Mbps); *Internet Access Services: Status as of June 30, 2025*, FCC, INDUSTRY ANALYSIS DIVISION, OFFICE OF ECONOMICS AND ANALYTICS, at 1, 7, 69 (May 2026), <https://docs.fcc.gov/public/attachments/DOC-421557A1.pdf> (wireline technologies that allow information to be sent to or received with a speed of at least 0.2 Mbps include coaxial cable, hybrid fiber-coaxial cable, and fiber to the premises); cf. *Check Your Internet Speed*, VONAGE, (Oct. 5, 2020), <https://support.vonage.com/articles/answer/Check-Your-Internet-Speed-1060> (“Vonage recommends minimum upload speed of 90 kilobytes per second or greater per phone line to attain the highest audio quality.”); see also *Getting Broadband Q&A*, FCC, (Jan. 25, 2024), <https://www.fcc.gov/consumers/guides/getting-broadband-qa> (broadband supports VoIP which can be accessed over different platforms including cable and fiber). For the avoidance of doubt, Verizon cites Vonage not because it is relying on over-the-top options in this Application, but rather to illustrate that voice calls place minimal demands on modern networks.

¹²¹ See *Communications Marketplace Report* ¶¶ 154-57 (discussing a “multitude of other voice service options for consumers,” including VoIP bundled with the underlying broadband connection, and stating that “U.S. consumers benefit from the ever evolving choices available to meet their voice communication needs”); *Network Modernization Order* ¶ 32 (finding that “interconnected VoIP service benefits consumers by providing access to networks that can support advanced protocols and technologies”); see also *Numbering Policies for Modern Communications et al.*, Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 8951, ¶ 1 (2023) (“[T]echnological innovations such as VoIP calling capabilities have brought advanced communications services to the marketplace to the benefit of consumers . . .”).

¹²² See, e.g., *Numbering Policies for Modern Communications et al.*, Second Report and Order and Second Further Notice of Proposed Rulemaking, 38 FCC Rcd 8951 (2023) (robocall requirements); *BellSouth’s Petition for Declaratory Ruling Regarding the Commission’s Definition of Interconnected VoIP in 47 C.F.R § 9.3 and the Prohibition on State Imposition of 911 Charges on VoIP Customers in 47 U.S.C. § 615a-1(f)(1) et al.*, Declaratory Ruling, 34 FCC Rcd 10158 (2019) (911 calling); *Contributions to the Telecommunications Relay Services Fund*, Report and Order, 26 FCC Rcd 14532 (2011) (disability access); *Implementation of the Telecommunications Act of 1996: Telecommunications Carriers’ Use of Customer Proprietary Network Information and Other Customer Information et al.*, Report and Order and Further

Of course, similar or even added requirements apply to CMRS as well,¹²³ and the Commission has acknowledged the marketplace reality that consumers overwhelmingly choose mobile voice.¹²⁴ The Bureau has previously approved technology transition applications via streamlined treatment where the replacement is third-party facilities-based interconnected VoIP or mobile wireless.¹²⁵

Notice of Proposed Rulemaking, 22 FCC Rcd 6927 (2007) (customer privacy/CPNI); *Communications Assistance for Law Enforcement Act and Broadband Access and Services*, First Report and Order and Further Notice of Proposed Rulemaking, 20 FCC Rcd 14989 (2005) (law enforcement/CALEA).

¹²³ See, e.g., 47 C.F.R. §§ 9.9-.10; see also *id.* § 20.15.

¹²⁴ See, e.g., *Reforming Legacy Rules for an All-IP Future et al.*, Notice of Proposed Rulemaking, FCC 26-11, ¶¶ 11, 13 (rel. Feb. 19, 2026).

¹²⁵ See, e.g., *Comments Invited on CenturyLink's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, Public Notice, DA 26-270 (WCB rel. Mar. 19, 2026) (granting streamlined treatment to Lumen where Xfinity VoIP and Verizon mobile wireless were the proposed replacement services); Section 63.71 Application of Qwest Corporation d/b/a CenturyLink QC For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue a Telecommunications Service, WC Docket No. 26-66 (filed Mar. 10, 2026); *Comments Invited on CenturyLink's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, Public Notice, 40 FCC Rcd 3205 (WCB 2025) (granting streamlined treatment to Lumen where Verizon mobile wireless was the proposed replacement service); Section 63.71 Application of Qwest Corporation d/b/a CenturyLink QC For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue a Telecommunications Service, WC Docket No. 25-177, at 2, 5-8 (filed May 16, 2025); *Comments Invited on Section 214 Application(s) to Discontinue Domestic Non-Dominant Carrier Telecommunications Services as Part of a Technology Transition*, Public Notice, 35 FCC Rcd 11342 (WCB 2020) (granting streamlined treatment to Lumen where Charter Spectrum was the proposed replacement service); Section 63.71 Application of Embarq Florida, Inc., d/b/a CenturyLink For Authority Pursuant to Section 214 of the Communications Act of 1934, As Amended, to Discontinue a Telecommunications Service, WC Docket No. 20-328 (filed Sept. 30, 2020).

1. The Providers Offer Substantially Similar Levels of Network Performance and Availability as Verizon POTS.

Based on the totality of the circumstances, the Providers offer substantially similar network infrastructure and service quality as the POTS Verizon would discontinue.

a. Network Performance and Availability.

The totality of the circumstances demonstrates that users can rely on the Providers for substantially similar network performance and availability as Verizon POTS.¹²⁶ Indeed, the cable, fiber, and mobile technologies employed by the Providers are far superior to legacy copper. The Commission found almost two years ago that “[a]lthough the public switched telephone network was once the only means to connect, there now exists a multitude of other voice service options for consumers in the United States.”¹²⁷ The *Network Modernization Order* confirmed specifically at the Commission level that facilities-based interconnected VoIP and facilities-based 4G LTE (5/1 Mbps) or faster mobile wireless are adequate replacements,¹²⁸ reenforcing earlier Bureau discontinuance determinations, as discussed above. These decisions represent a clear-cut conclusion that facilities-based interconnected VoIP delivered over cable or fiber and facilities-based mobile wireless voice meet consumers’ needs.

The marketplace reinforces this sound conclusion. As detailed in Section II above, most consumers choose mobile wireless for voice service, and most of the remainder pick interconnected VoIP. From a technological perspective, voice requires minimal network

¹²⁶ See *2016 Technology Transitions Order* ¶ 91.

¹²⁷ *Communications Marketplace Report* ¶ 154.

¹²⁸ *Network Modernization Order* ¶¶ 32, 34.

capacity in comparison to modern applications such as video conferencing and gaming, and modern cable, fiber, and mobile wireless networks are more than up to the task.¹²⁹

All ten of the Providers emphasize their high-quality network performance and availability.¹³⁰ The Providers have received many awards and recognition for their networks from third parties, including from testing services.¹³¹ The Providers submit detailed data into the

¹²⁹ See generally *id.*

¹³⁰ See, e.g., *AT&T Customers Win: Company's Wireless Network Outperforms T-Mobile in Speed, Reliability, and Performance. Plus, AT&T Fiber Awarded as Fastest and Top-Rated Internet*, AT&T (Sept. 8, 2025), <https://about.att.com/story/2025/ookla-rootmetrics-awards.html>; *America's Best Network Keeps Getting Better*, T-MOBILE, <https://www.t-mobile.com/coverage/network> (last visited Sept. 8, 2026) ("T-Mobile is the Best Mobile Network in the U.S."); *America's Smartest Broadband Network*, COMCAST, <https://corporate.comcast.com/our-network> (last visited Sept. 8, 2026) (describing Comcast's network as "Resilient by Design" and explaining that "every connection is optimized in real-time to deliver fast, reliable and secure Internet to our customers"); *Speed and Reliability: Spectrum Internet Delivers*, CHARTER (Sept. 9, 2024), <https://policy.charter.com/spectrum-internet-delivers> (stating that "Spectrum delivers the most reliable internet" and "the fastest Internet download speeds"); *A Phone that Fits Your Lifestyle*, COX, <https://www.cox.com/residential/phone.html> (last visited Sept. 8, 2026) ("Cox Voice uses an upgraded digital fiber-optic network that makes it first in reliability. . . . Plus, we monitor the network 24 hours a day to help keep your phone service trouble-free."); *Serving 1.5 Million Homes & Businesses*, BREEZELINE, <https://www.breezeline.com/what-our-customers-say> (last visited Sept. 8, 2026) (highlighting Breezeline's "lightning fast Internet, TV and Home Phone services" and "Always Reliable Network"); *High-Speed Internet For All Your Needs*, MEDIACOM, <https://mediacomcable.com/internet> (last visited Sept. 8, 2026) (emphasizing Mediacom's "fast, reliable" service); *A Fresh Start Deserves Fast, Fiber-Powered Internet*, OPTIMUM, <https://www.optimum.com/cf/> (last visited Sept. 8, 2026) (emphasizing fast speeds and network reliability); *Our Internet Gets Faster and More Reliable Every Day*, SHENTEL, <https://www.shentel.com/en/internet> (last visited Sept. 8, 2026) ("Switching to Shentel High-Speed Internet means faster speeds [and] more reliable service . . ."); *Sparklight Phone: Reliable phone service that connects you to what matters*, SPARKLIGHT, <https://www.sparklight.com/phone> (last visited Sept. 8, 2026) (emphasizing Sparklight Phone's "exceptional clarity and dependable service"); *Why Choose Armstrong?*, ARMSTRONG, <https://armstrongonewire.com/WhyArmstrong> (last visited Sept. 8, 2026) (highlighting Armstrong's "state-of-the-art fiber-optic network," that its "field technician teams are locally based," and its efforts to "augment [its] network to increase capacity"); see also Section 63.71 Application of AT&T, WC Docket No. 24-220, at 22-27 (Nov. 1, 2024).

¹³¹ See, e.g., *United States: Converged Consumer Experience Report*, OOKLA, <https://www.ookla.com/research/reports/united-states-converged-report-h1-2026> (last visited Sept. 8, 2026); *United States: State of the Mobile Union Report*, OOKLA,

BDC regarding the availability and quality of their broadband offerings,¹³² and the Providers have every incentive to report accurately because of the risk of significant penalties and reputational damage.¹³³ In the highly competitive communications marketplace, the Providers would not have the large customer bases they possess today if customers thought they offered poor quality or suffered excessive outages. Accordingly, the Commission's precedent, the

<https://www.ookla.com/research/reports/rootmetrics-us-state-of-mobile-union-1h-2025> (last visited Sept. 8, 2026); *Xfinity Ranks #1 for Consistent Quality and Download Speed in 'USA Converged Experience Report, April 2026' from Opensignal*, DISCOVERY HUB: XFINITY (July 2, 2026), <https://www.xfinity.com/hub/internet/xfinity-fastest-most-consistent-internet>; Rupert Bapty, *USA Fixed Broadband Reliability Experience — National View — August 2024*, OPENSIGNAL (Aug. 29, 2024), <https://insights.opensignal.com/2024/08/29/usa-fixed-broadband-reliability-experience-national-view-august-2024>; *Optimum Internet: Powering the Tri-State's Connected Homes with Unmatched Speed and Reliability*, OPTIMUM (Feb. 13, 2026), <https://www.optimum.com/articles/internet/optimum-recognized-by-ookla>; News Release, Sparklight, *Sparklight® Recognized by Ookla® for Outstanding Internet Performance Across Multiple U.S. Markets* (Mar. 27, 2025), <https://www.sparklight.com/news/sparklight-recognized-by-ookla-for-outstanding-internet-performance-across>; News Release, Cox, *HighSpeedInternet.com rates Cox the fastest U.S. broadband provider* (June 24, 2024), <https://newsroom.cox.com/2024-06-26-HighSpeedInternet-com-rates-Cox-the-fastest-U-S-broadband-provider>; News Release, Breezeline, *Breezeline Voted Best Internet Provider in West Virginia* (Aug. 8, 2024), <https://www.breezeline.com/news/breezeline-voted-best-internet-provider-in-west-virginia>; News Release, Shentel, *Glo Fiber Named Fiber Provider of the Year in Cablefax's Prestigious Top Ops Awards* (Aug. 22, 2024), <https://investor.shentel.com/news-releases/news-release-details/glo-fiber-named-fiber-provider-year-cablefaxes-prestigious-top>; *Armstrong Media Packet*, ARMSTRONG, at 9, https://armstrongonewire.com/Content/Documents/Media_Info_Packet.pdf (last visited Sept. 8, 2026); see also News Release, Mediacom, *Mediacom Communications Recognized as a US Best Managed Company for Fifth Consecutive Year* (May 14, 2025), <https://www.businesswire.com/news/home/20250514204416/en/Mediacom-Communications-Recognized-as-a-US-Best-Managed-Company-for-Fifth-Consecutive-Year> (May 14, 2025); (fifth consecutive annual award sponsored by the *Wall Street Journal* and Deloitte Private based on factors such as strategy and ability to execute); News Release, Mediacom, *2-Gig Internet Speeds now Offered Companywide* (June 10, 2026), <https://mediacomcable.com/news/2-gig-internet-speeds-now-offered-companywide> (announcing completion of strategic network-wide upgrade).

¹³² See 47 C.F.R. § 1.7004(c) (“Providers shall include in their filings data relating to the availability and quality of service of their broadband internet access service in accordance with this subpart.”).

¹³³ See *id.* § 1.7009.

marketplace, and information from the Providers support the conclusion that users can rely on the Providers for substantially similar network performance and availability as Verizon POTS.

b. Replacement Service Coverage.

The latest BDC data, on which Verizon relies, demonstrate that the Providers offer coverage to the locations in question. As Chairman Carr has stated, the BDC “accurately detail[s] the availability of wired and wireless broadband.”¹³⁴ The *Network Modernization Order* expressly endorsed use of the BDC to determine mobile wireless coverage.¹³⁵ Reliance on the BDC is warranted given that Congress directed this granular source of coverage information.¹³⁶ Further, Verizon’s use of 4G LTE coverage data reported in the BDC reflects a cautious approach, as the minimum throughput requirements of 5 Mbps downlink and 1 Mbps uplink far surpass the network requirements to support a mobile voice call using Voice over LTE.

The Providers must certify the accuracy of their BDC submissions, which are subject to extensive and iterative Commission review processes.¹³⁷ None of the Providers has been subject to a public Commission enforcement action for noncompliance with BDC requirements. Further, Verizon has determined, based on publicly available information, that each of the Providers offers voice service.

¹³⁴ *Establishing the Digital Opportunity Data Collection et al.*, Fifth Report and Order, 40 FCC Rcd 4681, 4720 (2025).

¹³⁵ See *Network Modernization Order* ¶ 34 (“We find facilities-based mobile wireless service operating at speeds of at least 5/1 Mbps, as reflected on the National Broadband Map, to be an adequate replacement”) (footnotes omitted).

¹³⁶ See Broadband Deployment Accuracy and Technological Availability Act, Pub. L. No. 116-130, 134 Stat. 228 (2020) (codified at 47 U.S.C. §§ 641-46).

¹³⁷ See 47 C.F.R. § 1.7004(d) (certification); *id.* § 1.7006 (data verification); *id.* § 1.7009 (enforcement).

2. The Providers Offer Access to Critical Applications and Functionalities.

a. 911 and Emergency Services.

To Verizon's knowledge, based on its review of the publicly available information discussed below, all Providers comply with all applicable regulations regarding the availability, required functionality, and reliability of 911 service.¹³⁸ Each Provider publicly asserts that it provides customers access to 911.¹³⁹ None of the Providers has been subject to a public Commission enforcement action for a 911 outage occurring within the past two years. The Commission generally assumes good faith compliance by regulatees,¹⁴⁰ and the *Network*

¹³⁸ See 2016 Technology Transitions Order ¶¶ 128-29, 134.

¹³⁹ AT&T, *AT&T Through History – 911*, YOUTUBE (Mar. 4, 2026) <https://www.youtube.com/watch?v=io0b3-6S4t4&t=11s>; *Safety: 911*, T-MOBILE, <https://www.t-mobile.com/responsibility/consumer-info/safety/9-1-1> (last visited Sept. 8, 2026); *What is Enhanced 911 (E911) and how does it work?*, XFINITY, <https://www.xfinity.com/support/articles/about-e911> (last visited Sept. 8, 2026); *Important Information About Spectrum Voice® 911 Services & Battery Backup*, SPECTRUM, <https://www.spectrum.com/policies/battery> (last visited Sept. 8, 2026); *Support: Enhanced 911 and 911 Services*, COX, <https://www.cox.com/residential/support/enhanced-911-and-911-services.html>; *E911*, BREEZELINE, <https://www.breezeline.com/e911> (last visited Sept. 8, 2026); *Stay Connected with Xstream Home Phone*, MEDIACOM, <https://mediacomcable.com/home-phone> (last visited Sept. 8, 2026) (identifying Enhanced 911 as a feature of home phone service); *Is a home phone still worth it?*, OPTIMUM, <https://www.optimum.com/home-phone#accordion-39b3955748-item-d2dfd6f907> (last visited Sept. 8, 2026) (listing Enhanced 911 as a calling feature); *Frequently Asked Questions*, SHENTEL, <https://support.shentel.com/expresshelp/phone/can-i-call-911-with-shentel-phone-service> (last visited Sept. 8, 2026) (“Shentel Home Phone provides 911 service”); *Mandatory 10-Digit Dialing*, SPARKLIGHT, <https://support.sparklight.com/hc/en-us/articles/4411311103639-Mandatory-10-Digit-Dialing> (last visited Sept. 8, 2026) (explaining that customers can dial three digits to reach 911); *Telephone Users Guide: Equipment, Features & Voice Mail*, ARMSTRONG, at 2, <https://armstrongonewire.com/content/documents/telusersguide.pdf> (last visited Sept. 8, 2026) (“Armstrong is proud to offer 911 emergency dialing.”).

¹⁴⁰ See, e.g., *Procedures for Reviewing Requests for Relief from State & Local Regulations Pursuant to Section 332(c)(7)(B)(v) of the Communications Act of 1934*; *Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation et al.*, Second Memorandum Opinion and Order and Notice of Proposed Rulemaking, 12 FCC Rcd 13494, ¶ 151 (1997) (“Generally, we presume that licensees are in compliance with our rules unless presented with evidence to the contrary.”); *Telecommunications Relay Services and Speech-to-Speech*

Modernization Order extends that longstanding approach to this specific context because it does not require a specialized showing regarding compliance with 911 rules for facilities-based interconnected VoIP or mobile wireless.¹⁴¹ Rather, the Commission specifically highlighted the benefits of mobile wireless and facilities-based VoIP in concluding that its approach is “sufficient to safeguard access to emergency services.”¹⁴² The foregoing demonstrates that the Providers meet this sub-prong of the Adequate Replacement Test, especially viewed through the lens of the Commission’s latest thinking on the topic.¹⁴³

Services for Individuals with Hearing and Speech Disabilities, Order, 24 FCC Rcd 11985, ¶ 5 (CGB 2009) (“The Commission’s rules assume good faith compliance with the Communications Act and the law generally on the part of providers seeking compensation from the Fund”); *see also Contemporary Media, Inc. v. FCC*, 214 F.3d 187, 193 (D.C. Cir. 2000) (“The FCC relies heavily on the honesty and probity of its licensees in a regulatory system that is largely self-policing.”) (citations omitted); *In the Matter of Policy to be Followed in the Allowance of Litigation Expenses of Common Carriers in Ratemaking Proceedings In the Matter of Revisions to the Uniform System of Accounts*, 92 FCC 2d 140, 144 (FCC 1982) (“Good faith is presumed on the part of a carrier’s management”).

¹⁴¹ *See Network Modernization Order* ¶¶ 32, 34; *cf. id.* ¶ 38 (making adequacy of a “widely available [] voice service” contingent on whether it “provides access to 911 and complies fully with applicable 911 requirements”). To the extent that the *2016 Technology Transitions Order* suggested that a replacement service must offer dispatchable address capability to satisfy the Adequate Replacement Test, the *Network Modernization Order* supersedes that claim. Further, the *2016 Technology Transitions Order* predated the effectiveness of the Commission’s current wireless 911 location-accuracy framework and therefore did not account for the materially improved coordinate-based location information wireless providers now must supply. *See* 47 C.F.R. § 9.10(i); *see also Wireless E911 Location Accuracy Requirements*, Sixth Further Notice of Proposed Rulemaking, 40 FCC Rcd 2764, ¶ 2 (2025).

¹⁴² *Network Modernization Order* ¶¶ 48-49.

¹⁴³ The backup power aspect of the Adequate Replacement Test is inapplicable because the Commission’s residential backup power requirement has sunset. *See 2016 Technology Transitions Order* ¶ 130 (requiring “a showing that at least one replacement service in the area complies with our residential backup power requirements” located at 47 C.F.R. § 12.5 or “an applicant may show that another provider in the affected area offers line-powering or complies with Section 12.5.”). The Commission subsequently renumbered 47 C.F.R. § 12.5 as 47 C.F.R. § 9.20. *See Implementing Kari’s Law and Section 506 of RAY BAUM’S Act, Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems et al.*, Report and Order, 34 FCC Rcd 6607, 6745 (2019). The residential backup power rule expired in 2025 and was subsequently deleted entirely. 47 C.F.R. § 9.20(g) (2024); *Delete, Delete, Delete*, Direct

b. Communications Security.

There can be no doubt that the Providers’ “replacement service[s] offers comparably effective protection from network security risks.”¹⁴⁴ The Commission has concluded that the transition to modern, IP-based networks promotes public safety and cybersecurity.¹⁴⁵ “[N]on-copper infrastructure increases network security and reliability.”¹⁴⁶ As a recent report on network resilience noted, “[n]ot only are TDM networks slower and less capable than IP networks, [] they are extremely limited in the comparative security features they can offer and

Final Rule, 40 FCC Rcd 9569, 9576 (2025). Nevertheless, nearly all fixed service Providers state that they make available backup power options for voice. *See, e.g., Equipment: Everything you need to always stay in touch*, XFINITY, <https://www.xfinity.com/learn/home-phone-services/equipment#659baa3d-4c1e-4f4e-b673-bd29891c0a0a> (last visited Sept. 8, 2026) (offering a backup battery case for up to 24 hours); *Important Information About Spectrum Voice® 911 Services & Battery Backup*, SPECTRUM, <https://www.spectrum.com/policies/battery> (last visited Sept. 8, 2026); *Support: Enhanced 911 and 911 Services*, COX, <https://www.cox.com/residential/support/enhanced-911-and-911-services.html> (last visited Sept. 8, 2026) (battery available for purchase); *E911*, BREEZELINE, <https://www.breezeline.com/e911> (last visited Sept. 8, 2026); *Is a home phone still worth it?*, OPTIMUM, <https://www.optimum.com/home-phone#accordion-39b3955748-item-29291a22c9> (last visited Sept. 8, 2026); *Frequently Asked Questions*, SHENTEL, <https://support.shentel.com/expresshelp/phone/does-an-ema-require-a-battery-to-function> (last visited Sept. 8, 2026) (offering battery backup for purchase by calling); *Phone Backup Battery Information*, SPARKLIGHT, <https://support.sparklight.com/hc/en-us/articles/115014902528-Phone-Backup-Battery-Information> (last visited Sept. 8, 2026); *Maintaining Telephone Capability During Electrical Outages*, ARMSTRONG, <https://armstrongonewire.com/Content/Documents/MTA-Battery-Backup-Notice.pdf> (last visited Sept. 8, 2026); *see also Home Internet Backup: A safety net for your internet*, T-MOBILE, <https://www.t-mobile.com/home-internet/plans/5g-backup-internet-options> (last visited Sept. 8, 2026) (offering home internet backup for \$20.00 per month). Mobile devices contain a rechargeable battery and can be charged with widely available and inexpensive portable batteries. *See also Network Modernization Order* ¶ 49 (noting that mobile wireless services are designed to work during cellular network outages).

¹⁴⁴ 2016 Technology Transitions Order ¶ 136.

¹⁴⁵ *Advancing IP Interconnection et al.*, Notice of Proposed Rulemaking, 40 FCC Rcd 8566, ¶ 12 (2026).

¹⁴⁶ Comments of the Free State Foundation, WC Docket No. 25-304 et al., at 4 (Jan. 20, 2026).

the frameworks they can adopt.”¹⁴⁷ The *Network Modernization Order* embodies this viewpoint by choosing not to make network security a part of any of its “adequate replacement” analyses.

All of the Providers publicly describe network security safeguards.¹⁴⁸ Moreover, none of the Providers has been subject to a public Commission enforcement action for a network security issue that occurred in at least the past two years. In addition, the Commission has recognized the

¹⁴⁷ Liberty Bell Project Paper at 2; *see also id.* at 1 (discussing how “modern fiber and wireless networks . . . far outperform networks built on Time-Division Multiplexing (TDM)-based technology”).

¹⁴⁸ *See, e.g., Cybersecurity*, AT&T, <https://sustainability.att.com/priority-topics/cybersecurity> (last visited Sept. 8, 2026); Press Release, T-Mobile, T-Mobile Unveils New Cyber Defense and Executive Briefing Centers (Oct. 15, 2025), <https://www.t-mobile.com/news/network/t-mobile-unveils-new-cyber-defense-briefing-centers>; Comments of Comcast Corporation, PS Docket No. 23-239, at 3-4 (Oct. 6, 2023) (“Comcast employs a ‘security-by-design’ approach that prioritizes cybersecurity throughout its product development processes, at all levels of its network management operations, and for the duration of the product lifecycle.”); Exhibit 1 – Public Interest Statement (July 14, 2025) (exhibit to Joint Application of Cox Enterprises, Inc. and Charter Communications, Inc., WC Docket No. 25-233 (July 15, 2025)) (explaining that Charter is “firmly committed to advancing U.S. national security priorities, including by refraining from using any services and equipment on its own network that appear on the Commission’s Covered List” among other measures); *Learn About Cybersecurity: Go online with peace of mind*, COX, <https://www.cox.com/residential/internet/learn/cybersecurity-options.html> (last visited Sept. 8, 2026); *Get unbeatable coverage with Breezeline WiFi+*, BREEZELINE, <https://www.breezeline.com/internet/wifi> (last visited Sept. 8, 2026) (Breezeline Wifi+ “includes 24/7 cloud-based protection against malware, spyware, ransomware, and phishing attacks on every device connected to your network”); *Technology for Today, and Tomorrow – Network Security*, MEDIACOM, <https://mediacomcable.com/built-for-future> (last visited Sept. 8, 2026) (“Mediacom’s upgraded platform has built-in, automatic threat detection to help protect against online attacks before they [disrupt] your digital life.”); *Built-in Security*, OPTIMUM, <https://www.optimum.net/pages/secure.html> (last visited Sept. 8, 2026) (“Our network now has built-in security to protect you online.”); *Open Internet Disclosure*, SHENTEL, https://shentel.com/en/legal/open_internet_disclosure (last visited Sept. 8, 2026) (stating that Shentel implements dynamic network security measures); *Network Management Disclosure*, SPARKLIGHT, <https://www.sparklight.com/legal/open-internet-and-network-management#Security> (last visited Sept. 8, 2026) (“Sparklight employs security measures to protect customers and the network, including prevention of Denial of Service attacks, spam, and identity theft.”); *Our fiber network is unmatched*, ARMSTRONG, <https://armstrongonewire.com/Network> (last visited Sept. 8, 2026) (“We’ve invested in the latest security and network technology that automatically detects and blocks thousands of cyber security events each day.”).

proactive, coordinated efforts of major U.S. providers to mitigate operational risks, protect consumers, and preserve national security interests.¹⁴⁹ The foregoing is more than sufficient to demonstrate that this sub-prong of the Adequate Replacement Test is satisfied.

c. Service for Individuals with Disabilities.

All of the Providers' voice services are subject to Commission accessibility requirements.¹⁵⁰ Each of the Providers is listed in the accessibility Recordkeeping Compliance Certification and Contact Information Registry.¹⁵¹ Moreover, none of the Providers has been subject to a public Commission enforcement action for an accessibility violation that occurred in the past two years. These demonstrations are sufficient to satisfy the accessibility sub-prong of the Adequate Replacement Test. Should there be any doubt, the *Network Modernization Order* underscores the sufficiency of relying on accessibility rules and requirements by "declin[ing] to adopt an accessibility-specific requirement as part of the service discontinuance review."¹⁵²

¹⁴⁹ See, e.g., *Protecting the Nation's Communications Systems from Cybersecurity Threats*, Order on Reconsideration, 40 FCC Rcd 9582, ¶¶ 2, 10-11 (2025) (describing applicable federal cybersecurity requirements along with providers' proactive commitment to implementing cybersecurity controls increased cybersecurity information sharing, both with the federal government and within the communications sector). In keeping with these commitments, AT&T, Charter, Comcast, Cox, T-Mobile, and Verizon, among others, formed the Communications Cybersecurity Information Sharing and Analysis Center. See Hema Kadia, *Eight Major U.S. Carriers Form C2 ISAC to Strengthen Network Cybersecurity*, TECKNEXUS (May 19, 2026), <https://tecknexus.com/eight-major-us-carriers-form-c2-isac-to-strengthen-network-cybersecurity/>.

¹⁵⁰ 47 U.S.C. §§ 255, 617; see also 47 C.F.R. pts. 6, 7, 14.

¹⁵¹ See *Recordkeeping Compliance Certification and Contact Information Registry*, FCC, <https://apps.fcc.gov/rccci-search/search.action> (last visited Sept. 8, 2026) (with contact information for AT&T Services, Inc.; T-Mobile USA, Inc.; Comcast Cable Communications, LLC; Charter Communications Inc.; Cox Communications, Inc.; Cogeco US, LLC (several entities); MCC Telephony, LLC (a subsidiary of Mediacom Communications Corporation); OV LLC (Cablevision Optimum Voice); Shenandoah Telephone Company and Shenandoah Telephone Company-NR; Cable One Inc. and Cable One VoIP LLC; Armstrong Telecommunications, Inc. and Armstrong Telephone Company (several entities)).

¹⁵² *Network Modernization Order* ¶ 50.

D. Additional Information Required by 47 C.F.R. §§ 63.71, 63.505, and 63.602.

1. Name and Address of Carrier.

Citizens Telecommunications Company of California Inc.; Citizens Telecommunications Company of Illinois; Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier California Inc.; Frontier Communications – Midland, Inc.; Frontier Communications – Prairie, Inc.; Frontier Communications – Schuyler, Inc.; Frontier Communications of AuSable Valley, Inc.; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of the Carolinas LLC; Frontier Communications of Depue, Inc.; Frontier Communications of Illinois, Inc.; Frontier Communications of Lakeside, Inc.; Frontier Communications of Lakewood, LLC; Frontier Communications of Michigan, Inc.; Frontier Communications of Mt. Pulaski, Inc.; Frontier Communications of New York, Inc.; Frontier Communications of Orion, Inc.; Frontier Communications of Oswayo River, LLC; Frontier Communications of Pennsylvania, LLC; Frontier Communications of Seneca-Gorham, Inc.; Frontier Communications of the Southwest Inc.; Frontier Communications of Sylvan Lake, Inc.; Frontier Midstates Inc.; Frontier North Inc.; Frontier Telephone of Rochester, Inc.; Frontier West Virginia Inc.; Ogden Telephone Company d/b/a Frontier Ogden Telephone Company; The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut; Verizon Maryland LLC; Verizon New England Inc.; Verizon New York Inc.; Verizon North LLC; Verizon Pennsylvania LLC; Verizon Washington, DC Inc.

The following address can be used to contact each of the applicants:

Verizon Communications, Inc.
1 Verizon Way, Legal Department
Basking Ridge, NJ 07920

3. Date of Planned Discontinuance.

Effective on or after November 30, 2026, pending regulatory approval,¹⁵³ Verizon will discontinue residential and business legacy voice service in the geographic areas detailed below.

2. Points of Geographic Areas of Service Affected and Description of the Affected Service Area.

Verizon plans to discontinue its residential and business legacy copper-based POTS service throughout its telephone service areas in California, Connecticut, District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia in locations where (1) Verizon either offers mobile wireless service, has overbuilt fiber, or offers fixed wireless POTS voice replacement services that qualify as legacy POTS replacement services and/or (2) at least one of a select group of third parties (AT&T, T-Mobile, Xfinity, Spectrum, Breezeline, Mediacom, Optimum, Shentel, Sparklight, or Armstrong) offers a fiber, cable, or mobile wireless adequate replacement service, as described in detail herein.¹⁵⁴

3. Brief Description of Type of Service Affected.

Verizon's residential and business POTS services are TDM-based exchange access line services that consist of the serving central office line equipment and all outside plant facilities needed to connect the serving central office with the network interface at the demarcation point

¹⁵³ To the extent that additional state requirements apply to discontinuing POTS, Verizon will satisfy those requirements prior to effectuating the discontinuance.

¹⁵⁴ The telephone service areas in California, Connecticut, District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia are depicted in maps in Exhibit B below.

of the customer premises. The service includes optional custom calling features and the End User Common Line service, which allows the line to facilitate local exchange, intrastate interexchange, and interstate voice calling.

4. Brief Description of the Dates and Method of Notice to All Affected Customers.

Customer notices were sent by U.S. Mail on September 8, 2026, to customers of Verizon's legacy voice service located in the discontinuance area. Representative examples of the customer notices are attached as Exhibit A.

Copies of this application are being sent via FedEx Overnight (or U.S. Priority Mail for P.O. Box addresses) to the governor, public utility commission, federally recognized tribes in the discontinuance areas, and to the Chief Information Officer of the Department of Defense, as required by Section 63.71(a) of the Commission's rules.¹⁵⁵

5. Regulatory Classification of Carrier.

Verizon offers POTS pursuant to non-dominant carrier regulation.

6. Statement Identifying the Application as a Technology Transition (47 C.F.R. § 63.602(a)(2)).

The proposed discontinuance constitutes a technology transition under the Commission's rules. Remaining Verizon POTS customers in the discontinuance area will be required to replace their TDM-based voice service with a different technology or transmission medium when Verizon discontinues legacy voice service, as there is no other TDM-based voice service available to them.

¹⁵⁵ Section 63.71(a) directs applicants to submit a copy of the application to the Secretary of Defense, Special Assistant for Telecommunications. However, due to restructuring within the Department of Defense, that position no longer exists. We understand from a review of prior applications that Commission staff has advised that a copy of the application should instead be sent to the Department of Defense Chief Information Officer.

7. Information Regarding the Price of the Service for Which Discontinuance Authority Is Sought and the Price of the Proposed Replacement Service (47 C.F.R. § 63.602(a)(3)).

The version of Verizon’s legacy TDM-based voice service that is most comparable to Verizon mobile wireless service, Verizon’s fixed wireless POTS voice replacement service, and Verizon’s VoIP over fiber service costs \$20.00 to \$30.00 per month, plus taxes, surcharges, and fees.

Verizon’s fixed wireless POTS voice replacement services are available for as little as \$20.00 per month, plus taxes, surcharges, and fees, and Verizon’s post-paid mobile wireless subscriptions are available for \$30.00 per month, plus taxes, surcharges, and fees.¹⁵⁶ Prepaid mobile wireless service through Visible by Verizon is available starting at \$19.00 per month.¹⁵⁷ Additionally, voice service over Verizon’s fiber, where available, costs \$30.00 per month plus taxes, surcharges, and fees, in addition to the cost of Verizon fiber broadband. Cable and fiber VoIP services from other providers are available in the discontinuance area at prices ranging from \$10.00 to \$40.00 per month plus taxes, surcharges, and fees where applicable.¹⁵⁸ In

¹⁵⁶ See *Introducing Simplicity Plan*, VERIZON, <https://www.verizon.com/plans/unlimited/> (last visited Sept. 8, 2026) (Simplicity Plan with limited-term \$15/month switching discount).

¹⁵⁷ See VISIBLE, <https://www.visible.com/> (last visited Sept. 8, 2026) (initial promotional rate).

¹⁵⁸ *Xfinity Internet*, XFINITY, <https://www.xfinity.com/digital/offers/plan-builder?autolocalization=9.SC-0000> (last visited Sept. 8, 2026) (Xfinity Voice Premier for \$40.00 per month); *Spectrum Voice*, SPECTRUM, <https://www.spectrum.com/home-phone> (last visited Sept. 8, 2026) (Spectrum Voice for \$15.00 per month for three years when bundled with Internet and TV or Mobile); *Cox Voice Preferred Home Phone*, COX, <https://www.cox.com/residential/phone.html> (last visited Sept. 8, 2026) (Voice Preferred for \$20.00 per month); *Serving 1.5 Million Homes & Businesses*, Breezeline, <https://www.breezeline.com/what-our-customers-say> (last visited Sept. 8, 2026) (“Add unlimited home phone to your plan for just \$20.00 per month”); *Stay Connected at an Affordable Price*, MEDIACOM, <https://mediacomcable.com/home-phone> (last visited Sept. 8, 2026) (home phone can be added to a broadband plan for \$10.00 per month after entering an address); *Optimum packages: TV, internet and phone*, OPTIMUM, <https://www.allconnect.com/providers/optimum/bundles> (last visited Sept. 8, 2026) (home phone \$10.00 per month); *Shentel Home Phone Services: Crystal Clear Calling*, SHENTEL,

addition, post-paid and prepaid mobile wireless service from AT&T is available for \$30.00 and \$20.00 per month plus taxes, surcharges, and fees, respectively,¹⁵⁹ while T-Mobile offers post-paid (voice/text) and prepaid mobile wireless service for \$20.00 and \$40.00 per month plus taxes, surcharges, and fees, respectively.¹⁶⁰

8. Certification That the Information Submitted in This Application Is True and Accurate (47 C.F.R. § 63.602(a)(4)).

See the attached certification of Kevin Smith at Exhibit C.

9. Applicable Tariff Listing (47 C.F.R. § 63.505(e)).

Verizon's mobile wireless, voice over fiber, and fixed wireless POTS voice replacement services are not tariffed services. Accordingly, there are no new tariff listings for them. The differences in prices between Verizon's POTS service to be discontinued and mobile wireless, VoIP, and fixed wireless POTS voice replacement services are set out in Section III.E.8. above.

<https://www.shentel.com/en/phone> (last visited Sept. 8, 2026) (local phone for \$26.95 per month, and unlimited for \$41.95 per month); *New Customer Residential – Monthly Price Guide*, SPARKLIGHT, <https://edge.sitecorecloud.io/cableone177cb-residential803d-cableonepro4f42-a78b/media/Project/residential-website/sparklight/RateCards/SPKLT-12-25.pdf> (last visited Sept. 8, 2026) (economy phone for \$20.00 per month with \$0.10 per minute in the continental U.S.); *Explore Armstrong®: Shop internet, TV and phone*, ARMSTRONG, <https://www.allconnect.com/providers/armstrong> (last visited Sept. 8, 2026) (bundled home phone \$29.95 per month). Broadband service may be required and is priced separately.

¹⁵⁹ *Switch to wireless that's made for the way you live*, AT&T, <https://www.att.com/plans/wireless/> (last visited Sept. 8, 2026) (post-paid Value 2.0 plans starting at \$30.00 per month per line for 4 lines); *Prepaid phone plans for everyone*, AT&T, <https://www.att.com/prepaid/plans/> (last visited Sept. 8, 2026) (prepaid plans starting at \$20.00 per month when you prepay \$240).

¹⁶⁰ *Unlimited Talk & Text Only Plan*, T-MOBILE, <https://www.t-mobile.com/cell-phone-plans/talk-text-only-plan> (last visited Sept. 8, 2026) (unlimited talk and text only plan at \$20.00 per line per month); *Compare our best monthly plans*, T-MOBILE, <https://prepaid.t-mobile.com/prepaid-plans?brand=TMOPrepaid> (last visited Sept. 8, 2026) (prepaid plans starting at \$40.00 per month for one line with Autopay).

10. Name of Any Other Carrier or Carriers Providing Telephone Service to the Community (47 C.F.R. § 63.505(g)).

No other providers offer legacy TDM-based voice service in the areas at issue in this Application. However, as set forth above, a number of competitors offer voice services to the individuals in the portions of the states where Verizon is discontinuing POTS service.

11. Description of Any Previous Discontinuance, Reduction, or Impairment of Service (47 C.F.R. § 63.505(j)).

Verizon has not discontinued, reduced, or impaired residential or business POTS services to any locations in the discontinuance area.

12. Number of Toll Messages (47 C.F.R. § 63.505(l)).

While Verizon does not track the monthly number of toll messages or toll revenues in the discontinuance areas, the amount of toll traffic on Verizon's network has steadily decreased as the vast majority of Verizon's former legacy voice customers have migrated to other wireline and wireless voice service providers.

* * *

Questions about this application can be addressed to Randy Clarke, c/o Verizon, 1300 I Street, N.W., Suite 500E, Washington, D.C. 20005, or randolph.clarke@verizon.com.

IV. CONCLUSION.

For the reasons identified above, the public convenience and necessity will not be adversely affected by the discontinuance of Verizon's legacy POTS in the areas at issue in this Application. Verizon respectfully requests the Commission approve this Section 63.71 Application to discontinue service.

William H. Johnson
Of Counsel

Respectfully submitted,

/s/ Randy Clarke
Randy Clarke
Verizon
1300 I Street, N.W., Suite 500E
Washington, D.C. 20005
(202) 684-5350 (Office)

September 9, 2026

Exhibit A:

Example Frontier and Verizon Customer Notices



600 Hidden Ridge
Irving, TX 75038

September 8, 2026

Customer Name
Address 1
Address 2
City, State ZIP

Telephone Number: [Telephone number]

Important Update About Your Home Phone Service

Dear [Customer Name],

This letter is informational only, and requires no customer action at this time.

We're pleased to inform you about updates to our home phone service. As part of our ongoing network improvements, we are planning to discontinue traditional copper-based home phone service for certain customers in your area. If your service will be discontinued, you will have the opportunity to switch to service delivered using fiber, cable, or modern wireless technology.

We're here to support you through this transition.

What's Changing and When

On or after **November 30, 2026**, subject to Federal Communications Commission (FCC) approval, Frontier will have the authority to discontinue traditional copper-based home phone service.

What This Means for You

Rest assured, you don't need to take any action right now, and there is no change or interruption to your service at this time. We'll contact you with next steps to ensure a seamless transition. Meanwhile, if you have questions, please visit us at frontier.com/copper. If your service will be discontinued, you will receive advance notice by letter with your specific disconnection date. Again, there is no change or interruption to your service today and you don't need to take any action at this time.

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, many legacy alarm systems, faxes, and many medical devices
- Delivers a reliable, modern service

If your service will be discontinued, you will have at least one fiber, cable, or mobile wireless voice option available. Many customers will be able to choose modern Verizon voice service over wireless or fiber. You can see options available at your home based on official FCC data by visiting <https://broadbandmap.fcc.gov/home> and then typing in your home address.

CMT-FRONTIER

Additional Information

- Frontier's fiber network services, where available, are not affected and will continue without interruption.
- 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. Whether you stay with us or transition to another provider, we're committed to making this transition as simple and smooth as possible.

Sincerely,

Frontier, a Verizon Company

On behalf of:

State	Legal Entity
New York	Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York
	Frontier Telephone of Rochester, Inc.
	Frontier Communications of New York, Inc.
	Frontier Communications of AuSable Valley, Inc.
	Frontier Communications of Seneca-Gorham, Inc.
	Frontier Communications of Sylvan Lake, Inc.
	Ogden Telephone Company d/b/a Frontier Ogden Telephone Company.
Pennsylvania	Frontier Communications of Pennsylvania, LLC
	Frontier Communications of Breezewood, LLC
	Frontier Communications of Canton, LLC
	Frontier Communications of Lakewood, LLC
	Frontier Communications of Oswayo River, LLC
	Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company
	Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York
California	Frontier California Inc.
	Citizens Telecommunications Company of California Inc.
	Frontier Communications of the Southwest Inc.

State	Legal Entity
Connecticut	The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut.
Illinois	Frontier North Inc.
	Frontier Communications of the Carolinas LLC
	Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois
	Frontier Communications of Depue, Inc.
	Frontier Communications of Illinois, Inc.
	Frontier Communications of Lakeside, Inc.
	Frontier Communications of Mt. Pulaski, Inc.
	Frontier Communications of Orion, Inc.
	Frontier Communications - Midland, Inc.
	Frontier Communications - Prairie, Inc.
	Frontier Communications - Schuyler, Inc.
West Virginia	Frontier West Virginia Inc.
	Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia Inc.

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 Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York; Frontier Telephone of Rochester, Inc.; Frontier Communications of New York, Inc.; Frontier Communications of

AuSable Valley, Inc.; Frontier Communications of Seneca-Gorham, Inc.; Frontier Communications of Sylvan Lake, Inc.; Ogden Telephone Company d/b/a Frontier Ogden Telephone Company; Frontier Communications of Pennsylvania, LLC; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Oswayo River, LLC; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Frontier California Inc.; Citizens Telecommunications Company of California Inc.; Frontier Communications of the Southwest Inc.; The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut; Frontier North Inc.; Frontier Communications of the Carolinas LLC; Citizens Telecommunications Company of Illinois; Frontier Communications of Depue, Inc.; Frontier Communications of Illinois, Inc.; Frontier Communications of Lakeside, Inc.; Frontier Communications of Mt. Pulaski, Inc.; Frontier Communications of Orion, Inc.; Frontier Communications - Midland, Inc.; Frontier Communications - Prairie, Inc.; Frontier Communications - Schuyler, Inc.; Frontier West Virginia Inc.; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Verizon New York Inc.; Verizon Pennsylvania LLC; Verizon North LLC; Verizon Maryland LLC; Verizon New England Inc.; Verizon Washington, DC Inc.; Frontier Communications of Michigan, Inc.; Frontier Midstates Inc. , all Verizon companies. 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, including for 911 emergency calls.

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 charged power bank, which is inexpensive, typically starting at approximately \$20, and available online and at various retail stores.
- 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>).

Attachment A2 - Additional Information for Facilities-Based Phone Service From A Provider Other Than Verizon

Mobile Wireless Phone Service

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, 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 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, typically starting at approximately \$20, and available online and at various retail stores.
- 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>).

Cable or Fiber Phone Service

Home phone devices may require batteries, wired power, or both.

- Actual battery life may vary depending on network conditions, features in use, call frequency, and usage patterns.

- Please review all documentation from your device manufacturer and service provider.

Important Notes:

- Voice service delivered over fiber or cable does not supply power through the phone line.
- 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, if available for your device, and the backup must be installed. You are responsible for obtaining any such option, if available.
- If you move you must update your service address with your service provider immediately.
- Read the FCC's 911 tips, available here: <https://www.fcc.gov/emergency>.

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.



220 Anderson Avenue
Moonachie, NJ 07074

September 8, 2026

Customer Name
Address 1
Address 2
City, State ZIP

Telephone Number: [Telephone number]

Important Update About Your Home Phone Service

Dear [Customer Name],

This letter is informational only, and requires no customer action at this time.

We're pleased to inform you about updates to our home phone service. As part of our ongoing network improvements, we are planning to discontinue traditional copper-based home phone service for certain customers in your area. If your service will be discontinued, you will have the opportunity to switch to service delivered using fiber, cable, or modern wireless technology.

We're here to support you through this transition.

What's Changing and When

On or after **November 30, 2026**, subject to Federal Communications Commission (FCC) approval, Verizon will have authority to discontinue traditional copper-based home phone service.

What This Means for You

Rest assured, you don't need to take any action right now, and there is no change or interruption to your service at this time. We'll contact you with next steps to ensure a seamless transition. Meanwhile, if you have questions, please visit us at [verizon.com/copper](https://www.verizon.com/copper).

If your service will be discontinued, you will receive advance notice by letter with your specific disconnection date. Again, there is no change or interruption to your service today and you don't need to take any action at this time.

Service Affected

Traditional Home Phone Service: copper-based dial tone base home phone service, services offered as "Residence Dial Tone Service," "Basic Service Access Line," and "Individual Line".

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, many legacy alarm systems and faxes, and many medical devices
- Delivers a reliable, modern service

If your services will be discontinued, you will have at least one fiber, cable, or mobile wireless voice option available. Many customers will be able to choose modern Verizon voice service over wireless or fiber. You can see options available at your home based on official FCC data by visiting <https://broadbandmap.fcc.gov/home> and then typing in your home address.

Additional Information

- Verizon's Fios and wireless services, where available, are not affected and will continue without interruption.
- 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 Verizon customer. Whether you stay with us or transition to another provider, we're committed to making this transition as simple and smooth as possible.

Sincerely,

Verizon Support Team

On behalf of

State	Company	Address
New York	Verizon New York Inc.	140 West Street, New York, NY 10007
Pennsylvania	Verizon Pennsylvania LLC	900 Race Street, 6th Floor, Philadelphia, PA 19107
	Verizon North LLC	900 Race Street, 6th Floor, Philadelphia, PA 19107
Connecticut	Verizon New York Inc.	140 West Street, New York, NY 10007
Maryland	Verizon Maryland LLC	12 West Street, Annapolis, MD 21401
Massachusetts	Verizon New England Inc.	6 Bowdoin Square, 9th Floor, Boston, MA 02114
The District of Columbia	Verizon Washington, DC Inc.	1300 I Street NW, Suite 500 East, Washington, DC 20005

Note for Massachusetts Customers

Massachusetts customers can also contact the MA Department of Telecommunications and Cable Hotline at 800.392.6066.

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 Citizens Telecommunications Company of New York, Inc. d/b/a Frontier Communications of New York; Frontier Telephone of Rochester, Inc.; Frontier Communications of New York, Inc.; Frontier Communications of AuSable Valley, Inc.; Frontier Communications of Seneca-Gorham, Inc.; Frontier Communications of Sylvan Lake, Inc.; Ogden Telephone Company d/b/a Frontier Ogden Telephone Company; Frontier Communications of Pennsylvania, LLC; Frontier Communications of Breezewood, LLC; Frontier Communications of Canton, LLC; Frontier Communications of Lakewood, LLC; Frontier Communications of Oswayo River, LLC; Commonwealth Telephone Company LLC d/b/a Frontier Communications Commonwealth Telephone Company; Citizens Telecommunications Company of New York Frontier California Inc.; Citizens Telecommunications Company of California Inc.; Frontier Communications of the Southwest Inc.; The Southern New England Telephone Company d/b/a Frontier Communications of Connecticut; Frontier North Inc.; Frontier Communications of the Carolinas LLC; Citizens Telecommunications Company of Illinois; Frontier Communications of Depue, Inc.; Frontier Communications of Illinois, Inc.; Frontier Communications of Lakeside, Inc.; Frontier Communications of Mt. Pulaski, Inc.; Frontier Communications of Orion, Inc.; Frontier Communications - Midland, Inc.; Frontier Communications - Prairie, Inc.; Frontier Communications - Schuyler, Inc.; Frontier West Virginia Inc.; Citizens Telecommunications Company of West Virginia d/b/a Frontier Communications of West Virginia; Verizon New York Inc.; Verizon Pennsylvania LLC; Verizon North LLC; Verizon Maryland LLC; Verizon New England Inc.; Verizon Washington, DC Inc.; Frontier Communications of Michigan, Inc.; Frontier Midstates Inc. , all Verizon companies. 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, including for 911 emergency calls.

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.

Fios Digital Voice (a Verizon 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:

- Fios Digital Voice service is delivered over fiber and does not supply power through the phone line.
- Battery backup units are provided for home use 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 charged power bank, which is inexpensive, typically starting at approximately \$20, and available online and at various retail stores.
- 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>).

Attachment A2 - Additional Information for Facilities-Based Phone Service From A Provider Other Than Verizon

Mobile Wireless Phone Service

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, 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 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, typically starting at approximately \$20, and available online and at various retail stores.
- 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>).

Cable or Fiber Phone Service

Home phone devices may require batteries, wired power, or both.

- Actual battery life may vary depending on network conditions, features in use, call frequency, and usage patterns.
- Please review all documentation from your device manufacturer and service provider.

Important Notes:

- Voice service delivered over fiber or cable does not supply power through the phone line.
- 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, if available for your device, and the backup must be installed. You are responsible for obtaining any such option, if available.
- If you move you must update your service address with your service provider immediately.
- Read the FCC's 911 tips, available here: <https://www.fcc.gov/emergency>.

Landline Phones and Power Requirements

Some phones - especially cordless models - require electricity to operate.

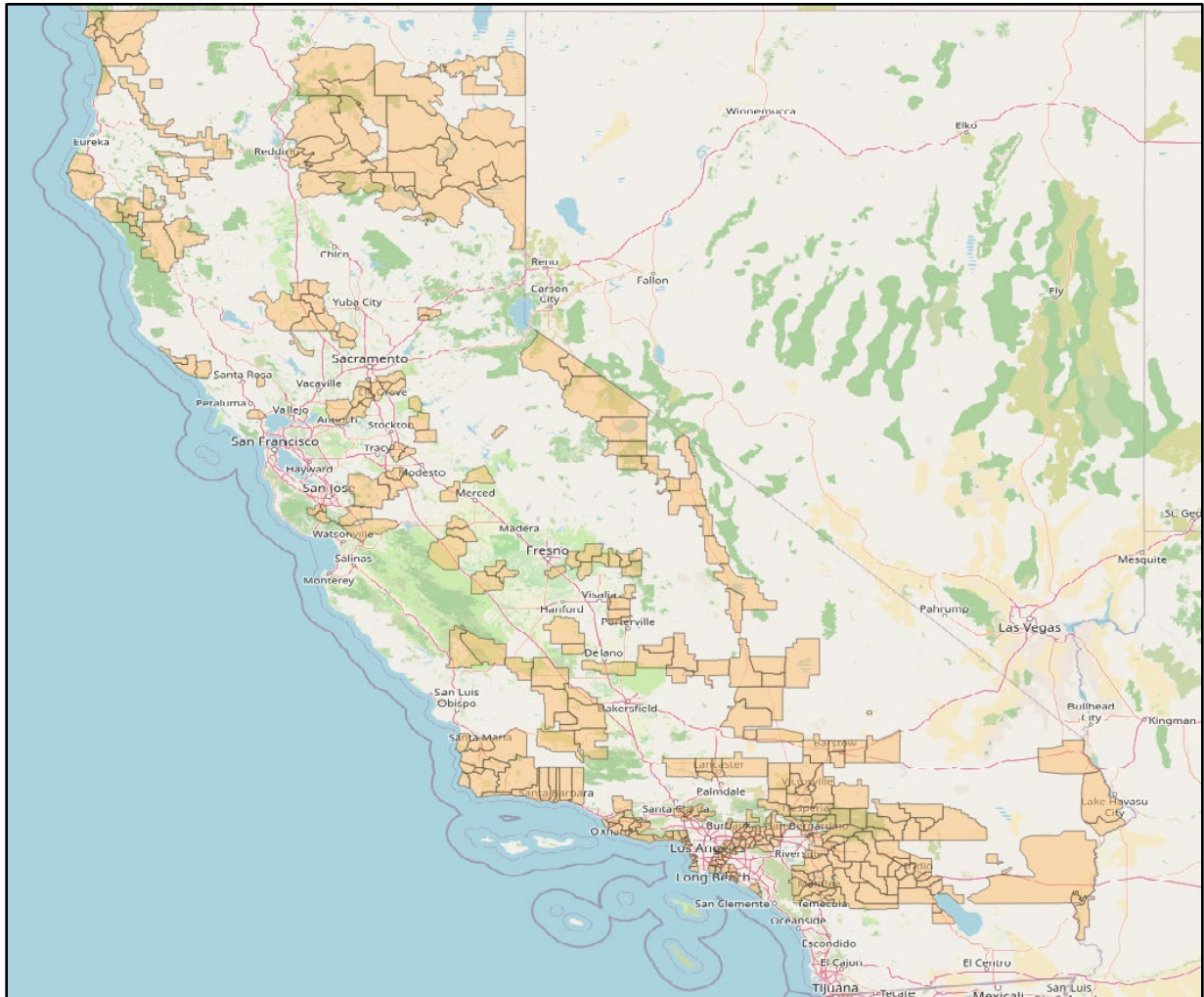
- If your phone requires external power, it will not work during a power outage, even if your service has battery backup.
- This includes the ability to make or receive 911 calls.

For maximum reliability during power outages, consider using a corded phone that does not require external power.

Exhibit B:

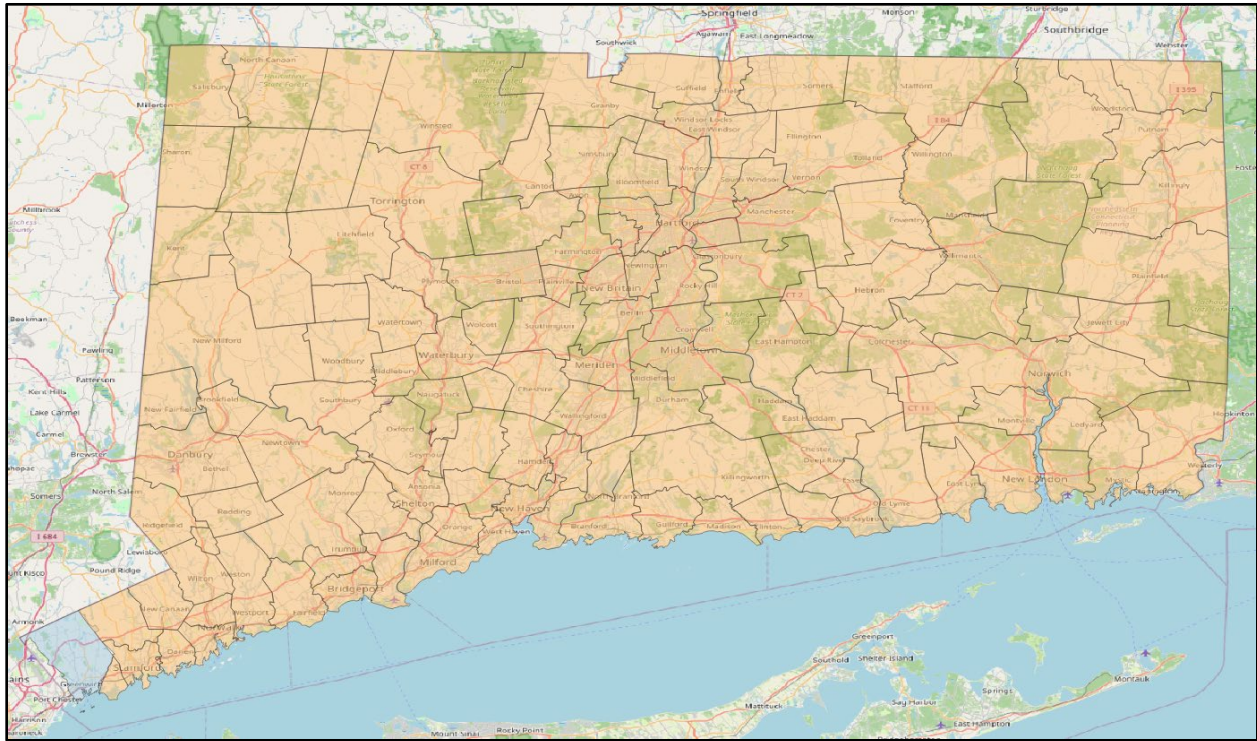
Maps Showing the Borders of ILEC Service Areas in the Jurisdictions Subject to This Application

California



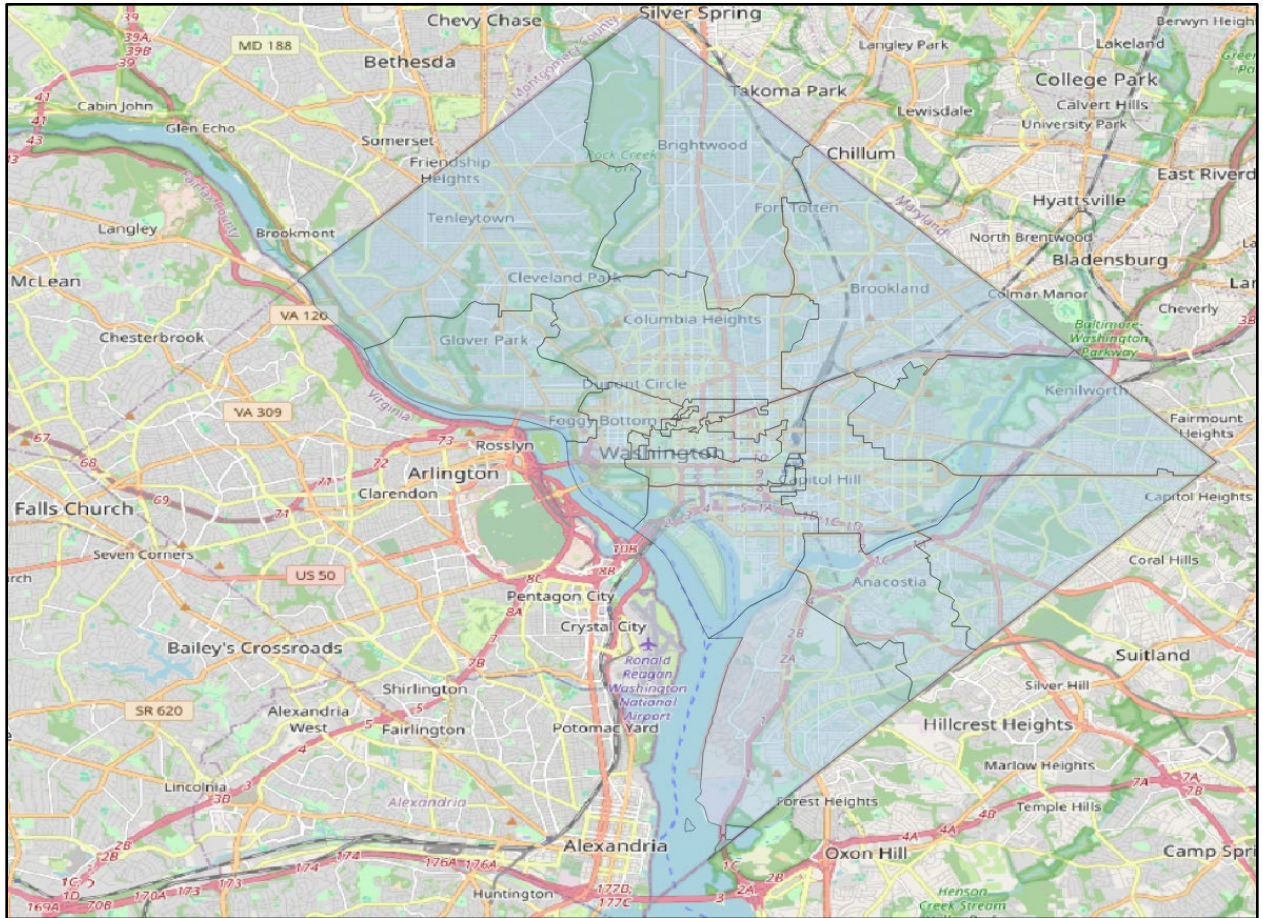
 Frontier Service Areas

Connecticut



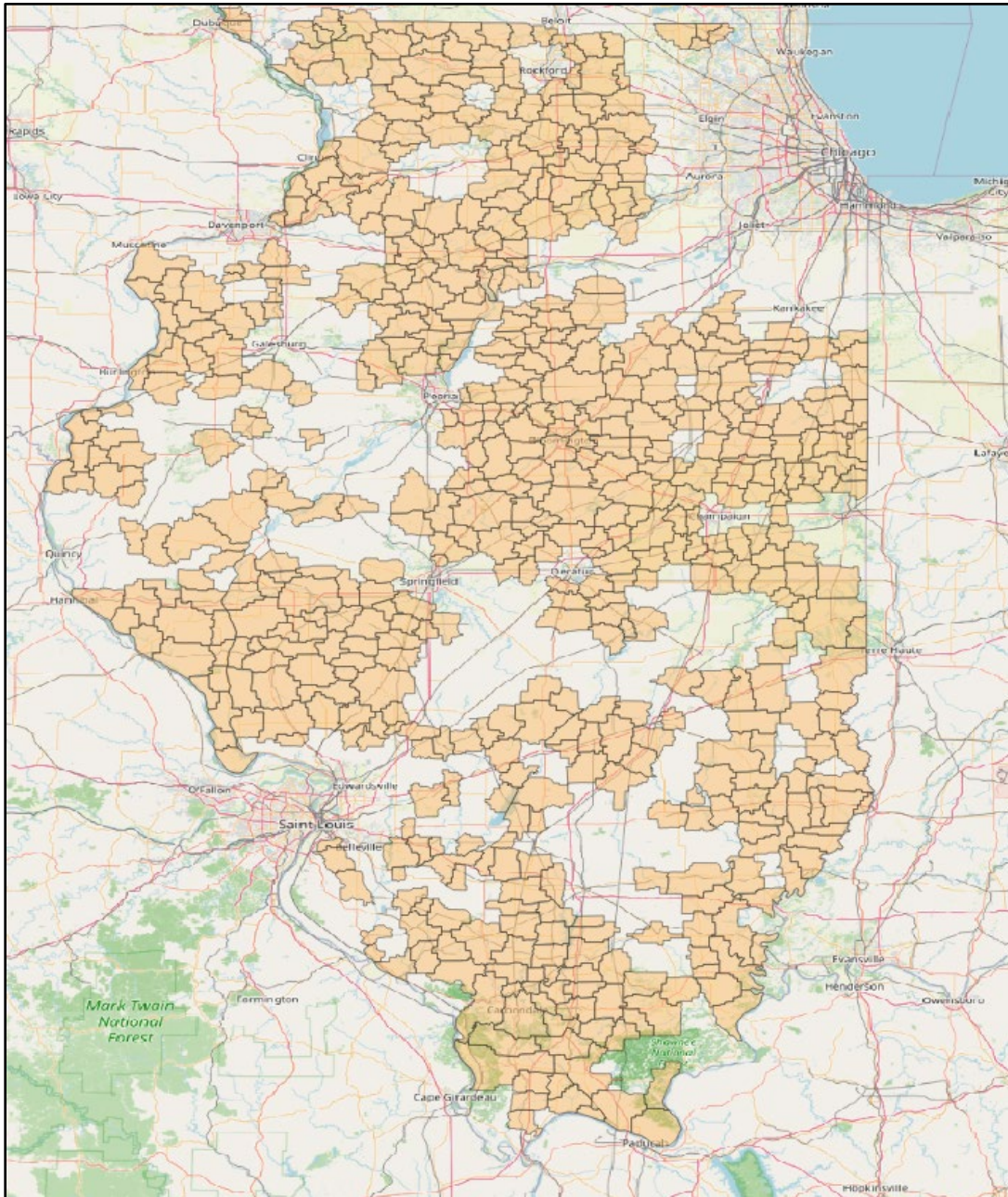
- Frontier Service Areas
- Verizon Service Areas

District of Columbia



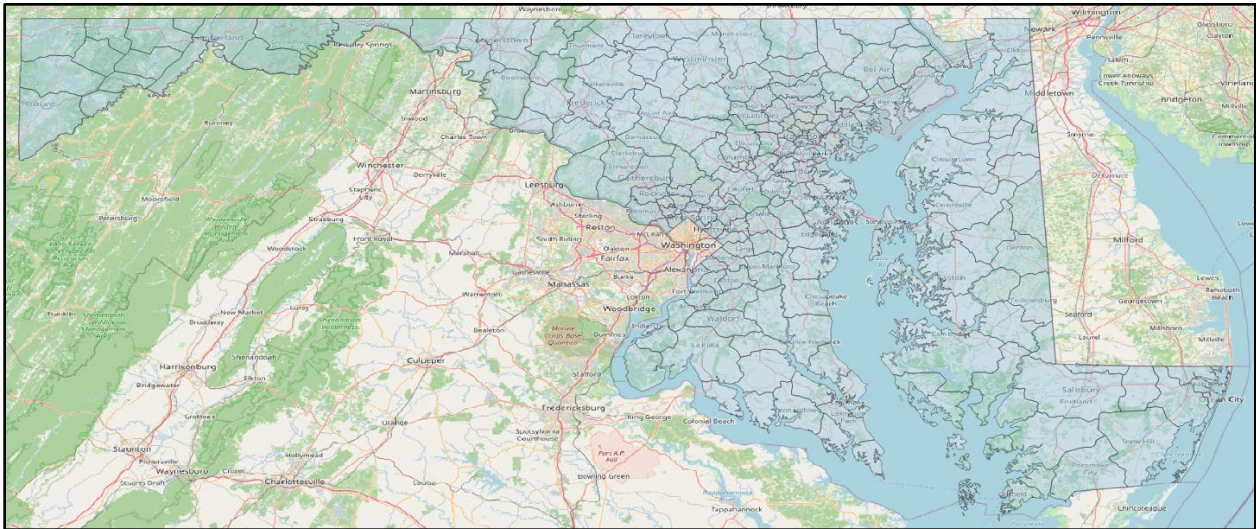
 Verizon Service Areas

Illinois



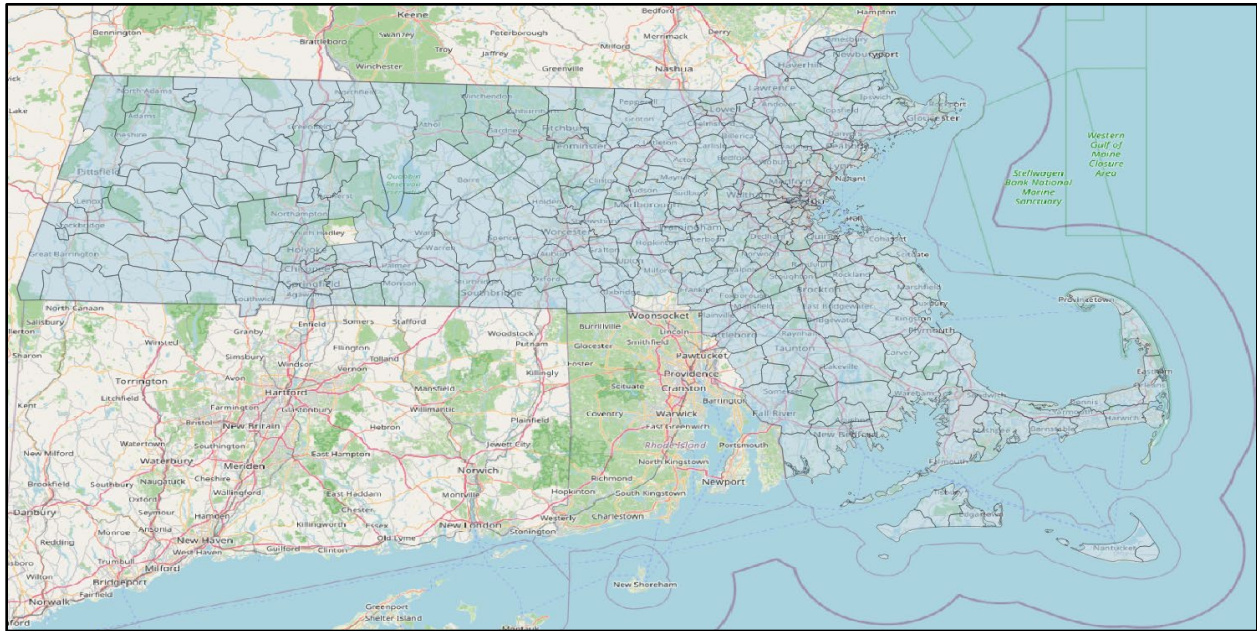
 Frontier Service Areas

Maryland



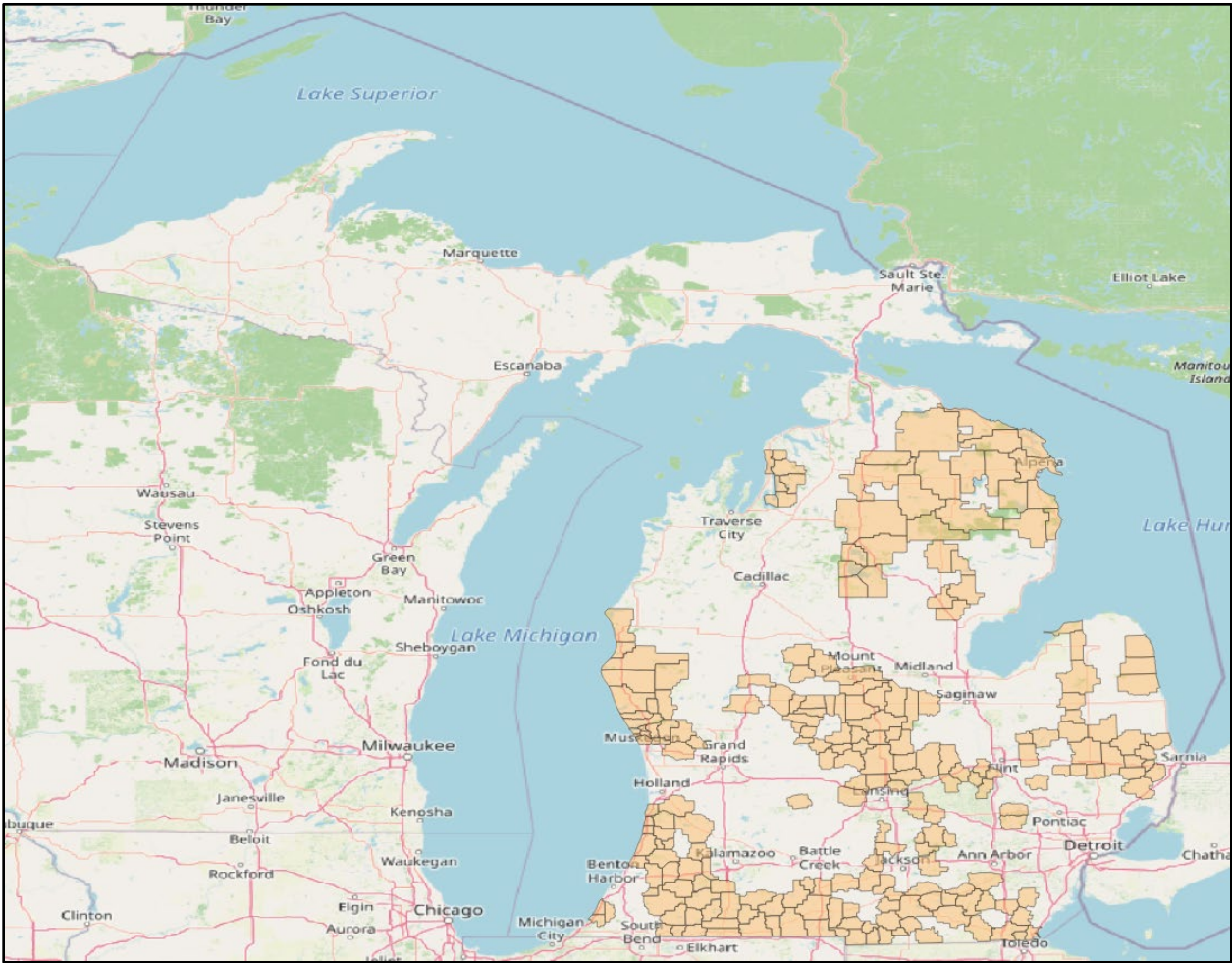
 Verizon Service Areas

Massachusetts



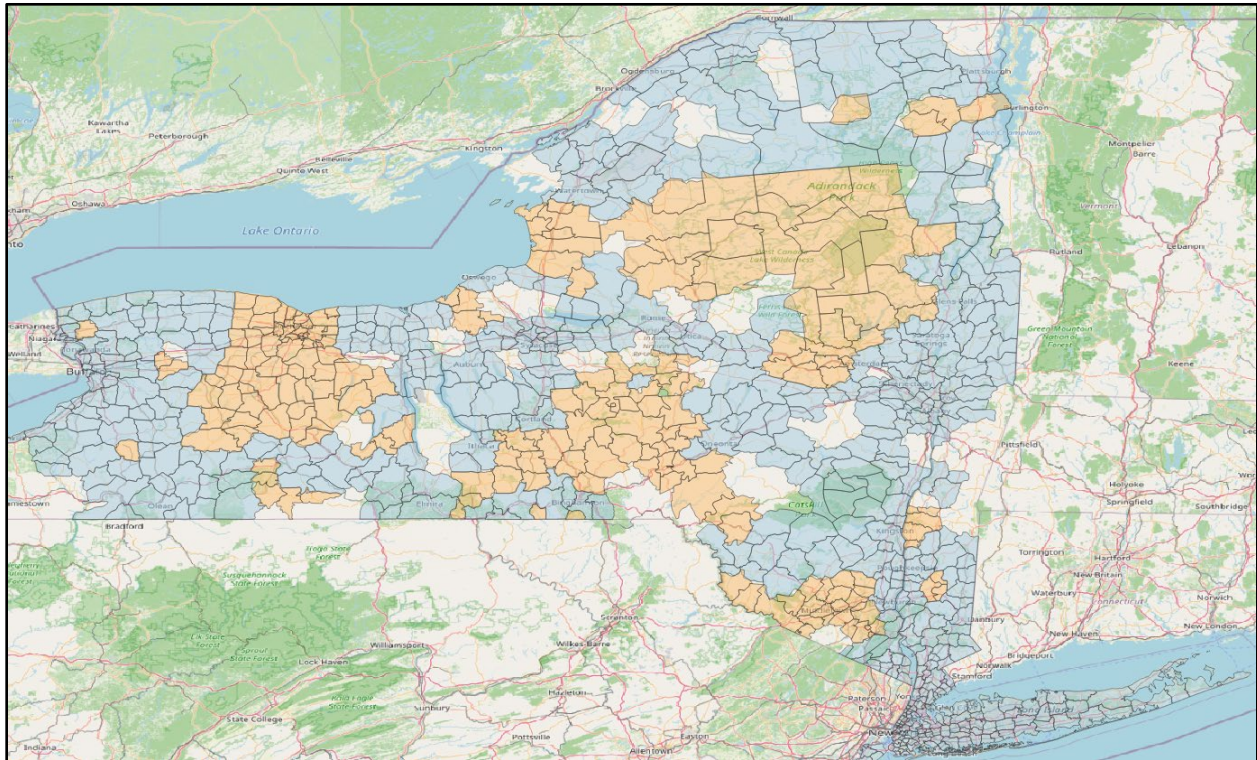
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Michigan

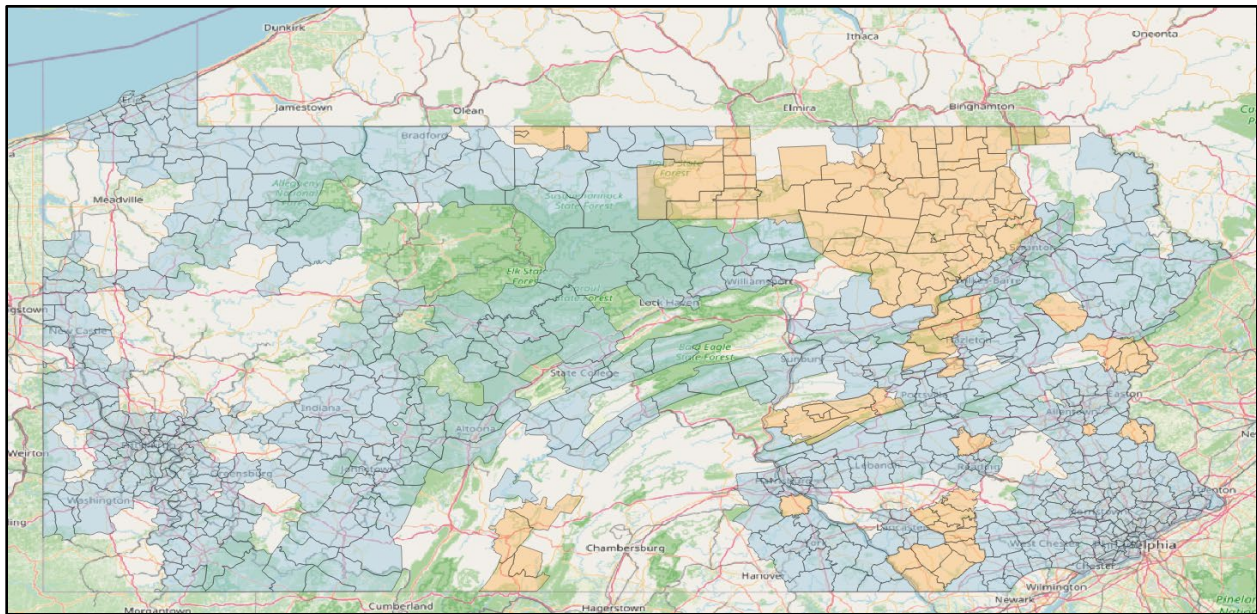


 Frontier Service Areas

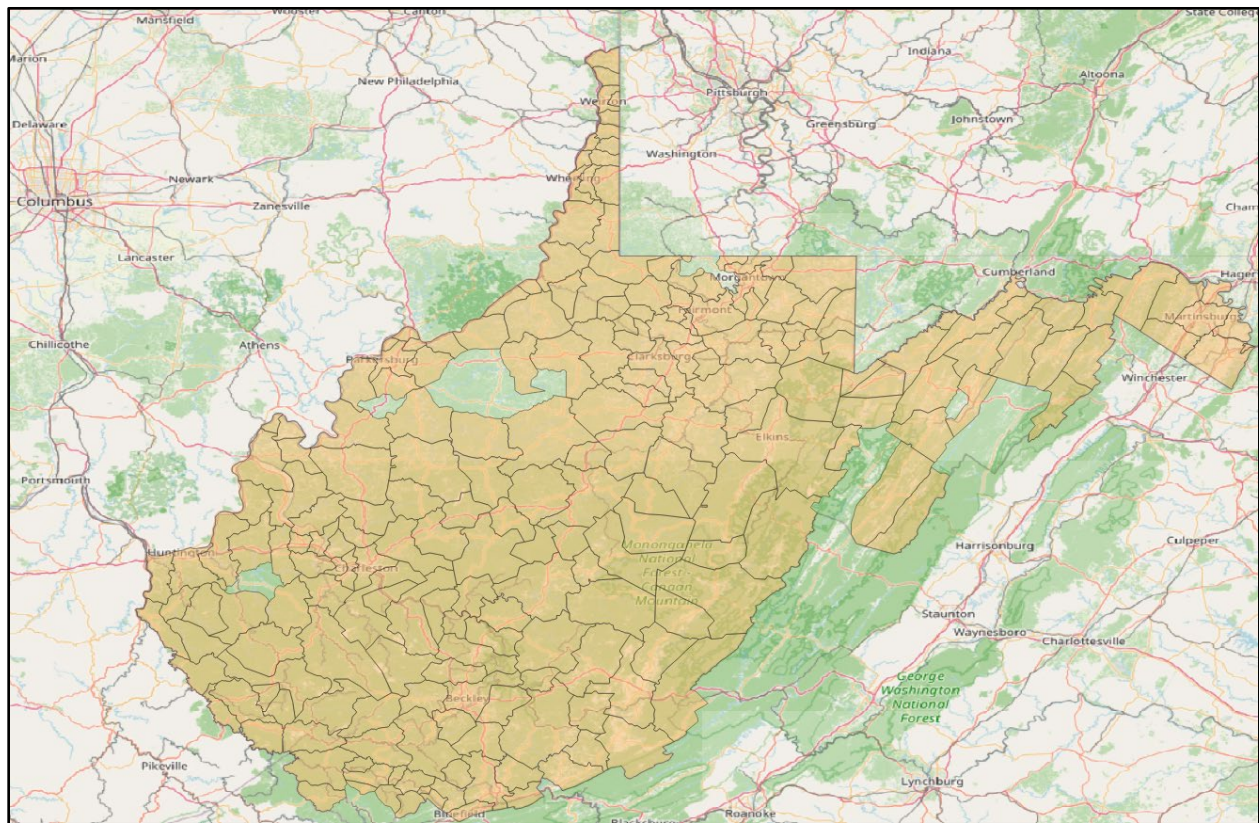
New York



Pennsylvania



West Virginia



Frontier Service Areas

Exhibit C: Section 63.602(a)(4) Certification

SECTION 63.602(a)(4) CERTIFICATION

I, Kevin Smith, Vice President of Network Engineering, am employed by Verizon. I certify under penalty of perjury that, to the best of my knowledge, information, and belief, including based on information provided to me by others, the information required by 47 C.F.R. § 63.602 submitted in the Section 63.71 application of Verizon is true and correct.

Dated September 9, 2026.

/s/ Kevin Smith
Kevin Smith

CERTIFICATE OF SERVICE

I, Theresa Holden, certify that I have, on September 9, 2026, served a copy of the foregoing Section 63.71 application of Verizon by FedEx Overnight (or U.S. Priority Mail for P.O. Box addresses), to the addresses below:

/s/ Theresa Holden

Theresa Holden

Office of the President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Office of the Governor
1021 O Street
Suite 9000
Sacramento, CA 95814

Office of the Chair
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Office of the Chair
Public Service Commission of the District of
Columbia
1325 G St NW
Suite 800
Washington, DC 20005

Office of the Mayor
John A. Wilson Building
1350 Pennsylvania Avenue, NW,
Washington, DC 20004

Office of the Chair
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Office of the Governor
401 S. Spring St.
Springfield, IL 62704

Office of the Chair
Maryland Public Service Commission
6 St. Paul St., 16th Floor
Baltimore, MD 21202

Office of the Governor
100 State Circle
Annapolis, MD 21401

Office of the Chair
Department of Public Utilities
1 South Station
3rd Floor
Boston, MA 02110

Office of the Governor
Massachusetts State House
24 Beacon St.
Room 280
Boston, MA 02133

Office of the Chair
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

Office of the Governor
111 S Capitol Ave.
Lansing, MI 48933

Office of the Chair
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223

Office of the Governor
NYS State Capitol Building
Albany, NY 12224

Office of the Chair
Pennsylvania Public Utility Commission
400 North Street
Keystone Bldg.
Harrisburg, PA 17120

Office of the Governor
501 North 3rd Street
508 Main Capitol Building
Harrisburg, PA 17120

Office of the Chair
Public Service Commission of West Virginia
201 Brooks St.
Charleston, WV 25301

Office of the Governor
1900 Kanawha Blvd. E
Charleston, WV 25305

Cayuga Nation of New York
Clint Halftown, Nation Representative
P.O. Box 803
Seneca Falls, NY 13148

Mashantucket Pequot Indian Tribe
2 Matts Path
P.O. Box 3060
Mashantucket, CT 06338

Mashpee Wampanoag Tribe
Brian M. Weeden, Chairman
483 Great Neck Road South
Mashpee, MA 02649

Mohegan Tribe of Indians of
Connecticut
R. James Gessner Jr., Chairman
13 Crow Hill Road
Uncasville, CT 06382

Oneida Indian Nation
Ray Halbritter, Nation Representative
5218 Patrick Road
Verona, NY 13421

Onondaga Nation
Spencer Lyons, Chief
Alson Gibson, Chief
Shannon Booth, Chief
4040 Route 11
Nedrow, NY 13120

Saint Regis Mohawk Tribe
Michael Conners, Chief
Donald Thompson, Jr., Chief
Ross Garrow, Chief
71 Margaret Terrance Memorial Way
Akwesasne, NY 13655

Seneca Nation of Indians
J. Conrad Seneca, President
12837 Route 438
Irving, NY 14081

Shinnecock Indian Nation Tribal Office
Lisa Goree, Council of Trustees
Lance Gumbs, Council of Trustees
Daniel Collins, Council of Trustees
P.O. Box 5006
Southampton, NY 11969

Tonawanda Band of Seneca
Roger Hill, Chief
7027 Meadville Road
Basom, NY 14013

Tuscarora Nation
Tom Jonathan, Chief
Brennen Ferguson, Chief
5226 Walmore Road
Lewiston, NY 14092

Wampanoag Tribe of Gay Head
(Aquinnah)
Kevin Devine, Chairman
20 Black Brook Road
Aquinnah, MA 02535

Bay Mills Indian Community, Michigan
Whitney Gravelle, President
12140 West Lakeshore Drive
Brimley, MI 49715

Grand Traverse Band of Ottawa and
Chippewa Indians, Michigan
Sandra Witherspoon, Chairwoman
2605 N. West Bay Shore Drive
Peshawbestown, MI 49682

Hannahville Indian Community, Michigan
Kenneth Meshigaud, Chairperson
N14911 Hannahville B1 Road
Wilson, MI 49896

Keweenaw Bay Indian Community,
Michigan
Everett Ekdahl Jr., President
16429 Beartown Road
Baraga, MI 49908

Lac Vieux Desert Band of Lake Superior Chippewa
Indians of Michigan
James Williams Jr., Chairman
P.O. Box 249
Watersmeet, MI 49969

Little River Band of Ottawa Indians,
Michigan
Larry Romanelli, Ogema
2608 Government Center Drive
Manistee, MI 49660

Little Traverse Bay Bands of Odawa Indians,
Michigan
Winnay J. Wemigwase, Chairperson
7500 Odawa Circle
Harbor Springs, MI 49740

Match-e-be-nash-she-wish Band
Bob Peters, Chairperson
2872 Mission Drive
Shelbyville, MI 49344

Nottawaseppi Huron Band of the Potawatomi,
Michigan
Homer A. Mandoka, Chairperson
1485 Mno-Bmadzewen Way
Fulton, MI 49052

Saginaw Chippewa Indian Tribe of
Michigan
Lucas Sprague, Chief
7500 Soaring Eagle Boulevard
Mt. Pleasant, MI 48858

Pokagon Band of Potawatomi Indians, Michigan
and Indiana
Matthew J. Wesaw, Chairperson
P.O. Box 180
Dowagiac, MI 49047

Sault Ste. Marie Tribe of Chippewa Indians,
Michigan
Austin Lowes, Chairperson
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Sault Ste. Marie, MI 49783

Alturas Indian Rancheria, California
Phillip Del Rosa, Chairman
901 County Road 56
Alturas, CA 96101

Bear River Band of the Rohnerville Rancheria,
California
Josefina Frank, Chairperson
266 Keisner Road
Loleta, CA 95551

Big Lagoon Rancheria, California
Virgil Moorehead, Chairman
P.O. Box 3060
Trinidad, CA 95570

Big Sandy Rancheria of Western Mono Indians of
California
Elizabeth Hutchins-Kipp, Chairperson
P.O. Box 337
Auberry, CA 93602

Bishop Paiute Tribe
Emma Williams, Chairwoman
50 Tu Su Lane
Bishop, CA 93514

Agua Caliente Indian Reservation
Reid D. Milanovich, Chairman
5401 Dinah Shore Drive
Palm Springs, CA 92264

Augustine Band of Cahuilla Indians,
California
Amanda Augustine, Chairperson
84-001 Avenue 54
Coachella, CA 92236

Berry Creek Rancheria of Maidu
Indians of California
Francis Steele Jr., Chairman
5 Tyme Way
Oroville, CA 95966

Big Pine Paiute Tribe of the Owens
Valley
Cheyenne Stone, Chairperson
P.O. Box 700
Big Pine, CA 93513

Big Valley Band of Pomo Indians of the
Big Valley Rancheria, California
Flaman McCloud Jr., Chairman
2726 Mission Rancheria Road
Lakeport, CA 95453

Blue Lake Rancheria, California
Jason Ramos, Chairperson
P.O. Box 428
Blue Lake, CA 95525

Buena Vista Rancheria of Me-Wuk
Indians of California
Jessalynn Pastran, Chairwoman
8950 Cal Center Dr.
Ste. 160
Sacramento, CA 95826

Bridgeport Indian Colony
Joseph Sam, Chairman
P.O. Box 37
Bridgeport, CA 93517

Cachil DeHe Band of Wintun Indians of
the Colusa Indian Community of the
Colusa Rancheria, California
Wayne Mitchum Jr., Chairman
3730 Highway 45
Colusa, CA 95932

Cabazon Band of Cahuilla Indians
Doug Welmas, Chairman
84-245 Indio Springs Parkway
Indio, CA 92203

Cahto Tribe of the Laytonville
Rancheria
Misty Davidson, Chairwoman
P. O. Box 1239
Laytonville, CA 95454

Cahuilla Band of Indians
Erica Schenk, Chairwoman
52701 Highway 371
Anza, CA 92539

California Valley Miwok Tribe,
California
Antoinette Del Rio, Interim
Chairwoman
P.O. Box 695
San Andreas, CA 95249

Campo Band of Diegueno Mission Indians of the
Campo Indian Reservation, California
Marcus Cuero, Chairman
36190 Church Road Suite 1
Campo, CA 91906

Capitan Grande Band of Diegueno
Mission Indians of California
Raymond Welch, Spokesman
1095 Barona Road
Lakeside, CA 92040

Capitan Grande Band of Diegueno Mission Indians
of California
1095 Barona Road
Lakeside, CA 92040

Capitan Grande Band of Diegueno
Mission Indians of California: Viejas
John Christman, Chairman
1 Viejas Grade Road
Alpine, CA 91901

Cedarville Rancheria, California
Monique Davis, Chairperson
300 West 1st Street
Alturas, CA 96101

Cher-Ae Heights Indian Community of
the Trinidad Rancheria, California
Garth Sundberg Sr., Chairman
P.O. Box 630
Trinidad, CA 95570

Chicken Ranch Rancheria of Me-Wuk Indians of
California
Joseph Mathiesen-Powell, Chairman
P.O. Box 1159
Jamestown, CA 95327

Cloverdale Rancheria of Pomo Indians
of California
Patricia Hermosillo, Chairwoman
555 S. Cloverdale Boulevard
Suite 1
Cloverdale, CA 95425

Cold Springs Rancheria of Mono Indians of California

Blossom Garcia, Chairwoman

P.O. Box 209

Tollhouse, CA 93667

Coyote Valley Band of Pomo Indians of California

Jennifer Feliz, Chairwoman

7601 N. State St.

Redwood Valley, CA 95470

Dry Creek Rancheria Band of Pomo Indians, California

Chris Wright, Chairman

P.O. Box 607

Geyserville, CA 95441

Elem Indian Colony of Pomo Indians of the Sulphur Bank Rancheria, California

Agustin Garcia, Chairman

P.O. Box 757

Lower Lake, CA 95457

Elk Valley Rancheria, California

Dale Miller, Chairman

2332 Howland Hill Road

Crescent City, CA 95531

Enterprise Rancheria of Maidu Indians of California

Glenda Nelson, Chairwoman

2133 Monte Vista Avenue

Oroville, CA 95966

Ewiiapaayp Band of Kumeyaay Indians

Robert Pinto Sr., Chairman

4054 Willows Road

Alpine, CA 91901

Federated Indians of Graton Rancheria, California

Greg Sarris, Chairman

6400 Redwood Drive

Suite 300

Rohnert Park, CA 94928

Fort Bidwell Indian Community of the Fort Bidwell Reservation of California

Dean Townsend, Chairman

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Fort Bidwell, CA 96112

Fort Independence Indian Community of Paiute Indians of the Fort Independence Reservation, California

Carl Dahlberg, Chairman

P.O. Box 67

Independence, CA 93526

Greenville Rancheria

Kyle Self, Chairman

P.O. Box 279

Greenville, CA 95947

Grindstone Indian Rancheria of Wintun-Wailaki Indians of California

Ronald Kirk, Chairman

P.O. Box 63

Elk Creek, CA 95939

Guidiville Rancheria of California

Donald Duncan, Chairperson

P.O. Box 339

Talmage, CA 95481

Habematolel Pomo of Upper Lake, California

Danielle Cirelli, Chairperson

P.O. Box 516

Upper Lake, CA 95485

Hoopa Valley Tribe, California
Joe Davis, Chairman
P.O. Box 1348
Hoopa, CA 95546

Hopland Band of Pomo Indians,
California
Julian Maldonado, Chairman
3000 Shanel Road
Hopland, CA 95449

Iipay Nation of Santa Ysabel, California
Kevin Osuna, Chairman
P.O. Box 130
Santa Ysabel, CA 92070

Inaja Band of Diegueno Mission Indians
of the Inaja and Cosmit Reservation,
California
Rebecca Osuna, Chairperson
2005 S. Escondido Boulevard
Escondido, CA 92025

Ione Band of Miwok Indians of California
Sara Dutschke, Chairwoman
P.O. Box 699
Plymouth, CA 95669

Jackson Band of Miwok Indians
Adam Dalton, Chairman
P.O. Box 1090
Jackson, CA 95642

Jamul Indian Village of California
Erica Pinto, Chairwoman
P.O. Box 612
Jamul, CA 91935

Karuk Tribe
Russell Attebery, Chairman
P.O. Box 1016
Happy Camp, CA 96039

Kashia Band of Pomo Indians of the Stewarts Point
Rancheria, California
Kim Gentry, Chairperson
1440 Guerneville Road
Santa Rosa, CA 95403

Kletsel Dehe Wintun Nation of the
Cortina Rancheria
Charlie Wright, Chairman
P.O. Box 1630
Williams, CA 95987

Koi Nation of Northern California
Darin Beltran, Chairman
P.O. Box 3162
Santa Rosa, CA 95402

La Jolla Band of Luiseno Indians,
California
Wesley Ruise Jr., Chairperson
22000 Highway 76
Pauma Valley, CA 92061

La Posta Band of Diegueno Mission Indians of the
La Posta Indian Reservation, California
Eric La Chappa, Chairperson
8 Crestwood Road
Boulevard, CA 91905

Lone Pine Paiute-Shoshone Tribe
Thomas Swab Jr., Chairman
P.O. Box 747
Lone Pine, CA 93545

Los Coyotes Band of Cahuilla and Cupeno Indians,
California
Ray Chapparosa, Spokesperson
P.O. Box 189
Warner Springs, CA 92086

Lytton Rancheria of California
Andrew Mejia, Chairman
1500 Falling Oak Way
Windsor, CA 95492

Manchester Band of Pomo Indians of the
Manchester Rancheria, California
Tisha Jones, Chairwoman
P.O. Box 623
Point Arena, CA 95468

Manzanita Band of Diegueno Mission
Indians of the Manzanita Reservation,
California
Angela Santos, Chairperson
P.O. Box 1302
Boulevard, CA 91905

Mechoopda Indian Tribe of Chico Rancheria,
California
Dennis Ramirez, Chairman
1920 Alcott Avenue
Chico, CA 95928

Mesa Grande Band of Diegueno
Mission Indians of the Mesa Grande
Reservation, California
Curtis La Chusa, Chairman
P.O. Box 270
Santa Ysabel, CA 92070

Middletown Rancheria of Pomo Indians of
California
Jose Simon III, Chairman
P.O.Box 1035
Middletown, CA 95461

Mooretown Rancheria of Maidu Indians
of California
Benjamin Clark, Chairman
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