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May 19, 2026

VIA ELECTRONIC FILING

Hon. David Jones, Chairman
c/o Ectory Lawless, Docket Manager
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243
TPUC.DocketRoom@tn.gov

Electronically Filed in TPUC Docket
Room on May 19, 2026 at 4:10 p.m.

RE: *Petition of Citizens Telecommunications Company of Tennessee L.L.C. for an Order Confirming Relinquishment of its Eligible Telecommunications Carrier Designation, TPUC Docket No. 26- 00041*

Dear Chairman Jones:

Attached for filing please find the *Petition of Citizens Telecommunications Company of Tennessee L.L.C. for an Order Confirming Relinquishment of its Eligible Telecommunications Carrier Designation*.

As required, copies will be mailed to your office. We have also enclosed a check in the amount of \$25.00 for the required filing fee. Should you have any questions concerning this filing or require additional information, please do not hesitate to contact me.

Very truly yours,

BUTLER SNOW LLP



Melvin J. Malone

Attachment

cc: Suzan D. Paiva, Verizon

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100835838.v1

**BEFORE THE TENNESSEE PUBLIC UTILITY COMMISSION
NASHVILLE, TENNESSEE**

**IN THE MATTER OF PETITION OF)
CITIZENS TELECOMMUNICATIONS)
COMPANY OF TENNESSEE L.L.C.)
FOR AN ORDER CONFIRMING)
RELINQUISHMENT OF ITS ELIGIBLE)
TELECOMMUNICATIONS CARRIER)
DESIGNATION)**

Docket No. 26-00041

**PETITION OF CITIZENS TELECOMMUNICATIONS COMPANY OF TENNESSEE
L.L.C. FOR AN ORDER CONFIRMING RELINQUISHMENT OF ITS ELIGIBLE
TELECOMMUNICATIONS CARRIER DESIGNATION**

Pursuant to 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, Citizens Telecommunications Company of Tennessee L.L.C. d/b/a Frontier (“Frontier”) hereby provides the required “advance notice” that it is relinquishing its eligible telecommunications carrier (“ETC”) designation effective September 1, 2026. Frontier respectfully requests that the Tennessee Public Utility Commission (“Commission”) issue an order confirming Frontier’s relinquishment of its ETC designation by July 1, 2026, in order to allow time for Frontier to provide sufficient notice to its Lifeline customers. In support of this Petition, Frontier provides the following information:

BACKGROUND

1. Frontier is an incumbent local exchange carrier (“incumbent LEC”) in Tennessee.
2. On December 17, 1997, pursuant to 47 U.S.C. § 214(e)(1), the Tennessee Regulatory Authority designated Frontier as an ETC in its Tennessee incumbent LEC service

area.¹ Frontier’s Tennessee incumbent LEC service area consists of the wire centers listed in Exhibit A.

3. Pursuant to 47 U.S.C. § 214(e)(1), ETCs are eligible to receive federal universal service support in accordance with 47 U.S.C. § 254, in exchange for which they are required to offer and advertise supported services pursuant to 47 C.F.R. § 54.201(d) and meet the obligations associated with the universal service programs in which they participate. Federal universal service support includes “high-cost” support to deploy and maintain networks in rural and other high-cost areas, as well as Lifeline support for discounts provided to eligible low-income consumers.

4. With this Petition, Frontier is providing notice that it is relinquishing its ETC designation for its entire Tennessee service area effective September 1, 2026. Frontier is relinquishing its ETC designation because the underlying purpose of the designation – to enable the receipt of high-cost universal service support – no longer exists for Frontier in the state of Tennessee. Frontier has not received any high-cost universal service support in Tennessee since December 2021, when the FCC’s Connect America Fund ended and was replaced by the Rural Digital Opportunity Fund (RDOF). In the 2020 RDOF auction, the FCC awarded all high-cost support for the RDOF-eligible census blocks in Frontier’s service area to other carriers.

5. There will be little or no consumer impact from Frontier’s relinquishment of its ETC designation. Frontier currently has just 51 Lifeline customers in Tennessee – a 75 percent decline from just five years ago – because most Lifeline-supported households have already chosen to obtain their Lifeline service from one of the many other ETCs that have been designated

¹*Order Designating Eligible Telecommunications Carriers Pursuant to 47 U.S.C. § 214(e), the Telecommunications Act of 1996, section 254(c) and FCC Order 97-157*, Tennessee Regulatory Authority Docket No. 97-00888 (December 17, 1997).

by the FCC and the Commission.² The small number of remaining Frontier Lifeline customers will be able to obtain Lifeline service from one of the other ETCs or may instead elect to continue obtaining service from Frontier at standard rates, terms, and conditions. Frontier will provide its Lifeline customers with ample notice of the changes in their Lifeline service, using the same notice timeline that the Commission approved when the AT&T incumbent LEC relinquished its ETC designation.

LEGAL STANDARD

6. In 47 U.S.C. § 214(e)(4) and 47 C.F.R. § 54.205, Congress and the FCC made clear that a state commission “shall permit” an ETC to relinquish its ETC designation in any area served by “more than one” ETC. Specifically, 47 U.S.C. § 214(e)(4) provides that:

“A State commission . . . **shall permit an eligible telecommunications carrier to relinquish its designation** as such a carrier **in any area served by more than one eligible telecommunications carrier**. An eligible telecommunications carrier that seeks to relinquish its eligible telecommunications carrier designation for an area served by more than one eligible telecommunications carrier shall give advance notice to the State commission ... of such relinquishment.” (Emphasis added).

7. As the Commission has recognized, 47 U.S.C. § 214(e)(4) does not treat relinquishment by an incumbent LEC any differently than relinquishment by other designated ETCs. Consistent with 47 U.S.C. § 214(e)(4), the Commission in 2017 and 2021 permitted the

² Universal Service Administrative Company (USAC) disbursement data show that the number of Frontier Lifeline customers declined from 206 to 51 over the five years since April 2021. The rapid decline in the number of Frontier Lifeline customers is consistent with national trends: USAC data show that, for the nation as a whole, (1) incumbent LEC Lifeline disbursements fell 70 percent over the five years from 2020 to 2025; and (2) incumbent LEC ETCs now receive just 2 percent of Lifeline disbursements, while wireless ETCs receive 97 percent of Lifeline disbursements. See <https://www.usac.org/lifeline/resources/program-data/> (“Lifeline’s Data and Statistics” file).

AT&T incumbent LEC to relinquish its Tennessee ETC designation based on AT&T's demonstration that there was more than one ETC in AT&T's service area.³

FRONTIER IS ENTITLED TO RELINQUISH ITS ETC DESIGNATION

8. Frontier clearly meets the 47 U.S.C. § 214(e)(4) “more than one ETC” standard for relinquishing its ETC designation. As is shown by Exhibit B, the FCC and the Commission (following a change in Tennessee law in 2022 that gave the Commission the authority to designate wireless ETCs) have designated at least 18 other ETCs in Frontier's Tennessee service area.

9. Of the 18 carriers listed in Exhibit B, the FCC and the Commission designated 13 carriers as ETCs on a statewide basis. Because each of the 13 statewide ETCs serves all or nearly all Frontier wire centers, every Frontier wire center is served by multiple ETCs.⁴ In addition, most Frontier wire centers are also served by one of the five other ETCs listed in Exhibit B, which are recipients of RDOF support. The FCC (and, in one case, the Commission) designated the RDOF recipients as ETCs in their RDOF-funded census blocks in Frontier wire centers, and the FCC also designated three RDOF recipients – West Kentucky Telephone, Scott County Telephone, and Twin Lakes Communications – as “Lifeline-only” ETCs in additional census blocks.

³ *Order Confirming AT&T Tennessee's Relinquishment of its Eligible Telecommunications Carrier Designation in Specified Areas*, Docket No. 16-00123 (March 24, 2017) (“*AT&T 2017 Relinquishment Order*”); *Order Confirming Relinquishment of Eligible Telecommunications Carrier*, Docket No. 21-00115 (December 1, 2021) (“*AT&T 2021 Relinquishment Order*”).

⁴ According to the designation orders issued by the FCC, Verizon Value's designated service area included “all” Tennessee zip codes; Assurance's service area included “nearly all” Tennessee zip codes; and i-wireless's service area included both Frontier study areas. For the statewide ETCs designated by the Commission, all petitions for designation described service areas that included all or nearly all Frontier wire centers. For example, at least four petitioners included wireless coverage maps that showed statewide coverage, thus encompassing all Frontier exchanges (TerraCom, IM Telecom, TAG Mobility, Amerimex), while at least three petitioners described their service areas using zip code lists that included all or nearly all Frontier Tennessee zip codes (Air Voice, Dish, and American Broadband and Telecommunications).

10. Because every Frontier wire center is served by multiple statewide ETCs and several Frontier wire centers are also served by RDOF ETCs, 47 U.S.C. 214(e)(4) mandates that the Commission permit Frontier to relinquish its ETC designation throughout its service area.

LIFELINE CUSTOMER NOTICES

11. As is noted above, Frontier currently has just 51 Lifeline customers in Tennessee. The small number of remaining Lifeline customers will be able to obtain Lifeline service from one of the many other ETCs in Frontier's service area, including Frontier's Verizon Value affiliate (formerly TracFone Wireless), or they may instead elect to continue obtaining service from Frontier at standard rates, terms, and conditions. If a current Lifeline customer elects to continue obtaining service from Frontier, Frontier will remove the Lifeline discount as of the relinquishment effective date.

12. After the Commission issues an order confirming relinquishment, Frontier will provide its remaining Lifeline customers with notice that they will need to select another ETC in order to continue receiving a Lifeline discount after the relinquishment effective date. Frontier will use the same notice timeline that the Commission approved in the 2017 and 2021 AT&T relinquishment orders. Specifically, at least 60 days prior to the relinquishment date, Frontier will notify any remaining Lifeline customers by mail that (1) Frontier will no longer offer the federal Lifeline discount; and (2) if the customer does not choose another provider, Frontier will continue to provide service at Frontier's standard prices (including applicable surcharges, fees and taxes) after the effective date of the relinquishment. Frontier will also send each remaining affected Lifeline customer a second notice letter at least 15 days prior to the relinquishment date. All notices will explain that Lifeline customers can obtain a list of other ETCs from the Universal Service

Administrative Company (USAC), and that they may contact those other ETCs in order to discuss the available Lifeline benefits. Exhibit C provides sample language for the notices that Frontier will send to affected customers.

13. To avoid customer confusion and assist with a smooth transition process, Frontier will stop enrolling customers in the Lifeline program after the Commission issues an order or on July 1, 2026, whichever is later. The Commission approved this approach, which will prevent a newly enrolled Lifeline customer from having to change to another Lifeline provider shortly after enrolling with Frontier, in the 2017 and 2021 AT&T relinquishment orders.


14. Frontier requests that the Commission issue an order granting this Petition as soon as possible, but no later than July 1, 2026, so that Frontier can provide sufficient notice to its Lifeline customers prior to the relinquishment effective date of September 1, 2026.

CONCLUSION

For the foregoing reasons, Frontier respectfully requests that the Commission grant this Petition expeditiously and issue an order confirming Frontier's relinquishment of its ETC designation in Tennessee, effective September 1, 2026.

Respectfully submitted this the 19th day of May 2026.

Respectfully submitted,



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Company of Tennessee L.L.C. d/b/a Frontier
and Verizon*

Exhibit A – Frontier Tennessee Designated Wire Centers

Wire Center	Exchange
ALGDTNXA	ALGOOD
CXTNTNXA	CLAXTON
CKVLTNXA	COOKEVILLE
CSVLTNXA	CROSSVILLE
DRSDTNXA	DRESDEN
LTHMTNXA	LATHAM
MARTNXA	MARTIN
MMVLTNXA	MCMINNVILLE
MTRYTNXA	MONTEREY
PLVLTNXA	PALMERSVILLE
PLHLTNXA	PLEASANT HILL
POWLTNXA	POWELL
RTLGTNXA	RUTLEDGE
SHRNTNXA	SHARON
SIDNTNXA	SIDONIA
SPRTNXA	SPARTA
TANSTNXA	TANSI
TTSPTNXA	TATE SPRINGS
WSBNTNXA	WASHBURN

Exhibit B – ETCs Designated in Frontier Wire Centers

ETCs designated on a statewide basis

ETC	Designation Order
Verizon Value (formerly TracFone Wireless)	FCC CC Docket No. 96-45, April 11, 2008 (FCC 08-100)
Assurance (formerly Virgin Mobile USA)	FCC CC Docket No. 96-45, March 5, 2009 (FCC 09-18)
i-wireless	FCC CC Docket No. 96-45, June 13, 2012 (DA 12-934)
Air Voice Wireless d/b/a Air Talk Wireless	Docket 22-00033, July 8, 2022
IM Telecom d/b/a Infiniti Mobile	Docket 23-00084, March 4, 2024
Tag Mobility d/b/a TAG Mobile	Docket 24-00068, December 9, 2024
Global Connection, Inc. of America, d/b/a STANDUP WIRELESS	Docket 22-00034, July 8, 2022
TruConnect Communications	Docket 22-00036, July 8, 2022
Telrite d/b/a Life Wireless	Docket 22-00041, July 8, 2022
American Broadband and Telecommunications	Docket 24-00025, September 30, 2024
TerraCom d/b/a Maxsip Tel	Docket 23-00047, August 31, 2023
DISH Wireless, LLC d/b/a Gen Mobile	Docket 23-00010, June 1, 2023
Amerimex Communications d/b/a SafetyNet Wireless	Docket 24-00043, September 30, 2024

RDOF ETCs designated in Frontier wire centers

ETC	Designation Order
Scott County Telephone Cooperative	FCC WC Docket No. 09-197, June 8, 2021 (DA-21-663) (RDOF areas); December 16, 2024 (DA 24-1261) (Lifeline-only areas)
West Kentucky Telephone Cooperative	FCC WC Docket No. 09-197, June 8, 2021 (DA-21-663) (RDOF and Lifeline-only areas)
Charter Communications	FCC WC Docket No. 09-197, October 14, 2021 (DA 21-1286) (RDOF areas)
Ben Lomand Communications	Docket 21-00054, August 11, 2021
Twin Lakes Communications	FCC WC Docket No. 09-197, June 8, 2021 (DA-21-663) (RDOF and Lifeline-only areas)

Exhibit C – Sample Customer Notifications

First Customer Letter

IMPORTANT INFORMATION ABOUT YOUR LIFELINE DISCOUNT

Date

Customer Name

Address

City, State ZIP

Dear Valued Customer,

Reference Telephone Number: XXX-XX-XXXX Subscriber Name: XXXXXXXX XXXXXXXXXX

We will no longer provide a Lifeline discount in your area in Tennessee through the Lifeline Program beginning xx/1/23. This change is due to our decision to no longer be an eligible telecommunications carrier (ETC) in Tennessee.

How does this impact you? While your voice service will not change, you will no longer receive the Lifeline discount on your monthly bill. In order to retain your Lifeline discount, you must contact another ETC service provider participating in the Lifeline Program. A list of those providers can be found at lifelinesupport.org/companies-near-me/ or you can call the Universal Service Administrative Company (USAC) at 800-234-9473.

If you have questions about this letter, please call us at **800-921-8101**

Sincerely,

Frontier Lifeline Services

Second Customer Letter

FINAL NOTICE: YOUR LIFELINE DISCOUNT

Date

Customer Name

Mailing Address

City, State Zip

Dear Valued Customer,

Reference Telephone Number: XXX-XX-XXXX Subscriber Name: XXXXXXXX XXXXXXXXXX

You were previously advised that we will no longer provide a Lifeline discount in your area in Tennessee through the Lifeline Program beginning XXXX. This change is due to our decision to no longer be an eligible telecommunications carrier (ETC) in Tennessee.

How does this impact you? While your voice service will not change, you will no longer receive the Lifeline discount on your monthly bill. In order to retain your Lifeline discount, you must contact another ETC service provider participating in the Lifeline Program. A list of those providers can be found at lifelinesupport.org/companies-near-me/ or you can call Universal Service Administrative Company (USAC) at 800-234-9473 If you have questions about this letter, please call us at 1-800-921-8101 to speak with a representative.

Sincerely,

Frontier Lifeline Services