BEFORE THE
COMMONWEALTH OF PENNSYLVANIA SENATE CONSUMER PROTECTION AND PROFESSIONAL LICENSURE COMMITTEE

Public Hearing: The Impact of Verizon's Line Discontinuance Application

October 20, 2026

Testimony of
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I. INTRODUCTION

Good morning, Majority Chair Stefano, Minority Chair Boscola, and Members of the Senate Consumer Protection and Professional Licensure Committee. My name is Katie Kennedy, and I am an Assistant Consumer Advocate at the Pennsylvania Office of Consumer Advocate, or OCA, where I work on behalf of Pennsylvania Consumer Advocate, Darryl Lawrence. I am also here today with Joel Cheskis, a Senior Assistant Consumer Advocate.

Thank you for the opportunity to present this testimony regarding this very important matter of the Application of Verizon Communications to the Federal Communications Commission (FCC) under Section 214 of the Federal Communications Act. In its Application, Verizon seeks permission from the FCC to discontinue the provision of "Plain Old Telephone Service," sometimes referred to as basic local exchange service or "POTS," over the traditional copper wire network in Pennsylvania and several other states. Verizon asserts that consumers have "adequate replacement options" and proposes transferring affected consumers to alternative services, but whether those alternatives provide comparable service, affordability, reliability, and meaningful consumer choice remains an open question.

In Verizon's Application, Verizon explains that it must satisfy the FCC's Alternative Options and Adequate Replacement test, while also acknowledging in a footnote that as of

October 15, 2026, there is a streamlined process available that replaces those tests.[1] On September 8, 2026, Verizon mailed letters telling consumers they would need to transition to services delivered over alternative technologies without establishing whether those alternatives are actually available in their service areas. The Application affects consumers throughout Verizon Pennsylvania (the former Bell Atlantic service territory) and Verizon North (the former GTE North service territory), as well as the Pennsylvania service territories served by Frontier Communications companies. Verizon and Frontier are major telecommunications providers in Pennsylvania, and this Application will likely have a large impact on the provision of those services. The proposed transition could significantly affect consumers, businesses, and communities across the Commonwealth. The FCC must ensure that every affected consumer can access a reliable replacement service and has a meaningful opportunity to participate in the review process before the FCC acts.

This is the third such Application Verizon has made to the FCC affecting other states. Over the summer, the FCC allowed Verizon's first Application to be deemed approved without further action, leaving consumers served by Verizon's copper network in Alabama, Georgia, Iowa, Mississippi, and Tennessee facing the consequences of that decision.[2] Verizon's second Application came within one day of being deemed approved without further FCC action before the FCC determined that additional review was warranted. The outcome will affect consumers who rely on Verizon's copper network in Florida, Indiana, Minnesota, Nebraska, Nevada, North

[1] Verizon, *Section 63.71 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition*, FCC ECFS Filing No. 26110076152 at n. 4 (filed Sept. 9, 2026), https://www.fcc.gov/ecfs/search/search-filings/filing/26110076152.

[2] Federal Communications Commission, *Section 214 Application to Discontinue Domestic Legacy Voice Service*, WC Docket No. 26-116, https://www.fcc.gov/ecfs/search/search-filings/results?q=(proceedings.name:(%2226-116%22)) (last visited Oct. 15, 2026)(First Tier Docket).

Carolina, Texas, and Wisconsin. Verizon's third Application, [3] which includes Pennsylvania, has not yet been published in the *Federal Register*. That publication triggers the 15-day public comment period and the 30-day clock for the Application to be deemed granted, making timely public scrutiny especially important. The Application puts consumers who rely on Verizon's copper network in California, Connecticut, the District of Columbia, Illinois, Maryland, Massachusetts, Michigan, New York, Pennsylvania, and West Virginia at risk of losing existing services without assurance that reliable, affordable, and functional alternatives will be available where they live or work.

Under the FCC's procedural rules, affected parties generally have only up to 15 days after publication in the *Federal Register* to submit comments on a proposed service discontinuance.[4] In addition, qualifying applications may be automatically granted on the 31st day after publication in the *Federal Register*, unless the FCC intervenes.[5] We are very concerned that, once the Application involving Pennsylvania is published, interested parties may have as little as 15 days to submit comments to the FCC. This limited timeframe could significantly restrict the ability of affected stakeholders to fully assess the application and prepare meaningful comments.

The OCA's major concerns at this point involve:

1. How will the needs of Pennsylvania households that lack an adequate alternative or replacement for basic local exchange service delivered over copper facilities be addressed? What protections will ensure that these consumers are not left without reliable and affordable telephone service?

[3] Federal Communications Commission, *ECFS Filing No. 26110076152*, https://www.fcc.gov/ecfs/search/search-filings/filing/26110076152 (last visited Oct. 15, 2026)(Third Tier Application).
[4] 47 C.F.R. § 63.71(a)(5)(i).
[5] 47 C.F.R. § 63.71(f)(1).

2. How will Verizon's proposed discontinuance affect the commitments Verizon has made in Pennsylvania as part of the Pennsylvania Public Utility Commission's (PUC) approval of the Verizon–Frontier merger last year? What happens to the obligations arising from the resolution of the OCA's complaint concerning Frontier's poor service quality, as the compliance period is still ongoing? Will these commitments and obligations remain enforceable following the proposed transition?
3. How many Verizon consumers rely solely on Digital Subscriber Line (DSL) service and may be affected by these Applications? Were these consumers excluded from notification because they are not POTS consumers? Have they been adequately informed of the proposed changes, how their service may be affected, and what alternatives are available? And
4. How will the proposed discontinuance affect Pennsylvania-specific protections governing basic local exchange service, such as Chapter 30 of the Public Utility Code and the PUC's oversight?

II. BACKGROUND

By way of brief background, it is important to note that, in 1993, the General Assembly had the foresight to add Chapter 30 to the Public Utility Code providing an alternative form of regulation for incumbent local exchange carriers, or ILECs, in exchange for the accelerated deployment of a "broadband" network. Of course, what we considered "broadband" in 1993 is a fraction of the speed of what we call "broadband" today. Nonetheless, 1993 was only a few years removed from the Modified Final Judgment that broke up the former "Ma Bell" System, and it preceded several major legislative developments that reshaped the telecommunications and utility industries: the federal Telecommunications Act of 1996, Pennsylvania's Electric Choice

and Competition Act of 1996, and Pennsylvania's Natural Gas Choice and Competition Act of 1999.

In many ways, telecommunications law has led the way in moving away from traditional rate base rate of return rate regulation that governed utilities for almost a century and towards an alternative form of regulation. The transitional regulatory framework was built on a fundamental bargain. When the General Assembly enacted Chapter 30 in 1993, incumbent telephone companies were given the opportunity to move away from traditional rate-base, rate-of-return regulation in exchange for commitments to modernize their networks and accelerate the deployment of advanced telecommunications services throughout the Commonwealth while preserving universal service, affordable rates, and access to reliable telecommunications service in rural, suburban, and urban communities alike.[6]

Since the 1990s and early 2000s, as technology has changed and customer preferences have evolved, the need for access to basic local exchange service that is adequate and reasonable and provided at just and reasonable rates, has remained and still remains in Pennsylvania. Although the mode of providing that service has changed and the number of consumers relying on basic voice service using copper facilities has decreased, there still remains, as evidence by Verizon's own Application, a substantial number of households in Pennsylvania that require access to basic local exchange service currently provided by copper network facilities. If you are one of those households, or your family member or neighbor are one of those households, and you have no real alternative, then access to safe, reliable basic local exchange service at just and reasonable rates remains essential. The key point is that people still need universal service to

[6] *See* 66 Pa. Cons. Stat. §§ 3001–3009 (repealed 2004); *Popowsky v. Pennsylvania Pub. Util. Comm'n*, 550 Pa. 449, 453–54, 706 A.2d 1197, 1199 (1997).

communicate by voice for everyday commerce and social interaction, and to get help in public safety and health situations and emergencies. This happens over both copper and fiber networks.

You may have access to the latest telecommunications technology, but your neighbor may not have a viable alternative to basic local exchange service, whether because of technological limitations, lack of infrastructure investment, affordability, or other circumstances. If that neighbor's home catches fire, you want them to be able to call 911 and get the fire department there as quickly as possible. If a family member lives in a remote part of Pennsylvania and relies on basic local exchange service, you want that family member to be able to reach 911 and get an ambulance when they experience a medical emergency. And there is another important consideration: telephone service derives much of its value from its ability to connect people with one another. The more people who can be reached through the telephone network, the more valuable that network is to every user. Ensuring that everyone has access to reliable basic local exchange service is therefore not just about individual households; it is about public safety and emergency communication, public health, community connectivity, and the value of the network as a whole.

Nevertheless, through its September 9, 2026 application, Verizon seeks to discontinue service to consumers who continue to rely on its traditional copper network in favor of alternative technologies or providers, without sufficient assurance that those alternatives exist for the consumer in the first place, and will provide adequate, reliable, and affordable replacement service for every affected consumer. Accordingly, the OCA submits that Verizon's application should be denied unless and until Verizon demonstrates that each affected consumer does have access to an adequate replacement for their existing service.

III. VITAL TELECOMMUNICATIONS SERVICE TO PENNSYLVANIA'S RURAL CUSTOMERS

First, Verizon's discussion about the availability of alternative services warrants careful scrutiny. You have likely heard—and will continue to hear—from constituents who know firsthand what the coverage maps and aggregate statistics cannot tell you: they have poor or nonexistent cell service, cannot access satellite service, lose service quality whenever it rains, or cannot afford a competitor's bundled package. These are real customers served by this network, and their lived experiences must count. The OCA has heard these same concerns directly from consumers, including during public hearings, and has conducted extensive research to corroborate these firsthand accounts and better assess the scope and severity of the problem.

Rural Pennsylvanians cannot be assumed to have access to a reliable alternative to traditional copper-wire landline telephone service. Cellular coverage is not universal in rural areas, and the availability of a wireless signal does not necessarily establish that a dependable connection is available at a particular residence.[7] Pennsylvania's own broadband planning documents acknowledge persistent disparities in rural connectivity and explain that rural residents may have limited, if any, options, relying on lower-speed connections, satellite service, or no broadband service at all. Satellite coverage claims likewise should not be equated with a guarantee of reliable, continuous voice telephone service at every location. Consequently, cellular and satellite technologies cannot categorically be treated as equivalent substitutes for copper-wire landlines throughout rural Pennsylvania. Any determination that an alternative is

[7] *See* Fed. Commc'ns Comm'n, *National Broadband Map: About*, https://broadbandmap.fcc.gov/about (last visited Oct. 19, 2026) (expressly cautioning that mobile broadband coverage maps are based on propagation modeling and standardized assumptions, do not reflect indoor service availability, and may not accurately predict actual service due to device limitations, network capacity, terrain, and differences in providers' mapping methodologies).

adequate should be based on actual service availability and reliability at the affected location, rather than nominal coverage alone, including at an affordable price.

So, Verizon may characterize its proposal as a straightforward transition to alternative services, but its own October 9, 2026 letter acknowledges that an FCC-approved replacement may prove unavailable at a customer's location.[8] Verizon's commitment to withhold disconnection or restore copper service in such circumstances underscores the central concern: identifying a replacement technology is not the same as ensuring that a customer can actually obtain adequate replacement service. Many of your constituents would likely tell you the same thing. Cost, deployment limitations, technological constraints, and other barriers must be examined rather than assuming that an alternative on paper is a viable option for every affected consumer.

IV. VERIZON'S COMMITMENTS TO THE PUBLIC UTILITY COMMISSION AND ITS PENNSYLVANA CUSTOMERS

In addition, it is important to note that just one year ago, the PUC approved the settlement of the case involving the merger of Verizon and Frontier.[9] Similarly, in *Office of Consumer Advocate v. Commonwealth Telephone Co.*, the OCA along with the Office of the Small Business Advocate, filed a formal Complaint against Frontier regarding many service quality issues that were being experienced by customers throughout the Frontier service territory. That proceeding was also resolved by a settlement that the PUC approved on May 9, 2024.[10] The PUC's approval

[8] Verizon, *Letter from Randy Clarke to Marlene H. Dortch*, WC Docket No. 26-227, Comp. Pol. File No. 2178 (Oct. 9, 2026), https://www.fcc.gov/ecfs/document/26110080304/1 (previously accessed on Oct. 19, 2026).
[9] *Joint Application of Verizon Communications Inc. and Frontier Communications Parent, Inc. for Approval of a Change of Control*, Docket No. A-2024-3051925 (Pa. Pub. Util. Comm'n), available at: https://www.puc.pa.gov/pcdocs/1894806.pdf (previously accessed on Oct. 15, 2026).
[10] *Office of Consumer Advocate v. Commonwealth Telephone Co.*, Docket No. C-2023-3037574, Order at 1–2 (Pa. Pub. Util. Comm'n May 9, 2024), available at: https://www.puc.pa.gov/pcdocs/1828745.pdf (previously accessed on Oct. 15, 2026).

of the merger settlement and the service quality settlement remain valid and enforceable legal obligations that Verizon must adhere to.

During the public input hearings in the Verizon-Frontier merger proceeding before the PUC last year, consumers, public officials, community organizations, healthcare providers, educators, and other stakeholders raised concerns about the reliability and modernization of Frontier's Pennsylvania networks. They called for specific, enforceable commitments to upgrade infrastructure, improve service reliability and public safety, expand broadband availability to speeds that meet modern needs, and considered replacing aging aerial and copper facilities with underground infrastructure and fiber optics. Although some participants were cautiously receptive to the merger, they questioned whether Verizon would follow through on its promises after closing. Verizon did not begin auditing its acquired network until June of 2026, yet it has already, just a few months later, filed an application to discontinue service, potentially before the findings of that audit have been fully reviewed or acted upon.

Further still, the OCA raised concerns during the Verizon–Frontier merger proceeding that Verizon's limited emphasis on the availability of its fixed wireless access (FWA) service to Frontier customers in Pennsylvania was telling, particularly given the apparent limitations on its availability in rural wire centers served by copper facilities. The OCA made its concerns clear on the record, explaining that Verizon should not be permitted to count wireless broadband availability as a benefit of the merger merely because its coverage maps[11] suggest that service might be available. Rather, Verizon should demonstrate precisely where customers can actually

[11] *See* Fed. Commc'ns Comm'n, *National Broadband Map: About*, https://broadbandmap.fcc.gov/about (last visited Oct. 19, 2026) (expressly cautioning that mobile broadband coverage maps are based on propagation modeling and standardized assumptions, do not reflect indoor service availability, and may not accurately predict actual service due to device limitations, network capacity, terrain, and differences in providers' mapping methodologies).

obtain reliable service and identify what additional benefits the transaction would deliver beyond what Verizon could provide independently.

At the time, the OCA was concerned about gaps in coverage and areas where wireless service was unavailable or unreliable. Those concerns have not diminished; they have become even more pressing as Verizon now seeks to discontinue legacy copper-based service. Without clear evidence of where fixed wireless service is genuinely available and capable of meeting customers' needs, there is no assurance that affected Pennsylvanians, particularly those in rural communities or other dead zones, will have access to an adequate replacement.

The OCA therefore continues to urge careful, location-specific scrutiny of Verizon's claimed alternatives and the potential consequences for customers who may have nowhere else to turn. Whether an adequate replacement exists is a premise-specific question: infrastructure must be physically present, wireless signals must reach the customer without impairments that undermine service, and terrain, vegetation, and other local conditions can determine whether an alternative is actually available and reliable. The FCC must look beyond the Application's broad-brush assumptions and aggregate statistics, including Verizon's assertion that only 2.7% of customers subscribe to POTS, and examine conditions at the individual premises. Low POTS subscription rates do not establish that customers have viable replacement options.[12] Accordingly, we should not infer from aggregate subscription figures that adequate alternatives exist; proper review should require a granular, premise-specific assessment of whether each affected customer can actually obtain reliable, functional replacement service.

[12] *See* U.S. Gov't Accountability Off., *Broadband Programs: Agencies Need to Further Improve Their Data Quality and Coordination Efforts*, GAO-25-107207 (2025), https://files.gao.gov/reports/GAO-25-107207/index.html (previously accessed on Oct. 19, 2026).

Additionally, in the Frontier Service Quality Case, customers described limited alternatives in rural areas, including places where cellular reception was inadequate. A wireless option that works well in a nearby town may not work indoors at a customer's home, and a cellular connection cannot solve a coverage problem simply because the customer switches providers. Some consumers in that case had testified that loss of telephone service created serious safety risks because they depended on their landlines to contact emergency responders. Critically, a consumer testified that her household had no cellular service and no telephone access at home when her landline failed. Another consumer similarly testified that he could not rely on cellular service to contact 911 while his disabled wife was home alone. You can find this information further memorialized in the Initial Decision that is public and available on that docket.[13] Still today, the PUC's May 9, 2024 settlement with Frontier Communications remains subject to ongoing compliance obligations. The settlement's core service-quality, infrastructure, remediation, and reporting obligations remain relevant today. The capital-investment program is in its final calendar year, while the three-year compliance period is expected to continue until approximately May 2027, with certain reporting extending for a further year.

It remains unclear from Verizon's Application, or from our informal conversations with the Company, to what extent Verizon and Frontier intend to continue to abide by those obligations if the FCC approves their Application. It would be a significant loss of substantial, affirmative public benefits for consumers, secured only one year ago, if the FCC were to approve the Application, resulting in Verizon and Frontier no longer fulfilling the commitments undertaken in those proceedings.

[13] *Office of Consumer Advocate v. Commonwealth Telephone Co.*, No. C-2023-3037574, Initial Decision at 6 (Pa. Pub. Util. Comm'n), available at: https://www.puc.pa.gov/pcdocs/1821439.pdf (last accessed on Oct. 15, 2026).

V. PENNSYLVANIA-SPECIFC ISSUES TO CONSIDER

Finally, the OCA notes additional Pennsylvania-specific issues that the FCC should consider when addressing Verizon's Application, and the General Assembly should consider when determining what action it should take in response to Verizon's Application. As noted above, Pennsylvania was an early mover in providing an alternative form of regulation for its ILECs in 1993. Pennsylvania, with its unique demographics and topography (which impedes wireless service coverage), must ensure that it doesn't fall behind other states in its provision of basic local exchange services to consumers who still rely on them.

One of the main tenants of Chapter 30 was the requirement to "maintain universal telecommunications service at affordable rates."[14] Verizon may have satisfied its network modernization obligations under Chapter 30 a long time ago, but the fundamental requirement in Chapter 30 for universal service throughout its service territory remains the law in Pennsylvania.

Similarly, the PUC has established consumer protections through regulations governing residential telecommunications service, including billing practices, service interruptions, and procedures for resolving disputes and filing informal and formal complaints.[15] It remains unclear whether, and to what extent, Verizon intends to continue honoring these protections if consumers are migrated from traditional copper-based service to an alternative technology. For example, will consumers retain meaningful access to the PUC's complaint process if they experience service-quality problems, billing errors, or other disputes that cannot be resolved through the competitive provider? Although a change in transmission technology does not necessarily

[14] 66 Pa.C.S. § 3011(2).
[15] *See* 52 Pa. Code §§ 64.1, 64.11–64.24, 64.51–64.53, 64.131–64.163.

eliminate PUC jurisdiction or applicable consumer protections, the regulatory status of the replacement service may affect which requirements apply.

Verizon's Application does not appear to address the particular challenges that Pennsylvania's mountainous terrain may pose to the availability and reliability of wireless alternatives. The mere identification of a wireless provider or service as available in a geographic area does not necessarily establish that a consumer can obtain reliable service at their residence, particularly in rural and mountainous communities. Availability and service quality are premise specific and dependent on presence and quality of infrastructure. The absence of any meaningful discussion of these geographic and infrastructure challenges is concerning and underscores the importance of ensuring that the FCC fully considers Pennsylvania's mountainous terrain and its potential effects on the availability and reliability of replacement services. The FCC or Verizon should not assume that a service identified as available in a given area will necessarily provide reliable connectivity at a consumer's residence, particularly in rural and mountainous communities. Accordingly, the OCA is very concerned as to whether the proposed alternatives are genuinely available and reliable for affected consumers before authorizing the discontinuance of traditional copper-based telephone service.

You may also hear about the influx of federal funds coming into Pennsylvania through the federal response to Covid that sought to provide broadband to everyone. This money may be referred to as Broadband Equity, Access, and Deployment (BEAD) money. During the COVID-19 pandemic, when everyone was working from home or going to school from home, gaps in broadband coverage throughout the country were exposed. As a result, $42 billion was allocated to close those gaps, of which Pennsylvania was allocated $1.1 billion. The problem is, while the Pennsylvania Broadband Development Authority (PBDA) has done a tremendous job in

allocating that money, the amount of money has already been reduced to less than $800 million and even some of that money is not being used because the providers are surrendering the money for a variety of reasons. The point is, while we appreciate the BEAD money, it cannot be relied on just yet the way Verizon relies on it to provide those alternative services if its Application to discontinue service over the copper network is approved. Additionally, satellite service should not automatically be treated as a comparable replacement for existing copper-based service simply because it is included as an eligible option under the BEAD program. For many consumers, satellite service may entail higher costs, installation challenges, and variable signal quality, making it an inadequate or impractical alternative depending on their location and circumstances.

The FCC must consider these Pennsylvania-specific issues and so too must the General Assembly.

VI. CONCLUSION

So, in conclusion, the question remains how Pennsylvania should respond to Verizon's pending Application. As I noted at the outset, it is possible that the Application could be published in the *Federal Register* at any time, triggering a comment period that may be as short as 15 days. Although we do not yet know precisely when publication will occur or how the FCC will proceed, this remains a real possibility.

Accordingly, we encourage the Senate and all other interested parties to submit comments to the FCC identifying any concerns they may have regarding the Application and its potential impact on Pennsylvania consumers. We also encourage Pennsylvania's federal

congressional delegation to be apprised of this matter so that its members have an opportunity to review the Application and submit comments, as appropriate.

Depending on how the FCC ultimately acts on Verizon's Application, Pennsylvania will need to respond accordingly to ensure that the promise of universal telecommunications service at affordable rates is preserved. That promise was central to the original purpose of Chapter 30 and remains embedded in Pennsylvania law.

Thank you for your time and consideration today. The OCA intends to submit comments to the FCC addressing these and other concerns once the Application is formally published in the *Federal Register* and the comment period opens. I emphasize again that the comment period may be as short as 15 days, making it important for interested parties to be prepared to act promptly.

Joel and I would be happy to answer any questions you may have about this important issue, either now or at your convenience in the future.