



**FRONTIER DECLARATION FOR CONFIDENTIAL TREATMENT OF INFORMATION PROVIDED IN
RESPONSE TO SAN BERNARDINO EAST METRO AUDIT REPORT**

DECLARATION OF JUDY GEISE

I, JUDY GEISE, hereby declare:

1. I am Manager – Regulatory for Frontier California Inc (U-1002-C) (“Frontier”) and designated by Allison M. Ellis, Senior Vice President Business Development, of Frontier Communications Parent, Inc. (“Frontier”), the “Parent company” of Frontier California Inc. If called as a witness, I could and would competently testify as to the matters stated herein from my own personal knowledge, except as to any matters that I state upon information and belief, and as to those matters, I am informed and believe them to be true.

2. Pursuant to the California Public Utilities Commission’s rules governing the submission of confidential information by parties to Commission proceedings, as set forth in D.17-09-023, General Order (“G.O.”) 66-D, I submit this declaration in support of Frontier’s confidential designations of information contained in its attachments responsive to the San Bernardino East Metro Audit Report issued by the California Public Utilities Commission’s Electric Safety and Reliability Branch (ESRB) on September 3, 2025 (“San Bernardino Audit Report”).

3. I am familiar with the information contained in Frontier’s response to the San Bernardino Audit Report, portions of which Frontier has designated as confidential pursuant to Public Utilities Code Section 583 and Commission G.O. 66-D, Section 3.2(a)-(b). The information that Frontier has designated as confidential is appropriately marked and the factual basis for treating that information as confidential is as follows.

4. Frontier’s response “Frontier Confidential Response CA2025 1328_San Bernardino East Metro.pdf” contains street addresses for certain Frontier overhead and underground facilities included in the PUC audit field inspections. The response concerns Critical Infrastructure Information and is being voluntarily provided to the Commission in expectation of protection from disclosure as provided by 6 U.S.C. § 673(a)(1)(E). This information is therefore restricted from disclosure as material specifically precluded from disclosure by statute. *See* Cal. Gov’t. Code § 6254(k); *see also* Cal. Gov’t Code § 6254(e). The information is critical to maintaining the proper functioning and security of Frontier’s network. The public disclosure of this information would compromise network security and public safety. This information also constitutes a “compilation” of competitively sensitive information that derives economic, market and competitive value from not being known to the public or actual and potential competitors. *See* Evid. Code § 1060; Civ. Code § 3426.1(d); Government Code § 6254(k). If disclosed, Frontier’s competitors could leverage this information to direct their deployment, operations or marketing decisions to Frontier’s economic detriment, resulting in unfair competition and harm to the competitive market for telecommunications services.



5. I am not aware of any material public benefit to be advanced by releasing the information described in Paragraph 4 publicly. Any public benefit associated with the disclosure of this type of information is far outweighed by the extensive harm caused to the public interest and public safety that would occur from forcing Frontier to disgorge this information through the regulatory process and hand it over to its competitors. See Gov. Code § 6255(a).

6. For the foregoing reasons, I am informed and believe that the information described in Paragraph 4 is appropriate for confidential treatment and should be withheld from public view.

Dated this 25th day of September at Dallas, Texas.

/s/ Judy Geise
Manager, Regulatory Reporting