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A.20-05-010

**FRONTIER COMMUNICATIONS CORPORATION
FRONTIER CALIFORNIA INC. (U 1002 C)
CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. (U 1024 C),
FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC. (U 1026 C),
FRONTIER COMMUNICATIONS ONLINE AND LONG DISTANCE INC. (U 7167 C),
AND FRONTIER COMMUNICATIONS OF AMERICA, INC. (U 5429 C)**

**DECLARATION OF ALLISON ELLISON
IN SUPPORT OF FACTUAL INFORMATION CONTAINED IN THE OPENING
TESTIMONY OF MARK D. NIELSEN**

August 4, 2020

I, Allison Ellis, hereby declare:

1. I am a Senior Vice President for Frontier Communications Corporation, Frontier California Inc. (U-1002-C), Citizens Telecommunications Company of California Inc. (U-1024-C), Frontier Communications of the Southwest Inc. (U-1026-C), Frontier Communications Online and Long Distance Inc. (U 7167 C), and Frontier Communications of America, Inc. (U 5429 C) (collectively, "Frontier"). 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. This declaration is presented to preserve the confidentiality of sensitive materials submitted in Frontier's opening testimony in this proceeding. Confidential material will be supplied in the opening testimony of Mark D. Nielsen. This declaration is designed to comply with Commission General Order ("G.O.") 66-D, Section 3.2 as to the confidential data being supplied by Frontier.

3. I am familiar with the confidential information that is being supplied in Mr. Nielsen's opening testimony. These data have been properly marked in accordance with G.O. 66-D, and I hereby attest that these materials have characteristics that make them confidential and justify their protection.

4. Pages 39-41 of Mr. Nielsen's opening testimony presents information, which reflects broadband deployment data for Frontier, at specified capability levels for precise numbers of households. Information of this sort is competitively sensitive and confidential and Frontier takes

1 significant steps to protect it from public disclosure. It derives economic and competitive value
2 from not being known to the public, and from not being known to Frontier's current or potential
3 competitors. If disclosed, this information would provide these current competitors and potential
4 competitors with information that could influence operational decisions to better compete with
5 Frontier, such as preparing more precise targeted marketing, redirecting operational resources to
6 areas of higher demand, and adjusting business practices to respond to Frontier's network
7 deployment. Such a result would expose Frontier to unfair competition. The ultimate effects of
8 such unfair competition would be to distort the operation of the competitive market and,
9 ultimately, harm consumers. I am not aware of any countervailing public benefit favoring
10 disclosure that could outweigh these harms.

11 2. Based on the foregoing, and as explained above, I believe this information is
12 properly designated as confidential in connection with the opening testimony of Mark D. Nielsen
13 in this proceeding. *See* Pub. Util. Code § 583; G.O. 66-D, § 3.2(b); Gov. Code §§ 6255, 6254(k),
14 Civil Code § 3426.1(d); Evid. Code § 1060.

15 Dated this 4th day of August 2020 at Durham, North Carolina.

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19 _____
20 Allison Ellis,
21 Senior Vice President
22 Frontier Communications Corporation
23 Frontier California Inc. (U-1002-C), Citizens
24 Telecommunications Company of California
25 Inc. (U-1024-C),
26 Frontier Communications of the Southwest
27 Inc. (U-1026-C),
28 Frontier Communications Online and Long
Distance Inc. (U 7167 C), and Frontier
Communications Of America, Inc. (U 5429
C)