

► See separate instructions.

Part I	Reporting Issuer
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1 Issuer's name

2 Issuer's employer identification number (EIN)

Frontier Communications Corporation

06-0619596

3 Name of contact for additional information

4 Telephone No. of contact

5 Email address of contact

George McArthur

203-614-4656

GM1581@FTR.com

6 Number and street (or P.O. box if mail is not delivered to street address) of contact

7 City, town, or post office, state, and ZIP code of contact

401 Merritt 7

Norwalk, CT 06851

8 Date of action

9 Classification and description

April 30, 2021

See attached.

10 CUSIP number

11 Serial number(s)

12. Ticker symbol

13	Account number(s)
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See attached.

See attached.

See attached.

See attached.

See attached.	See attached.	See attached.	See attached.
Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.			

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ► See attached.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ► See attached.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ► See attached.

Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► See attached.

18 Can any resulting loss be recognized? ► See attached.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► See attached.

**Sign
Here**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ►

Date ►

Print your name ►

Title ►

**Paid
Preparer
Use Only**

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if
self-employed

PTIN

Firm's name ►

Firm's EIN ►

Firm's address ►

Phone no.

Frontier Communications Corporation
EIN 06-0619596
Updated Attachment to Form 8937

The information contained in Form 8937 and this attachment does not constitute tax advice and does not purport to take into account any securityholder's specific circumstances (including holders that may be subject to special tax rules or that held the relevant claims or equity interests as other than a capital asset). Securityholders are urged to consult their own tax advisors regarding the U.S. tax consequences of the transaction described herein and the impact to tax basis resulting from the transaction. Capitalized terms used but not otherwise defined in this memorandum shall have the meaning ascribed to such terms in the *Fifth Amended Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code*, filed August 21, 2020 (as modified, amended or supplemented, the "Plan") and the *Disclosure Statement Relating to the Third Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Disclosure Statement").

Form 8937, Part I, Lines 9-13

Classification and Description (Line 9)	CUSIP Number (Line 10)	Serial Number (Line 11)	Ticker Symbol (Line 12)	Account Number (Line 13)
8.500% unsecured notes due April 15, 2020, issued pursuant to the 2010 Notes Indenture	35906AAH1	N/A	N/A	N/A
8.875% unsecured notes due September 15, 2020, issued pursuant to the 2015 Notes Indenture	35906AAT5	N/A	N/A	N/A
9.250% unsecured notes due July 1, 2021, issued pursuant to the 2009 Notes Indenture	35906AAL2	N/A	N/A	N/A
6.250% unsecured notes due September 15, 2021, issued pursuant to the 2009 Notes Indenture	35906AAP3	N/A	N/A	N/A
8.750% unsecured notes due April 15, 2022, issued pursuant to the 2010 Notes Indenture	35906AAK4	N/A	FTR3765942	N/A
10.500% unsecured notes due September 15, 2022, issued pursuant to the 2015 Notes Indenture	35906AAW8; 35906AAU2 (144A); U3144QAF7 (REGS)	N/A	N/A	N/A
7.125% unsecured notes due January 15, 2023, issued pursuant to the 2009 Notes Indenture	35906AAM0	N/A	N/A	N/A
7.625% unsecured notes due April 15, 2024, issued pursuant to the 2009 Notes Indenture	35906AAN8	N/A	N/A	N/A
6.875% unsecured notes due January 15, 2025, issued pursuant to the 2009 Notes Indenture	35906AAQ1	N/A	N/A	N/A
7.000% unsecured debentures due November 1, 2025, issued pursuant to the 1991 Notes Indenture	177342AM4	N/A	N/A	N/A

11.000% unsecured notes due September 15, 2025, issued pursuant to the 2015 Notes Indenture	35906AAZ1; 35906AAX6 (144A); U3144QAG5 (REGS)	N/A	N/A	N/A
6.800% unsecured debentures due August 15, 2026, issued pursuant to the 1991 Notes Indenture	177342AN2	N/A	N/A	N/A
7.875% unsecured notes due January 15, 2027, issued pursuant to the 2006 Notes Indenture	17453BAS0	N/A	N/A	N/A
9.000% unsecured notes due August 15, 2031, issued pursuant to the 2001 Notes Indenture	17453BAJ0	N/A	CZN.GF	N/A
7.680% unsecured debentures due October 1, 2034, issued pursuant to the 1991 Notes Indenture	177342AK8	N/A	N/A	N/A
7.450% unsecured debentures due July 1, 2035, issued pursuant to the 1991 Notes Indenture	177342AL6	N/A	N/A	N/A
7.050% unsecured debentures due October 1, 2046, issued pursuant to the 1991 Notes Indenture	177342AP7	N/A	N/A	N/A
New Common Stock issued by Reorganized Frontier	35909D109	N/A	FYBR	N/A
5.875% Second Lien Secured Notes due 2029	35908MAA8	N/A	FTR5179405	N/A

Form 8937, Part II, Line 14

On April 14, 2020, Frontier and its subsidiaries commenced cases under chapter 11 of title 11 of the United States Code in the U.S. Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”). On May 15, 2020, the Debtors filed a proposed Joint Plan of Reorganization and related Disclosure Statement, each of which were amended on June 26, 2020, June 29, 2020, June 30, 2020 and August 21, 2020. On August 27, 2020, the Bankruptcy Court entered the *Order Confirming the Fifth Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the “Confirmation Order”), which approved and confirmed the Plan. On April 28, 2021 the Debtors filed with the Bankruptcy Court the *Seventh Amended Plan Supplement* (which included the Restructuring Transactions Memorandum). On April 30, 2021 (the “Effective Date”), the Plan became effective and the Debtors emerged from their Chapter 11 Cases.

On the Effective Date, and in accordance with the Restructuring Transactions Memorandum, Frontier transferred all of the stock of its direct, first-tier subsidiaries (and any other directly-held assets) to Holdings in exchange for (i) New Common Stock issued by Reorganized Frontier, (ii) the Takeback Debt (issued simultaneously by Holdings), and (iii) Holdings’ assumption of all of Frontier’s Reinstated Secured Debt, the exit facility and the exit revolving facility (and any other liabilities of Frontier Reinstated pursuant to the Plan, including without limitation the Subsidiary Secured Notes Claims and the Subsidiary Unsecured Notes Claims). Immediately thereafter, Frontier transferred the New Common Stock, Takeback Debt, and Surplus Cash to the Senior Noteholders in satisfaction of their Senior Notes Claims under the Plan (the “Emergence Transaction”). Frontier thereafter dissolved, ceasing to exist as a legal entity.

The discussion above does not represent a comprehensive summary of the steps take pursuant to the Plan and the Restructuring Transactions Memorandum and only describes certain of the steps that are relevant to this Attachment to Form 8937.

Form 8937, Line 15

Frontier expects that receipt of New Common Stock, Takeback Debt, and Surplus Cash in respect of Allowed Senior Notes Claims will be treated as a taxable exchange under Section 1001 of the Internal Revenue Code. Thus, a Holder of an Allowed Senior Notes Claim is expected to have a tax basis in the New Common Stock and Takeback Debt received equal to the fair market value of such property as of the Effective Date.

Form 8937, Line 16

Fair market value generally is the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or sell and both having reasonable knowledge of the facts.

Frontier has taken the position that, as of the Effective Date, (i) the fair market value of the New Common Stock is \$25.62 per share and (ii) fair market value of the Takeback Debt is \$750,067,500.

Holders of New Common Stock and Takeback Debt should consult their own tax advisors as to the proper calculation of fair market value for U.S. federal income tax purposes.

Form 8937, Line 17

Sections 1001 and 1012 of the Internal Revenue Code.

Form 8937, Line 18

Loss generally may be allowed to the extent that the Holders of Allowed Senior Notes Claims' adjusted basis in their claims exceeds the fair market value of the total consideration received pursuant to the Plan.

Form 8937, Line 19

The Emergence Transaction occurred on April 30, 2021. Frontier cannot offer tax advice. Creditors and shareholders should consult their tax advisor regarding the application of the Internal Revenue Code to a particular circumstance. The reportable tax year is 2021 with respect to calendar year taxpayers.