

DOCKET NO. UM 1426

**Required Cover Sheet for Submission of
2009 Annual ETC Recertification Reports
Filing Deadline: Wednesday, July 15, 2009**

Name of Eligible Telecommunications Carrier: Citizens Telecommunications Company of Oregon, dba Frontier Communications of Oregon

Filing date: June 15, 2009

Is this: Original submission?

OR

Revised submission? If revised, please identify which reports are being revised _____

Person to contact for questions:

Name Ingo Henningsen

Phone number 801-274-3127

E-mail address ingo.Henningsen@frontiercorp.com

Filing instructions: Please file reports under Docket No. UM 1426. File reports electronically via the PUC Filing Center; see the PUC website for instructions. Also send one original and 2 hard copies to the PUC Filing Center. If selected portions of reports, e.g., network improvement plans, are to receive confidential treatment, those portions should not be filed electronically. Hard copies of confidential material should be filed in accordance with confidential designation requirements described in OAR 860-011-0080. Regular delivery methods may be used to send all hard copy documents; overnight or express delivery is not necessary. *Please do not send copies of advertising that does not specifically contain advertising for Basic Service or Low Income Programs.* Send documents to the Filing Center using one of the two following addresses, depending on the delivery carrier used:

For US mail: Public Utility Commission of Oregon
Attn: Filing Center
PO Box 2148
Salem, OR 97308-2148

For other carriers: Public Utility Commission of Oregon
Attn: Filing Center
550 Capitol St. NE #215
Salem, OR 97308-2148

DOCKET NO. UM 1426

If you have any questions on these reports, please call Kay Marinos at 503-378-6730, or Celeste Hari at 503-378-6628.

DOCKET NO. UM 1426

2009 Annual Recertification Reports for ETCs in Oregon

Docket No. UM 1426

Report Formats to Satisfy Requirements of Order No. 06-292 for 2009

Report #1 Supported Services Offerings

- 1.1. Basic Local Usage Service Offerings – **All ETCs**
- 1.2. Comparable Local Usage Plan – **CETCs only**
- 1.3. Supported Services Not Provided – **CETCs only**
- 1.4. Equal Access Acknowledgement – **CETCs only**

Report #2 Unfulfilled Service Requests

- 2.1. Unfulfilled Service Requests/Held Orders – **All ETCs**
- 2.2. Service Request Processing – **CETCs only**

Report #3 Evidence of Advertising for Basic Supported Services - **All ETCs**

Report #4 Low-income Services – **All ETCs**

- 4.1. Number of Lifeline Customers
- 4.2. Advertising of Low-income Program Service Offerings

Report #5 Outage Report – **All ETCs**

Report #6 Trouble Report – **All ETCs**

Report #7 Network Improvement Plan – **CETCs only**

Report #8 Special Commitments/Requirements – **CETCs only**

Report #9 Certifications – **All ETCs**

- 9.1. IAS or ICLS Certification Copy – **All ETCs Receiving IAS or ICLS**
- 9.2. Certification of Use of Universal Service Funds – **All ETCs Receiving Traditional High-Cost Support (HCL, LSS)**
- 9.3. Certification of Emergency Functionality and Compliance with Service Quality/Consumer Protection Measures – **All ETCs**

DOCKET NO. UM 1426

Report #1 – Supported Services Offerings

1.1. Basic Local Usage Service Offerings – All ETCs

Choose **either A. or B.** below, as applicable:

- A. Basic local usage service offerings are filed under tariff with the Oregon PUC. The specific tariff references (with *company name, tariff number, section and page numbers*) for the basic local usage offerings and corresponding rates are:
 1. residence:

Citizens Telecommunications Company of Oregon, PUC OR No. 3, Sec. III, pgs 1-40
 2. business:

Citizens Telecommunications Company of Oregon, PUC No. 3, Sec. III, pgs 1-40

- B. Basic local usage service offerings are **not** filed under tariff with the Oregon PUC. Submit the following information for each basic service offering that includes local usage allowances (unlimited or limited): 1) plan’s name, 2) advertised public description, 3) number of local minutes included, 4) calling area included, and 5) rates and charges. Include basic offerings for both residence and business services.

1.2. Comparable Local Usage Plan – CETCs only

The carrier certifies that it offers at least one basic local usage plan that is comparable to those offered by the ILECs in its designated service area: yes _____ no _____

Identify which of the plans in 1.1.B above are “comparable” to the ILEC local usage offerings, and explain the basis for the comparability. _____

1.3. Supported Services Not Provided – CETCs only

Identify any supported services that were not available at designation, but were to be provided as a condition of ETC designation (e.g., toll restriction for qualifying low-income consumers, E911): _____

Are these services provided currently? yes _____ no _____

If no, explain why not: _____

1.4. Equal Access Acknowledgement – CETCs only

The carrier acknowledges that it may be required to provide equal access if it is the only remaining ETC in an area: yes _____ no _____

DOCKET NO. UM 1426

Report #2 – Unfulfilled Service Requests

2.1. Unfulfilled Service Requests/Held Orders – All ETCs

Choose **either A. or B.** below, as applicable:

- A. ___ Service quality reports for “primary held orders over 30 days” were filed with the Oregon PUC for calendar year 2008. No additional submission is required for recertification purposes.
- B. X Service quality reports for “primary held orders over 30 days” were **not** filed with the Oregon PUC for calendar year 2008. In this case, choose **one** of the following alternatives for reporting:
1. ___ The number of customer requests for supported services that were not fulfilled during calendar year 2008: _____.
If greater than zero, include an attachment noting for each such request, the location (address) of the request and a description of attempts to provide service.
 2. X The number of “primary held orders over 30 days” (as defined in Section 860-034-0390 of the Oregon Commission rules) for calendar year 2008: 1_____.
If greater than zero, include attachment noting for each such held order, the reason the order was held and the original commitment date.

2.2. Service Request Processing - CETCs only

Submit a description of how the carrier ensures that every request for service that cannot be immediately fulfilled is recorded and processed under the 6-step process set forth in 47 CFR Section 54.202(a)(1)(i).

DOCKET NO. UM 1426

Report #3 – Evidence of Advertising for Basic Supported Services (excluding low-income/lifeline) – All ETCs

Describe how basic supported services were advertised during calendar year 2008 throughout the designated service area. List the types of media used, advertising frequencies and geographic coverage. Attach examples of actual advertisements, noting dates, specific distribution methods, and target geographical populations, sufficient to demonstrate that basic supported services and rates were advertised **throughout** the designated service area in 2008.

Frontier Communications places basic service advertisements in each of its directories, on its web site at www.Frontier.com and in local newspapers.

Newspaper ads are placed once each year.

During 2008 newspaper ads were placed in the following publications:

Grants Pass Daily Courier

Illinois Valley News

News Review

Examples attached.

DOCKET NO. UM 1426

Report #4 – Low-income Services – All ETCs

4.1. Number of Lifeline Customers – All ETCs

The total number of customers receiving Lifeline discounts during the month of December 2008 in the designated service area: 718.

CETCs only - also list counts by ILEC service area as follows:

<u>ILEC Svc Area</u>	<u>No. of Lifeline customers</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

4.2. Advertising of Low-Income Program Service Offerings – All ETCs

Submit copies of all advertisements (for all media) for Lifeline, LinkUp, and OTAP service offerings that were run during calendar year 2008, noting media (newspaper name, radio station, bill inserts, internet postings, etc.), run/distribution dates, and geographic coverage area.

Frontier Communications of Oregon advertises Lifeline, LinkUp, and OTAP in each of its Oregon Directories and on its web site at www.frontiercorp.com .

See attached

DOCKET NO. UM 1426

Report #5 – Outage Report – All ETCs

Choose either A. or B. below, as applicable:

A. Carrier was required to report service outages (as defined in Oregon PUC Rules at Sections 860-034-0390(9) for small telecom utilities, 860-023-0055(9) for large telecom utilities, and 860-032-0012(9) for competitive telecom providers) to the Oregon PUC during year 2008. No additional submission is required for recertification purposes.

B. Carrier was *not* required to report service outages (as defined in Oregon PUC Rules at Sections 860-034-0390(9) for small telecom utilities, 860-023-0055(9) for large telecom utilities, and 860-032-0012(9) for competitive telecom providers) to the Oregon PUC during year 2008. Select #1 (wireline carriers) or #2 (wireless carriers) below.

1. The number of service outages, as defined in Oregon PUC rules, that occurred during calendar year 2008 was _____.

If the number was greater than zero, attach a report that lists for each such outage the following: the date and time of onset, a brief description of the outage and its resolution, the particular services affected, the geographic areas affected, steps taken to prevent a similar future occurrence, and the number of customers affected.

2. The number of service outages, as defined in FCC rules at 47 CFR Section 54.209(a)(2), that occurred during calendar year 2008 was _____.

If the number was greater than zero, attach a report that lists for each such outage the following: the date and time of onset, a brief description of the outage and its resolution, the particular services affected, the geographic areas affected, steps taken to prevent a similar future occurrence, and the number of customers affected.

DOCKET NO. UM 1426

Report #6 – Trouble Report – All ETCs

Choose **either A. or B.** below, as appropriate:

A. ____ Trouble reports were filed with the Oregon PUC for calendar year 2008 per Oregon PUC service quality rules. No additional submission is required for recertification purposes.

B. **X** Trouble reports were **not** filed with the Oregon PUC during calendar year 2008. In this case, choose **one** of the following alternatives for reporting:

1. ____ The average monthly number of customer trouble reports received per 100 wireless handsets for supported services during calendar year 2008, for each company switch.

<u>Trouble Type</u>	<u>Switch A (location)</u>	<u>Switch B (location)</u>
No service	_____	_____
Network busy	_____	_____
Interruption of service	_____	_____
Poor reception	_____	_____

2. **X** The average monthly number of customer trouble reports, as defined in Section 860-034-0390 (5) of the Oregon PUC rules, per 100 access lines, received during calendar year 2008: .91 per month, per 100 working access lines.

DOCKET NO. UM 1426

Report #7 – Network Improvement Plan – CETCs Only

Per Docket No. UM 1217, Order No. 06-292, competitive ETCs (CETCs) must file network improvement plans annually for recertification purposes. Appendix A of the order details the information that must be included in such plans. Only CETCs must file these plans for annual recertification purposes; ILECs are not required to file such plans. CETCs that receive *only* low-income program support (no high-cost or access-related support) do not have to file network improvement plans. CETCs are strongly encouraged to use the template in the attached Excel worksheets for their network improvement plans. This template incorporates all the items of information required by the order.

DOCKET NO. UM 1426

Report #8 – Special Commitments/Requirements – CETCs only

Did the Oregon PUC impose any special commitments or requirements at initial designation or during the previous annual recertification process? yes ____ no ____.

If yes, identify the commitments or requirements and explain if, and how, they have been met.

DOCKET NO. UM 1426

Report #9 – Certifications - All ETCs

9.1. IAS or ICLS Certification Copy – All ETCs Receiving IAS and/or ICLS

All ETCs receiving interstate access-related support (IAS or ICLS) must submit a copy of the certification for the use of IAS or ICLS support that was sent to USAC and the FCC in June 2009.

See Attachment

9.2. Certification of Use of Universal Service Funds – All ETCs receiving HCL and/or LSS (Rural ILECs and CETCs Designated in Rural ILEC Areas)

To continue receiving traditional high cost support (HCL, LSS), ETCs must submit a notarized affidavit signed by a responsible company official certifying that the carrier will use the high cost support funds only for the intended purposes. Use of the sample affidavit form displayed on the following page is recommended.

See Attachment

9.3. Certification of Emergency Functionality and Compliance with Service Quality and Consumer Protection Measures – All ETCs

Each ETC must submit a notarized affidavit signed by a responsible company official certifying that the carrier: 1) is able to remain functional in an emergency, and 2) is complying with all service quality and consumer protection measures in either the applicable Oregon Commission rules (for wireline carriers), the CTIA Consumer Code (for wireless carriers), or some other specific set of standards. All ETCs must submit this affidavit. A copy of an acceptable affidavit form follows the affidavit for high cost support.

See Attachment

2.1. Unfulfilled Service Requests/Held Orders

Frontier Communications had one held order as defined in section 860-034-0390 during 2008.

This order was due in October 2008.

The facilities were ordered by the selling agent, for a new home, being constructed in a new subdivision. Facilities were not available in the area. A new fiber line needed to be placed and spliced.

Frontier Communications is a community telecommunications service provider who offers basic and enhanced services at reasonable rates within its serving areas. Basic services are offered at the following rates:

Single Party Residence Service	\$ 12.67 / mo.*
Single Party Business Service	\$ 22.32 / mo.*
Federal Subscriber Line Charge- Single Line (Residence and Business)	\$ 6.50 / mo.
Federal Subscriber Line Charge- Non Primary (Residence)	\$ 7.00 / mo.
Federal Subscriber Line Charge- Multi Line (Business)	\$ 9.20 / mo.
Directory Assistance	\$ 0.50 / call after initial 2 calls
Touch Tone Service	No charge
Toll Blocking	\$ 2.40 / mo.
Emergency 911 Service Surcharge(s)	\$ 0.75/ mo.
Emergency 911 Calls	No charge for calls to 911

*Additional charges apply for Extended Area Service. Budget Measured Service may also be available.

Low-income individuals eligible for Lifeline and Link-Up telephone assistance programs may be eligible for discounts off these basic local service charges through state-specified telephone assistance plans. Upon service initiation, qualified individuals are entitled to waiver of a deposit if they agree to toll blocking, which is provided at no charge. Your eligibility to participate in these programs will be verified by an authorized state agency.

After February 17, 2009, a television receiver with only an analog broadcast tuner will require a converter box to receive full power over-the-air broadcasts with an antenna because of the Nation's transition to digital broadcasting. Frontier can help you with your questions regarding Analog to Digital transition. Call 1-888-391-8898.

Basic services are offered to all consumers in the Frontier territories at the rates, terms and conditions specified in the Company's tariffs. If you have any questions regarding the Company's services, please call us at 800-921-8101 for further information.



www.FrontierOnline.com
OR 2008

Oregon Basic Service
Newspaper Advertisements

State		Newspaper	Description	Run Date
Oregon				
Oregon	✓	Grant's Pass Daily Courier	Basic Services Ad	12/11
Oregon	✓	Illinois Valley News	Basic Services Ad	12/24
Oregon	✓	News-Review, The	Basic Services Ad	12/10

State Specific Information: Oregon

Frontier is committed to helping qualified low-income individuals pay for telephone service. This information specific to Oregon should prove helpful to you.

Lifeline Telephone Service discounts in Oregon are provided through the Oregon Telephone Assistance Program (OTAP). You must subscribe to flat rate residential local exchange service, and certify that you are the head of household. The eligible service must be your only service, at your principal place of residence.

In order to qualify for OTAP assistance, you must contact the state program directly by calling 1-800-848-4442, for specific qualifications and instructions. For conducting your call by TTY, call 1-800-648-3458. The Oregon Public Utilities Commission (OPUC) will provide Frontier with notifications for new customers, terminating customers, and other customer changes, along with the effective dates for discount initiation or ending.

Qualifying programs include:

- Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)
- Oregon Health Plan
- Supplemental Security Income (SSI)
- Temporary Assistance to Needy Families (TANF)
- Welfare Medical ID card

Your participation may also be subject to periodic audit, pursuant to state or federal guidelines, by statistically valid sampling or other means.

FEDERAL ENHANCED LIFELINE – TRIBAL

Federal programs in support of Universal Lifeline Telephone Service provide for additional discounts to qualified residential telephone subscribers who reside on tribal lands. Qualified subscribers receive Lifeline Service discounts, and additional federal discounts that can

reduce local monthly service to as low as \$1.00. In no case will your monthly service be lower than that.

For further information, please contact Frontier at 1-800-921-8101. We're here to help. A Frontier representative will be happy to answer your questions and provide you with such information as you may need to follow through with the appropriate application process, with the Oregon Telephone Assistance Program.

OREGON TELEPHONE ASSISTANCE PROGRAM (OTAP)

In order to qualify for OTAP assistance, you must contact the state program. The Oregon Public Utilities Commission (OPUC) will provide Frontier with notifications for new customers, terminating customers, and other customer changes, along with the effective dates for discount initiation or ending. The OPUC can be viewed from this link: www.puc.state.or.us

The following information from OTAP should prove helpful:

Office Hours: 8 am to 5 pm, Monday through Friday

Telephone:

1-800-848-4442 or (503) 373-7171

TTY: 1-800-648-3458 or (503) 378-6962

Fax: 1-877-567-1977 or (503) 378-6047

Email: puc.otap@state.or.us

Street Address

Oregon Public Utility Commission

OTAP

550 Capitol St NE Ste 215

Salem OR 97301-2551

[Directions](#)

Mailing Address *

Oregon Public Utility Commission

OTAP

PO Box 2148

Salem OR 97308-2148

*Federal Express, Airborne Express or UPS do not deliver to PO Boxes. When using these or similar services, ship to the Street Address.

Products & Services

Customer Service 1-800-921-8101

Lifeline

YOU MAY BE ELIGIBLE FOR LOW-COST FRONTIER TELEPHONE SERVICE.



At Frontier, we're committed to providing quality phone service for everyone. That's why we're pleased to tell you about **LifeLine** and **Link-Up**.

LifeLine

Provides low-cost monthly phone service to customers that meet eligibility criteria.

Link-Up

Provides discounts on the installation of phone service.

Read about Lifeline in this directory.



www.FrontierOnline.com/lifeline

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Oregon Telephone Assistance Program (OTAP) and Link-Up America

Several programs provide financial help, depending on your circumstances. The Oregon Telephone Assistance Program (OTAP) provides reduced phone bills for qualified low-income customers. The Link-Up America program provides financial help with telephone service installation charges for qualified persons.

Oregonians whose incomes are at or below the current federal poverty level and are on a state public assistance program may receive a reduction in their monthly bill for local residential telephone service. Eligible customers receive a reduction in their monthly phone bill for as long as they qualify. Half of the amount is funded through the legislatively-approved telecommunications service surcharge, and the other half is the waived portion of the FCC-authorized subscriber line charge.

Link-Up America

The Link-Up America Program helps qualified low-income individuals by paying for one-half of the line connection portion of the hook-up charges for new residential telephone service. Customers are responsible for the other half, as well as providing a telephone and paying for any installation charges, deposits, unpaid phone bills, labor, service calls or other costs of acquiring phone service.

Eligibility

Individuals who meet the income guidelines and currently have an open file with any one of the following low-income, public assistance programs also qualify for the OTAP Program or Link-Up America:

- Food Stamps
- Welfare Medical ID Card
- Oregon Health Plan
- Supplemental Security Income
- Low-Income Energy Assistance Program

Note: If a person qualifies only for the Low-Income Energy Assistance Program, he or she will only be eligible for Link-Up America and not for OTAP.

How To Apply

To apply for equipment, to obtain an application for OTAP and/or Link-Up America, or for more information, please call toll-free **1-800-848-4442** or write to:

Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

or go online at www.oregon.gov/puc/.

Digital Television Transition

For important information regarding the nation's transition to digital broadcasting on February 17, 2009, Frontier can help you with the solution you may need. Call us today at **1-888-765-6472**, or refer to the Consumer Information section in this directory, under **Digital Television Transition**.

Products & Services

Call Center.....1-800-921-8101

Lifeline

YOU MAY BE ELIGIBLE FOR LOW-COST FRONTIER TELEPHONE SERVICE.



At Frontier, we're committed to providing quality phone service for everyone. That's why we're pleased to tell you about **Lifeline** and **Link-Up**.

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Provides low-cost monthly phone service to customers that meet eligibility criteria.

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www.FrontierOnline.com/lifeline

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Eligibility

Individuals who meet the income guidelines and currently have an open file with any one of the following low-income, public assistance programs also qualify for the OTAP Program or Link-Up America:

- Food Stamps
- Welfare Medical ID Card
- Oregon Health Plan
- Supplemental Security Income
- Low-Income Energy Assistance Program

Note: If a person qualifies only for the Low-Income Energy Assistance Program, he or she will only be eligible for Link-Up America and not for OTAP.

How To Apply

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Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

Cave Junction, OR June 2008 Directory: Lifeline

Products & Services

Call Center 1-800-921-8101

Lifeline

YOU MAY BE ELIGIBLE FOR LOW-COST FRONTIER TELEPHONE SERVICE.



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Provides discounts on the installation of phone service.

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www.FrontierOnline.com/lifeline

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Several programs provide financial help, depending on your circumstances. The Oregon Telephone Assistance Program (OTAP) provides reduced phone bills for qualified low-income customers. The Link-Up America program provides financial help with telephone service installation charges for qualified persons.

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- Welfare Medical ID Card
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Public Utility Commission of Oregon
PO Box 2148
Salem, OR 97308-2148

**Interstate Access Support (IAS)
2008 - 2009**



June 25, 2008

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ms. Karen Majcher
Vice President – High Cost and Low Income Division
Universal Service Administration Company
2000 L Street, NW, Suite 200
Washington, DC 20036

**Re: CC Docket No. 96-45
Interstate Access Support - IAS
Annual Certification Filing**

This is to notify the Federal Communications Commission (“the Commission”) that Citizens Communications Company will use its Interstate Access Support only for the provision, maintenance and upgrading of facilities and service for which the support is intended.

I am authorized to make this certification on behalf of the company named above. This certification is for the study areas listed below.

Company Name	[Study Area Name]	State	Study Area Code
Citizens Utilities Rural Company, Inc.		AZ	452172
Citizens Telecommunications Company of the White Mountains, Inc.		AZ	454426
Citizens Telecommunications Company of California, Inc.		CA	542308
Citizens Telecommunications Company of the Golden State		CA	543402
Citizens Telecommunications Company of Tuolumne		CA	544342
Citizens Telecommunications Company of Idaho		ID	474427
Citizens Telecommunications Company of Illinois		IL	341183
Citizens Telecommunications Company of Minnesota, Inc.	[Lakes]	MN	361123
Citizens Telecommunications Company of Minnesota, Inc.	[South]	MN	367123
Citizens Telecommunications Company of Montana		MT	484322
Citizens Telecommunications Company of Nebraska		NE	371128
Citizens Telecommunications Company of Nevada	[North]	NV	554431
Citizens Telecommunications Company of Nevada	[South]	NV	554432
Citizens Telecommunications Company of New York, Inc.	[Upstate]	NY	154532
Citizens Telecommunications Company of New York, Inc.	[Red Hook]	NY	154533
Citizens Telecommunications Company of New York, Inc.	[Western Counties]	NY	154534
Citizens Telecommunications Company of Oregon		OR	533401
Citizens Telecommunications Company of Tennessee LLC		TN	294336
Citizens Telecommunications Company of the Volunteer State LLC		TN	290580
Citizens Telecommunications Company of Utah		UT	504429

Company Name	[Study Area Name]	State	Study Area Code
Citizens Telecommunications Company of West Virginia	[Bluefield]	WV	204339
Citizens Telecommunications Company of West Virginia	[Mountain State]	WV	200271
Citizens Telecommunications Company of West Virginia	[St. Mary's]	WV	204338
Navajo Communications Company, Inc.	[Arizona]	AZ	454449
Navajo Communications Company, Inc.	[New Mexico]	NM	494449
Navajo Communications Company, Inc.	[Utah]	UT	504449
Ogden Telephone Company		NY	150110
Rhineland Telephone Company	[Crandon]	WI	330870
Rhineland Telephone Company	[Headwaters]	WI	330891
Rhineland Telephone Company	[Rhineland]	WI	330940
Rhineland Telephone Company	[Rib Lake]	WI	330941
Frontier Communications of Alabama, Inc.		AL	250306
Frontier Communications of the South, Inc.	[Alabama]	AL	250318
Frontier Communications of the South, Inc.	[Florida]	FL	210318
Frontier Communications of Fairmount, Inc.		GA	220362
Frontier Communications of Illinois, Inc.		IL	341038
Frontier Communications of Lakeside, Inc.		IL	341011
Frontier Communications – Midland, Inc.		IL	341055
Frontier Communications of Mt. Pulaski, Inc.		IL	341061
Frontier Communications of Orion, Inc.		IL	341067
Frontier Communications – Prairie, Inc.		IL	341073
Frontier Communications of Schuyler, Inc.		IL	341079
Frontier Communications – Thorntown, Inc.		IN	320828
Frontier Communications of Iowa, Inc.		IA	351127
Frontier Communications of Michigan, Inc.	[Michigan]	MI	310682
Frontier Communications of Michigan, Inc.	[Ohio]	OH	300682
Frontier Communications of Minnesota, Inc.		MN	361367
Frontier Communications of AuSable Valley, Inc.		NY	150072
Frontier Communications of New York, Inc.		NY	150100
Frontier Telephone of Rochester, Inc.		NY	150121
Frontier Communications of Seneca-Gorham, Inc.		NY	150122
Frontier Communications of Sylvan Lake, Inc.		NY	150128
Frontier Communications of Breezewood, Inc.		PA	170149
Frontier Communications of Canton, Inc.		PA	170152
Frontier Communications of Lakewood, Inc.		PA	170178
Frontier Communications of Oswayo River, Inc.		PA	170194
Frontier Communications of Pennsylvania, Inc.		PA	170168
Frontier Communications of Mondovi, Inc.		WI	330912
Frontier Communications of Wisconsin, Inc.		WI	330964
Global Valley Networks		CA	542315

Sincerely,



Date: 6/23/08

Katherine Caminiti
Vice President – Corporate Accounting

Citizens Communications Company
3 High Ridge Park
Stamford, Connecticut 06905
(203) 614-5600

DOCKET NO. UM 1426

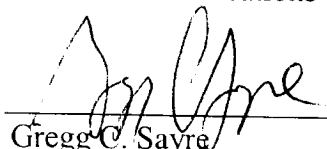
AFFIDAVIT CERTIFYING USE OF UNIVERSAL SERVICE FUNDS

I, Gregg C. Sayre, being of lawful age and duly sworn, on my oath, state that I am the Assistant Secretary of Citizens Telecommunications Company of Oregon ("Company") and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

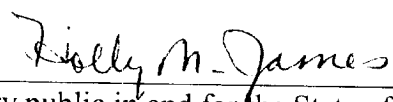
Pursuant to the rules of the Federal Communications Commission, 47 C.F.R. § 54.314, there must be annual certification that funds received under the federal Universal Service Fund programs will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended. The Company hereby certifies to the Public Utility Commission of Oregon that pursuant to 47 C.F.R. § 54.7, and for purposes of the certification required under 47 C.F.R. § 54.314, the company will use all federal high-cost support provided to it only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with the principles of universal service set forth in 47 U.S.C. 254. This includes, but is not limited to, trying to meet the goal of the provision of services that are properly supported by the high-cost funds at rates that are reasonably comparable to rates charged for similar services in urban areas.

DATED this 1st day of June, 2009.

Citizens Telecommunications Company of Oregon


By: Gregg C. Sayre
Its: Assistant Secretary

SUBSCRIBED AND SWORN to
before me this 1st day of June, 2009.


Notary public in and for the State of New York

My Commission Expires: _____
HOLLY M. JAMES
~~Notary~~ Public, State of New York
Qualified in Monroe County
My Commission Expires Nov. 30, 2010

DOCKET NO. UM 1426

AFFIDAVIT CERTIFYING EMERGENCY FUNCTIONALITY AND COMPLIANCE WITH SERVICE QUALITY AND CONSUMER PROTECTION MEASURES

I, Gregg C. Sayre, being of lawful age and duly sworn, on my oath, state that I am the Assistant Secretary of Citizens Telecommunications Company of Oregon ("Company") and that I am authorized to execute this Affidavit on behalf of the Company, and the facts set forth in this Affidavit are true to the best of my knowledge, information and belief.

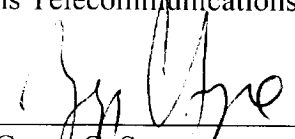
The Company hereby certifies to the Public Utility Commission of Oregon, pursuant to the requirements of Commission Order No. 06-292, that it:

- 1) is able to remain functional in emergencies, and,
- 2) complies with service quality and consumer protection measures in (check one):

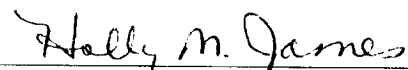
applicable Oregon Commission rules, or
 the CTIA Consumer Code for Wireless Carriers, or
 other (describe and explain conformance with requirements of Order No. 06-292): _____

DATED this 1st day of June, 2009.

Citizens Telecommunications Company of Oregon


 By: Gregg C. Sayre
 Its: Assistant Secretary

SUBSCRIBED AND SWORN to before me this 1st day of June, 2009.


 Notary public in and for the State of New York

My Commission Expires: _____
 HOLLY M. JAMES
 Notary Public, State of New York
 Qualified in Monroe County
 My Commission Expires Nov. 30, 2010