



December 15, 2016

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Irving, Texas 75039

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Email: kimberly.a.douglass@ftr.com

Public Utilities Commission of Oregon
Attention: Filing Center
201 High St SE, Suite 100
Salem, Oregon 97301

Re: **Connect America Fund, WC Docket 10-90**

Dear Commission:

On December 9, 2016 Frontier Communications Corporation ("Frontier") submitted to the Federal Communications Commission, pursuant to 47 C.F.R. § 54.312 (c)(4) the enclosed list of census blocks not previously identified in its election of Connect America Fund ("CAF") Phase I Round 2 incremental support.

Frontier hereby provides the Public Utilities Commission of Oregon a copy of that information. Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in black ink that reads "Kim Douglass" with a long horizontal flourish extending to the right.

Kim Douglass
Manager - Regulatory Affairs

Enclosures



Federal Regulatory Affairs
1800 M Street, NW, Suite 800N
Washington, DC 20036

December 9, 2016

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On August 26, 2016, Frontier Communications Corp. ("Frontier"), pursuant to 47 C.F.R. § 54.312(c)(4), submitted a list of 3,146 census blocks not previously identified in its election of Connect America Fund ("CAF") Phase I Round 2 incremental support.¹ Shortly thereafter, on September 7, 2016, the Wireline Competition Bureau put out a public notice announcing this filing.² With today's filing, Frontier is including a list of the specific locations associated with the census blocks that it intends to count as part of CAF Phase I Round 2 and is filing its certification as required under 47 C.F.R. § 54.312(c).³

Pursuant to 47 C.F.R. § 54.312(c) the undersigned certifies that:

- (i) The locations to be served to satisfy the deployment obligation are not shown as served by fixed broadband at the speeds specified in 47 C.F.R. § 54.312 (c)(2) or (c)(3) provided by any entity other than Frontier or its affiliate on the version of the National Broadband Map;
- (ii) To the best of Frontier's knowledge, the locations would, in fact, be unserved by fixed Internet access with speeds of at least 3 Mbps downstream and 768 kbps upstream, or 768 kbps downstream and 200 kbps upstream, as appropriate, without CAF Phase I Round 2;
- (iii) Frontier's current capital improvement plan did not already include plans to complete broadband deployment within the next three years to the locations to be counted to satisfy the deployment obligation;
- (iv) Incremental support will not be used to satisfy any merger commitment or similar

¹ See Letter from AJ Burton, Director, Federal Regulatory Affairs, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 10-90 (filed Aug. 26, 2016).

² See *Wireline Competition Bureau Announces Deadline for Existing Providers to Notify Frontier Communications Corp. that They Serve Census Blocks that Frontier Communications Corp. Proposes to Serve with Connect America Phase I Incremental Support*, Public Notice, 31 FCC Rcd 9723 (Sept. 7, 2016).

³ See Attachment A.

regulatory obligation;

- (v) Frontier has undertaken due diligence to determine the locations in question are not within the service area of either Broadband Initiatives Program or the Broadband Technology Opportunities Program projects that will provide Internet access with speeds of at least 3 Mbps downstream and 768 upstream;
- (vi) Frontier has prioritized its projects so as to maximize the deployment of broadband-capable infrastructure to locations lacking Internet access with speeds of 768 kbps downstream and 200 kbps upstream. Frontier has explored deployment to all locations lacking 768 kbps downstream and 200 kbps locations for which it is economically reasonable before addressing those lacking speeds of 3 Mbps downstream and 768 kbps upstream; and
- (vii) Pursuant to §54.312(c)(8), Frontier certifies that for locations identified as served by “Frontier only,” on the latest version of the National Broadband Map, without CAF Phase I Round 2, the locations would not actually receive speeds of 3 Mbps upstream and 768 kbps downstream and the locations would be served through copper-fed digital subscriber line access multiplexers.

Frontier notes that several parties submitted objections to the census blocks that Frontier originally submitted.⁴ At this time, Frontier is not including any census blocks to which these parties objected as part of today’s list of locations that Frontier intends to include as part of CAF Phase I Round 2.⁵ However, Frontier has filed a response to the objection it received from one party – StarTouch – because Frontier believes it is more likely than not that these blocks remain unserved despite StarTouch’s claims.⁶ If Frontier receives a favorable decision as to those census blocks, Frontier will file a certification as to those census blocks at that time.

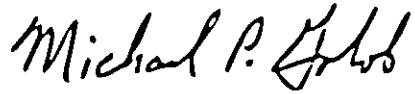
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⁵ Frontier inadvertently included 29 census blocks for which it already had authorization to deploy. See Letter from Michael D. Saperstein, Jr., to Marlene H. Dortch, Docket No. 10-90 (filed Mar. 3, 2014). A list of these census blocks is attached as Attachment B. Because Frontier already had authorization to deploy to these census blocks, any objections to these census blocks due to Frontier’s initial erroneous inclusion of these census blocks in its list submitted on August 26, 2016, is irrelevant.

⁶ Letter from AJ Burton, Frontier Communications, to Marlene H. Dortch, FCC, Docket No. 10-90 (filed Oct. 28, 2016).

Please contact AJ Burton, Director of Federal Regulatory Affairs, at 202-223-6807 or aj.burton@ftr.com should you have any questions.

Sincerely,

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Michael Golob
Senior Vice President, Engineering
Frontier Communications

Attachments

cc: Alex Minard
Heidi Lankau

Attachment A: Frontier CAF I Round 2 Additional Locations

29

CensusBlock2010	OCN	SAC	Wirecenter CLLI	LAT	LONG	State	Served Status
410099711001082	4323	532416	VRNNORXX	45.866515	-123.165954	OR	Underserved
410099711001119	4323	532416	VRNNORXX	45.856519	-123.166275	OR	Underserved
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410099711003062	4323	532416	VRNNORXX	45.843747	-123.233795	OR	Underserved
410099711003081	4323	532416	VRNNORXX	45.839672	-123.225886	OR	Underserved
410099711003081	4323	533401	VRNNORXX	45.841582	-123.224984	OR	Underserved
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410333616005032	3401	533401	CVJTORXA	42.053893	-123.621506	OR	Underserved
410333616005032	3401	533401	CVJTORXA	42.055028	-123.619185	OR	Underserved
410333616005032	3401	533401	CVJTORXA	42.054888	-123.619517	OR	Underserved
410333616005035	3401	533401	CVJTORXA	42.056657	-123.616057	OR	Underserved
410333616005035	3401	533401	CVJTORXA	42.058055	-123.615928	OR	Underserved
410333616005035	3401	533401	CVJTORXA	42.06172	-123.612695	OR	Underserved
410333616005045	3401	533401	CVJTORXA	42.051037	-123.619317	OR	Underserved
410333616005045	3401	533401	CVJTORXA	42.051179	-123.620444	OR	Underserved



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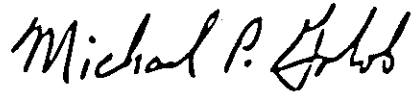
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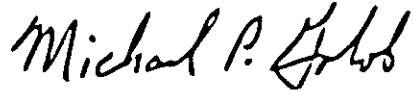
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410333616005032	3401	533401	CVJTORXA	42.052821	-123.620355	OR	Underserved
410333616005032	3401	533401	CVJTORXA	42.054034	-123.620133	OR	Underserved
410333616005032	3401	533401	CVJTORXA	42.053893	-123.621506	OR	Underserved
410333616005032	3401	533401	CVJTORXA	42.055028	-123.619185	OR	Underserved
410333616005032	3401	533401	CVJTORXA	42.054888	-123.619517	OR	Underserved
410333616005035	3401	533401	CVJTORXA	42.056657	-123.616057	OR	Underserved
410333616005035	3401	533401	CVJTORXA	42.058055	-123.615928	OR	Underserved
410333616005035	3401	533401	CVJTORXA	42.06172	-123.612695	OR	Underserved
410333616005045	3401	533401	CVJTORXA	42.051037	-123.619317	OR	Underserved
410333616005045	3401	533401	CVJTORXA	42.051179	-123.620444	OR	Underserved