

9260 E. Stockton Blvd. Elk Grove, CA 95624

January 27, 2015

Oregon Public Utility Commission Attention: Filing Center P.O. Box 2148 550 Capital Street N.E., Suite 215 Salem, OR 97301-2551

RE: Annual Eligibility Re-Certification of Lifeline Subscribers

Dear Commission:

Citizens Telecommunications Company of Oregon d/b/a Frontier Communications of Oregon (Study Area Code 533401) and Frontier Communications Northwest Inc (Study Area code 532416) herein after referred to as "Frontier" hereby provides a copy of its Annual Lifeline Eligible Telecommunications Carrier Certification FCC Form 555 in compliance with 47 CFR 54.416 as adopted by the Federal Communication Commission (FCC) in its Lifeline Reform Order, FCC 12-11, released February 6, 2012.

Section 54.416(b) requires eligible telecommunication carriers (ETCs) to annually provide the results of their re-certification efforts performed pursuant to Section 54.410 (f) to the FCC and the Universal Service Administrative Company (USAC). ETCs are also required to provide the results of their re-certification efforts to state commissions and relevant tribal governments.

If you have any questions, please contact me at (916) 686-3588 or by email at joe.chicoine@ftr.com

Respectfully Submitted,

Joe Chicoine Manager, Regulatory Compliance and Reporting

Enclosures cc: Renee Willer, Frontier

Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission **IMPORTANT: PLEASE READ INSTRUCTIONS FIRST** Deadline: January 31st (Annually)

533401

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).

OR

CITIZENS TELECOMM CO OF OREGON

State

Frontier Communications of Oregon

DBA, Marketing or Other Branding Name (If same as ETC name, list "N/A" Do not leave blank)

ETC Name

Frontier Communications Corporation

Holding Company Name (If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

No O Yes 💿

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
See attached worksheet	

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate bylaws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

Initial JCM

Section 2: Annual Recertification

Α	В	С	D	$\mathbf{E} = (\mathbf{A} - \mathbf{B} - \mathbf{C} - \mathbf{D})$
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
693	0	9	185	499

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non- responding subscribers	Number of subscribers responding that they are no longer eligible (<i>This should be a subset of Block</i> <i>G.</i>)	Number of subscribers de- enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
0	0	0	0	0

K	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
499	64

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on:

<u>Public Utility Commission of Oregon</u>. Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial JCM

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial ______

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

M = (F+K)	N = (J+L)	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly <u>or</u> through a state administrator, ETC access to a state database, or by USAC (<i>This should equal the number</i> <i>reported in Block E</i>)	Number of subscribers de- enrolled or scheduled to be de- enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
499	64	12.83%

Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes 🖸

No 🙆

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Signed,
Certified Online
Signature of Officer
jessica.matushek@ftr.com
Email Address of Officer
Cassandra Guinness
Person Completing This Certification Form

Jessica C. Matushek, Director, Accounting

Printed Name and Title of Officer 01/22/2015 Date 585-777-4557 Contact Phone Number

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300615Frontier North Inc.330886Frontier North Inc.343035Frontier Communications of the Carolinas Inc.	310695	Frontier North Inc.	
343035 Frontier Communications of the Carolinas Inc.	300615	Frontier North Inc.	
	330886	Frontier North Inc.	
	343035	Frontier Communications of the Carolinas Inc.	
230477 [Fronuer Communications of the Carolinas Inc.	230479	Frontier Communications of the Carolinas Inc.	
230509 Frontier Communications of the Carolinas Inc.	230509	Frontier Communications of the Carolinas Inc.	
240479 Frontier Communications of the Carolinas Inc.			
240526 Frontier Communications of the Carolinas Inc.	240526		
320750 Frontier Communications of Indiana Inc.	320750	Frontier Communications of Indiana Inc.	
320828 Frontier Communications of Thorntown Inc.			
323034 Frontier Midstates Inc.			
313033 Frontier Midstates Inc.			
310682 Frontier Communications of Michigan Inc.			
300682 Frontier Communications of Michigan Inc.			
361123 CITIZENS TEL OF MINNESOTA			
367123 CITIZENS TEL OF MINNESOTA			

SAC	Name
361367	Frontier Communications of Minnesota Inc.
280460	Frontier Communications of Mississippi Inc.
484322	CITIZENS TELECOMM CO OF MONTANA
371128	CITIZENS TEL OF NEBRASKA
554431	CITIZENS TEL COMPANY
554432	CITIZENS TEL COMPANY
154532	CITIZENS TELECOMMUNICATIONS COMPANY OF N
154533	CITIZENS TELECOMMUNICATIONS COMPANY OF N
154534	CITIZENS TELECOMMUNICATIONS COMPANY OF N
150072	Frontier Communications of AuSable Valley Inc.
150100	Frontier Communications of New York Inc.
150122	Frontier Communications of Seneca Gorham Inc.
150128	Frontier Communications of Svlvan Lake Inc.
150121	Frontier Telephone of Rochester Inc.
150110	OGDEN TELEPHONE COMPANY
533401	CITIZENS TELECOMM CO OF OREGON
170161	Commonwealth Telephone Company
170149	Frontier Communications of Breezewood LLC
170152	Frontier Communications of Canton LLC
170178	Frontier Communications of Lakewood LLC
170194	Frontier Communications of Oswayo River LLC
170168	Frontier Communications of Pennsylvania LLC
294336	CITIZENS TEL OF TENNESSEE LLC
290580	CITIZENS TEL OF VOLUNTEER STATE
504429	CITIZENS TELECOMM CO OF UTAH
472416	Frontier Communications Northwest Inc.
532416	Frontier Communications Northwest Inc.
522416	Frontier Communications Northwest Inc.
522449	Frontier Communications Northwest Inc.
330912	Frontier Communications of Mondovi LLC
330967	Frontier Communications of Viroqua LLC
330964	
330944	Frontier Communications - St. Croix LLC
330870	RHINELANDER TEL CO
330891	Rhinelander Tel Co
330940	Rhinelander Tel Co
330941	Rhinelander Tel Co
200271	CITIZENS MOUNTAIN STATE TEL
204338	Citizens Mountain State Tel
204339	Citizens Mountain State Tel
205050	Frontier West Virginia Inc.
135200	The Southern New England Telephone Comapny

Annual Lifeline Eligible Telecommunications Carrier Certification Form All carriers must complete all or portions of all sections Form must be submitted to USAC and filed with the Federal Communications Commission **IMPORTANT: PLEASE READ INSTRUCTIONS FIRST** Deadline: January 31st (Annually)

532416

Study Area Code (SAC)

(An Eligible Telecommunications Carrier (ETC) must provide a certification form for each SAC through which it provides Lifeline service).

OR

Frontier Communications Northwest Inc.

State

Frontier Communications Northwest Inc.

DBA, Marketing or Other Branding Name (If same as ETC name, list "N/A" Do not leave blank)

ETC Name

Frontier Communications Corporation

Holding Company Name (If same as ETC name, list "N/A" Do not leave blank)

Does the reporting company have affiliated ETCs?

Yes 👩 No 👩

Provide a list of all ETCs that are affiliated with the reporting ETC, using page 4 and additional sheets if necessary. Affiliation shall be determined in accordance with Section 3(2) of the Communications Act. That Section defines "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person." 47 U.S.C. § 153(2). See also 47 C.F.R. § 76.1200.

Affiliated ETC's SAC	Affiliated ETC's Name
See attached worksheet	

For purposes of this filing, an officer is an occupant of a position listed in the article of incorporation, articles of formation, or other similar legal document. An officer is a person who occupies a position specified in the corporate bylaws (or partnership agreement), and would typically be president, vice president for operations, vice president for finance, comptroller, treasurer, or a comparable position. If the filer is a sole proprietorship, the owner must sign the certification.

Section 1: Initial Certification All ETCs must complete this section

I certify that the company listed above has certification procedures in place to:

- A) Review income and program-based eligibility documentation prior to enrolling a consumer in the Lifeline program, and that, to the best of my knowledge, the company was presented with documentation of each consumer's household income and/or program-based eligibility prior to his or her enrollment in Lifeline; and/or
- B) Confirm consumer eligibility by relying upon access to a state database and/or notice of eligibility from the state Lifeline administrator prior to enrolling a consumer in the Lifeline program.

I am an officer of the company named above. I am authorized to make this certification for the Study Area Code listed above.

JCM Initial

Section 2: Annual Recertification

A	В	С	D	$\mathbf{E} = (\mathbf{A} - \mathbf{B} - \mathbf{C} - \mathbf{D})$
Number of subscribers claimed on February FCC Form 497 of current Form 555 calendar year (February data month)	Number of lines claimed on February FCC Form 497 of current Form 555 calendar year provided to wireline resellers	Number of subscribers claimed on the February FCC Form 497 that were <u>initially</u> enrolled in the current Form 555 calendar year (These subscribers did not have Lifeline service prior to January 1 of the current 555 calendar year.)	Number of subscribers de-enrolled <u>prior</u> to recertification attempt by either the ETC, a state administrator, access to an eligibility database, or by USAC	Number of subscribers ETC is responsible for recertifying for current Form 555 calendar year
4542	0	76	942	3524

Do not leave empty blocks. If an ETC has nothing to report in a block, enter a zero.

Recertification Results:

F	G	H = (F-G)	I	J = (H+I)
Number of subscribers ETC contacted directly to recertify eligibility through attestation	Number of subscribers responding to ETC contact	Number of non- responding subscribers	Number of subscribers responding that they are no longer eligible (<i>This should be a subset of Block</i> <i>G.</i>)	Number of subscribers de- enrolled or scheduled to be de-enrolled as a result of non-response or response of ineligibility from ETC recertification attempt
4	4	0	1	1

К	L
Number of subscribers whose eligibility was reviewed by state administrator, ETC access to eligibility database, or by USAC	Number of subscribers de-enrolled or scheduled to be de-enrolled as a result of finding of ineligibility by state administrator, ETC access to eligibility database, or USAC
3520	242

Note: If any subscriber was reviewed by an ETC accessing a state database or by a state administrator and subsequently contacted directly by the ETC in an attempt to recertify eligibility, those subscribers should be listed in Blocks F through J as appropriate and not in Blocks K and L. As a result, all subscribers subject to recertification who were not de-enrolled prior to the recertification attempt must be accounted for in Block F or Block K.

The total of Block F and Block K should equal the number reported in Block E.

Certification:

Based on the data entered above, initial the certification(s) below that apply. Both Certification A and B may apply depending on the recertification procedures in place for the SAC reporting on this form. If Certification C applies, neither Certification A nor B may apply.

A.) I certify that the company listed above has procedures in place to recertify the continued eligibility of all of its Lifeline subscribers, and that, to the best of my knowledge, the company obtained signed certifications from all subscribers attesting to their continuing eligibility for Lifeline. Results are provided in the chart above in Blocks F through J. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above.

Initial JCM

AND/OR

B.) I certify that the company listed above has procedures in place to recertify consumer eligibility by relying on:

Public Utility Commission of Oregon_______. Results are provided in the chart above in Blocks K through L. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial JCM

OR

C.) I certify that my company did not claim federal low income support for any Lifeline subscribers for the February Form 497 data month for the current Form 555 calendar year. I am an officer of the company named above. I am authorized to make this certification for the SAC listed above. Initial

Section 3: De-enroll Percentage

Using the data entered in Section 2, complete the chart below to find the percentage of subscribers de-enrolled for this ETC.

M = (F+K)	N = (J+L)	$O = ((N \div M) * 100)$
Number of subscribers that the ETC attempted to recertify directly <u>or</u> through a state administrator, ETC access to a state database, or by USAC (<i>This should equal the number</i> <i>reported in Block E</i>)	Number of subscribers de- enrolled or scheduled to be de- enrolled as a result of non-response or ineligibility	Percentage of subscribers de-enrolled or scheduled to be de-enrolled as a result of ineligibility or non-response
3524	243	6.9%

Section 4: Pre-Paid ETCs

All ETCs must complete the appropriate check-box; pre-paid ETCs must complete all of Section 4. Pre-paid ETCs generally do not assess or collect a monthly fee from their Lifeline subscribers. ETCs that only assess a fee but do not collect such fees are pre-paid ETCs and must complete the chart below.

Is the ETC Pre-Paid? Yes 🖸

No 🙆

If Yes, record the number of subscribers de-enrolled for non-usage by month in Block Q below.

P	Q
Month	Subscribers De-Enrolled for Non-Usage
January	0
February	0
March	0
April	0
May	0
June	0
July	0
August	0
September	0
October	0
November	0
December	0
Total Subscribers	0

Signature Block

By signing below, I certify that the company listed above is in compliance with all federal Lifeline certification procedures. I am an officer of the company named above. I am authorized to make this certification for the Study Area Code (SAC) listed above.

Cassandra Guinness	Signature of Officer jessica.matushek@ftr.com Email Address of Officer Cassandra Guinness	Signed,
jessica.matushek@ftr.com Email Address of Officer Cassandra Guinness	jessica.matushek@ftr.com Email Address of Officer Cassandra Guinness	Certified Online
Email Address of Officer Cassandra Guinness	Email Address of Officer Cassandra Guinness	Signature of Officer
Cassandra Guinness	Cassandra Guinness	jessica.matushek@ftr.com
		Email Address of Officer
Person Completing This Certification Form	Person Completing This Certification Form	Cassandra Guinness
		Person Completing This Certification Form

Jessica C. Matushek, Director, Accounting

Printed Name and Title of Officer	
01/22/2015	
Date	
585-777-4557	
Contact Phone Number	

SAC	Name
250306	Frontier Communications of Alabama LLC
250301	Frontier Communications Lamar County LLC
250318	Frontier Communications of the South LLC
210318	Frontier Communications of the South LLC
454426	CITIZENS UTILITIES CO
452172	CITIZENS UTILITIES RURAL TEL CO
452302	Frontier Communications of the Southwest Inc.
541863	Frontier Communications of the Southwest Inc.
552302	Frontier Communications of the Southwest Inc.
454449	NAVAJO COMM CO
504449	NAVAJO COMM CO
494449	NAVAJO COMM CO
542308	CITIZENS TELECOMM CO OF CA
542315	CITIZENS TELECOMM CO OF CA
544342	CITIZENS TELECOMM CO OF CA
543402	CITIZENS TELECOMM CO OF CA
542344	Frontier Communications West Coast Inc.
220362	Frontier Communications of Fairmount LLC
220387	Frontier Communications of Georgia LLC
351127	Frontier Communications of Iowa Inc
474427	CITIZENS TELECOMM CO OF IDAHO
341183	CITIZENS TEL OF ILLINOIS INC
341055	Frontier Communications - Midland Inc.
340998	Frontier Communications of DePue Inc.
341038	Frontier Communications of Illinois Inc.
341011	Frontier Communications of Lakeside Inc.
341061	Frontier Communications of Mt. Pulaski Inc.
341067	Frontier Communications of Orion Inc.
341073	Frontier Communications - Prairie Inc.
341079	Frontier Communications - Schuvler Inc.
341015	Frontier North Inc.
341036	
320772	Frontier North Inc.
320779	Frontier North Inc.
310695	Frontier North Inc.
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367123	CITIZENS TEL OF MINNESOTA

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150100	Frontier Communications of New York Inc.	
150122	Frontier Communications of Seneca Gorham Inc.	
150128	Frontier Communications of Svlvan Lake Inc.	
150121	Frontier Telephone of Rochester Inc.	
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533401	CITIZENS TELECOMM CO OF OREGON	
170161	Commonwealth Telephone Company	
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170194	Frontier Communications of Oswavo River LLC	
170168	Frontier Communications of Pennsylvania LLC	
294336	CITIZENS TEL OF TENNESSEE LLC	
290580	CITIZENS TEL OF VOLUNTEER STATE	
504429	CITIZENS TELECOMM CO OF UTAH	
472416	Frontier Communications Northwest Inc.	
532416	Frontier Communications Northwest Inc.	
522416	Frontier Communications Northwest Inc.	
522449	Frontier Communications Northwest Inc.	
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330967	Frontier Communications of Viroqua LLC	
330964		
330944	Frontier Communications - St. Croix LLC	
330870	RHINELANDER TEL CO	
330870		
330940	Rhinelander Tel Co Rhinelander Tel Co	
330940	Rhinelander Tel Co	
200271	CITIZENS MOUNTAIN STATE TEL	
204338		
	Citizens Mountain State Tel	
204339	Citizens Mountain State Tel	
205050	Frontier West Virginia Inc.	
135200	The Southern New England Telephone Comapny	