



9260 E Stockton Blvd.
Elk Grove, California 95624

February 22, 2012

Oregon Public Utility Commission
Attention: Filing Center
P.O. Box 2148
550 Capitol Street N.E., Suite 215
Salem, OR 97301-2551
Fax (503) 373-7752

RE: UM 1431 Petition to Release Funds from Broadband Escrow Account – Order No.
10-067

Dear Commission:

In compliance with Appendix A, Condition No. 14 of the above referenced order, Frontier Communications Northwest Inc ("Frontier") is hereby filing a Petition for approval to release of funds from the broadband escrow account that was established to fulfill its broadband commitment.

The enclosed information is considered confidential and should be treated as such. Pursuant to Order 09-197, the "Confidential" document is being sent via US Mail in a sealed envelope with the proper labeling.

If you have any questions, please contact me at (503) 645-7909 or by email at Renee.Willer@ftr.com.

Sincerely,

A handwritten signature in black ink that reads "Renee M. Willer". The signature is written in a cursive, flowing style.

Renee Willer
Manager, State Government & Regulatory Affairs

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UM 1431

In the Matter of)
VERIZON COMMUNICATIONS INC.,) Petition for Approval of Release of
AND FRONTIER COMMUNICATIONS) Funds from Broadband Escrow Account
CORPORATION) Through December 2011
)
Joint Application for an Order Declining to)
Assert Jurisdiction, or, in the alternative, to)
Approve the Indirect Transfer of Control of)
Verizon Northwest Inc.)

Frontier Communications Northwest Inc. ("Frontier") petitions the Commission for the release of certain funds held in the \$15 million escrow Frontier established for broadband deployment as required by Commission Order 10-067 in Docket UM 1431. Frontier specifically asks the Commission to release [\$ Redacted] based upon Frontier's work on broadband projects through December 2011.¹

Attached as Exhibit A is the list of Frontier's expenditures for broadband through December 31, 2011. Frontier's broadband expenditures are identified by project identification number, wire center and specific geographic areas within each wire center. This information is competitively sensitive and submitted as confidential information under the Protective Order 09-197 in Docket UM 1431.

In further support of this Petition, Frontier states as follows:

1. In Commission Order 10-067, Appendix A, Condition No. 14 required Frontier to prudently expend \$10 Million in broadband deployment by July 1, 2011 and an additional \$15 Million by July 1, 2013. Frontier placed \$15 Million in escrow as required by condition of the merger 30 days after close under which funds could be released upon Commission approval.

¹ Fourth quarter 2011 Compliance Filing dated 1/30/12 filed by Joe Chicoine

2. In the 3rd and 4th quarters of 2010, Frontier began the engineering and deployment necessary for the broadband build-out in Oregon. The Commission will note that quarterly report filed on July 27, 2011 reflected [\$ Redacted] spent in broadband deployment by the end of the first year following the close of the transaction.
3. The expenditures listed on Exhibit A are a comprehensive total of all broadband projects that have been booked since July 1, 2010 using the reporting format provided by Commission Staff. The 4th quarter report submitted on January 30, 2012 shows total expenditures of [\$ Redacted] through December 31, 2011.
4. Frontier requested and was granted release of [\$ Redacted] from the escrow account to reimburse Frontier for the funds expended on broadband through September of 2011. Funds were released on December 30, 2011.
5. Accordingly, Frontier respectfully asks for the immediate release of [\$ Redacted] from the escrow account in order to reimburse Frontier for the funds expended on broadband during the fourth quarter of 2011, as shown on Exhibit A. By doing so, the Commission will encourage the more rapid improvement of Frontier's broadband network in Oregon.

Relief Requested:

1. That the Commission treat Exhibit A as confidential under protective order 09-197; and
2. That the Commission approve an Order authorizing the immediate release of [\$ Redacted] from the escrow account established by Order 10-067 in Docket UM 1431.

Respectfully submitted this 21st day of February 2012.

FRONTIER COMMUNICATIONS NORTHWEST INC.



Renee M. Willer -- Authorized Representative
20575 NW Von Neumann Drive
Beaverton, OR 97006
renee.willer@ftr.com

Frontier Communications Northwest, Inc.
FRONTIER OREGON BROADBAND INFRASTRUCTURE IMPROVEMENTS
July 1, 2010 to December 31, 2011

	07/01/10	08/01/10	09/01/10	10/01/10	11/01/10	12/31/10	01/01/11	02/01/11	03/01/11	04/01/11	05/01/11	06/01/11	07/01/11	08/01/11	09/01/11	10/01/11	11/01/11	12/31/11
Project ID																		
Project Name																		
Location																		
Start Date																		
End Date																		
Category																		
Priority																		
Status																		
Budget																		
Actual Cost																		
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Notes																		

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Total
Overall Project Budget and Financial Summary