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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:

Pursuant to 47 C.F.R. § 54.320(d), Frontier is filing its initial year-end Connect America Fund (CAF) Phase II build-out status notification as it continues to tabulate its progress for the March 1, 2021 reporting deadline. Frontier's 2020 construction progress was somewhat impacted by the unprecedented challenges to rural broadband construction caused by the COVID-19 pandemic. Specifically, although Frontier employees and construction crews continued their work to deploy broadband to unserved areas as quickly as possible throughout the pandemic, statewide shutdowns, local government lockdowns, curfews, state office closures, and hotel and business closures presented extraordinary obstacles to achieving year-end deployment goals.

From the outset of the pandemic and throughout 2020, Frontier worked collaboratively with state and local officials to ensure our essential communications workers could continue to provide and expand service, but our construction crews were subject to the same challenges as all Americans. As with other companies, we experienced workforce challenges associated with team members who became ill or were required to quarantine due to COVID-19 exposure. Our crews also faced delays because state and local permitting offices were closed. Further, widespread supply-chain and shipping delays—whether for personal protective equipment or necessary broadband electronics—constrained deployment progress. And, even when our crews could freely travel, securing safe, available lodging in some of the most rural parts of the country was unexpectedly difficult. In short, the challenges caused by the COVID-19 pandemic in 2020 created unprecedented business/deployment challenges and complexity.

Coinciding with the pandemic, in April 2020, Frontier announced a strategic Chapter 11 restructuring in order to eliminate more than \$10 billion in debt (and nearly \$1 billion in associated annual interest obligations) and strategically reposition the Company for the long-term. The restructuring did not negatively impact or delay CAF II buildouts; however, Frontier's team had the

additional challenge of working to set our company on a more solid foundation for the future. Frontier's successful emergence from Chapter 11 is expected in March or April, which will enable Frontier to continue its large scale fiber-to-the-premises investment that is already underway and to complete its transformation into a stronger service provider.

Despite the above unexpected and historic hurdles, Frontier's review of year-end data reflects that it met or exceeded the program's December 31, 2020 final broadband deployment milestone in eight states: Connecticut, Florida, Georgia, Mississippi, North Carolina, Pennsylvania, South Carolina, and Tennessee. However, Frontier's initial data, which the company is continuing to review, suggests that as of December 31, 2020 Frontier may not have reached the CAF Phase II one-hundred percent deployment milestone in Alabama, Arizona, California, Illinois, Indiana, Iowa, Michigan, Minnesota, Nebraska, Nevada, New Mexico, New York, Ohio, Texas, Utah, Wisconsin, and West Virginia.¹

Frontier has completed additional deployments in the above states since December 31, 2020 and will provide updated data on March 1, 2021 in accordance with 47 C.F.R. § 54.316. As allowed by the Commission under 47 C.F.R. § 54.320(d)(2), Frontier has until December 31, 2021 to complete its CAF II buildout in the states where it has not yet achieved the 100% milestone.² In these states, Frontier continues to deploy broadband as expeditiously as possible and expects it will have met its final CAF II deployment milestone in them by June 30, 2021—with the exception of Arizona, Utah, and New Mexico, where Frontier has faced extraordinary permitting delays that warranted a waiver of Frontier's 2019 interim deployment milestone.³ Frontier expects to complete the deployments in Arizona, Utah and New Mexico by September 30, 2021.

Consistent with section 54.320(d), Frontier is also providing this notice to the Universal Service Administrative Company as well as to state commissions and relevant Tribal Governments in the impacted states. Please contact the undersigned with any questions regarding this notice.

Sincerely,

/s/ Ken Mason

Ken Mason

cc: Alex Minard
hccerts@usac.org

¹ Frontier is providing this notice in accordance with 47 C.F.R. § 54.320(d).

² 47 C.F.R. § 54.320(d)(2) (providing that a CAF II recipient "will have twelve months from the date of the final milestone deadline to come into full compliance with this milestone").

³ See *Connect America Fund, Petition for Waiver of Frontier Communications Corporation*, No. 10-90, DA 20-66A1 (Jan. 14, 2020).