



**AJ Burton**

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March 1, 2019

**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 January 16, 2019, Frontier notified that Commission that while very close, Frontier may not have reached its Connect America Fund (CAF) Phase II deployment milestone in two states – Nebraska and New Mexico.<sup>1</sup> Frontier explained that it was continuing its process to review, validate, and confirm its data and would file the vetted requisite information in the HUBB portal in accord with 47 C.F.R. § 54.316. Now that this process is complete, Frontier has determined that it has in fact met the deployment milestone in both Nebraska and New Mexico. However, in the process of preparing and filing this final data, Frontier has determined that it was slightly short in Arizona and Ohio.<sup>2</sup> While Frontier did not reach the full sixty-percent year-end 2018 milestone in these two states, Frontier reached more than 57% of its target in both states and thus does not trigger the Commission's non-compliance measures.<sup>3</sup>

Frontier files this letter today to update its January 16, 2019 notification based on the latest information. In accord with section 54.320(d), Frontier is also providing this notice to the Universal Service Administrative Company and to state commissions and relevant Tribal Governments in the impacted states. Please contact the undersigned with any questions regarding this notice.

Sincerely,

/s/ AJ Burton

AJ Burton

cc: Alex Minard  
hccerts@usac.org

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<sup>1</sup> See *Ex Parte Letter* from AJ Burton, Frontier, to Marlene Dortch, FCC, Docket No. 10-90 (Jan. 16, 2019).

<sup>2</sup> In Arizona, Frontier was 525 locations short of its target 13,661 locations, reaching 57.7% of its total 22,768 locations; in Ohio, Frontier was 285 locations short of its target 39,955 locations, reaching 59.6% of its total 66,592 locations.

<sup>3</sup> See 47 C.F.R. § 54.320(d) (reflecting that non-compliance measures are not triggered until a carrier has a compliance gap of at least five percent); see also *Connect America Fund*, Report and Order, 29 FCC Rcd 15644 n.323 (2014) (stating that "a shortfall of less than 5% of locations for a given interim milestone should not be a concern warranting additional monitoring").