



AJ Burton

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July 11, 2018

VIA ECFS

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

Re: *In re Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. §160(c) to Accelerate Investment in Broadband and Next-Generation Networks* (WC Docket No. 18-141)

Dear Ms. Dortch:

On July 9, 2018, Ken Mason and the undersigned of Frontier Communications Corporation ("Frontier") together with Patrick Brogan from USTelecom met with Michele Berlove, Madeleine Findley, Dan Kahn, William Hupp, Pam Megna, Terri Natoli, and Claudia Pabo to discuss questions from staff regarding the data Frontier provided to USTelecom in support of the above-captioned petition for forbearance.¹

Frontier discussed the following issues:

- We described the capabilities of different types of UNE loops sold by Frontier. We noted our understanding that UNE customers generally purchase analog loops to provide voice service and digital loops to provide data services.
- We noted that there are no technical, performance, or other real differences between DS1 or DS3 loops that are sold as UNEs and those that are sold as special access or pursuant to other commercial agreements.
- We explained that the states Frontier chose as data sources for the economic study are representative of Frontier's overall service territory, including rural and urban areas and areas subject to varying levels of competition. Those states represent a large majority of Frontier's total UNE loop demand.
- We explained that there is very limited demand for UNE Subloops and no demand for UNE NIDs.
- We explained that Frontier is very committed to rural broadband deployment and that Frontier is one of the largest participant in the Connect America Fund program. We explained that we were not aware of any case in which a carrier customer is utilizing UNEs

¹ *Petition of USTelecom for Forbearance Pursuant to 47 U.S. C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141 (filed May 4, 2018) (Petition).

purchased from Frontier to provide DSL in areas where Frontier itself does not provide DSL.

- We explained that there was in fact very little CLEC ordering in rural areas. To the extent that there was any ordering in rural areas, this ordering was for business locations, and these locations could be served by at least one other facilities-based provider in addition to Frontier.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ AJ Burton

AJ Burton

cc: Michele Berlove
Madeleine Findley
William Hupp
Dan Kahn
Pam Megna
Terri Natoli
Claudia Pabo