

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Reform of Certain Part 61 Tariff Rules	)	WC Docket No. 18-276
	)	
Petitions for Limited Waiver of Rule 61.74(a)	)	WC Docket No. 17-308
	)	

**COMMENTS OF FRONTIER COMMUNICATIONS**

Frontier Communications Corporation (“Frontier”) hereby submits these comments in response to the *Notice of Proposed Rulemaking* seeking comment on whether the Commission (1) should amend its tariff filing rules to allow a carrier to cross-reference its own tariffs and (2) should eliminate the requirement that price cap incumbent LECs file short form tariff review plans 90 days before access tariffs are due.<sup>1</sup> Frontier answers both questions with an emphatic yes.

As the Commission astutely recognizes, these rules have become “outdated” with the advent and adoption of electronic filing.<sup>2</sup> Electronic filing has obviated the cross-referencing rule—now, all it takes is a few seconds and a few clicks to find the referenced tariff. The mere fact that the Commission “routinely grants” waivers of the rule is dispositive of the rule’s limited functional purpose.<sup>3</sup> Yet, as Verizon and AT&T point out, the process of requesting a waiver is

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<sup>1</sup> *In the Matter of Reform of Certain Part 61 Tariff Rules, Petitions for Limited Waiver of Rule 61.74(a)*, Notice of Proposed Rulemaking and Interim Waiver Order, FCC 18-142 (released Oct. 18, 2018) (“*NPRM*”).

<sup>2</sup> *NPRM* ¶ 1.

<sup>3</sup> *See NPRM* ¶ 5.

unduly burdensome for the carriers.<sup>4</sup> Surely, reviewing and granting waiver requests is also a drain on Commission resources, which would be better directed elsewhere. Frontier therefore urges the Commission to eliminate the prohibition on cross-referencing.

The short form rule is also a carryover from a different time, and it no longer serves a useful purpose. Currently, Frontier spends approximately forty hours or more preparing and filing each short form tariff review plan. However, as the Commission notes, these plans do little to aid the Commission, particularly given the deregulatory actions that have considerably reduced the volume of tariff filings. Eliminating the requirement will free up valuable carrier resources with no discernable downside for Commission staff.<sup>5</sup>

Moreover, as noted in the NPRM, certain exogenous cost factors are not available when the short form review plans are due<sup>6</sup> because regulatory fees and TRS factors are not released until after the filing deadline. As the Commission recognizes, without this information the review plans have little value to the Commission, industry, and consumers.<sup>7</sup> Thus, the benefits appear to significantly outweigh any burdens and Frontier strongly supports the Commission's proposal to eliminate this requirement.

Frontier applauds the Commission's ongoing efforts to update outdated rules by recognizing the efficiencies gained through technology. The Commission's elimination of the

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<sup>4</sup> *Id.*

<sup>5</sup> Indeed, as the Commission recognizes, there appears to have been no negative consequences from the Commission's wholesale waiver of the short form requirement was waived in 2017 and 2018. *See NRPM* ¶ 12.

<sup>6</sup> *NRPM* ¶ 11.

<sup>7</sup> *Id.*

cross-referencing prohibition and short form review plans would streamline the tariff filing process, easing burdens on both carriers and Commission staff.

Respectfully submitted,

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December 20, 2018