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November 25, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: *Connect America Fund*; WC Dkt No. 10-90

Dear Ms. Dortch:

On November 21, 2014, Kathleen Q. Abernathy, Executive Vice President, External Affairs, Frontier Communications, and I met with Carol Matthey and Alexander Minard of the Wireline Competition Bureau. The parties discussed potential changes to Phase II of the Connect America Fund (“CAF”) and emphasized that if the Commission is considering increasing the CAF Phase II obligations then it must also consider adjusting other terms associated with the program, including increasing the term of support and extending the timeframe to complete the CAF Phase II broadband deployment.

The parties also talked about the relationship between CAF Phase I Round 2 and CAF Phase II broadband deployment. The parties discussed that the Commission is considering requiring price cap carriers accepting Phase II support to report the latitude and longitude coordinates of the individual locations to which it has deployed broadband in fulfillment of its CAF Phase II obligations. This approach is consistent with the reporting obligations for CAF Phase I. If this is the case then the Commission will have identifying information for each location served in the entire CAF program. In CAF Phase I Round 2, the Commission directed the Bureau “to ensure the funding is not provided to the same *census blocks* under both Phase I incremental support and Phase II.”¹ Frontier suggested that, if the Commission does require specific identifying information for each CAF Phase II location, then it should alter the current standard to ensure that *locations* do not receive duplicate support, not census blocks. This minor modification would ensure that locations are not unnecessarily excluded from receiving broadband through the CAF Phase II program simply because they happen to share a census block with a location that received CAF Phase I Round 2 support.

Pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

¹ *In re: Connect America Fund*, WC Dkt. No. 10-90; *Report and Order*, 28 FCC Rcd. 7766 at ¶ 21 (2013) (emphasis added).

Ms. Marlene H. Dortch

November 25, 2014

Page 2

Sincerely,

A handwritten signature in blue ink that reads "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.

Cc: Carol Matthey
Alex Minard