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VIA ECFS

December 5, 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 December 3, 2015, Kathleen Q. Abernathy, Executive Vice President, External Affairs, Frontier Communications, met with Nicholas Degani, Legal Advisor to Commissioner Ajit Pai, and Amy Bender, Legal Advisor to Commissioner Mike O’Rielly, to discuss the Connect America Fund (CAF) Phase II program. Frontier’s advocacy was consistent with previous advocacy in the above-referenced proceeding.

In particular, meeting participants discussed potential changes to CAF Phase II. Frontier 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 beyond five years to complete the CAF Phase II broadband buildout.

An extended term is essential because capital investment in high speed infrastructure in rural America – while critical to fulfilling the public policy goal of universal broadband – is a costly investment. Infrastructure spend per customer is naturally high in such sparsely populated areas which are often geographically challenging for deployment. Furthermore, despite the fact that Frontier builds to higher speeds with 75% of homes passed having access to speeds of 12 Mbps, over 80% of Frontier’s broadband customers subscribe to our basic tier at speeds of 6 Mbps or less and at a price as low as \$19.99. A rational economic framework to ensure buildout at the higher speed of 10/1 to the most costly, hardest-to-reach and currently unserved locations can only be justified with an extended deployment and funding period.

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. Please feel free to contact me if you have any questions.

Sincerely,

/s/ Jennifer Schneider

Jennifer Schneider

cc: Amy Bender
Nicholas Degani