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October 23, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-5-A325
Washington, DC 20554

Re: *Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Transfer Control of Licenses and Authorizations*, MB Docket No. 15-149

Frontier Communications Corporation Response to Request for Information

Dear Ms. Dortch:

On behalf of Frontier Communications Corporation (“Frontier”), enclosed for filing in response to the October 9, 2015 correspondence from William T. Lake, Chief of the Media Bureau (the “Request”), is the Redacted version of Frontier’s Responses to the Commission’s Request for Information. In accordance with the Protective Order issued in this proceeding,¹ all pages of this filing are marked “REDACTED – FOR PUBLIC INSPECTION.”

Any questions relating to the enclosed responses should be directed to the undersigned.

Respectfully,

/s/ AJ Burton
AJ Burton
Director, Federal Regulatory Affairs

Enclosure

¹ See *Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent to Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 15-149, Order, FCC 15-110, Protective Order (rel. Sep. 11, 2015).

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Frontier’s Response to Information, Data, and Document Request
MB Docket No. 15-149

1. *Explain or identify and provide documents sufficient to show:*
 - a. whether and to what extent the Company’s ability to compete for Internet access service subscribers has been or would be increased by offering Internet access service using fiber to the premises (FTTP);

Response:

Frontier offers Internet access service both using DSL and FTTP. As of December 31, 2014, Frontier is capable of offering broadband to approximately 7.8 million households, or 92% of the 8.5 million households in our markets. As of that same date, 55 percent of households throughout Frontier’s territories were capable of speeds of 20 Mbps or more, 74 percent were capable of speeds of 12 Mbps or more, and 83 percent were capable of 6 Mbps or more.¹ We continue to expand and upgrade broadband availability and speed in our markets and view this investment as an opportunity to attract and retain a greater number of customers and increase average revenue per residential and business customer.

As a general matter, in order to complete network expansion and upgrades, Frontier extends fiber further out into the network and closer to end-user premises. While offering competitive speeds is important, we believe that a significant factor in competition for high speed Internet subscribers is the ability to offer bundled voice, broadband, and video services.

- b. the Company’s plans for capital investments that would increase the speed of the DSL-based Internet access service it offers, and the Company’s reasons to make those investments;*

Response:

Frontier continues to invest in network speed and capacity to support our goal of increasing broadband penetration and market share. Our capital expenditures to improve broadband availability and speed include enhancing the existing outside plant by expanding fiber-based infrastructure throughout our network, upgrading network hardware and expanding transport capacity of our middle-mile and data backbone.

In particular, the Connect America Fund (“CAF”) remains fundamental to enabling Frontier to

¹ See Consolidated Application of Verizon Communications Inc. and Frontier Communications Corporation for Consent to Partially Assign and Transfer Control of Domestic and International Authorizations Pursuant to Section 214 of the Communications Act of 1934, As Amended, Exhibit 1 at 12-13 (filed Feb. 24, 2015).

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further invest in infrastructure to high cost areas where the economics otherwise do not support investment sufficient for high speed Internet. On June 15, 2015, Frontier accepted the FCC's CAF Phase II offer for all of our 28 states, which will enable us over the next six years to provide broadband to more than 650,000 households and businesses located in some of the most rural parts of America.² CAF-funded broadband deployment is reserved for locations where there is no unsubsidized competitor providing broadband at a comparable speed.

Additionally, as part of our proposed acquisition of Verizon's wireline properties in California, Florida, and Texas, Frontier has explained that we plan to deliver broadband to an additional 750,000 households at speeds of 25Mbps/2-3Mbps by the end of 2020 across our entire footprint, including the properties we propose to acquire in California, Florida and Texas.³

- c. The plans of the Company to replace Internet access service that it currently provides over DSL with Internet access service over FTTP and the Company's rationales in favor of or against such replacements;

Response:

Frontier considers all options when deciding how best to spend limited capital resources for the purposes of deploying and upgrading broadband offerings. We are constantly expanding and upgrading our network, which requires extending fiber further out in the network and closer to end-user premises. Frontier will invest in the network in this manner to fulfill the broadband deployment obligations associated with CAF Phase II and for purposes of delivering broadband to an additional 750,000 households at speeds of 25Mbps/2-3Mbps by the end of 2020 across our entire footprint, including the properties we propose to acquire in California, Florida and Texas.

- d. *What download and upload speeds the Company believes are required to support Internet usage for different types (e.g., standard definition, high definition, 3D, ultra HD/4K) of video consumption by the average individual and by the average household, both at present and in the future; and*

Response:

For purposes of the Connect America Fund Phase II, the Commission has adopted a minimum speed standard of 10 Mbps downstream and 1 Mbps upstream.⁴ As the Commission notes, high definition video requires 5 Mbps downstream.⁵ As of the end of Q3 2014, while 75% of the Frontier's homes passed can access 12 Mbps, 83% of our residential broadband customers

² See, e.g., *Wireline Competition Bureau Authorizes Frontier Communications Corporation to Receive Over \$283 Million in Connect America Phase II Support To Serve 1.3 Million Rural Americans In 28 States*, Public Notice, 30 FCC Rcd 6310 (2015).

³ See Letter from Daniel McCarthy, CEO, Frontier, to Chairman Wheeler, FCC (Aug. 11, 2015).

⁴ See *Connect America Fund*, Order, 29 FCC Rcd 15644 ¶ 15 (2014).

⁵ *Id.* ¶ 17.

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Frontier’s Bilateral Peering Policy may be found at the following link:
http://ipadmin.frontier.com/bilateralpeering_policy.pdf.

- 3. Explain the Company’s use of data caps or usage allowances and describe your data cap or usage allowance plan in each of your service areas, including a description of how the company selected the service area for implementing or trialing data caps or usage allowances. In your answer, describe the factors you used to determine whether to implement data caps or usage.*

Response:

Frontier does not apply usage-based pricing to any of its broadband offerings. Frontier has no plans at this time to offer a metered broadband service. We continue to monitor the market and continue to consider a usage-based offering as an option. Factors Frontier considers in this process include the FCC’s Open Internet rules, policies of other companies, consumer demand, network capacity, and cost, among other factors

- 4. Produce one copy of each agreement between the Company and any other persons that contain provisions relating to peering, paid peering or settlement-free interconnection.*

Response:

Frontier’s interconnection agreements are highly sensitive privileged and confidential business information. See response to question 2 providing information on the Company’s general interconnection policies and procedures.

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5. *Describe, and provide and identify documents sufficient to show, how the Company responds to competitors' pricing behavior and product offerings for each relevant service.*

Response:

Frontier faces competition from a wide variety of service providers, such as cable operators, wireless carriers, long distance carriers, competitive local exchange carriers, satellite video and broadband providers, and other wireline carriers.

Throughout its footprint, Frontier sells broadband services at highly competitive prices, and simplified products and pricing is one of many strategies Frontier pursues to attract and retain customers. Frontier offers customers standalone and bundled service solutions that enable customers to select from a range of options to best fit their performance requirements and their budget. Frontier also frequently offers promotions, incentives, and new products and services to ensure that it is delivering value to its customers. The ongoing competitiveness of the telecommunications marketplace, combined with an increase in the number of products and services offered to customers, requires all companies to ensure they are efficient, innovative, customer friendly, and competitively priced.

While broadband pricing is important, the ability to offer video and voice services, in tandem with high speed Internet – a “triple-play” offering – is a key competitive factor in the market for high speed Internet. In the markets where we operate, Frontier is generally the only facilities-based competitor to the cable provider. We provide our own video offering only in a very limited portion of our service footprint. We agree with the FCC’s observation that broadband adoption increases significantly when it is offered together with video services, and that enhanced video competition and broadband deployment are interrelated.⁶ Frontier is considering providing a video offering in other markets within our service footprint.

⁶ See, e.g., *Promoting Innovation and Competition in the Provision of Multichannel Video Programming Distribution Service*, NPRM, 29 FCC Rcd 15995 ¶ 5 (2014).