



Michael Golob
Senior Vice President, Network &
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December 30, 2015

VIA ECFS

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

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

In the December 2014 *Connect America Fund* (“CAF”) Phase II Report and Order (the “Order”), the Commission explained that there would be some variance between the number of model-determined locations in eligible census blocks and the actual number of locations.¹ In particular, the Commission recognized that there would be instances where the model predicted more locations in eligible census blocks on a statewide basis than actually exist.² The Commission explained that if a price cap carrier discovers this issue in any of its states, it should inform the Bureau. The Order then delegates authority to the Bureau to adjust the number of funded locations and instructs the Bureau to adjust funding levels on a pro rata basis accordingly.³

As Frontier has been developing its network plans, it has found – as the Commission predicted – certain states where the actual number of locations in eligible census blocks is less than the model-determined number. Specifically, Frontier has found fewer locations than predicted in the following seven states:

State	FCC Model Predicted Location Count	Actual Number of Locations in Eligible Census Blocks	Difference between FCC Model and Actual Locations	Percentage Difference
AZ	22,768	21,960	808	3.5%
CT	1,388	913	475	34.2%
IA	5,438	5,079	359	6.6%
MN	46,910	44,490	2,420	5.2%
NE	3,380	2,349	1,031	30.5%
NM	7,032	6,413	619	8.8%
NY	45,610	45,510	100	0.2%

¹ *Connect America Fund*, Report and Order, 29 FCC Rcd 15644 ¶ 38 (2014).

² *Id.*

³ *See id.* ¶ 38 n.88.

Based on these findings, Frontier requests that the Bureau adjust Frontier's location targets in these states to the actual number of locations in eligible census blocks as Frontier indicates above. In accordance with the Order, upon adjustment of these location targets, associated funding levels in these states would be adjusted on a pro rata basis.⁴

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in black ink that reads "Michael P. Golob". The signature is written in a cursive style with a large initial 'M' and 'G'.

Michael Golob
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and Engineering Integration
Frontier Communications
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⁴ See *id.*