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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:

On May 13, 2016, Michael Saperstein, Vice President, Federal Regulatory Affairs, Frontier Communications, and the undersigned met with Rebekah Goodheart of Commissioner Clyburn's office.

During the meetings, Frontier's representatives discussed Frontier and CenturyLink's proposal for interim support to ensure continuity of voice service to extremely high-cost households in the territories of price cap carriers that accepted the offers of model-based support.¹ Frontier explained that the current lack of support places customers in these areas at risk for unnecessary loss of voice service during extreme weather events and urged the Commission to implement an interim voice maintenance support mechanism as it adopts the reverse auction framework for the next phase of the CAF. Frontier emphasized that this funding support is interim until the Commission implements the Remote Areas Fund, and Frontier explained that the annual funding amount already targeted for the Remote Areas Fund would cover much of the cost of this interim funding.

Frontier also highlighted the recent outpouring of support for the FCC to continue supporting landline voice service from local fire chiefs, sheriffs, mayors, and elected state representatives.²

¹ See, e.g., Letter from L. Charles Keller, Counsel to Frontier, to Marlene Dortch, Secretary, FCC, Docket No. 10-90 (Feb. 23, 2016).

² See, e.g., Letter from Dustin Turska, Police Chief, Brookport, IL, and John Klaffer, Mayor, Brookport, IL, to Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai, and O'Rielly, Docket No. 10-90 (May 12, 2016); Letter from Jim McCabe, Sheriff, Mohave County, AZ, Robert J. DeVries, Chief of Police, City of Kingman, AZ, Jake Rhoades, Fire Chief, City of Kingman, AZ, and Joseph Dedman Jr., Sheriff, Apache County, AZ, to Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai, and O'Rielly, Docket No. 10-90 (May 12, 2016); Letter from Washington State Senator Linda Evans Parlette, Washington State Representative Brad Hawkins, and Washington State Representative Cary Condotta to Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai, and O'Rielly, Docket No. 10-90 (May 12, 2016).

These local public safety officials and elected representatives explained that it was critical for the FCC to continue supporting the maintenance of voice service in extremely high cost areas because these areas are especially vulnerable to extreme weather events, and residents in these areas rely disproportionately on landline emergency services.

Local public safety official and elected representatives also explained that reverse 911 – a service that allows public safety officials to call residents in the event of emergencies and natural disasters – is especially important in these areas and must be maintained with interim voice support. For example, the Mayor of City of Tonasket, Washington, explained that his county had set up a multi-level contact system and that during the record-breaking fires in Washington last year, this reverse 911 notification system helped public safety contact and inform people regarding wildfires and avoid much greater damages. Likewise, the Mayor of City of Arlington, Washington, explained that immediately following a devastating mudslide in 2014, reverse 911 allowed public safety to instantaneously notify residents and communities downstream about the mudslide and that the local river was flooding.³

By implementing Frontier and CenturyLink’s proposal for interim support for voice services, the Commission can continue to protect the public safety in extremely rural, high-cost communities. Please feel free to contact me with any further questions.

Sincerely,

/s/ AJ Burton

AJ Burton

cc: Rebekah Goodheart

³ Letter from Barbara Tolbert, Mayor, City of Arlington, WA, to Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai, and O’Rielly, Docket No. 10-90 (May 12, 2016).