frontier
A Citizens Communications Company
www.FrontierCorp.com

Legal Services
180 South Clinton Avenue
Rochester, NY 14646-0700

Tel: 585.777.7270
Fax: 585.263.9986
gregg_sayre@frontiercorp.com

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VIA OVERNIGHT DELIVERY

February 11, 2002

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: CC Docket No's 01-318, 98-56, 98-147, 96-98 and 98-141
Comments of the Frontier and Citizens ILECs

Dear Secretary Salas:

Enclosed for filing please find an original plus nine (9) copies of the Reply Comments of Frontier and Citizens Incumbent Local Exchange Carriers in the above-referenced proceedings.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Gregg C. Sayre
Associate General Counsel –
Eastern Region

GCS:hmj
Encl.
cc: Qualex International (on paper and diskette)
Janice Myles, Policy & Program Planning Division, CCB (on diskette)

No. of Copies rec'd 0+9
List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of	)	
	)	
Performance Measurements and Standards for Unbundled Network Elements and Interconnection	)	CC Docket No. 01-318
	)	
Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection and Operator Services and Directory Assistance	)	CC Docket No. 98-56
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
	)	
Petition of Association for Local Telecommunications Services for Declaratory Ruling	)	CC Docket Nos. 98-147, 96-98, 98-141
	)	

REPLY COMMENTS OF THE FRONTIER AND CITIZENS INCUMBENT LOCAL EXCHANGE CARRIERS

Gregg C. Sayre

Attorney for Frontier Communications

180 South Clinton Avenue
Rochester, New York 14646
(585) 777-7270
gregg_sayre@frontiercorp.com

Date: February 11, 2002

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
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Performance Measurements and Standards for Unbundled Network Elements and Interconnection	)	**CC Docket No. 01-318**
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Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection and Operator Services and Directory Assistance	)	**CC Docket No. 98-56**
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REPLY COMMENTS OF THE FRONTIER AND CITIZENS INCUMBENT LOCAL EXCHANGE CARRIERS

The Frontier and Citizens incumbent local exchange carriers ("ILECs") under the common ownership of Citizens Communications Company (hereafter, the "Frontier ILECs") respectfully submit:

The Association of Local Telecommunications Services claims at page 7 of its Comments that "adoption of performance metrics will not impose significant new burdens either on regulators or the industry." This is far from reality. The Frontier ILECs have refined the estimated costs required to comply with the requirements that the Commission might adopt in this proceeding. The Frontier ILECs' best estimate is

an initial expenditure of $4,100,000 to modify 8 service order, installation and repair records systems, plus $800,000 to extract automated reports from the data within these systems, for a total of $4.9 million. In addition to these costs would be ongoing training, operational and software support costs to maintain the systems changes and to produce the reports. Spread over Citizens' nearly 2.5 million access lines, the initial costs would amount to approximately $2 per access line.

It would be unreasonable to expect the Frontier ILECs to bear these costs in light of the lack of any demonstrated quantified or even unquantified benefits from pushing these potential requirements down to the small and mid-sized ILECs. Costs of this magnitude are far out of proportion to the Frontier ILECs' size. By way of comparison based on the relative number of access lines, an unfunded mandate of this amount placed upon the Frontier ILECs would be the equivalent of a $124.6 million requirement placed upon Verizon. Even if a cost burden of such magnitude were fair when placed upon a former Bell company, the Commission must recognize that the whole competitive marketplace arises from the tradeoffs in the Telecommunications Act of 1996. Some of the costs placed on the former Bell companies are in some manner offset by revenues from their entry into in-region InterLATA long distance markets. No such benefits are being offered to small and mid-sized ILECs like the Frontier ILECs.

The Frontier ILECs therefore continue to urge the Commission not to require small and mid-sized ILECs to comply with the requirements that may be imposed in this docket.

Respectfully submitted,

Gregg C. Sayre
Associate General Counsel –
Eastern Region
Citizens Communications
180 South Clinton Avenue
Rochester, New York 14646
(585) 777-7270
gregg_sayre@frontiercorp.com

Dated: February 11, 2002