

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Petition of Cingular Wireless, LLC for) CC Docket No. 96-45
Designation as an Eligible)
Telecommunications Carrier in the State of)
Georgia)

Comments of Frontier Communications

Kenneth F. Mason
Director – Federal Regulatory

Frontier Communications
180 South Clinton Avenue
Rochester, NY 14646-0700
585-777-5645
KMason@czn.com

Gregg C. Sayre
Associate General Counsel – Eastern Region

Frontier Communications
180 South Clinton Avenue
Rochester, NY 14646-0700
(585) 777-7270
gregg.sayre@frontiercorp.com

Date: February 20, 2007

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COMMENTS OF FRONTIER COMMUNICATIONS

Pursuant to the Commission's Public Notices, DA 07-158 (Jan. 23, 2007) and DA 07-552 (Feb. 5, 2007), Frontier Communications of Georgia LLC and Frontier Communications of Fairmount LLC ("Frontier")¹ hereby submit their comments in opposition to the Petition of Cingular Wireless, LLC² to become an Eligible Telecommunications Carrier ("ETC") in the state of Georgia. AT&T Wireless is the largest wireless carrier in the United States, and is held by a corporate parent that now constitutes the largest ILEC in the United States. By way of comparison, Frontier has fewer than 30,000 access lines in Georgia. AT&T Wireless and its corporate parent are orders of magnitude larger than Frontier and its corporate parent. Nevertheless, AT&T Wireless seeks entitlement to draw the same level of high cost support as Frontier draws in Georgia from the Universal Service Fund.

In evaluating AT&T Wireless' Petition, Frontier urgently requests the Commission to look behind the dry, cookie-cutter requirements that have been applied to similar petitions and make an affirmative determination of where these requirements are taking the Universal Service Fund

¹ The Frontier companies are under the ownership of Citizens Communications Company. Even including all of Citizens' other Incumbent Local Exchange Carrier ("ILEC") subsidiaries, Frontier is no more than a mid-sized ILEC.

² Cingular Wireless is now wholly owned by AT&T, Inc., the former SBC Corp., and is in the process of changing its name to AT&T Wireless. The Petitioner will be referred to herein as "AT&T Wireless".

and the United States telecommunications industry in general. Frontier suggests that the Commission, in evaluating the public interest factors behind the petition, should ask a few questions.

First, does AT&T Wireless really need high cost support at the same level as Frontier? The answer is clearly no. AT&T Wireless makes no showing that its costs are as high as Frontier's.

Second, does AT&T Wireless really need high cost support to provide service in Frontier's area? Once again, the answer is no. AT&T Wireless is already providing service throughout Frontier's area, having already been motivated to do so by the economic forces of profit and competition with other carriers.

Third, will AT&T's receipt of high cost support promote the advancement of universal service in Georgia and elsewhere? Once again, the answer is no. As AT&T Wireless and other wireless carriers increasingly draw "support" for their already profitable ventures out of the Universal Service Fund, the only possible results are the spiraling of Universal Service Fund surcharges out of all control, or the need to slash the Universal Service Fund draws through mechanisms such as reverse auctions that would steer funding away from the carriers that most need support to the carriers that least need support.

Fourth, as AT&T Wireless, T-Mobile and possibly Verizon Wireless pull "support" out of the Universal Service Fund, will rural customers, or in fact any customers, see lower prices as a result of this transfer of wealth? Once again, the answer is no. Customers will be faced with relentless increases in their Universal Service Fund surcharges not only in rural areas but also across the entire United States. Ultimately, if the Universal Service Fund suffers "reforms" that lock out rural ILECs from predictable or sufficient high cost support, rural customers may lose the ILECs as carriers of last resort. Their only alternative may be significantly higher priced cellular service, and in rural areas cellular service may be inadequate in terms of coverage or

quality of service. If the Commission's Universal Service policies drive rural ILECs out of their positions as carriers of last resort, the result will be a large number of extremely unhappy citizens, especially those who lack either adequate cellular coverage or the price protection of Lifeline eligibility.

A completely plausible long run result, if the Commission continues to grant ETC status to the largest wireless carriers and adopts something like reverse auctions for high cost funding, is that the largest and lowest-cost wireless carriers would bid low and therefore would receive most if not all of the high cost funding. This would offset most if not all of the net outflow of high cost support paid by their large ILEC affiliates. The customers of the nation's highest cost rural ILECs would become net payers of what is supposed to be high cost support. The net recipients of that support would be the nation's largest wireless carriers. This may be a result that is financially desirable for the largest carriers, but it would be a perversion of the purposes of universal service funding. This appears, however, to be a natural outgrowth of some of the policies that the Commission is considering.

Are these results necessary? Once again, the answer is no. The statute requires a higher public interest standard by allowing permissive rather than mandatory certification of an ETC in rural telephone company areas as compared to other areas.³ Frontier submits that the answers to the questions above show that granting this application at this time is not in the public interest.

Frontier respectfully suggests that wireless ETC funding is turning into a runaway train, a pending disaster that may cause other disasters in a chain reaction when the funding requirements to provide "support" to behemoth wireless carriers become unmanageable. Frontier therefore urges the Commission to deny the current application at this time, and to place a moratorium on wireless ETC designations in general until it can consider the entire

³ 47 U.S.C. §214(e)(2).

picture of universal service funding and universal service support, and adopt consistent reforms that will actually promote universal service as opposed to increasing the profits of the nation's largest wireless carriers at the expense of all other carriers and their customers.

Respectfully Submitted,



Gregg C. Sayre
Associate General Counsel – Eastern Region

Kenneth F. Mason
Director – Federal Regulatory

Frontier Communications
180 South Clinton Avenue
Rochester, NY 14646-0700
585-777-5645
KMason@czn.com

Frontier Communications
180 South Clinton Avenue
Rochester, NY 14646-0700
Tel: (585) 777-7270
Fax: (585) 263-9986
gregg.sayre@frontiercorp.com

Date: February 20, 2007

CERTIFICATE OF SERVICE

I, Gregg C. Sayre, do certify that on February 20, 2007, the aforementioned **Comments of Frontier Communications** were electronically filed with the Federal Communications Commission through its Electronic Comment Filing System and were electronically mailed or placed in U.S. mail postage prepaid to the following:

Best Copy and Printing, Inc. (BCPI) (via email)
Portals II
445 12th Street, SW
Room CY-B402
Washington, DC 20554
fcc@bcpiweb.com

Vickie Robinson (via email)
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Room 5-A441
Washington, DC 20554
vickie.robinson@fcc.gov

Toni Stevens (via email)
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Room 5-B521
Washington, DC 20554
antoINETte.stevens@fcc.gov

Michael P. Goggin, Esq. (via U.S. Mail)
Cingular Wireless LLC
1818 N Street, NW
Suite 800
Washington, DC 20036

By: 

Gregg C. Sayre