

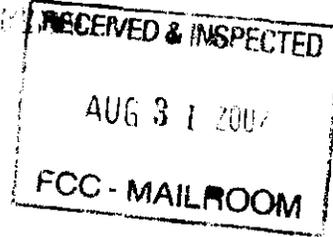
frontier

COMMUNICATIONS SOLUTIONS

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BY OVERNIGHT COURIER

August 30, 2007

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
9300 East Hampton Drive
Capitol Heights, MD 20743

**Re: WC Docket No. 06-147; *Frontier Communications* Petition for
Forbearance from Title II and Computer Inquiry Requirements
for Broadband Services**

Dear Ms. Dortch:

Enclosed for filing under seal, pursuant to the Commission's August 16, 2007 First Protective Order in this proceeding, is Frontier Communications' response to the August 23, 2007 request of the Wireline Competition Bureau to provide market data to enable a local market analysis for the services identified in our forbearance petition.

Frontier has exerted its best efforts to assemble the data that could be gathered during the brief period of time since receiving the WCB's request. The confidential data enclosed with this letter warrant the following conclusions:

First, in all relevant markets Frontier is nowhere near being a dominant player in terms of the addressable market share. Frontier's low market share and the degree of "churn" for these services show that Frontier does not have a dominant position and is only able to offer competitively priced services.

Second, in the broadband Internet access market, in which Incumbent Local Exchange Carriers such as Frontier were previously given forbearance by the Commission, Frontier is likewise in no way a dominant provider of these services. There is no hint in these data that Frontier has the remotest opportunity to monopolize the market. This warrants the further conclusion that additional forbearance in the commercial broadband service market would only serve to bring additional competition to these markets to the benefit of all customers, as occurred in the broadband Internet access market.

Third, the number of competitors providing facilities-based broadband services in the territories of all of Frontier's operating entities confirms the presence of competition. Allowing

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Frontier regulatory forbearance for these services will afford customers the benefits of a truly competitive market by removing the shackles of pricing regulation from Frontier.

Frontier is filing these data under seal because these data are not otherwise available to Frontier's competitors, many of which are much larger than Frontier and have vastly greater financial resources. Many of them, including massive cable television Multiple System Operators, provide services directly competitive with Frontier's on an unregulated or at most an extremely lightly regulated basis. The market share data of the incumbent telephone company would be invaluable to competitors to help them draw up and prioritize their engineering and marketing plans. Frontier's competitors hold their own similar data in strict confidence, and it would be manifestly unfair to allow Frontier's competitors to receive and use Frontier's data for competitive purposes as a result of this proceeding.

As required by paragraph 4 of the First Protective Order, Frontier will provide a Washington, DC location for access to and review of Frontier's confidential information pursuant to the Protective Order.

Frontier urges the Commission to grant Frontier the same regulatory relief that was provided to Verizon for these services.

Respectfully submitted,



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Attachments