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**VIA FCC ELECTRONIC COMMENT FILING SYSTEM**

March 28, 2008

Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S. W.  
Washington, DC 20554

**Re: In the Matter of Frontier petition for limited waiver relief upon conversion of Global Valley Networks Inc. to Price Cap Regulation WC Docket No. 08-18: Ex Parte Presentation**

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. §1.1206, Frontier Communications (Frontier) provides notice of an ex parte meeting on March 27, 2008. Wireline Competition Bureau attendees were Albert Lewis, Pam Arluk, Doug Slotten, Jay Atkinson, Jennifer McKee, Nicholas Alexander, Elizabeth Valinoti, and Ted Burmeister. Frontier attendees were Robert Binder, Manager – Government and External Affairs and Kevin Clinefelter, Manager- Pricing and Tariffs.

In the meeting the Frontier attendees sought the assistance of the Commission to convert Global Valley to Price Cap regulation under the CALLS framework in an expedited manner. The Frontier attendees further explained that the commission's rules require Frontier to convert Global Valley Networks ("GVN") to Price Cap Regulation in its next annual filing while at the same time requiring a waiver to complete that conversion. The Frontier attendees presented Frontier's need for waivers with respect to the ATS, for which Frontier meets the line density requirement, and the ICLS, for which there are alternatives as described in the petition.

The Frontier attendees and Staff also discussed the possibility of Frontier amending its Petition to a modified version of the Commission's recent Windstream order.<sup>1</sup>

Respectfully submitted,

Gregg C. Sayre  
Associate General Counsel –  
Eastern Region

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<sup>1</sup> See *Windstream Petition for Conversion to Price Cap Regulation and for Limited Waiver Relief*, WC Docket No. 07-171, Order, FCC 08-81 (rel. March 18, 2008) ("Order").