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VIA FCC ELECTRONIC COMMENT FILING SYSTEM

April 22, 2008

Ex Parte Presentation

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

**Re: High-Cost Universal Service Support; Federal-State Joint Board on Universal Service,
WC Docket No. 07-267; CC Docket No. 96-45
Developing a Unified Carrier Compensation Regime, CC Docket No. 01-92
Network Management Practices, WC Docket No. 07-52**

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. §1.1206, Citizens Communications Company and its Frontier Communications subsidiaries provide notice of an ex parte meeting on April 21, 2008. Commission participants were Commissioner Robert McDowell and John Hunter, Special Counsel, Wireline. Frontier participants were Maggie Wilderotter, Chairman, President and Chief Executive Officer, Dan McCarthy, Executive Vice President and Chief Operating Officer, and Ken Mason, Vice President – Government and Regulatory Affairs.

In the meeting the Frontier participants provided an overview of the company and its operations.

On the topic of Universal Service support, the Frontier participants suggested that the Commission can address a large part of the problem by requiring all recipients to have the same Carrier of Last Resort obligations, and by basing distributions on the recipients' individual costs. The Frontier participants opposed the use of reverse auctions for the reasons stated in Frontier's comments, but noted that reverse auctions might be used for wireless carriers competing for support in a study area. The Frontier participants stated that supporting multiple wireless carriers in a single study area is bad policy.

On the topic of intercarrier compensation for phantom traffic, the Frontier participants urged the Commission to take action to require all call information to be appropriately passed with each call. Rules should include complaint procedures and penalties that have more teeth than a mere requirement for a carrier breaking the rules to pay the compensation it should have paid in the first place. The Frontier participants suggested that one potential remedy would be to allow carriers to refuse to accept non-compliant traffic.

On the topic of broadband network management, the Frontier participants urged the Commission to allow network operators to manage their networks and stated that there is no need for additional regulation. In addition, to allow for new innovation, network operators should be able to enter commercial arrangements.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gregg C. Sayre". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Gregg C. Sayre
Associate General Counsel -
Eastern Region

GCS/hmj