

Frontier Communications  
Legal Services  
180 South Clinton Ave.  
Rochester, NY 14646

September 6, 2008

**EX PARTE**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Petition of AT&T Inc. for Forbearance under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements, WC Docket No. 07-139; Petition of the Frontier and Citizens ILECs Seeking Forbearance from Enforcement of Certain ARMIS Reporting Requirements, WC Docket No. 07-204**

Dear Ms. Dortch:

While Frontier Communications Corporation, on behalf of its operating subsidiaries ("Frontier"), is convinced that data from only a few carriers does not paint an accurate or useful picture of the communications industry, Frontier proposes in the event the Commission grants the requested forbearance relief, Frontier would continue collecting service quality data (report 43-05) and operating data (report 43-08), on a voluntary basis for twenty four months from the date an Order in the above-referenced proceeding is approved. Under the FCC's current rules, Frontier has never collected nor filed data related to customer satisfaction (report 43-06) or network infrastructure (report 43-07). This would effectively preserve the *status quo* with respect to these data for a sufficient period of time to enable the Commission to review the types of data that is today collected *via* the ARMIS reporting requirements and to address any prospective data gathering needs through other proceedings.

Also, Frontier proposes that, in the event the Commission grants the requested forbearance relief, Frontier would continue to publicly report through the FCC's ARMIS reporting process its service quality data (report 43-05) on a voluntary basis for twenty four months from the date an Order in the above-referenced proceeding is approved.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically with the Commission. If you have any questions, please contact me at (585) 777-7270.

Sincerely,



Gregg C. Sayre  
Associate General Counsel – Eastern Region

Frontier Communications  
180 South Clinton Ave.  
Rochester, NY 14646  
[gregg.sayre@frontiercorp.com](mailto:gregg.sayre@frontiercorp.com)

cc: N. Alexander  
A. Bender  
S. Bergmann  
S. Deutchman  
G. Orlando  
D. Shaffer