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VIA FCC ELECTRONIC COMMENT FILING SYSTEM

October 3, 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**

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. §1.1206, Frontier Communications Company provide notice of an ex parte meeting on September 29, 2008. Commission participants were Commissioner Michael Copps and Scott Deutchman, Competition and Universal Service Legal Advisor. Frontier participants were Maggie Wilderotter, Chairman, President and Chief Executive Officer, Kathleen Abernathy, Member of Frontier's Board of Directors, Dan McCarthy, Executive Vice President and Chief Operating Officer, and Ken Mason, Vice President – Government and Regulatory Affairs.

On the topic of Universal Service support, consistent with prior filings the Frontier participants suggested that the Commission can address a large 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. In addition, the Commission should evaluate under what parameters funding might be available for broadband investment to reach the most expensive customers to serve.

On the topic of intercarrier compensation, the Frontier participants urged the Commission to reject the reform proposals that suggest a \$0.0007 terminating rate for all carriers. The revenue shifted out of intercarrier compensation would place a large burden on rural consumer rates as well as strain the Universal Service Fund (USF). Frontier would see the equivalent of \$20.00 per month per customer displaced under a \$0.0007 terminating rate in some of its most rural

markets. Finally, if the Commission wants to provide immediate reform for intercarrier compensation in a short timeframe focusing on providing a Phantom Traffic solution and clarifying that IP originated traffic providers who utilize our networks should pay appropriate access charges would be positive first steps.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kenneth Mason", with a long horizontal flourish extending to the right.

Kenneth Mason
Vice President – Government and Regulatory
Affairs