



Legal Department
180 South Clinton Ave.
Rochester, NY 14646-0700

October 28, 2008

Electronic Filing

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

Re: Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; High-Cost Universal Service Support, WC Docket No 05-337; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Universal Service Contribution Methodology, WC Docket No. 06-122; Intercarrier Compensation for ISP-Bound Traffic, WC Docket No. 99-68; Petition of AT&T for Declaratory Ruling and Limited Waivers Regarding Access Charges and "ESP Exemption," WC Docket No. 08-152; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135

Dear Ms. Dortch:

Frontier Communications Corporation ("Frontier") writes to express its support of the filing made by Windstream Communications, Inc. ("Windstream") on October 28, 2008. Frontier agrees that the Commission should resolve the ISP-bound issues separately, and place the comprehensive intercarrier compensation reform proposal out for public view and comment. Alternatively, if the Commission feels that it must address the comprehensive plan on November 4, Frontier supports Windstream's proposed modifications to the intercarrier compensation reform plan. Frontier agrees that these modifications would make the comprehensive plan more fair and balanced.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Gregg C. Sayre".

Gregg C. Sayre
Associate General Counsel – Eastern Region

GCS/cag