



September 18, 2009

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

*Re: Applications Filed by Frontier Communications Corporation and Verizon Communications Inc. for Assignment or Transfer of Control, WC Docket No. 09-95*

Dear Ms. Dortch:

Calix is the leading supplier of broadband access equipment to Tier 2 and Tier 3 service providers across the United States. As an equipment supplier to Frontier Communications Corporation (Frontier), Calix fully supports the assignment or transfer of control of the millions of subscriber lines targeted from Verizon Communications Inc. (Verizon) to Frontier (WC Docket No. 09-95) because it will clearly serve the public interest locally, regionally, and nationally.

The Calix relationship with Frontier dates back to March of 2003, when Calix was first deployed by Frontier as an access platform for deployment of voice and advanced broadband services. Over the last six years, Frontier has deployed hundreds of thousands of ports of Calix broadband infrastructure to its subscribers across the country, primarily in rural areas.

With over 90% of its customers broadband-enabled today, Frontier stands well ahead of the national average for broadband deployment among communications service providers. It is this track record and commitment to successful broadband deployment across its rural footprint that gives Calix confidence that the acquisition of over 4 million primarily rural lines from Verizon will be beneficial to both residential and business customers in these proposed regions, and by association benefit the communities involved as well.

Calix also believes that this transaction will benefit the economic development of the targeted regions. Our experience with our customer base, composed of hundreds of rural service providers across the country, has proven that investment in advanced broadband infrastructure in these communities stimulates the local economy. New businesses seek out these upgraded rural areas to take advantage of the combination of lower labor rates and lower cost of living, yet highly competitive infrastructure. Existing local businesses expand because they can utilize the broadband infrastructure to find new efficiencies or new growth opportunities regionally, nationally, and globally. Furthermore, a virtuous cycle is created as students and the local population as a whole embrace broadband and become broadband savvy, and as a result become more attractive to prospective employers.

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United States-based vendors of broadband access equipment like Calix also stand to benefit from this transaction. With millions of new potential subscribers targeted by Frontier's infrastructure build-out, Calix equipment will be likely deployed throughout this region. In recent years, Frontier has already invested billions of dollars in its broadband infrastructure, and companies like Calix have benefitted immensely, creating jobs and economic stimulus across the county.

Again, Calix is fully supportive of this transaction. We truly feel that this transaction not only benefits both Verizon and Frontier, the interests of the businesses and communities served as well. Additionally, we see a transaction of this magnitude trickling throughout the United States economy, benefiting vendors like ourselves who design, develop, and manufacture broadband equipment, and those who provide services to us.

Please let us know if you have any questions, as we would be happy to provide any further input required in support of this transaction.

Sincerely,

/s/  
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