

May 6, 2010

Julius Genachowski, Chairman  
Federal Communications Commission

Michael J. Copps, Commissioner  
Federal Communications Commission

Robert M. McDowell, Commissioner  
Federal Communications Commission

Mignon Clyburn, Commissioner  
Federal Communications Commission

Meredith Attwell Baker, Commissioner  
Federal Communications Commission

Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn and Baker:

Thank you all for taking the time to meet with me over the past several months on our pending acquisition of the Verizon rural properties in 14 states. I thought I would outline in more detail our philosophy and guiding principles for our employees, our focus on the customer and our unique local engagement model.

Frontier employees are the backbone of the company. They deliver valuable products and services to our customers each and every day. Frontier's future growth and success are dependent on ensuring we have the right people, in the right jobs, delivering on our commitment to quality. I have always believed that if you have great people, they in turn will take great care of your customers. Over the past 5 years, we have improved our work environment, increased training and have provided career opportunities. Our employee satisfaction is best in class at 83 percent.

Frontier is a "customer-centered" organization. We organize and focus our efforts on improving and simplifying the customer experience. With local general management, each market we serve is treated in a unique fashion. We judge our success on customer satisfaction and loyalty. Our local employees - whether our professional installation and maintenance technicians in the field, our inbound call and service center employees, or our sales teams, all put the customer first!

The synergies that we anticipate achieving from this transaction will surely be a benefit to the success of the company after the merger. Improving efficiencies allows us to provide our customers with quality service and innovative new products. Although the Communications Workers of America (CWA) claim that these synergies can only be attained through massive job cuts, this is simply inaccurate. Our customer-centered focus is not at risk. Frontier expects to achieve cost savings and other merger-related synergies principally by (1) leveraging the scalability of Frontier's existing corporate administrative functions, information technology, and network systems to cover the new Verizon properties we are acquiring, (2) internalizing certain functions formerly provided by third-party service providers to the Verizon business, and (3) operating the business more efficiently by implementing Frontier's best practices across all new markets.

Local engagement and local decision making are key to our current and future success. At Frontier we push day-to-day decision making close to the customer. Our five Regions each oversee multiple states, with general management leadership in market clusters to enable significant decision-making at the local level. This model is very different from many other incumbent providers who utilize a centralized structure, managing their businesses from one headquarters location. In addition, Frontier will continue to have a flat organization with three layers between me and the local General Manager running the Frontier operations in the communities we serve. Those layers include my COO, Region Presidents and State Leadership. Our management structure ensures that decisions are made quickly and tailored to the specific needs of the communities and customers in our properties.

As we prepare to operate our new markets, we have decided to open our Southeast Region Headquarters in Charleston, West Virginia. That organization will add 30-40 new jobs in Charleston. We are also locating our Midwest Region in Fort Wayne, Indiana; again opening up new regional job opportunities. We have already started to hire new employees through job fairs in many of the 14 states. For example, we recently held two job fairs in West Virginia and hired 60 new plant service representatives who are being trained in our existing Bluefield, West Virginia location in anticipation of the acquisition.

We believe that our commitment to local engagement also provides our employees with greater opportunities for internal advancement and professional development. Today Frontier fills more than 30 percent of all open positions from within.

The new markets will also benefit from Verizon employees who choose to retire before we close the transaction. We will replace those employees with individuals who have a mix of skills and experience in Telephone, Broadband and Network Operations. In addition, a percentage of new employees will be hired right out of high school and college. We have already started filling these retiree positions to make sure we have the right staffing at close.

These new employment opportunities offer quality, full-time jobs with benefits in many rural communities at a time when employment options are limited and unemployment remains high. Frontier provides all of our new employees with the training they need to deliver the services our customers demand. In addition, as we do today in the legacy Frontier markets, we will continue to embrace our Work-At-Home program and our Pro Resource Program, which rehires retirees on a part-time basis. We will also be introducing a new program focused on hiring veterans.

In closing, I want to reiterate Frontier's focus on the customer experience and give you my personal commitment to continue to bring the benefits of Broadband to rural America. Our focus on employees and local engagement has proven successful in our existing properties, and we look forward to deploying this approach in the Verizon markets.

I hope you will agree that this transaction is not only good for the existing and new Frontier employees, but also for the communities and customers we serve today and when the acquisition closes.

Please do not hesitate to contact me if I can answer any further questions.

Sincerely,



Maggie Wilderotter  
Chairman & CEO

cc: Edward Lazarus  
Jennifer Schneider  
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