



Federal Regulatory Affairs
2300 N St. NW, Suite 710 Washington DC 20037
www.Frontier.com

October 18, 2011

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

Re: *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Connect America Fund*, WC Docket No. 10-90; *High Cost Universal Service Support*, WC Docket No. 05-337; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45

Dear Ms. Dortch:

On October 17, 2011, Maggie Wilderotter, Chairman and CEO of Frontier Communications; Kathleen Q. Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs, Frontier Communications; spoke on the phone with Chairman Genachowski, Eddie Lazarus, Chief of Staff for Chairman Genachowski; and Zachary Katz, Chief Counsel and Senior Legal Advisor to Chairman Genachowski; to discuss the above-captioned proceedings.

Frontier emphasized its support for the America's Broadband Connectivity Plan ("ABC Plan") and Joint Framework filed in these dockets. Frontier discussed that its substantial broadband deployment commitments demonstrate that it shares the Commission's goal of ubiquitous broadband deployment. However, Frontier's broadband deployment initiatives are based on the current funding mechanisms and the FCC should be mindful not to destabilize ongoing broadband deployment in this reform process. Frontier highlighted the delicate balance that the ABC Plan struck for access replacement and noted the benefits of proceeding with that approach. Frontier also discussed the importance of the ABC Plan's targeted approach to providing service only to high-cost areas over a ten-year funding period with obligations commensurate to the funding level.

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.
Director of Federal Regulatory Affairs
Frontier Communications
(203) 614-4702

cc: Chairman Genachowski
Eddie Lazarus
Zac Katz