



Federal Regulatory Affairs
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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 14, 2011, Ken Mason, Vice President of Government and Regulatory Affairs for Frontier Communications spoke on the telephone with Steve Rosenberg of the Wireline Competition Bureau and Michael Steffen of the Office of General Counsel 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 the benefits of the ABC Plan's proposal for intercarrier compensation reform. Specifically Mr. Mason noted the benefit of including the Plan's access recovery mechanisms that would adequately allow Frontier to recover lost revenues as access rates are harmonized at a low uniform rate. Mr. Mason emphasized the benefits of viewing the intercarrier compensation and Universal Service components of the ABC Plan, and the total business risks from reform, holistically as the Commission proceeds. The parties also discussed the importance of the ABC Plan's targeted approach to providing service only to high-cost areas over an extended funding period with commensurate obligations.

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: Steve Rosenberg
Michael Steffen