



Federal Regulatory Affairs  
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October 21, 2011

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 20, 2011, Kathleen Q. Abernathy, Chief Legal Officer and Executive Vice President, Regulatory and Government Affairs, Frontier Communications and the undersigned met with Commissioner Michael J. Copps; Mark Stone, Chief-of-Staff for Commissioner Copps; and Margaret McCarthy, Policy Advisor, Wireline, to Commissioner Copps, to discuss the above-captioned proceedings.

The parties discussed the effect that intercarrier compensation reform would have upon Frontier and also consumers. Specifically, the parties discussed the overall decline in access revenues that would occur as a result of a transition to a low uniform rate and how those revenues could be recovered through both residential and business subscriber line charge increases. Frontier emphasized the need for a stable transition period in order to achieve all of the goals of reform. The parties also discussed the importance of ensuring that support from the Connect America Fund is commensurate with the obligations on the recipients to deploy broadband in high cost rural America. In particular, the parties discussed the significant increases in deployment that can occur from deploying at a 768 kbps upstream speed instead of a 1 Mbps upstream speed.

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: Commissioner Copps  
Mark Stone  
Margaret McCarthy