



Federal Regulatory Affairs  
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**REDACTED—FOR PUBLIC INSPECTION**

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September 24, 2012

**BY HAND**

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

Re: *High-Cost Universal Service Support*, WC Dkt. No. 05-337; Connect America Fund, WC Dkt. No. 10-90

Dear Ms. Dortch:

On July 24, 2012, Frontier Communications Corp. filed its acceptance of all of its eligible funding from Phase I of the Connect America Fund.<sup>1</sup> By accepting all eligible funding, Frontier pledged to serve 92,877 qualifying locations over the next three years. Frontier remains committed to deployment of broadband to the 92,877 households but by this filing is providing updated information regarding the specific locations targeted for deployment. Frontier filed a similar revision on September 4, 2012; this filing supersedes and replaces that filing in its entirety.<sup>2</sup>

This revision is consistent with the *Order* released July 18, 2012, wherein the Commission recognized that carriers may need flexibility in deciding the exact locations to which it will deploy over the next three years. Accordingly, the Commission decided that “carriers may, in satisfaction of their deployment requirement, deploy to eligible locations not identified in their notices of acceptance, but will be required to identify subsequently where deployment actually occurred.”<sup>3</sup> Accordingly, Frontier has reevaluated the locations to which it will deploy and submits this filing to the Commission in order to update the previous submitted data set; Frontier will continue to update its deployment data until the final location information is due to the Commission in July 2013. All of the certifications contained in Frontier’s initial acceptance remain applicable to this data.<sup>4</sup>

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<sup>1</sup> Letter from Michael Golob, Senior Vice President, Engineering and Technology, Frontier Communications, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 05-337, 10-90 (filed Jul. 24, 2012) (“Frontier CAF Phase I Acceptance”).

<sup>2</sup> See Letter from Michael D. Saperstein, Jr., Frontier Communications, to Marlene H. Dortch, Secretary, FCC, WC Dkt. Nos. 05-337, 10-90 (filed Jul. 24, 2012).

<sup>3</sup> See Connect America Fund, et al., W.C. Dkt. No. 10-90 *et al.*, *Order*, DA 12-1155, at ¶ 5 (rel. July 18, 2012).

<sup>4</sup> See Frontier CAF Phase I Acceptance at 3-4.

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The attached file updates by 2010 Census Block FIPS code and wire center CLLI code, locations where Frontier will deploy in satisfaction of its CAF Phase I requirement. Consistent with Frontier's initial submission, portions of the attached file include confidential information that is filed pursuant to the Commission's August 30, 2012, *Third Protective Order* in this docket.<sup>5</sup> Specifically, Frontier requests confidential treatment of the detailed census block and wire center information that Frontier provides as a guide to where it currently plans to deploy broadband. Frontier believes this information, if public, would provide competitors an exact roadmap of Frontier's proposed broadband expansion over the next three years. Such information is competitively sensitive because in addition to providing very specific information about Frontier's deployment plans, it also necessarily indicates where Frontier will not be using the CAF Phase I money in its footprint. Competitors could unfairly exploit such information to their own gains in both operations and marketing.

The non-redacted portions have been marked as confidential. Frontier is also filing a redacted copy of this report for public inspection.

Please feel free to contact me with any further questions.

Sincerely,

/s/

Michael D. Saperstein, Jr.  
Director of Federal Regulatory Affairs  
Frontier Communications  
(202) 223-6807

Attachment  
cc: Ryan Yates

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<sup>5</sup> *In re*: Developing a Unified Intercarrier Compensation Regime; Establishing Just and Reasonable Rates for Local Exchange Carriers; Connect America Fund; High-Cost Universal Service Support; A National Broadband Plan for Our Future, CC Dkt. No. 01-92, WC Dkt. Nos. 07-135, 10-90, 05-337, GN Dkt. No. 09-51, *Third Protective Order*, DA 10-1749 (rel. Aug. 30, 2012).