

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
High Cost Universal Service Support)	WC Docket No. 05-337

**COMMENTS OF FRONTIER COMMUNICATIONS CORPORATION IN SUPPORT OF
WEST VIRGINIA RURAL COMPANIES’ PETITION FOR WAIVER**

Frontier Communications Corporation (“Frontier”) hereby submits the following comments in support of the “West Virginia Rural Companies” Petition for Waiver of Sections 54.313(a)(10) and 54.318(i) Of The Commission’s Rules or, in the Alternative, Request For Temporary Waiver and Support for the Pending Request For Rulemaking to Modify Section 54.318(i) of the Commission’s Rules.¹ The relief requested in the West Virginia Rural Companies’ *Petition* is essentially the same relief that Frontier itself has requested from the Commission: to use a weighted average consumer rate when calculating its compliance with the Commission’s “rate floor”² and “rate ceiling”³ for its West Virginia territories due to the unique rate structures in the state.⁴

¹ Armstrong Telephone Company--Northern Division; Armstrong Telephone Company-- West Virginia; Hardy Telecommunications, Inc.; and Spruce Knob Seneca Rocks Telephone, Inc., Petition for Waiver By the West Virginia Rural Companies Of Sections 54.313(a)(10) and 54.318(i) Of The Commission’s Rules Or, In The Alternative, Request For Temporary Waiver and Support for the Pending Request For Rulemaking to Modify Section 54.318(i) of the Commission’s Rules, WC Dkt. Nos. 10-90, 05-337 (filed Feb. 5, 2013) (“West Virginia Rural Companies’ *Petition*”).

² See 47 C.F.R. § 54.318(i).

³ See 47 C.F.R. § 54.313(a)(10).

⁴ See Frontier Communications, Petition for Waiver of Sections 54.313(a)(10) and 54.318(i) of the Commission’s Rules, WC Dkt. Nos.10-90, 05-337 (filed Dec. 7, 2012) (“*Frontier Petition*”).

Frontier has addressed the need for this relief numerous times in this docket and the rationales in favor of relief remain true for the West Virginia Rural Companies. Frontier incorporates its previous comments by reference given the subject matter similarity.⁵ The comment cycle on the *Frontier Petition* recently ended with consensus support in favor of the Commission granting the requested relief. The record clearly demonstrated, with both industry and government support,⁶ that given the unique circumstances involved, it would be in the public interest for the Commission to grant the *Frontier Petition*.⁷ Given the similarities of the petitions and the consensus of the commenters, Frontier urges the Commission to consider and grant both the West Virginia Rural Companies' *Petition* and the *Frontier Petition* well in advance of the upcoming rate floor and rate ceiling compliance filing deadlines.

Respectfully submitted,

_____/s/_____
Michael D. Saperstein, Jr.
Director, Federal Regulatory
Frontier Communications
2300 N St. NW, Suite 710
Washington, DC 20037
(202) 223-6807

February 28, 2013

⁵ See generally *id.* See also Comments of Frontier Communications Corporation, WC Dkt. No. 10-90 (filed Sept. 28, 2012); Letter from Michael D. Saperstein, Director of Federal Regulatory Affairs, Frontier Communications, to Marlene H. Dortch, Secretary, FCC, WC Dkt. No. 10-90 *et al.* (filed Nov. 5, 2012); Reply Comments of Frontier Communications Corporation, WC Dkt. No. 10-90 (filed Feb. 26, 2013) (“Frontier Reply Comments”).

⁶ Comments of the Public Service Commission of West Virginia, WC Dkt. Nos. 10-90, 05-337, 4 (filed Feb. 4, 2013); Comments of the Independent Telephone and Telecommunications Alliance, WC Dkt. Nos. 10-90, 05-337, 3-4 (filed Feb. 11, 2013).

⁷ See generally Frontier Reply Comments.