

**CITIZENS COMMUNICATIONS COMPANY  
ANNUAL SECTION 64.2009(e) CERTIFICATION  
EB Docket No. 06-36**

**Company Name:** Frontier Communications Corporation and Subsidiaries  
**Form 499 Filer IDs:** See Attachment A  
**Name of Signatory:** Andrew Crain  
**Title of Signatory:** Senior Vice President, General Counsel  
**Date Filed:** March 1, 2013

I, Andrew Crain, hereby certify that I am a duly authorized officer of Frontier Communications Corporation and its subsidiaries, which are telecommunications carriers (collectively the "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission, codified at 47 C.F.R. §§ 64.2001-64.2011, implementing Section 222(c) of the Communications Act of 1934, as amended.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that Frontier Communications Corporation is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules. The Company received five customer allegations in 2012, summarized in the accompanying Attachment B, of unauthorized releases of CPNI. The Company did not take any actions against data brokers in 2012.

  
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Andrew Crain  
Senior Vice President, General Counsel  
Frontier Communications Corporation

**ANNUAL SECTION 64.2009(E)**  
**CPNI CERTIFICATION STATEMENT**  
**COVERING CALENDAR YEAR 2009**  
**EB DOCKET NO. 06-36**

In accordance with 47 C.F.R. § 64.2009(e), the following statement accompanies the officer compliance certificate and explains how the operating procedures of Frontier Communications Corporation and its subsidiaries, which are telecommunications carriers, ensure that the Company is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. §§ 64.2001-64.2011. The Frontier Communications Corporation subsidiaries that are telecommunications carriers generally do business under the name "Frontier Communications" and are identified, by name and by Form 499 Filer ID, in Attachment A hereto.

- Only authorized Frontier Communications employees can access CPNI. Company personnel so authorized, such as customer service representatives and billing and collection personnel, are trained regarding the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.
- Frontier Communications' managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness.
- Frontier Communications has implemented reasonable processes and procedures to discover and protect against attempts to gain unauthorized access to CPNI and provides training on these processes and procedures. Frontier Communications verifies a customer's identity and authenticates the customer as authorized on the account prior to disclosing CPNI based on a customer-initiated telephone contact, on-line account access, or a retail center visit.
- Frontier Communications has implemented supervisory review processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI is required under the Commission's CPNI rules.
- Frontier Communications employees involved in marketing are trained as to what information is CPNI and when it may be used to market services to customers.

All marketing campaigns that utilize CPNI are subject to supervisory approval and, where required, to verification of customer approval before CPNI is utilized. Records related to marketing campaigns that utilize CPNI are maintained for at least one year.

- Frontier Communications has implemented processes and procedures to prohibit the disclosure of CPNI to joint venture partners or independent contractors for the purpose of marketing communications-related services.
- Frontier Communications has implemented procedures to notify customers of their right to restrict access to, use of, and disclosure of their CPNI.
- Frontier Communications provides local and/or interexchange services to its customers. Frontier Communications uses CPNI without customer approval for: (1) the purposes of providing or marketing services to which that customer already subscribes, including the services and products enumerated in the FCC's rules as within its customers' total services; and (2) those purposes enumerated in Section 222(d) of the Communications Act. Except where use of CPNI is otherwise permitted without prior customer approval, Frontier Communications only uses CPNI to market additional communications-related services upon either obtaining customer opt-out approval, consistent with Section 64.2007 of the Commission's rules or obtaining "one-time" customer consent for inbound or outbound telephone calls for the duration of the call, consistent with Section 64.2008(f) of the Commission's rules. Frontier Communications does not presently access, use or disclose CPNI in a manner that requires "opt-in" approval.
- Frontier Communications does not allow access to or disclose CPNI online unless the customer provides Frontier Communications with a pre-established password.
- Frontier Communications has implemented processes and procedures to prevent the unauthorized release of customer call detail information. Frontier Communications will not release call detail information during a customer-initiated telephone call unless the customer provides Frontier Communications with a pre-established password. Frontier Communications, at the customer's request, will send call detail information to the customer's established address of record or contact the customer at the telephone number of record to disclose the call detail information. If a customer, during a customer-initiated telephone contact, is able to provide, without assistance from Frontier Communications personnel, all of the call detail information necessary to address a customer service issue, then Frontier Communications personnel are permitted to proceed with Frontier's routine customer care procedures in relation to that information only. Frontier Communications only releases call detail information to a customer during a retail center visit if the customer provides the pre-established password on the account or provides valid photo identification.

- Frontier Communications has implemented processes and procedures to notify customers immediately when: a password or back-up means of authentication for lost or forgotten passwords is created or changed; the account address of record is changed; an online account is established or changed; or the email address associated with the account is changes or a new address is added.
- Frontier Communications has implemented processes and procedures to first inform federal law enforcement agencies, followed up by notification to affected customers, after reasonable determination of a breach of its customers' CPNI in accordance with FCC rules.

**ATTACHMENT A - FRONTIER COMMUNICATIONS CORPORATION  
TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

<b>FILER ID #</b>	<b>COMPANY</b>
805302	Frontier Communications of Minnesota, Inc.
805782	Frontier Communications of Michigan, Inc.
805797	Frontier Communications of Illinois, Inc.
805851	Frontier Communications of Wisconsin LLC
805299	Frontier Communications of Iowa, Inc.
805857	Frontier Telephone of Rochester, Inc.
803939	Frontier Communications of America, Inc.
821046	Frontier Communications of Rochester, Inc.
805359	Frontier Communications of Alabama, LLC
805371	Frontier Communications of Fairmont LLC
805374	Frontier Communications of Mississippi LLC
805365	Frontier Communications of Georgia LLC
805368	Frontier Communications of Lamar County, LLC
805791	Frontier Communications of Pennsylvania, LLC
805776	Frontier Communications of Breezewood, LLC
805779	Frontier Communications of Canton, LLC
805806	Frontier Communications of Lakewood, LLC
805845	Frontier Communications of Sylvan Lake, Inc.
805830	Frontier Communications of Oswayo River, LLC
805773	Frontier Communications of AuSable Valley, Inc.
805839	Frontier Communications of Seneca-Gorham, Inc.
805794	Frontier Communications of New York, Inc.
805803	Frontier Communications of Lakeside, Inc.
805785	Frontier Communications of Indiana LLC
805788	Frontier Communications of DePue, Inc.
805842	Frontier Communications - St Croix LLC
805809	Frontier Communications - Midland, Inc.
805818	Frontier Communications of Mondovi LLC
805836	Frontier Communications – Schuyler, Inc.
805833	Frontier Communications – Prairie, Inc.

**ATTACHMENT A - FRONTIER COMMUNICATIONS CORPORATION  
TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

<b>FILER ID #</b>	<b>COMPANY</b>
803900	Frontier Communications Northwest Inc.
805827	Frontier Communications of Orion, Inc.
805821	Frontier Communications Mt Pulaski, Inc.
805854	Frontier Communications of Viroqua LLC
805848	Frontier Communications of Thorntown LLC
828347	Frontier Communications of the Carolinas Inc.
805362	Frontier Communications of the South, LLC
828346	Frontier Communications of the Southwest Inc.
828345	Frontier Communications Online and Long Distance Inc.
805070	Frontier Midstates Inc.
803870	Frontier North Inc.
803913	Frontier West Coast Inc.
806310	Frontier West Virginia Inc.
803993	Citizens Telecommunications Company of New York, Inc.
803996	Citizens Telecommunications Company of the White Mountains, Inc.
803995	Citizens Telecommunications Company of Montana
803931	Citizens Telecommunications Company of Tennessee L.L.C.
820800	Citizens Telecommunications Company Minnesota, LLC
805113	Citizens Telecommunications Company Nevada
802899	Citizens Utilities Rural Company, Inc.
805119	Citizens Telecommunications Company of the Golden State
820716	Citizens Telecommunications Company of Illinois
802893	Citizens Telecommunications Company California Inc.
802920	Ogden Telephone Company
803988	Citizens Telecommunications Company of Utah
805038	Citizens Telecommunications Company of West Virginia
803994	Citizens Telecommunications Company of Idaho
805137	Citizens Telecommunications Company Oregon
805131	Navajo Communications Company, Inc.

**ATTACHMENT A - FRONTIER COMMUNICATIONS CORPORATION  
TELECOMMUNICATIONS CARRIER SUBSIDIARIES**

<b>FILER ID #</b>	<b>COMPANY</b>
805107	Citizens Telecommunications Company of Tuolumne
805146	Citizens Telecommunications Company of the Volunteer State LLC
820718	Citizens Telecommunications Company of Nebraska
801954	Rhineland Telephone LLC
822888	CTE Telecom, LLC
805650	Commonwealth Telephone Company LLC
815558	CTSI, LLC
801390	Global Valley Networks, Inc.
826150	GVN Services

## ATTACHMENT B

Frontier Communications received the following allegations concerning the disclosure of CPNI to an individual not authorized to receive the information:

- A wholesale customer made a generalized assertion that Frontier technicians providing repair services to the wholesale customer's subscribers were improperly using the repair visits as an opportunity to sell Frontier products and services. The wholesale customer could not provide any concrete detail that Frontier could investigate for even a single incident where such activity allegedly took place. Frontier does not use such repair visits to sell Frontier products and services. In addition, our technicians are trained to only provide information on Frontier's products and services in response to a direct, unsolicited request for such information from the subscriber.
- A customer who asked Frontier to email her copies of her old bills reported that in addition to her records, the records of 13 unrelated accounts were also attached to the email. The email was generated by Frontier's account management system and inadvertently captured the additional accounts, which had recently been part of a system conversion. The inadvertent disclosure of unrelated account data was not a breach as defined in 47 C.F.R. § 2011(e). After learning of the system issue, the issue was promptly rectified and the automated email system was tested to confirm it was functioning properly. As a precaution, the customer service representative involved and other individuals responsible for escalated complaints were retrained on CPNI protections and procedures. Frontier supplemented its response to the FCC's request for information related to this customer on February 29, 2012 (11-C00355947-1).
- Frontier received an internal report that, in order to timely complete an assignment, a customer service representative requested assistance from a family member to review and identify discrepancies in a commercial customer's billing records. The customer service representative was formally reprimanded and retrained on Frontier's CPNI protections and procedures.
- In response a wholesale customer's requests for duplicate copies of its bills, the record files sent to the customer inadvertently included the records of other customers. The inclusion of other customer records was due to an administrative error. The employees mistakenly used a record request process that pulled all the files for a particular cycle rather than just those related only to the wholesale customer making the request. The two employees involved in the matter were coached as to the proper process for pulling duplicate bill records and, along with the rest of the team, were retrained on CPNI protections and procedures.
- A customer service representative sent a notice to two email addresses listed on an account. One email address belonged to a third party, not the customer, who called in to respond to the notice. The third party, also a Frontier customer, accurately provided some basic account information as was given the past due balance on the account. The customer service representative then realized she did not have the correct customer and did not provide any additional information to the caller. The employees involved were retrained on CPNI protections and procedures, including verification and authentication procedures.