



Federal Regulatory Affairs
2300 N St. NW, Suite 710 Washington DC 20037
www.Frontier.com

March 12, 2013

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

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

On March 8, 2013, Kathleen Q. Abernathy, Executive Vice President, External Affairs for Frontier Communications and the undersigned met with Michael Steffen, Legal Advisor to Chairman Genachowski, and Julie Veach, Chief, Wireline Competition Bureau. In the meeting Frontier urged the Commission to commit to the next round of Connect America Fund (“CAF”) Phase I funding and rapidly develop rules in accordance with the recently-filed joint proposals of Frontier and other price cap carriers (“Joint CAF Proposal”).¹ Acting now will ensure that price cap carriers can quickly commence deploying broadband to thousands of unserved locations across America in 2013 while the Commission finalizes Phase II of the CAF.

As part of the discussion Frontier explained the cost structures associated with its acceptance of Phase I support in 2012. Frontier also explained that it believes some of its service areas are being unnecessarily excluded from CAF funding because they show as “served” on the National Broadband Map by Wireless Internet Service Providers (“WISPs”) though broadband service is not actually available. Frontier’s statements were consistent with the WISP issues identified in the Joint CAF Proposal.² Finally, Frontier identified problems it has with using the 3 Mbps download/768 kbps upload speed tier on the National Broadband Map as a proxy for 4/1 service. This discussion was also consistent with the Joint CAF Proposal.³

Pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

¹ Comments of the United States Telecom Association, the Independent Telephone & Telecommunications Alliance, and the ABC Coalition, WC Docket No. 10-90 (filed January 28, 2013).

² *Id.* at 15-16.

³ *Id.* at 11-13.

Sincerely,

A handwritten signature in blue ink that reads "Michael Saperstein Jr." with a stylized flourish at the end.

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

cc: Michael Steffen
Julie Veach