

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
AT&T Inc.)	
)	
and)	
)	
Frontier Communications Corporation)	WC Docket No. 14-22
)	
Applications For Consent to Transfer of Control of)	
Domestic and International Authorizations Pursuant)	
to Section 214 of the Communications Act of 1934,)	
As Amended, and Associated Wireless Licenses)	

REPLY OF FRONTIER COMMUNICATIONS CORPORATION

No party has petitioned the Federal Communications Commission (“Commission”) to deny the above-captioned Applications. In light of the Applications’ uncontroversial nature, Frontier Communications Corporation (“Frontier”) respectfully requests that the Commission complete its review and grant the Applications as soon as possible.

Only one entity – the Communications Workers of America (“CWA”) – filed any comments at all.¹ CWA indicated that it opposes the Applications “at this time,” premised on its view that “[t]he Applicants have not provided the Commission with sufficient evidence to evaluate this transaction”² and that the Commission “must issue a detailed data request” addressing a host of topics.³ CWA is incorrect. The Commission’s Part 63 rules expressly

¹ Comments of Communications Workers of America, Applications Filed by Frontier Communications Corporation and AT&T Inc. for the Assignment or Transfer of Control of the Southern New England Telephone Company and SNET America, Inc. (WC Docket No. 14-22).

² *Id.* at 3.

³ *Id.* at 11-12.

prescribe what information is to be provided in Applications of the type at issue here, and the Applicants provided all of the required information. Among other things, the Applicants described in detail the authorizations and licenses they wish to transfer and provided extensive information regarding Frontier, AT&T Inc. (“AT&T”), the companies being sold, the post-transaction ownership structure Frontier envisions, and the numerous reasons that the transaction will advance the public interest and increase competition. Any additional information CWA seeks falls outside the scope of what the Commission asks Applicants to provide. CWA’s claim that the Commission lacks “sufficient evidence to evaluate this transaction” is wrong, as evidenced by the fact that no other entity seems to have shared CWA’s difficulty in assessing the Applications.

In any case, to facilitate the Commission’s review and approval of the Applications, Frontier hereby places into the record the direct testimony of the following individuals that Frontier submitted to the Connecticut Public Utilities Regulatory Authority (“PURA”) the same day that CWA filed its comments here:

- Kathleen Quinn Abernathy, Executive Vice President – External Affairs⁴
- Ken Mason, Vice President – Business Operations⁵
- Robert W. Starr, Senior Vice President and Treasurer⁶

⁴ Prepared Direct Testimony of Kathleen Quinn Abernathy, Executive Vice President – External Affairs, State of Connecticut Public Utilities Regulatory Authority, Docket No. 14-01-46 (Mar. 13, 2014) (“Abernathy Testimony”), appended hereto as Exhibit 1.

⁵ Prepared Direct Testimony of Ken Mason, Vice President – Business Operations, State of Connecticut Public Utilities Regulatory Authority, Docket No. 14-01-46 (Mar. 13, 2014) (“Mason Testimony”), appended hereto as Exhibit 2.

⁶ Prepared Direct Testimony of Robert W. Starr, Senior Vice President and Treasurer, State of Connecticut Public Utilities Regulatory Authority, Docket No. 14-01-46 (Mar. 13, 2014) (“Starr Testimony”), appended hereto as Exhibit 3.

These materials provide additional information on many of the issues CWA mentions, including for example, Frontier's managerial, technical, and financial ability to step into AT&T's shoes in the relevant markets⁷ and the transaction's likely effect on employment.⁸

Of course, if the Commission believes that more information is needed for it to complete its review, Frontier is willing to provide such information, subject to appropriate confidentiality protections. However, Frontier asks that the Commission make any such requests soon, to facilitate swift approval of these Applications.

Frontier respectfully requests that the Commission grant the Applications.

Respectfully submitted,

By: FRONTIER COMMUNICATIONS
CORPORATION

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⁷ See, e.g., Abernathy Testimony at 5-13, 16-21; Mason Testimony at 6-18, Starr Testimony at 3-11.

⁸ See Abernathy Testimony at 13-16.