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April 16, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

Re: *Connect America Fund*; WC Dkt No. 10-90

Dear Ms. Dortch:

On April 14, 2014, Kathleen Q. Abernathy, Executive Vice President, External Affairs, Frontier Communications, and I met with Commissioner Pai and Nick Degani, Legal Advisor, Wireline, to Commissioner Pai, to discuss potential changes to Phase II of the Connect America Fund (“CAF”).

Frontier used the attached document to explain its positions in the meeting. Frontier is committed to deploying broadband in rural America. Frontier is utilizing the CAF Phase I funding that the Commission made available in 2012 and 2013 to expand rural broadband by 194,000 locations. We have looked forward to CAF Phase II’s explicit support mechanisms as the final piece of the puzzle that would allow us to expand our rural broadband capabilities.

The Commission is currently circulating an item that may make changes to CAF Phase II.¹ Consistent with the recent USTelcom ex parte filed in this docket,² Frontier emphasized that if the Commission is considering increasing the CAF Phase II obligations then it must also consider adjusting other terms of support. Such adjustments could include increasing the length of the funding term, and adjusting the level of broadband necessary for an area to be considered “served” by an unsubsidized competitor to match the CAF Phase II service obligations. Frontier also discussed the difficulty of deploying a higher-speed service to every CAF Phase II location.

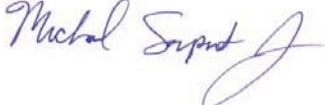
Pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

¹ See FCC Announces Tentative Agenda for April Open Meeting (rel. Apr. 2, 2014), **Connect America Fund; Universal Service Reform - Mobility Fund**: The Commission will consider a Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, and Seventh Order on Reconsideration taking significant steps to continue the implementation of the landmark reforms adopted in the 2011 USF/ICC Transformation Order to modernize universal service for the 21st century. An accompanying Further Notice of Proposed Rulemaking proposes measures to update and further implement the framework adopted by the Commission in 2011.

² Letter from David Cohen, USTelecom, to Marlene H. Dortch, FCC, WC Dkt. No. 10-90 (filed Apr. 10, 2014).

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Sincerely,

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

Michael D. Saperstein, Jr.

Cc: Commissioner Ajit Pai
Nick Degani