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Government & External Affairs  
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Rochester, NY 14646

April 15, 2009

COMMISSION  
CLERK

Ann Cole, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Frontier Communications of the South, LLC  
Study Area Code: 210318  
47 USC 254(e); 47 CFR § 54.314  
Docket No. 010977-TL

Dear Ms. Cole:

This letter is to request that the Florida Public Service Commission notify the Federal Universal Fund Administrator and the Federal Communications Commission that Frontier Communications of the South, LLC ("Frontier") is eligible to receive federal high-cost support in accordance with the above-referenced statute, federal rule and docket.

The amount of federal high-cost support Frontier will receive in 2010 will continue to be used for the services and functionalities outlined in 47 C.F.R. §54.101(a) and, as the attached affidavit shows, Frontier certifies that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and service for which such support is intended.

This state certification for federal support will be an annual process. In order to receive federal support beginning January 1 of each year, the Florida Public Service Commission must file its annual certification on or before October 1 of the year before.

Frontier respectfully requests that the Commission notify the FCC prior to October 1 of this year that Frontier is eligible to receive federal high-cost support for 2010.

Sincerely,

Deborah Fasciano  
Sr. Analyst - Regulatory Compliance

CC: Beth Salak  
Director, Competitive Markets & Enforcement  
Florida Public Service Commission

Enclosure

DOCUMENT NUMBER-DATE

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**AFFIDAVIT**

STATE OF NEW YORK  
COUNTY OF MONROE

BEFORE ME, the undersigned authority, appeared Gregg C. Sayre, who deposed and said:

1. My name is Gregg Sayre. I am Assistant Secretary of Frontier Communications of the South, LLC ("Frontier" or the "Company"). As an officer of the Company, I am authorized to give this affidavit on behalf of the Company. This affidavit is being given to support the Florida Public Service Commission's certification as contemplated in 47 C.F.R. §54.314. Please refer to Docket No. 010977-TL.
2. Frontier hereby certifies that it will only use the federal high-cost support it receives during 2010 for the provision, maintenance and upgrading of facilities and service for which such support is intended.
3. Frontier Communications of The South currently holds ETC status and is an ILEC offering a ubiquitous network throughout the service area. The FCC has clarified that, for the ETCs that it designates, the "service quality improvements in the five-year plan do not necessarily require additional construction of network facilities." *FCC 05-46*, ¶ 23. In such situations, the FCC has stated that the ETC Applicant may provide "an explanation of why service improvements in a particular wire center are not needed and how funding will otherwise be used to further the provision of supported services in that area." *FCC 05-46*, ¶ 23.

Because Frontier Communications of The South has coverage throughout the service area, the company will continue to use USF support to maintain its existing network, rather than to construct additional facilities to expand the coverage area. The company will replace and upgrade facilities and equipment on an "as needed" basis and for this reason, providing projected start and completion dates for projects, and specific geographic locations of such projects, is very difficult.

Frontier has submitted via annual NECA filings, the supporting documentation on network improvements and expenditures in support of our universal service filing and refer to this in lieu of formal network plans.

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4. Frontier experienced two outages that lasted more than 30 minutes and affected more than ten percent of the end users in its service area.
  - a. Date and Time of Outage – August 6, 2008 at 1:20 pm CT to 1:52 pm CT (32 minutes)
  - b. Cause – Local forces were in process of moving fiber due to road construction in area.
  - c. Services Affected – toll isolation
  - d. Site – Molino-RNS
  - e. Steps Taken – Fiber was moved and spliced
  - f. Customers affected – 3,750  
  - a. Date and Time of Outage – December 21, 2008 at 10:55 am CT to 3:01 pm CT (4:06 hrs)
  - b. Cause – SS7 links were riding over a bad fiber
  - c. Services Affected – Toll isolation
  - d. Site – Molino RNS & Remotes
  - e. Steps Taken – bad fiber was swapped between nodes to a spare fiber
  - f. Customers affected – 2,196
5. Frontier did not have any requests for service that were unfulfilled in 2008.
6. Frontier certifies that during 2008 Frontier received two complaints. The rate of troubles per 1,000 access lines was 0.55.
7. Frontier certifies that the company is complying with applicable service quality standards and consumer protection rules.
8. Frontier hereby certifies that it is able to function in emergency situations.
9. Frontier is the incumbent LEC in the relevant exchange area and offers a tariffed local flat rate plan and provides equal access to long distance carriers.

FURTHER AFFIANT SAYETH NOT.



Gregg C. Sayre

Assistant Secretary  
Frontier Communications of the South, LLC

STATE OF NEW YORK  
COUNTY OF MONROE

Acknowledged before me this 15th day of April 2009 by Gregg C. Sayre, as Assistant Secretary for Frontier Communications of the South, LLC, who is personally known to me or produced identification and who did take an oath.

*Holly M. James*

NOTARY PUBLIC

HOLLY M. JAMES  
Notary Public, State of New York  
Qualified in Monroe County  
My Commission Expires Nov. 30, 2010

Printed Name of Notary

Personally Known X

Produced Identification \_\_\_\_\_

Type of Identification Produced \_\_\_\_\_

DOCUMENT NUMBER - DATE

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