



Government & External Affairs  
180 S. Clinton Ave.  
5th Floor  
Rochester, NY 14646

April 21, 2010

Beth Salak  
Director  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
10 APR 23 PM 4: 26  
COMMISSION  
CLERK

Re: Frontier Communications of the South, LLC  
Study Area Code: 210318  
47 CFR § 54.314  
Order No. PSC-05-0824-FOF-TL  
Docket No. 010977-TL

Dear Ms. Salak:

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 2011 will continue to be used for the services and functionalities outlined in 47 C.F.R. §54.314 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 2011.

Sincerely,

Deborah Fasciano  
Sr. Analyst – Regulatory Compliance

CC: Ann Cole  
Commission Clerk  
Florida Public Service Commission

Enclosure

DOCUMENT NO. DATE  
03216-104/23/10  
FPSC - COMMISSION CLERK

## AFFIDAVIT

STATE OF NEW YORK  
COUNTY OF MONROE

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

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.

Frontier hereby certifies that it will only use the federal high-cost support it receives during 2011 for the provision, maintenance and upgrading of facilities and service for which such support is intended.

1. 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.

2. 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 12, 2009 at 15:15 CT to 17:11 CT (1:20 hours)
  - b. Cause – The online Line Switch Controllers (LSC) database became corrupt due to storms in the area.
  - c. Services Affected – Dial Tone
  - d. Site – Molino-RNS 1
  - e. Steps Taken – The online LSC was reloaded to clear the database corruption.
  - f. Customers affected – 447
  
- a. Date and Time of Outage – November 12, 2009 at 3:36 CT to 5:08 CT (1:32 hrs)
- b. Cause – Both Communication Buffer Controller's (CBC) failed.
- c. Services Affected – Dial Tone
- d. Site – Molino RNS & Remotes
- e. Steps Taken – The Maintenance Processor (MP) was manually rebooted causing a reload of the CBC's.
- f. Customers affected – 1,984
  
3. Frontier did not have any requests for service that were unfulfilled in 2009.
  
4. Frontier certifies that during 2009 Frontier did not receive any complaints. The rate of troubles per 1,000 access lines was 0.00.
  
5. Frontier certifies that the company is complying with applicable service quality standards and consumer protection rules, in accordance with Florida Statutes and the Florida Administrative Code.
  
6. Frontier hereby certifies that it is able to function in emergency situations.
  
7. Frontier is the incumbent LEC in the relevant exchange area and offers a tariffed local flat rate plan.
  
8. Frontier provides equal access to long distance carriers within its service area.

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 21st day of April 2010 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 \_\_\_\_\_