



A CITIZENS COMMUNICATIONS COMPANY

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11 MAY 20 AM 10:05

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

May 18, 2011

COMMISSION
CLERK

110134-TL

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

Re: Frontier Communications of the South, LLC
Study Area Code: 210318
47 CFR § 54.314
Order No. PSC-05-0824-FOF-TL
Docket No. 110134-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 2012 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 2012.

Sincerely,

Deborah Fasciano
Sr. Analyst - Regulatory Compliance

CC: Ann Cole
Commission Clerk
Florida Public Service Commission

Enclosure

11 MAY 20 AM 9:52

RECEIVED IN DOCUMENT NUMBER-DATE

03529 MAY 20 =

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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:

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. 110134-TL.

Frontier hereby certifies that it will only use the federal high-cost support it receives during 2012 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.

DOCUMENT NUMBER-DATE

03529 MAY 20 =

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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 8, 2010 at 11:37 CT to 12:30 CT (53 minutes)
 - b. Cause – The office received a TS1 sync loss that sent the switch from a duplex to a simplex condition with A side CP online. The switch then had an unknown error on the A side that caused the CP sides to switch. Because of the precious error, the B side was not running which dropped the switch to a no service condition.
 - c. Services Affected – Dial Tone
 - d. Site – Molino-RNS 1
 - e. Steps Taken – The cause of the unknown error was one of the communications buffer cards, which was replaced and spares were ordered.
 - f. Customers affected – 1,293

- a. Date and Time of Outage – March 22, 2011 at 14:30 CT to March 23, 2011 at 10:50 CT (20:20 hrs)
- b. Cause – CISCO 15454 fiber terminal went out of service for unknown reasons.
- c. Services Affected – Toll Isolation
- d. Site – Molino RNS & Remotes
- e. Steps Taken – Problem was determined to be in the fiber MUX. Cisco vendor support was called in and was able to reset and restore the system, which restored the SS7 links. Frontier is working on an upgrade plan to replace the current configuration.
- f. Customers affected – 2,220

3. Frontier did not have any requests for service that were unfulfilled from March 1, 2010 through March 1, 2011.

4. Frontier certifies that for the period from March 1, 2010 through March 1, 2011 Frontier had two complaints. The rate of troubles per 1,000 access lines was 0.64.

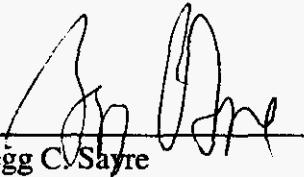
5. Frontier certifies that the company is complying with applicable service quality standards and consumer protection rules, in accordance with Florida Statutes and the Florida Administrative Code.

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.

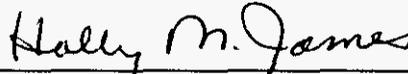
FURTHER AFFLIANT SAYETH NOT.



Gregg C. Sayre
Assistant Secretary
Frontier Communications of the South, LLC

STATE OF NEW YORK
COUNTY OF MONROE

Acknowledged before me this 18th day of May 2011 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.



NOTARY PUBLIC
HOLLY M. JAMES
Notary Public, State of New York
Qualified in Monroe County
Registration No. 01JA4805438
My Commission Expires Nov. 30, 2014

Printed Name of Notary

Personally Known X
Produced Identification _____
Type of Identification Produced _____