

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

July 13, 2018

BY ELECTRONIC FILING

Ms. Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No. 20180000-OT [UNDOCKETED] – Frontier Communications Corporation
Internal Restructuring Impacting Frontier Florida LLC.**

Dear Ms. Stauffer:

As the Commission is aware, on February 5, 2015, Frontier Communications Corporation (herein also referred to as "Frontier Corp.") and Verizon Communications, Inc. ("Verizon Inc.") entered into a Securities Purchase Agreement ("Agreement"). As set forth in their application to the FCC, prior to closing, Verizon created "Newco" as a wholly-owned subsidiary and the ownership interests of Verizon's operating subsidiaries, Verizon California Inc., Verizon Florida LLC, and GTE Southwest Incorporated d/b/a Verizon Southwest (together, the "Transferring Companies") were then moved to Newco so that they became wholly-owned, direct subsidiaries of Newco. Frontier Corp. then purchased all of the ownership interests of Newco. Upon completion of the proposed transaction, Newco became a wholly-owned, direct subsidiary of Frontier Corp., and, accordingly, the Transferring Companies became wholly-owned, indirect subsidiaries of Frontier Communications Corporation.¹ The transaction was approved by the FCC on September 15, 2015, in WC Docket No. 15-44. Consistent with the change of ownership consummated on April 1, 2016, the Articles of Incorporation on file with the Florida Department of State/Division of Corporations for Verizon Florida LLC were amended on April 6, 2016, to reflect the new name of the former Verizon entity – Frontier Florida LLC. Consistent with the change on the Articles of Incorporation, the name on Certificate Nos. 31 and 8033 were changed to Frontier Florida LLC.

¹ Frontier Corp. also operates in Florida through its subsidiaries, Frontier Communications of the South, LLC and Frontier Communications of America, Inc., holders of Certificate Nos. 5 and 7599, respectively.

Ms. Carlotta Stauffer, Clerk

July 13, 2018

Page 2

On June 22, 2018, Frontier undertook an internal corporate restructuring in which Frontier Florida LLC became a direct wholly-owned subsidiary of Frontier Communications Corporation, as opposed to an indirect wholly-owned subsidiary. Specifically, prior to the restructuring, Frontier Florida was a direct wholly-owned subsidiary of Newco West Holdings LLC (“Newco West”), which in turn was a direct wholly-owned subsidiary of Frontier. As a consequence of the restructuring, Newco West is no longer an intermediate holding company between Frontier Communications and Frontier Florida. The restructuring did not change the ultimate ownership or control of the Florida certificates, which remain with Frontier Florida LLC; thus, the transfer of control was *pro forma* in nature and will be entirely transparent to existing Frontier Florida LLC customers.

As always, if you have any questions in this regard, please do not hesitate to contact me.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

BK

cc: Cayce Hinton, Director (FPSC/Industry Development and Market Analysis)