



7979 N. Belt Line Rd  
Irving, Texas 75063

Phone 972-908-4415  
Email: [kimberly.a.douglass@ftr.com](mailto:kimberly.a.douglass@ftr.com)

September 20, 2019

Mr. Steven V. King  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Received  
Records Management  
09/20/19 13:07  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Docket UT-190004 - Annual Reporting Requirements for High – Cost Recipients Pursuant to 47 C.F.R. § 51.915 (d) (3) and 47 C.F.R. §54.304(c) (1)

Dear Mr. King:

The Federal Communications Commission’s (“FCC”) November 18, 2011 USF/ICC Transformation Order, FCC 11-161 (WC Docket No. 10-90) requires carriers seeking to obtain recovery through the federal mechanisms established in that Order to make certain certifications to the FCC and to state commissions regarding their eligibility for, and their compliance with the rules applicable to, such recovery.

Specifically, 47 C.F.R. §51.915(d)(3) requires Price Cap Carriers to certify annually to the FCC and to relevant state commissions that the carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the federal recovery mechanisms. In compliance with that requirement, Frontier Communications Corporation (Frontier Communications) hereby submits a copy of the certification that was filed with the Federal Communications Commission on September 16, 2019. Please refer to Attachment “A”.

The FCC’s November 18, 2011 USF/ICC Transformation Order, FCC 11-161 (WC Docket No. 10-90) also requires price cap carriers seeking CAF ICC support to file data establishing the amount of the price cap carrier’s eligible CAF ICC funding per 47 C.F.R. §54.304(c)(1). Please refer to Attachment “B” for Frontier Communications anticipated CAF ICC support and Access Recovery Charge Revenue amounts submitted with its Annual 2019 Access Tariff Filing.

If you have any questions, please call me at 972-908-4415 or email me at [kimberly.a.douglass@ftr.com](mailto:kimberly.a.douglass@ftr.com).

Sincerely,

Kim Douglass  
Manager  
Compliance – Regulatory Affairs

Enclosures  
cc: Jessica Epley

# ATTACHMENT A

CERTIFICATION

I am Senior Vice President, Regulatory Affairs for Frontier Communications Corporation. I hereby certify that I have overall responsibility for the preparation of all data for Frontier Telephone Companies which supports the 4Q19 Exogenous Tariff Filing and that I am authorized to execute this certification. Based on the information provided to me by employees responsible for the preparation of, or for the supervision of the preparation of, the data submitted in support of the rates contained in the proposed tariffs, I hereby certify that all data have been examined and reviewed and are true, correct, and complete.

I also certify that Frontier Communications Corporation and its price cap regulated subsidiaries are not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism described in §51.915 and have complied with §§51.915(d) and (e) of the Federal Communications Commission's rules, but are not eligible to receive the CAF ICC support pursuant to §51.915(f) of the Commission's rules because all of Frontier's Eligible Recovery can be recovered through charges assessed pursuant to §51.915(e) as of July 2, 2019.



Date: September 16, 2019

Kenneth Mason  
Group Vice President, Regulatory Affairs

# ATTACHMENT B

Frontier Communications Corporation  
Summary - 10/1/2019 FCC TRP Mid Year Filing  
Eligible Recovery, Tariffed ARC Revenue, ICC-CAF Support

<b>Holding Company Eligible Recovery</b>	<b>Holding Company Tariffed ARC Revenues</b>	<b>Holding Company ICC- CAF Support</b>
\$ 126,906,889	\$ 83,198,969	\$ -