Frontier Communications Northwest Inc.



1800 – 41st Street WA0105GC P. O. Box 1003 Everett, WA 98201-1003

July 29, 2011

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

Re: UT-090842 – Joint Application of Verizon Communications Inc. and Frontier Communications Corporation for an Order Declining to Assert Jurisdiction Over, or, in the Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.;

Notice - Operations Support Systems Integration Report

Dear Mr. Danner:

In compliance with its commitments under the Federal Communications Commission's (FCC's) May 21, 2010 Order approving the transfer of certain Verizon Communications operations to Frontier Communications Corporation, Frontier Communications Northwest Inc. ("Frontier") is submitting this Operations Support Systems Integration Report ("Integration Report") to the Washington Utilities and Transportation Commission ("Commission"). Specifically, Condition # 8 in Appendix C of the FCC's Order provides:

If, within three years after the Transaction Closing Date, Frontier plans to transition from any of the support systems transferred from Verizon to Frontier's legacy systems, or to any new systems, subject to appropriate confidentiality protections, Frontier will prepare and submit a detailed operations support system ("OSS") integration plan to the Wireline Competition Bureau, and the state commission of any affected state. . . . Frontier also will commit to provide this OSS integration plan to the Wireline Competition Bureau and commission of any affected state no less than 180 days prior to implementing the system transition, subject to appropriate confidentiality protections.

¹ Applications Filed by Frontier Communications Corp. and Verizon Communications Inc. For Assignment or Transfer of Control, Memorandum Opinion and Order, WC Docket 09-95, FCC 10-87 (Rel. May 21, 2010).

Frontier has prepared the attached Integration Report to fulfill this condition and in anticipation of the systems conversion in which Frontier will migrate customers located in Arizona, California, Idaho, Illinois, Nevada, Ohio, Oregon, Washington and Wisconsin from the Verizon-replicated OSS to the Frontier legacy OSS. Also, in accordance with Condition # 9 in the FCC's Order, Frontier is making this Integration Plan available to competitive local exchange carriers in its service territory to provide these carriers with an opportunity to review and provide input to Frontier regarding the Integration Plan.

In addition to the FCC conditions identified above, this filing also fulfills the requirement in Conditions #29 and 30, Appendix A in the Commission Order 06, Final Order Approving and Adopting, Subject To Conditions, Multiparty Settlement Agreements and Authorizing Transaction in Docket UT-090842 directing Frontier to prepare and submit a detailed operations support system integration plan to the Commission Staff at least 180 days prior to implementing the system transition.³ If the Commission has any questions regarding this informational submission, please contact me.

Very truly yours,

Helen Hall

Director Government Relations

Enclosures

Condition #30 in Appendix A provides... At least 180 days before transition... Frontier NW will file its proposed transition plan with the Commission and seek input from CLECs on any changes in functionality or e-bonding.

² Condition # 9 in Appendix C of the FCC's Order provides: "At least 180 days before transition of any of the support systems transferred from Verizon that support wholesale services to any other wholesale operations support systems, Frontier will file its proposed transition plan with the Commission, as described in Commitment 8, above and seek input from CLECs on any changes in wholesale functionality or e-bonding."

³ Condition # 29 in Appendix A of the Commission's Order provides: If, within three years after the closing of the proposed transaction, Frontier NW plans to transition from any of the Verizon support systems to Frontier's legacy systems, or to any new systems, Frontier will prepare and submit a detailed operations support system ("OSS") integration plan to the Commission Staff. Frontier NW's Integration plan will describe the operations support system to be replaced, the surviving operations support system, and why the change is being made. . . . Frontier NW will also commit to provide this operation support system integration plan to the Staff no less than 180 days prior to implementing the system transition