



August 18, 2011

VIA U. S. MAIL and Web Portal

Mr. David Danner  
Secretary and Executive Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

**Re: UT-090842 – Petition of Frontier Communications Northwest Inc. For Approval Of Release Of Funds From Broadband Escrow Account Through July 31, 2011**

Dear Mr. Danner:

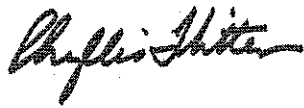
In Commission Order 06, Final Order Approving and Adopting, Subject To Conditions, Multiparty Settlement Agreements and Authorizing Transaction in Docket UT-090842 the Commission required Frontier to expend \$40 million on broadband deployment by December 31, 2014. On August 24, 2010 Frontier filed a fully executed copy of the Escrow Agreement with the Commission establishing a \$40 million escrow account under which funds could be released upon Commission approval. In the Settlement Agreement contained in Appendix A to Order 06 referenced above, Condition 13, page 3 provides that "Frontier NW may petition the Commission quarterly for reimbursement of expenditures incurred for broadband projects that have been completed and placed into service. ...the Commission will use its best efforts to approve the release of funds from the Account to Frontier NW within thirty (30) days from the date of the filing seeking reimbursement." Please find attached Frontier's Second Request for Reimbursement of Escrow Funds seeking approval of release of funds from the broadband escrow account, for expenditures from February 2011 through July 31, 2011.

Frontier requests expeditious approval of its First Request, filed May 2, 2011, as well as this Second Request.

In conjunction with the First Request for Reimbursement, Staff has requested a certification to assist in its review. This certification is not required for this filing under statute, rule or order in the docket, however, as an accommodation to the Staff, Attachment A is provided as the company's certification, in addition to the formal verification of the Request provided by our counsel's signature on the filing. Attachment B contains detail regarding Frontier's expenditures for broadband expansion, marked Highly Confidential per Protective Order in Docket No. UT-090842. In reviewing the First Request, Staff asked for an indicator of line number to assist them in requesting supporting documentation. This column has been added to the format. At Staff's request, we have also added columns to indicate amounts previously requested, amounts currently requested, and an indicator of when a project is considered "final." Also attached is a Public redacted version in accordance with the above-referenced docket. The attached Notice of Filing is being provided to all parties under the Certificate of Service, as suggested by Staff Counsel.

If there are questions regarding this filing, please contact me at the number below, or Helen Hall at 425-261-5844 or helen.hall@ftr.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Phyllis Whitten". The signature is fluid and cursive, with the first name being more prominent.

Phyllis Whitten  
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Attachments