



July 23, 2014

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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

**Re: Frontier Communications Northwest Inc. - Eligible Telecommunications Carriers'
Annual Recertification on High Cost Fund Pursuant to WAC 480-123-060, 070 and
080**

Dear Mr. King:

Enclosed for filing is Frontier Communications Northwest Inc.'s 2014 ETC Annual Recertification on High Cost Fund pursuant to WAC 480-123-060, 070 and 080. The Company considers financial information submitted with this filing confidential and protected under the provisions of WAC 480-07-160. These items are marked "Confidential per WAC 480-07-160". The Company, for commercial reasons, may be harmed if this information is not treated by the Commission as confidential. A confidential and redacted copy of the filing is enclosed.

Pursuant to WAC 480-123-060, Frontier provides a certification in the enclosed that it will use all federal high-cost support received for the provision, maintenance, and upgrading of facilities and services for which the support is intended. With this filing, Frontier requests the Washington Utilities and Transportation Commission provide appropriate certification to the Federal Communications Commission ("FCC") of Frontier's use of federal high cost support in accordance with applicable federal law.

If you have any questions concerning this report, please call me at 972-908-4415.

Sincerely,

A handwritten signature in black ink that reads "Kim Douglass". The signature is written in a cursive style with a long horizontal flourish at the end.

Kim Douglass
Manager - Regulatory Affairs

Enclosures

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

Frontier Communications Northwest Inc. (“Frontier” or the “Company”) submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

Report No. 1

WAC 480-123-070(1)(a) & (b) – Report on Use of Federal Funds and Benefits to Customers:

In 2013 Frontier in Washington received the following federal high cost support:

Frozen High Cost Support (FHCS)	\$11,432,424.00
Connect America Fund Intercarrier Compensation (ICC)	<u>\$243,732.00</u>
Total	<u>\$11,676,156.00</u>

These funds, along with other revenues, enabled the Company to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. Examples of the amount of investments made and expenses incurred by the Company in 2013 are:

- 1) Property, Plant & Equipment - *** ***** **
- 2) Plant Specific Expense - *** ***** **
- 3) Depreciation Expense - *** ***** **

These investments and expenditures generally benefit all customers receiving the federal high cost supported services from the Company within its designated service area.

REDACTED

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

Report No. 2

WAC 480-123-070(4) – Report on Complaints per One Thousand Lines:

Frontier reports that it is aware of 43 complaints made during 2013 to the Federal Communications Commission (“FCC”) and 111 complaints to the Washington Attorney General (“AG”). This corresponds to a number of complaints per 1,000 lines of approximately 0.06.

Of the 43 FCC complaints, 34 were related to services supported by federal high cost support. Of those 34, 22 involved billing issues and were resolved with explanations to the customer and billing adjustments where appropriate. One complaint involved provisioning-type issues, including multiple attempts or visits required for installation or repair and missed appointments. Five complaints were related to Public Relations, specifically, difficulty reaching a company representative, representative misinformation or general questions. Six complaints were about porting of local telephone service. The majority of the complaints were resolved with the customer satisfied.

The remaining 9 FCC complaints were not related to federal high cost supported services and dealt with data services, long distance and satellite TV.

Of the 111 AG complaints, 78 were related to federal high cost supported services. Sixty-three of the complaints concerned billing issues. All were resolved, where appropriate, with explanations to the customers and billing adjustments. Five complaints were related to Public Relations, specifically, difficulty reaching a company representative, representative misinformation or general questions. Ten complaints were related to installation or repair issues, solicitation, service not available and porting issues.

The remaining 33 AG complaints were not related to federal high cost supported services and dealt with DSL service, FiOS Data and Video, other carriers’ bills, satellite TV and long distance service. The majority of the complaints were resolved by making adjustments to the customer’s account when a credit was due.

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

Report No. 3

WAC 480-123-070(5) – Certification of Compliance with Applicable Service Quality Standards;

WAC 480-123-070(6) – Certification of Ability to Function in Emergency Situations:

See attached affidavits.

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

Report No. 4

WAC 480-123-070(7) – Advertising Certification:

See attached affidavit.

**WASHINGTON ETC REPORTS AS REQUIRED BY
WAC 480-123-070 AND WAC 480-123-080**

Report No. 5

WAC 480-123-080(1)(a) and (2) – Annual Plan for Universal Service Support Expenditures:

For 2015, the Company will use any federal high-cost support and other revenues to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. The nature and magnitude of its investments and expenditures are anticipated to be similar to those for the prior period. They are expected to benefit customers generally by helping enable the Company to continue to provide good quality supported services.

**CERTIFICATION OF SERVICE QUALITY STANDARDS AND EMERGENCY
FUNCTIONALITY AS REQUIRED BY WAC 480-123-070 (5) AND (6)**

In compliance with Washington Administrative Code (WAC) 480-123-070 (5) and (6) I certify the following:

- 1) That during the 2013 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h); and
- 2) That during the 2013 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

6/19/14

(Date and Place)



(Signature)

Kenneth Mason

(Printed Name)

Vice President

(Title)

CERTIFICATION OF TELEPHONE ASSISTANCE PROGRAM & INDIAN RESERVATION ADVERTISING AS REQUIRED BY WAC 480-123-070 (7)

In compliance with Washington Administrative Code (WAC) 480-123-070 (7) I certify the following:

- 1) That during the 2013 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the Company's designated ETC service area and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

6/19/14

(Date and Place)



(Signature)

Kenneth Mason

(Printed Name)

Vice President

(Title)

CERTIFICATION OF ELIGIBLE TELECOMMUNICATIONS CARRIER
REQUIRED BY WAC 480-123-060 (1)


In compliance with Washington Administrative Code (WAC) 480-123-060 (1), I certify to the Washington Utilities and Transportation Commission ("Commission") for use by the Commission in providing the certification to the Federal Communications Commission and the Universal Service Administrative Company required by 47 C.F.R. §54.314 as follows:

- 1) That all federal high-cost support received by Frontier Communications Northwest Inc. was used in 2013 and will be used in 2015 only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

6/19/14

(Date and Place)



(Signature)

Kenneth Mason

(Printed Name)

Vice President

(Title)