



July 31, 2012

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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: Frontier Communications Northwest Inc. 2012 ETC Certification Filing as  
Required by WAC 480-123-070 and WAC 480-123-080**

Dear Mr. Danner:

Enclosed for filing is Frontier Communications Northwest Inc.'s 2012 ETC Certification Filing as Required by WAC 480-123-070 and WAC 480-123-080. 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.

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" with a long horizontal flourish extending to the right.

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 2011 Frontier in Washington received only Interstate Access Support (“IAS”), in the amount of \$11,148,702. 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 2011 are:

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

These investments and expenditures generally benefit all customers receiving the IAS 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 62 complaints made during 2011 to the Federal Communications Commission (“FCC”) and 139 complaints to the Washington Attorney General (“AG”). This corresponds to a number of complaints per 1,000 lines of approximately 0.39.

Of the 62 FCC complaints, 42 were related to services supported by IAS. Twenty-six involved billing issues and were resolved with explanations to the customer and with billing adjustments where appropriate. Eight complaints 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, requests to be added to the company’s “Do Not Call” list, representative misinformation or general questions. Two complaints were about porting of local telephone service. The majority of the complaints were resolved with the customer satisfied.

The remaining 20 FCC complaints were not related to IAS supported services and dealt with satellite TV, FiOS Data and Video, DSL service, long distance service, wireless, and other carriers’ bills. The majority of the complaints were resolved by making adjustments to the customer’s account when a credit was due.

Of the 139 AG complaints, 108 were related to IAS supported services. Seventy-five of the complaints concerned billing issues. All were resolved, where appropriate, with explanations to the customers and billing adjustments. Complaints were related to miscellaneous issues, such as collection activity, pricing disputes, bill format, termination fees, long distance charges, or payment processing. Twenty-two complaints were regarding installation or repair issues, including dissatisfaction with the assigned installation date, intermittent disconnects, delayed installation or repair, and porting issues.

The remaining 31 AG complaints were not related to services supported by IAS and dealt with DSL service, FiOS Data and Video, other carriers’ bills, wireless, satellite TV, inside wire 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 affidavit.

**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:**

From October 2012 through September 2013, the Company will use any Connect America Fund (“CAF”) Support funds 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.

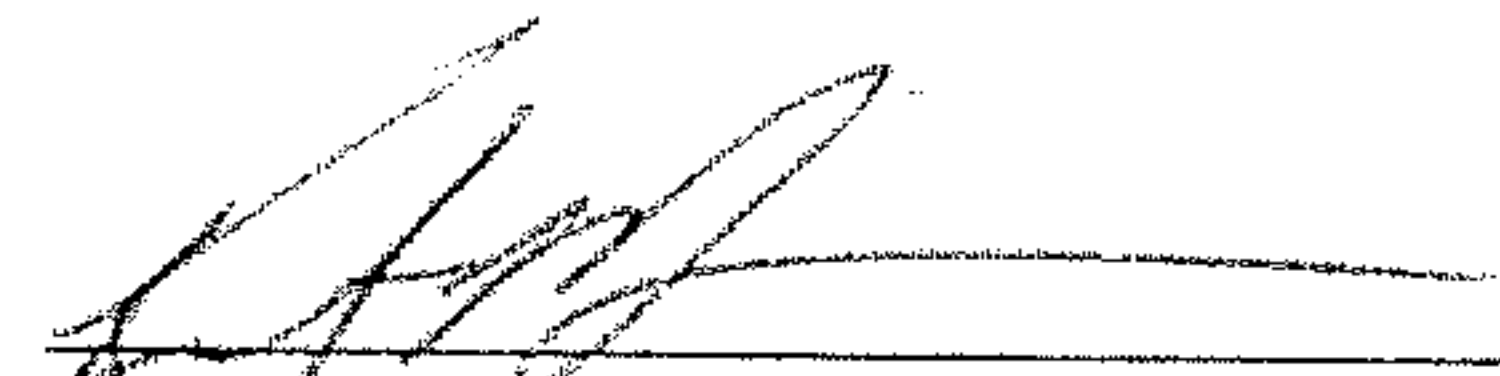
**CERTIFICATION OF SERVICE QUALITY STANDARDS AND EMERGENCY  
FUNCTIONALITY AS REQUIRED BY WAC 480-123-070 (5) AND (6)**

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

- 1) That during the 2011 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h); and
- 2) That during the 2011 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.

7/18/12 Rochester, NY  
(Date and Place)

  
\_\_\_\_\_  
(Signature)

Kenneth Mason  
\_\_\_\_\_  
(Printed Name)

Vice President  
\_\_\_\_\_  
(Title)

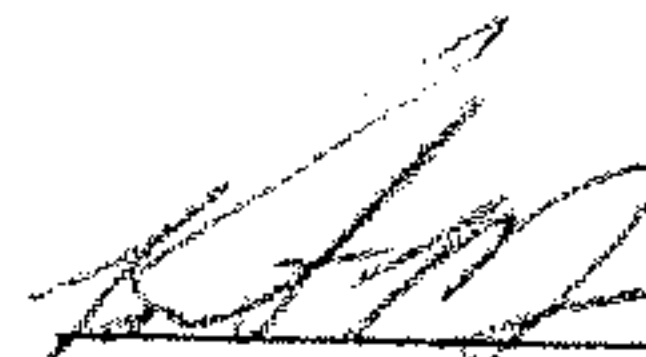
CERTIFICATION OF TELEPHONE ASSISTANCE PROGRAM & INDIAN  
RESERVATION ADVERTISING AS REQUIRED BY WAC 480-123-070 (7)

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

- 1) That during the 2011 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.

7/18/12 Rochester, NY  
(Date and Place)

  
(Signature)

Kenneth Mason  
(Printed Name)

Vice President  
(Title)