



July 31, 2013

805 Central Expressway South  
Suite 200  
Allen, Texas 75013

Phone 972-908-4415  
Fax 214-383-2737  
Email: [kimberly.a.douglass@ftr.com](mailto:kimberly.a.douglass@ftr.com)

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. 2013 ETC Certification Filing**

Dear Mr. King:

Enclosed for filing is Frontier Communications Northwest Inc.'s 2013 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.

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 ("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 line 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 the past, Frontier would have provided a copy of the Universal Service Fund (USF) Data Collection Forms for High Cost Loop calculations to NECA for its Washington study areas. Due to recent changes adopted in the FCC’s comprehensive order released November 18, 2011<sup>1</sup>, price cap carriers and their rate-of-return affiliates are no longer required to perform cost studies for the purpose of calculating high cost loop or local switching support. Therefore, Frontier did not submit a 2012 USF Data Collection Form to NECA.

In 2012 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>\$53,514.00</u>
Total	\$11,485,938.00

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 2012 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**

---

<sup>1</sup> See Connect America Fund, et. Al, W.C. Docket No. 10-90 et al. Report and Order and Further Notice of Proposed Rulemaking FCC 11-161 (Rel. November 18, 2011).

**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 85 complaints made during 2012 to the Federal Communications Commission (“FCC”) and 105 complaints to the Washington Attorney General (“AG”). This corresponds to a number of complaints per 1,000 lines of approximately 0.04.

Of the 85 FCC complaints, 77 were related to services supported by federal high cost support. Forty involved billing issues and were resolved with explanations to the customer and with billing adjustments where appropriate. Seven complaints involved provisioning-type issues, including multiple attempts or visits required for installation or repair and missed appointments. Twenty 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. Nine complaints were about porting of local telephone service. Two complaints were about slamming and/or cramming. The majority of the complaints were resolved with the customer satisfied.

The remaining 8 FCC complaints were not related to federal high cost 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 105 AG complaints, 86 were related to federal high cost supported services. Sixty-nine of the complaints concerned billing issues. All were resolved, where appropriate, with explanations to the customers and billing adjustments. Twelve 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. Five 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 19 AG complaints were not related to federal high cost supported services and dealt with DSL service, FiOS Data and Video, other carriers’ bills, wireless, 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 2014, 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 2012 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h); and
- 2) That during the 20121 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.

7/24/13  
\_\_\_\_\_  
(Date and Place)

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

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

Vice President, Regulatory  
\_\_\_\_\_  
(Title)

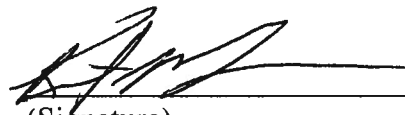
**CERTIFICATION OF TELEPHONE ASSISTANCE PROGRAM & INDIAN  
RESERVATION ADVERTISING AS REQUIRED BY WAC 480-123-070 (7)**

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

- 1) That during the 2012 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.

7/24/13  
\_\_\_\_\_  
(Date and Place)

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

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

Vice President, Regulatory  
\_\_\_\_\_  
(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 2012 and will be used in 2014 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.

7/24/13  
\_\_\_\_\_  
(Date and Place)

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

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

Vice President, Regulatory  
\_\_\_\_\_  
(Title)