



August 20, 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: UT-121287 – Supplemental Filing to Frontier Communications Northwest Inc. 2012 ETC Certification Filing**

Dear Mr. Danner:

As a result of discussions with Commission Staff on August 15, 2012, Frontier Communications Northwest Inc. ("Frontier") submits for filing a supplement to its 2012 ETC Certification Filing filed on July 31, 2012 in the above-reference docket number.

**WAC 480-123-060 – Annual certification of eligible telecommunications carriers:**

Pursuant to WAC 480-123-060, Frontier provides a certification in the attached 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.

**WAC 480-123-070(1)(a) – Request for NECA-1 report:**

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. As a result of the FCC's Report and Order and Further Notice of Proposed Rulemaking, FCC Order No. 11-161, released November 18, 2011, the FCC froze all support under its existing high cost fund support mechanisms. The frozen high cost amounts for 2012 will be equal to the amount of support dispersed in 2011. The FCC also eliminated the requirement for price cap carriers and their rate-of-return affiliates to perform cost studies for the purposes of calculating high cost loop

Mr. Dave Danner  
August 20, 2012  
Page 2

or local switching support<sup>1</sup>. Therefore, Frontier did not submit a 2012 USF Data Collection Form to NECA.

**Report No. 5**

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

At the request of Commission Staff to better align with the new FCC rules that require information on a calendar year instead of a fiscal year as required by WAC 480-123-080(1)(a), Frontier submits a revision to its original response for Report No. 5 as follows:

For 2013, 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.

If you have any questions concerning this supplemental filing, 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

Enclosure

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<sup>1</sup> FCC Order 11-161, Paragraph 133, footnote 212

**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 2011 and will be used in 2013 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.

8/20/2012  
\_\_\_\_\_  
(Date and Place)

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

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

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