



September 16, 2013

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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: Docket UT-133011 - Annual Reporting Requirements for High – Cost Recipients Pursuant to 47 C.F.R. § 51.915 (d) (3) and 47 C.F.R. §54.304(c) (1)

Dear Mr. King:

The Federal Communications Commission's ("FCC") November 18, 2011 USF/ICC Transformation Order, FCC 11-161 (WC Docket No. 10-90) requires carriers seeking to obtain recovery through the federal mechanisms established in that Order to make certain certifications to the FCC and to state commissions regarding their eligibility for, and their compliance with the rules applicable to, such recovery. The rules created by this order require Price Cap Carriers to make these filings with State Commissions in connection the r annual interstate access tariff filings.

These rules do not appear to contemplate that CAF ICC support will change between annual filings. This year, the FCC released changed contribution factors for Regulatory Fees and Telecommunications Relay Service obligation that require Price Cap Carriers to make an exogenous cost change filing on September 16, 2013, to be effective October 1, 2013. The change in exogenous costs from the annual filings made in June affects the amount of CAF ICC support Frontier is eligible for. Frontier does not believe that the rules require filings with State Commission for a non-annual filing such as this one. However, in an abundance of caution, Frontier is filing certifications comparable to those associated with its 2013 Annual Access Tariff Filing.

Specifically, 47 C.F.R. §51.915(d)(3) requires Price Cap Carriers to certify annually to the FCC and to relevant state commissions that the carrier is not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the federal recovery mechanisms. In compliance with that requirement, Frontier Communications Corporation (Frontier Communications) hereby submits a copy of the certification that was filed with the Federal Communications Commission on September 16, 2013. Please refer to Attachment "A".

The FCC's November 18, 2011 USF/ICC Transformation Order, FCC 11-161 (WC Docket No. 10-90) also requires price cap carriers seeking CAF ICC support to file data establishing the amount of the price cap carrier's eligible CAF ICC funding per 47 C.F.R. §54.304(c)(1). Please refer to Attachment "B" for Frontier Communications' anticipated CAF ICC support and Access Recovery Charge Revenue amounts submitted with its 4Q13 Exogenous Tariff Filing.

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If you have any questions, please call me at 972-908-4415 or email me at [kimberly.a.douglass@ftr.com](mailto:kimberly.a.douglass@ftr.com).

Sincerely,

A handwritten signature in black ink that reads "Kim Douglass" with a long horizontal flourish extending to the right.

Kim Douglass  
Manager  
Compliance – Regulatory Affairs

Enclosures  
cc: Carl Gipson

# ATTACHMENT A



### CERTIFICATION

I am Vice President, Government & Regulatory Affairs for Frontier Communications Corporation. I hereby certify that I have overall responsibility for the preparation of all data for Frontier Telephone Companies which supports the 4Q13 Exogenous Tariff Filing and that I am authorized to execute this certification. Based on the information provided to me by employees responsible for the preparation of, or for the supervision of the preparation of, the data submitted in support of the rates contained in the proposed tariffs, I hereby certify that all data have been examined and reviewed and are true, correct, and complete.

I also certify that Frontier Communications Corporation and its price cap regulated subsidiaries are not seeking duplicative recovery in the state jurisdiction for any Eligible Recovery subject to the recovery mechanism described in §51.915, have complied with §§51.915(d) and (e) of the Federal Communications Commission's rules, and are eligible to receive the CAF ICC support requested pursuant to §51.915(f) of the Commission's rules.

Date: September 16, 2013

A handwritten signature in blue ink, appearing to read "K. Mason", written over a horizontal line.

Kenneth Mason  
Vice President, Government & Regulatory Affairs

# ATTACHMENT B

Frontier Communications – Attachment B

<b>Holding Company Eligible Recovery</b>	<b>Holding Company Maximum ARC Revenues</b>	<b>Maximum CAF ICC Support</b>
\$64,313,833	\$51,102,827	\$13,211,007