



9260 E. Stockton Blvd
Elk Grove, CA 95624

June 16, 2020

Mr. Steve Kahl
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, Department 408
Bismarck, ND 58505-0480

Re: 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. Kahl;

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.

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 June 16, 2020. 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 Annual 2020 Access Tariff Filing.

If you have any questions, please contact me at (916) 686-3567 or by email at pam.pittenger@ftr.com.

Sincerely,

/s/ Pam Pittenger

Pam Pittenger
Sr. Analyst, Regulatory Affairs

Enclosures
cc: Scott Bohler, Frontier

1 **PU-20-277** Filed: 6/16/2020 Pages: 5
**Copy of 47CFR Section 51.915(d)(3) re certification
re duplicative recovery**

Frontier Communications Corporation

Pam Pittenger

ATTACHMENT A

CERTIFICATION

I am Senior Vice President, 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 2020 Annual Access 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 and have complied with §§51.915(d) and (e) of the Federal Communications Commission's rules, but are not eligible to receive the CAF ICC support pursuant to §51.915(f) of the Commission's rules because all of Frontier's Eligible Recovery can be recovered through charges assessed pursuant to §51.915(e) as of July 1, 2020.



Date: June 16, 2020

Kenneth Mason
Senior Vice President, Regulatory Affairs

ATTACHMENT B

Frontier Communications Corporation
Summary - 7/1/2020 FCC TRP Mid Year Filing
Eligible Recovery, Tariffed ARC Revenue, ICC-CAF Support

Holding Company Eligible Recovery	Holding Company Tariffed ARC Revenues	Holding Company ICC- CAF Support
\$ 74,472,843	\$ 58,188,436	\$ -