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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on  
Telecommunications Public Policy  
Programs

R. 06-05-028

**REPLY COMMENTS OF  
CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. D/B/A  
FRONTIER COMMUNICATIONS OF CALIFORNIA, FRONTIER  
COMMUNICATIONS WEST COAST INC. AND FRONTIER COMMUNICATIONS OF  
THE SOUTHWEST INC. (COLLECTIVELY "FRONTIER")  
ON THE DECISION ADOPTING FORWARD LOOKING MODIFICATION TO THE  
MOORE UNIVERSAL TELEPHONE SERVICE ACT**

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October 25, 2010

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**I. Introduction.**

Citizens Telecommunications Company of California Inc., d/b/a Frontier Communications Company of California, Frontier Communications West Coast Inc. and Frontier Communications of the Southwest Inc. (collectively “Frontier”) provide these reply comments on Commissioner Bohn’s proposed decision adopting forward modifications to the universal telephone service act released September 28, 2010 (“PD”). In reviewing the initial comments filed on October 11, 2010, it is clear that the PD raises a number of legitimate concerns that must be addressed before going forward with modifications to the California LifeLine program (“LifeLine”). As stated in its initial comments, Frontier supports the direction of the PD and believes that the reforms proposed will improve the LifeLine program. However, Frontier supports holding additional workshops and another full round of comments to build the record and to fully address the many concerns expressed in comments. Frontier’s primary concern with the PD is that it does not require ETC designation by all carriers who want to participate in the Lifeline program. At the federal level, carriers must have an ETC designation to participate in

the Federal Lifeline program and most states that have a state Lifeline program also require ETC designation. The PD acknowledges that the policies set forth in the Communications Act for ETC designation allow for a predictable level of service to consumers and will improve the long-term sustainability of the LifeLine program.<sup>1</sup> For the assurance of reliable service and long term quality of the program, it is essential that the Commission require ETC designation for all participating carriers.

## **II. Comments By SureWest Regarding CLEC ETC Status Should Be Rejected.**

Frontier disagrees with comments filed by SureWest Telephone and SureWest Televideo (“SureWest”) on pages 15-16 regarding “Non-ETC” makeup payments. In particular, SureWest suggests on page 16 that the “commission should at least lift the “study area” requirement for wireline CLECs seeking LifeLine-only ETC status in URF company territories.” SureWest is referring to the fact that Resolution T-17129 denied SureWest Televideo’s July 20, 2007 ETC application because it failed to commit to serving an entire wire center.

The Commission subsequently denied SureWest Televideo’s ETC request based on CPUC and FCC rules and regulations. The California Lifeline proceeding is not the proper venue to readdress the existing FCC and CPUC ETC status requirements. The rules are clear and any proposed modifications are definitely outside the scope of this proceeding. According to T-17129, page 2:

“The Commission adopted comprehensive ETC guidelines and reporting requirements in Resolution T-17002. ETC rules and guidelines were originally contained in Federal Communications Commission (FCC) 97-157 and 03-249. The CPUC adopted Resolutions T-16086 and T-16830 respectively to implement these FCC rules. In FCC 05-46 dated February 25, 2005, the FCC adopted additional mandatory requirements for ETC designation and ETC reporting requirements for federal universal high-cost support.<sup>2</sup> In the same order, the FCC encouraged states that exercise jurisdiction over

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<sup>1</sup> Page 95 of PD.

<sup>2</sup> Section 214 (e) (6) directs the FCC to designate carriers when those carriers are not subject to the jurisdiction of a state commission.

ETC designations pursuant to section (214 (e) (2) of the Communications Act, to adopt these requirements.<sup>3</sup> FCC requires that only state authorized ETCs will be eligible to receive federal high cost, low income support.<sup>4</sup> Subsequent to FCC 05-46 order, the CPUC adopted Resolution T-17002 that establishes the current ETC designation rules, which integrates the rules adopted in FCC 97-157, 03-249, 05-46, and other criteria the CPUC deemed necessary.<sup>5</sup> These rules and guidelines intend to ensure that a designated ETC has demonstrated that it is committed to provide adequate quality service at affordable rates to all customers requesting the services in the designated service territory.”

Further, on page 4 of T-17129:

“We agree with Frontier that SWB has not committed to the entire service area, or the entirety of any of the wire centers that that Frontier has disaggregated its support, as required by the CPUC. Resolution T-17002, Appendix A § II.A., which requires that ETCs should not be designated below incumbent wirecenter level. We reject SWB’s claim that they should be exempt due to the lack of publicly available Frontier wirecenter boundaries.”

### **III. Conclusion.**

Frontier supports the direction of the PD and urges the Commission to carefully consider Frontier’s recommendations that all participating providers be ETC certified for both Federal and State support. Frontier also recommends that because of the complexity of the LifeLine program and the many concerns expressed in comments that several workshops be scheduled to fully address these concerns before issuing a revised PD for comments

Dated October 25, 2010

Respectfully submitted,

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<sup>3</sup> 47 USC Section 214 (e) (2) provides state commissions with the primary responsibility for designating ETCs.

<sup>4</sup> 47 C. F. R Section 54.201 (a) (1)

<sup>5</sup> 47 USC Section 254 (f) The CPUC is not required to adopt the FCC’s Standards without change.



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**CERTIFICATE OF SERVICE BY MAIL**

I, Pam Pittenger, hereby certify that on this day I served a copy of the

REPLY COMMENTS OF CITIZENS TELECOMMUNICATIONS COMPANY OF CALIFORNIA INC. D/B/A FRONTIER COMMUNICATIONS OF CALIFORNIA, FRONTIER COMMUNICATIONS WEST COAST INC. AND FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC. (COLLECTIVELY "FRONTIER") ON THE DECISION ADOPTING FORWARD LOOKING MODIFICATION TO THE MOORE UNIVERSAL TELEPHONE SERVICE ACT

to all parties on the CPUC's service list for R.06-05-028. 1 true and correct Adobe Acrobat PDF copy was E-mailed to those parties on the service list who provided an E-mail address. For those parties who have not provided the Commission an electronic address, paper copies were provided via U.S. Mail. I have also sent paper copies to assigned Commissioner John Bohn and assigned Administrative Law Judge, Maribeth A. Bushey.

Dated at Elk Grove, California, this 25th day of October, 2010.

  
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