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**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington, D.C. 20554

Re: *Connect America Fund*, WC Docket No. 10-90

Dear Ms. Dortch:

In 2015, Frontier accepted Connect America Fund (CAF) Phase II support to deploy broadband service to over 774,000 locations in twenty-nine states. Using that support, Frontier has already enabled broadband service at speeds of at least 10/1 Mbps or higher to more than 596,000 locations in CAF II census blocks in those states. Frontier's current year-end data reflects that it met or exceeded the program's December 31, 2019 interim broadband deployment milestone in sixteen states.

At this point, however, that data also reflects that, while close, Frontier may not have reached the deployment milestone in thirteen states. Thus, in accord with 47 C.F.R. § 54.320(d), Frontier provides this notice that, based on preliminary year-end data, it may not have met the CAF Phase II eighty percent interim deployment milestone in Arizona, California, Illinois, Iowa, Minnesota, New Mexico, New York, Ohio, Oregon, Utah, Washington, Wisconsin, and West Virginia.

Frontier's deployment milestones in Arizona, New Mexico, and Utah are the subject of a waiver the FCC granted on January 14, 2020, due to unforeseeable hurdles with tribal permitting and rights of way.<sup>1</sup> In California, Iowa, New York, Oregon, and West Virginia, Frontier has deployed to more than seventy-six percent of the total CAF II locations in each state.<sup>2</sup> Frontier continues its

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<sup>1</sup> See *Petition for Waiver of Frontier Communications*, Order, Docket No. 10-90, DA 20-66 (Jan. 14, 2020).

<sup>2</sup> Because Frontier currently anticipates that any compliance gap for these states will be less than five percent of the interim deployment milestone, the Commission's non-compliance measures should not be triggered. See 47 C.F.R. § 54.320(d) (reflecting that non-compliance

process to review, validate and confirm its data. By March 1, we will provide the vetted requisite information to the HUBB portal in accord with 47 C.F.R. § 54.316. For those states where Frontier has not deployed to at least seventy-six percent of the total CAF II locations, Frontier will file requisite quarterly reports updating its deployment figures in accordance with 47 C.F.R. § 54.320(d)(1)(i). In all remaining states, Frontier has deployed to more than seventy percent of households.<sup>3</sup>

Frontier continues to deploy broadband to CAF II locations under the program and remains committed to meeting its CAF II obligations. In accord with section 54.320(d), Frontier is also providing this notice to the Universal Service Administrative Company and to state commissions and relevant Tribal Governments in the impacted states. Please contact the undersigned with any questions regarding this notice.

Sincerely,

/s/ AJ Burton

AJ Burton

cc: Alex Minard  
hccerts@usac.org

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measures are not triggered until a carrier has a compliance gap of at least five percent); *see also Connect America Fund, et al.*, WC Docket No. 10-90, et al., Report and Order, 29 FCC Rcd 15644, 15695 n.323 (2014) (stating that “a shortfall of less than 5% of locations for a given interim milestone should not be a concern warranting additional monitoring”).

<sup>3</sup> See 47 C.F.R. § 54.320(d) (reflecting that a compliance gap between 5% and 15% triggers quarterly reporting).