



December 6, 2013

PUC Filing Center
3930 Fairview Industrial Drive SE
Salem, OR 97302-1166

RE: AR 577 - OTA Petition to Amend the Definition of Basic Telephone Service

Dear Filing Center,

Please find enclosed the original and one copy of the comments of Frontier Communications in Docket AR 577. Please call me at (503) 645-7909 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Renee M. Willer". The signature is written in a cursive, flowing style.

Renee Willer
Regulatory Manager
Frontier Communications Northwest Inc.
20575 NW Von Neumann Drive
Beaverton, OR 97006
503.645.7909
renee.willer@ftr.com

Enclosures
Service List

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AR 577

| | | |
|---------------------------------------|---|-------------------------|
| IN THE MATTER OF |) | COMMENTS OF |
| |) | FRONTIER COMMUNICATIONS |
| THE OREGON TELECOMMUNICATIONS |) | |
| ASSOCIATION |) | |
| |) | |
| Petition to Amend OAR 860-032-0190 |) | |
| Definition of Basic Telephone Service |) | |
| _____ |) | |

Frontier Communications Northwest Inc. and Citizen’s Telecommunications of Oregon (collectively Frontier Communications) submit these comments in response to the Commission’s invitation to comment dated November 6, 2013.

The notice of invitation to comment invited the parties to comment on any of the six criteria that the Commission must consider when granting or denying a request to amend a rule:

- (1) The continued need for the rule;
- (2) The nature of comments or complaints concerning the rule from the public;
- (3) The complexity of the rule;
- (4) The extent to which the rule overlaps, duplicates, or conflicts with other state rules or federal regulations and to the extent feasible, with local government regulation;
- (5) The degree to which technology, economic conditions, or other factors have changed in the subject area affected by the rule; and
- (6) The legal basis for the rule.

On 11/4/2013 the Oregon Telecommunications Association (OTA) filed a petition to amend the definition of basic telephone service (OAR 860-032-0190) to include “access to broadband”. On November 14, 2013 the OTA made a subsequent filing to clarify that while Frontier and CenturyLink are members of the Association, they did not sign on to support the petition.

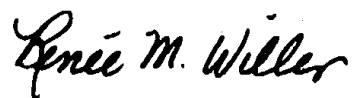
In its petition, OTA makes a point of distinction that broadband service itself that is provisioned by internet service providers would not be included in the definition; rather, it is “access to broadband” that would be included in the definition similar to access to long distance service that is currently part of

the definition today. To be clear, under federal law, state commissions do not have the authority to regulate broadband. Frontier would be opposed to any attempt to bring broadband service under the Commission's jurisdiction. The OTA proposal appears to make the distinction that while access to broadband would be included in the definition of basic service, it does not purport to mean that broadband would fall under services regulated by the Commission for deployment requirements, rates, terms and conditions. This needs to be clear if the rulemaking is to move forward.

OTA correctly notes that the telecommunications industry has undergone significant changes since the definition of basic service was established well over twelve years ago. Access to broadband has increased dramatically over the last few years and residential and business customers view access to broadband as a necessity. From their broadband connection customers can access any VoIP provider to allow voice conversations or can communicate a variety of other ways through FaceTime, Skype, Facebook and other applications. The FCC has realized the importance of broadband to meet modern telecommunications needs and to promote economic growth. Through their transformation order they have taken the steps to promote affordable "access to broadband service" via the National Broadband Plan. The OTA petition rightfully points out that Oregon customers see broadband as a necessary service to meet their communications needs. Communities likewise see broadband as necessary to promote economic growth and bring new businesses to their community. Modifying the definition of basic service to add "access to broadband" would require that the rules be modified to make certain that "access to broadband" is not subject to PUC regulations regarding deployment, pricing or terms and conditions related to broadband.

Respectfully submitted this 6th day of December 2013.

Sincerely,

A handwritten signature in black ink that reads "Renee M. Willer". The signature is written in a cursive, flowing style.

Renee Willer
State Regulatory Manager
Frontier Communications

CERTIFICATE OF SERVICE

AR 577

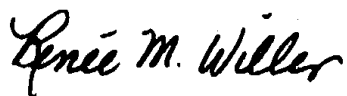
I certify that on the 6th day of December 2013, I served the foregoing Comments of Frontier Communications in the above mentioned docket electronically and by U.S. Mail to the PUC Filing Center and Electronically to the Service List.

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Public Utility Commission of Oregon
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Salem, OR 97308-2148
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Dated this 6th day of December, 2013



Renee Willer
State Regulatory Manager – Frontier Communications