

**CALIFORNIA PUBLIC UTILITIES  
COMMISSION**  
**Advice Letter Filing Summary Sheet**  
(PAL)

(Date Filed / Received Stamp by CPUC Industry  
Division)

Date AL served on parties: 02/26/16

**Company Name:** Frontier Communications of America, Inc.

**CPUC Utility Number** U-5429-C

**Address:** 9260 E. Stockton Blvd.

GRC-LEC     URF-Carrier     Other

**City, State, ZIP:** Elk Grove, CA 95624

Commission Resolution Requested

Carrier of Last Resort (See D.96-10-066)

**Filing AL #:** 119    **Requested Effective Date:** By Resolution

**AL Tier**    I     II     III

**Name:**

**Email Address:**

**Phone No.:**

**Fax No.:**

Filer

C. Born

[Charlie.Born@fr.com](mailto:Charlie.Born@fr.com)

(916) 686-3570

(916) 686-3569

Certif.

L. Saldana

[Linda.Saldana@fr.com](mailto:Linda.Saldana@fr.com)

(916) 686-3590

No. Tariff  
Sheets: -0-

*(Name, email address & Phone and FAX numbers are Required for "Filer")*

**Tariff Schedules:** N/A

**Keyword:** Interconnection Agreement

(see keyword list on reverse)

For Contract Keyword, Type: Government  Other  Date Executed \_\_\_\_\_ Contract Total Rev (\$) \_\_\_\_\_

**Subject of filing:** Temporary Support Service Agreement

(Service(s) included)

**Authorization for filing:** ALJ-181, D.07-01-024, D.07-09-019 and D.15-12-005

(Resolution #, Decision #, etc.)

**Affected services:** \_\_\_\_\_

(Other services affected, pending or replacement AL filings)

**Rate Element(s) affected *and* % change:** \_\_\_\_\_

(Non-recurring and / or recurring)

Customer Notice Required (if so, please attach)

**Notes/Comments:** \_\_\_\_\_

(Other information & reference to advice letter, etc.)

**File Protest and/or Correspondence to:**

Director, Telecommunications Division  
505 Van Ness Ave., San Francisco, CA 94102

**and if you have email capability, ALSO email to:**

**TD\_PAL@cpuc.ca.gov**

**Protest also must be served on utility:**

(see utility advice letter for more information)

**GRC-LEC** = Cost of Service LEC Carrier

**URF-Carrier** = Uniform Regulatory Framework Carrier

(see D.06-08-030/D.07-09-019)

**OTHER** = Wireless (CMRS) Carrier

(FOR CPUC USE ONLY)

Resolution Required

Executive Action Resolution Req'd.

TD Suspension on: \_\_\_ / \_\_\_ / \_\_\_

Comm. Suspension on: \_\_\_ / \_\_\_ / \_\_\_

Resolution No.: T - \_\_\_\_\_

Rev. 09/24/07

Supv. / Analyst \_\_\_\_\_ / \_\_\_\_\_

Due Date to Supv.: \_\_\_\_\_

Analyst Completion Date: \_\_\_\_\_

Supervisor Approval Date: \_\_\_\_\_

AL / Tariff Effective Date: \_\_\_\_\_

Notes: \_\_\_\_\_



9260 E. Stockton Blvd.  
Elk Grove, CA 95624

**Via UPS Mail**

February 26, 2016

(U-5429-C)

Advice Letter No. 119

**TO THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA:**

In compliance with Ordering Paragraph No. 7 (OP 7) of Decision 15-12-005<sup>1</sup>, Frontier Communications of America, Inc. ("Frontier"), on behalf of Citizens Telecom Services Company L.L.C. ("CTS") attaches in this Tier 3 advice letter filing a confidential Temporary Support Service Agreement for Internet Protocol (IP) Interconnection ("Support Agreement") by and between CTS and MCI Communications Services Inc. d/b/a Verizon Business ("Verizon Business") that was executed by the parties on February 17, 2016.

Although OP 7 indicates that this agreement should be submitted using a Tier I advice letter filing, Frontier files this Support Agreement as a Tier III advice letter based on a discussion with the Commission's Communications Division staff (Staff) and the recognition that under General Order 96-B, Telecommunications Industry Rules 7.3 and 8.1, interconnection agreement filings must be made with Tier III advice letters.

In addition, the Support Agreement is not an interconnection agreement pursuant to which Frontier, through Verizon California Inc. or any other affiliate, will be providing a service to or exchange traffic with other carriers. Instead, the Support Agreement is a temporary support services contract pursuant to which Frontier will be purchasing Session Initiation Protocol (SIP) carrier transiting and interconnect services from Verizon Business to facilitate the exchange of certain SIP traffic with five parties that had previously established arrangements to exchange SIP voice traffic pursuant to an Internet Protocol Interconnection Agreement for Certain Voice Traffic with Verizon Services Corp. on behalf of itself and its ILEC subsidiaries and affiliates.<sup>2</sup> The Support Agreement will ensure a continuation of existing service arrangements for exchanging SIP voice traffic that is unique and specific to

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<sup>1</sup> OP 7, Decision 15-12-005: "Frontier shall file with the Commission a Tier I Advice letter disclosing the terms of its recently signed interconnection agreement with Verizon Business, including a fully executed copy of the agreement as an exhibit, which the Commission shall review to determine whether or not it is an interconnection agreement subject to the filing, approval and opt-in requirements of § 252 of the federal Telecommunications Act."

<sup>2</sup> The five parties are: Bandwidth.com, Inc., Broadvox-CLEC LLC, Comcast IP Phone, LLC, Sprint Spectrum, L.P. and Vonage Holdings Corporation.

Frontier as the recipient of commercial services from Verizon Business and will only remain in effect on a temporary basis for approximately one year or until the traffic for these five parties is transitioned directly to Frontier's network and systems. Accordingly, based on these facts alone, and without waiving other legal arguments regarding why the Support

Agreement is not an interconnection agreement subject to the Commission's review and approval under section 252 of the federal Telecommunications Act,<sup>3</sup> Frontier requests that the Commission conclude that the Support Agreement is not an interconnection agreement subject to the filing, approval and opt-in requirements of section 252 of the federal Telecommunications Act.

To comply with OP 7 of Decision 15-12-005, this advice letter contains all of the information normally required for Agreements filed under G.O. 96-B. No tariff sheets have been submitted with this advice letter. This filing will not increase any existing rate or service, result in the withdrawal of service, or conflict with any of Frontier's other schedules.

Copies of this Advice Letter are being served to interested parties requesting such notification. In addition, Frontier is sending an email copy of this advice letter to the service list for A.15-03-005. This advice letter may be viewed on the Company's website at <http://tariffs.citizenscommunications.com/crtf/>.

This Agreement is being filed under seal pursuant to and subject to the protections afforded by Public Utilities Code Section 583 and G.O. 66-C. It is a commercial agreement that if revealed would place Frontier and Verizon Business at an unfair business disadvantage, it contains market-sensitive information not otherwise publicly available, and the parties to the agreement have deemed it and consistently treated it as confidential. Frontier hereby requests confidential treatment of the Support Agreement in accordance with Public Utilities Code Section 583 and General Order 66-C.<sup>4</sup>

If there are any questions regarding the distribution of this advice letter, call Charles Born at (916) 686-3570.

Anyone may object to this advice letter, which was filed on February 26, 2016, by sending a written protest to:

Telecommunications Advice Letter Coordinator  
Communications Division  
505 Van Ness Ave., 3<sup>rd</sup> Floor  
San Francisco, CA 94102-3298

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<sup>3</sup> If the Commission or Communications Division Staff would like Frontier to further identify the full factual or legal grounds for not treating the Support Agreement as an interconnection agreement, Frontier will supplement this filing.

<sup>4</sup> Upon request, Frontier will enter into a nondisclosure agreement with interested parties to make the Support Agreement available on a confidential basis.

The protest must state specifically the grounds on which it is based. The protest must be received by the Telecommunications Advice Letter Coordinator no later than 20 days after the date that the advice letter was filed. On or before the day that the protest is sent to the Telecommunications Advice Letter Coordinator, the protestant must send a copy of the protest to:

Charles E. Born  
Manager, Government & External Affairs  
Frontier Communications  
9260 E. Stockton Blvd.  
Elk Grove, CA 95624

To obtain information about the Commission's procedures for advice letters and protests, go to the Commission's Internet site ([www.cpuc.ca.gov](http://www.cpuc.ca.gov)). The addresses for mailing or delivering a protest to Frontier are:

Charles E. Born  
Manager, State Government Affairs  
Frontier Communications  
9260 E. Stockton Blvd.  
Elk Grove, CA 95624  
[Charlie.Born@ftr.com](mailto:Charlie.Born@ftr.com)

Kevin Saville  
Vice President & Associate General Counsel  
Frontier Communications Corporation  
2378 Wilshire Blvd.  
Mound, Minnesota 55364

The address for mailing or delivering a protest to Frontier Communications is:

Frontier Communications  
9260 E. Stockton Blvd.  
Elk Grove, CA 95624  
Attn: Charlie Born

Frontier respectfully requests approval of this Agreement by Commission Resolution.

Very truly yours,



Charles E. Born  
Manager, Government & External Affairs

cc: Frontier Advice Letter Service List  
G.O. 96 Telecommunications Industry Rule 10, Interconnection Service List  
Service List for Application 15-03-005

Enclosures