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June 13, 2018

Ms. Kassi Peerman
Administrative Assistant
Indiana Utility Regulatory Commission
101 West Washington Street, Suite 1500E
Indianapolis, IN 46204

RE: 30-day filing #50202

Dear Ms. Peerman:

On May 31, 2018, Frontier North Inc. ("Frontier") transmitted for filing a new intrastate access tariff titled I.U.R.C. No. T-8, Facilities for Intrastate Access pursuant to Indiana Administrative Code 170 IAC 1-6.

Frontier requests that the Indiana Utility Regulatory Commission ("IURC") issue an Emergency Order as allowed under IC 8-1-2-113, to temporarily approve Frontier's I.U.R.C. No. T-8, Facilities for Intrastate Access in less than the required 30 days, pending final approval under the IURC's regular 30-day filing rules.

The purpose of this filing is to establish a new complete baseline intrastate access tariff. Frontier intends to concur in the Frontier Telephone Companies TARIFF FCC NO. 6 with exceptions. Frontier's new intrastate access tariff, I.U.R.C. No. T-8, Facilities for Intrastate Access will, upon its approval, cancel and supersede Frontier's I.U.R.C. No. T-7 in its entirety.

If you have any questions relative to this filing, please contact me at 989-723-0277.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert E. Stewart".

Robert E. Stewart
State Director, Government and External Affairs

Attachment

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VERIFICATION STATEMENT

The purpose of this notice is to request that the Indiana Utility Regulatory Commission ("IURC") issue an Emergency Order to temporarily approve Frontier's I.U.R.C. No. T-8, Facilities for Intrastate Access, in less than the required 30 days, pending final approval under the IURC's regular 30-day filing rules. The rationale and justification for this request is:

1. The current intrastate access tariff, I.U.R.C. No. T-7 concurs in the GTE Telephone Operating Companies GTSC FCC No. 1 which has not existed in many years. The concurrence statements and exception citations in the I.U.R.C. No. T-7 were not corrected and causes confusion as to which concurrence was intended as well as to exception citations.
2. The implications of various IURC and FCC Orders had not been taken into consideration into updating the current intrastate access tariff pages accordingly. As an example, IURC Cause No. 43391 Order issued June 4, 2008 eliminated intrastate equal access scripting and customer notification requirements but I.U.R.C. No. T-7 was never updated.
3. All applicable rates for all intrastate access services are identical between the I.U.R.C. No. T-7 and the new I.U.R.C. No. T-8, Facilities for Intrastate Access replacing the I.U.R.C. No. T-7 in its entirety. There are no billing or rating implications to existing intrastate access customers as a result of this tariff replacement.

The FCC has preempted state commissions in certain respects pertaining to filing of intrastate access rates and tariffs, including but not limited to, mandating that certain intrastate (IURC) access rates and charges take effect at the same time as the corresponding interstate (FCC) access rates and charges. For switched access rates, the FCC requires Frontier to file revised interstate and intrastate switched access rates no later than June 18, 2018 effective July 3, 2018. Frontier requires the IURC to temporarily approve the new I.U.R.C. No. T-8, Facilities for Intrastate Access in order for Frontier to update it correctly for the intrastate switched access rates effective July 3, 2018. Given the FCC required filing date of June 18, 2018 and the mandatory effective date of July 3, 2018, it is not possible to meet the IURC's requirement to allow a minimum of 30 days to review the new intrastate access tariff filing.

For the reasons above, Frontier North Inc. respectfully requests that the IURC, as allowed under IC 8-1-2-113, issue an emergency order to temporarily approve the Frontier North Inc. I.U.R.C. No. T-8, Facilities for Intrastate Access in less than 30 days, pending final approval by the IURC after 30 days has passed from the filing date.

"I, Ken Mason, (Group Vice President) of Frontier North Inc. affirm under penalties for perjury that the foregoing representation is true to the best of my knowledge, information, and belief."

Signed 

Date 6/13/2018