



EX PARTE NOTICE

December 14, 2009

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554  
**Docket Number: 09-95**

Stephen M. Olea  
Director  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007  
**Docket Number: T-20679A-09-0274**

Ms. Elizabeth Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
**Docket Number: 09-0268**

Allen R. Francis  
Chief, Telecommunications Division  
Ohio Public Utilities Commission  
180 East Broad Street  
Columbus, OH 43215  
**Docket Number: 09-454-TP-ACO**

Bryan Conway  
Telecommunications Division  
Public Utility Commission of Oregon  
550 Capitol St NE #215  
PO Box 2148  
Salem OR 97308-2148  
**Docket Number: UM-1431**

Rick Applegate  
Regulatory Analyst  
WA Utilities and Transportation  
Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, WA 98504-7250  
**Docket Number: 090842**

Mrs. Sandra Squire  
Executive Secretary  
WV Public Service Commission  
P.O. Box 812  
Charleston, WV 25323  
**Case Number: 09-0871-T-PC**

RE: Verizon – Frontier asset transfer

Dear Sir or Madam:

Granite Telecommunications, LLC ("Granite") is a nationwide competitive provider of advanced telecommunications services to enterprise subscribers. Granite is the country's premier provider of nationwide local business telecommunications service with almost 900,000 phone lines serving multi-location business customers including 66 of the nation's Fortune 100 companies, as well as various governmental entities including the United States Postal Service.

Many of our customers are national in scope and have locations in almost every region of the country, therefore the impending transfer of service from Verizon Communications to Frontier Corporation raises concerns for our company and ultimately our end user customers. Our customers have grown accustomed to the high quality of service that Granite provides, however as a non-facilities based competitive carrier our customers have raised concerns about the continuity of service during the transition, especially after the pervasive issues that occurred during the Fairpoint and Hawaii divestitures.

We note that we have 293,127 lines located in the states identified by Verizon as containing areas potentially to be transferred to Frontier Corporation yet to date, neither Verizon nor Frontier has identified to Granite specific central offices, lines or customers to be impacted by these changes. They have provided no guidance as to support, billing, contracts or any of the critical information needed to ensure long-term uninterrupted service. Nor has Verizon or Frontier given any assurances that the missteps in prior divestitures have been rectified so that they will not repeat themselves here. In fact, we have been able to obtain almost no information from either company.

While Granite believes that there may be a long-term benefit to moving more rural regions to a company that is focused on providing service in these areas, we also believe that these benefits will only happen if the companies involved work closely with the CLEC community that shares these facilities to ensure that a well managed business and technical process is in place to guarantee a smooth transition of service. We find the lack of communication from these carriers very troubling and ask that your agencies actively support our efforts to have these carriers work with Granite and other competitive local exchange carriers to ensure a well-planned and mutually agreed-upon business and technical process for this transition is in place prior to any final approvals being granted by federal or state agencies.

Respectfully submitted,

GRANITE TELECOMMUNICATIONS, LLC

A handwritten signature in black ink, appearing to read 'S. J. Kline', with a long, sweeping horizontal line extending to the right.

Samuel J. Kline  
Vice President - Strategic Initiatives

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**12/14/2009 11:18:58 AM**

**in**

**Case No(s). 09-0454-TP-ACO**

Summary: Comments Ex Parte Letter regarding Verizon – Frontier asset transfer electronically filed by Mr. Tim French on behalf of Granite Telecommunications