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August 24, 2016

VIA ELECTRONIC FILING
The Honorable Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive (29210)
Post Office Drawer 11649
Columbia, South Carolina 29210

Re: DOCKET NUMBER 2016-267- C
IN RE: Petition Of The South Carolina Telephone Coalition To Require Interconnected Voice Over Internet Protocol ("Interconnected VoIP") Service Provisions To Contribute To The South Carolina Universal Service Fund
RPR File No. 7377.001

Dear Madame Clerk:

Enclosed for filing on behalf of Frontier Communications of the Carolinas LLC ("Frontier") in the above referenced docket, please find its Petition to Intervene.

By copy of this letter, I am serving all counsel of record with a copy of the above referenced documents as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

C. Jo Anne Wessinger Hill

CJWH/tbj
Enclosure
cc: Counsel of Record – see Certificate of Service

STATE OF SOUTH CAROLINA

(Caption of Case)
IN RE: Petition Of The South Carolina Telephone Coalition To Require Interconnected Voice Over Internet Protocol ("Interconnected VoIP") Service Provisions To Contribute To The South Carolina Universal Service Fund

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2016 - 267 - C

(Please type or print)

Submitted by: C. Jo Anne Wessinger Hill
Address: P.O. Drawer 7788
(1900 Barnwell Street, 29201)
Columbia, SC 29202

SC Bar Number: 15025
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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☐ Electric	☐ Affidavit	☐ Letter	☐ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certificatio
☐ Electric/Telecommunications	☐ Answer	☐ Motion	☐ Request for Investigation
☐ Electric/Water	☐ Appellate Review	☐ Objection	☐ Resale Agreement
☐ Electric/Water/Telecom.	☐ Application	☐ Petition	☐ Resale Amendment
☐ Electric/Water/Sewer	☐ Brief	☐ Petition for Reconsideration	☐ Reservation Letter
☐ Gas	☐ Certificate	☐ Petition for Rulemaking	☐ Response
☐ Railroad	☐ Comments	☐ Petition for Rule to Show Cause	☐ Response to Discovery
☐ Sewer	☐ Complaint	☒ Petition to Intervene	☐ Return to Petition
☒ Telecommunications	☐ Consent Order	☐ Petition to Intervene Out of Time	☐ Stipulation
☐ Transportation	☐ Discovery	☐ Prefiled Testimony	☐ Subpoena
☐ Water	☐ Exhibit	☐ Promotion	☐ Tariff
☐ Water/Sewer	☐ Expedited Consideration	☐ Proposed Order	☐ Other:
☐ Administrative Matter	☐ Interconnection Agreement	☐ Protest	
☐ Other:	☐ Interconnection Amendment	☐ Publisher's Affidavit	
	☐ Late-Filed Exhibit	☐ Report	

BEFORE THE
PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

IN RE: PETITION OF THE SOUTH CAROLINA TELEPHONE COALITION TO REQUIRE INTERCONNECTED VOICE OVER INTERNET PROTOCOL ("INTERCONNECTED VoIP") SERVICE PROVISIONS TO CONTRIBUTE TO THE SOUTH CAROLINA UNIVERSAL SERVICE FUND	)	Docket No. 2016-267-C **PETITION TO INTERVENE OF FRONTIER COMMUNICATIONS OF THE CAROLINAS, LLC**

Petitioner Frontier Communications of the Carolinas LLC ("Frontier"), an incumbent local exchange provider contributor and recipient of State USF, hereby submits this Petition to the South Carolina Public Service Commission ("Commission"), pursuant to Rule 103-825 of the Commission's Rules and other applicable rules and regulations, for permission to intervene in the above-referenced Docket with full rights to participate as a party of record. In support of its Petition, Frontier submits the following to the Commission:

1. Frontier is a facilities-based incumbent local exchange provider in South Carolina. Frontier seeks to intervene in this proceeding with full rights to participate as a party of record to represent its interests.

2. On July 8, 2016, the South Carolina Telephone Coalition and its individual member companies ("SCTC") filed a Petition for a ruling that all carriers who offer interconnected Voice over Internet Protocol ("Interconnected VoIP") services in South Carolina are required to contribute to the South Carolina Universal Service Fund ("State USF") previously established by the Commission pursuant to S.C. Code Ann. §58-9-280(E).

3. Frontier has standing to participate in this proceeding as it is a facilities-based

incumbent local exchange provider in South Carolina who supports the State USF by charging its customers the State USF fee and remitting the proceeds to the South Carolina Office of Regulatory Staff. Frontier has participated in numerous other proceedings before the Commission on matters related to the State USF and most recently, in Docket No. 2015-290-C.

4. Frontier's request to intervene is timely made and filed as the Commission established a deadline of August 24, 2016 for any interested party to this matter to file and make such petition to intervene.

5. While Frontier has not developed a final position at this time, Frontier believes that its participation in this proceeding is essential to protect its interests and to ensure a full and fair consideration of the issues raised in this proceeding with the development of a full and fair record. Frontier reserves the right to provide input and to take a specific position with respect to any issues that may arise in the proceeding.

6. Granting this Petition will not cause any undue delay, and it will not prejudice any party to this proceeding.

7. Correspondence and communications to Frontier with respect to this proceeding should be directed to undersigned counsel and Frontier regulatory contact:

C. Jo Anne Wessinger Hill, Esquire
Steven W. Hamm, Esquire
RICHARDSON, PLOWDEN & ROBINSON, P.A.
P.O. Drawer 7788 (1900 Barnwell Street, 29201)
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803-771-4400
803-771-0016 facsimile
Email: jhill@richardsonplowden.com
swhamm@richardsonplowden.com

Susan Miller
Frontier Communications
2600 Meridian Parkway
Durham, NC 27713
E-Mail: susan.miller@ftr.com
Telephone: (919) 941-3411
Facsimile: (919) 558-1041

8. Frontier is informed and believes that its request to be made a party of record in this docket is in the interest of the public, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record.

WHEREFORE, based upon the foregoing, Frontier respectfully requests that the Commission grant this Petition to Intervene as a formal party of record, permit its intervention to protect its interests and to allow Frontier to take such positions as it deems advisable, direct any and all parties of record provide it with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding, and grant all such other relief that deems just and proper.

Respectfully submitted, this 24th day of August, 2016.

FRONTIER COMMUNICATIONS OF
THE CAROLINAS LLC

By: _____

C. Jo Anne Wessinger Hill, Esquire
Steven W. Hamm, Esquire
RICHARDSON, PLOWDEN & ROBINSON, P.A.
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Email: jhill@richardsonplowden.com
swhamm@richardsonplowden.com

August 24, 2016.

Columbia, South Carolina.

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET 2016-267-C

IN RE: PETITION OF THE SOUTH CAROLINA TELEPHONE COALITION TO REQUIRE INTERCONNECTED VOICE OVER INTERNET PROTOCOL ("INTERCONNECTED VoIP") SERVICE PROVISIONS TO CONTRIBUTE TO THE SOUTH CAROLINA UNIVERSAL SERVICE FUND	)	**CERTIFICATE OF SERVICE**

This is to certify that I, C. Jo Anne Wessinger Hill, an attorney with the firm of Richardson Plowden & Robinson, PA, have on August 24, 2016, served one (1) copy of the foregoing document, filed on behalf of Frontier Communications of the Carolinas LLC in the above-referenced matter to the person(s) named below by causing said copy to be email as indicated below and to be deposited in the United States Postal Service (unless otherwise specified), first class postage prepaid and affixed thereto, and addressed as follows:

VIA ELECTRONIC MAIL SERVICE AND U.S. MAIL
M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
Bradley S. Wright, Esquire
South Carolina Telephone Coalition
McNair Law Firm, PA
Post Office Box 11390
Columbia, South Carolina 29211

VIA ELECTRONIC MAIL SERVICE AND U.S. MAIL
Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201

VIA ELECTRONIC MAIL SERVICE AND U.S. MAIL
The Honorable Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive (29210)
Post Office Drawer 11649
Columbia, South Carolina 29210

VIA ELECTRONIC MAIL SERVICE AND U.S. MAIL
Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
South Carolina Cable Television Association
Post Office Box 944
Columbia, South Carolina 29202

August 24, 2016
Columbia, South Carolina

C. Jo Anne Wessinger Hill