



Legal Department  
180 South Clinton Avenue  
Rochester, NY 14646-0700

Tel: 585.777.7270  
Fax: 585.263.9986  
gregg.sayre@ftr.com

November 15, 2010

Ms. Elizabeth A. Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

Dear Ms. Rolando:

As of today's date, I am filing electronically with the Illinois Commerce Commission the Opt-In Agreement for Local Interconnection between Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois and New Windsor Cable TV, Inc., the Joint Petition for Approval of Interconnection Agreement; the Statement in Support of Joint Petition for Approval of Interconnection Agreement; and the Verification.

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

Sincerely,

Gregg C. Sayre  
Associate General Counsel

Enclosures  
GCS/hmj

cc: Jenny Smith, Interconnection Manager – Citizens/Frontier (by e-mail - [Jenny.Smith@FTR.com](mailto:Jenny.Smith@FTR.com))  
Richard Ristau – New Windsor Cable TV, Inc. (by e-mail - [Wins3@winco.net](mailto:Wins3@winco.net))  
Gary L. Smith, Esq. - Loewenstein, Hagen & Smith, P.C. (by e-mail - [lexsmith@cox.net](mailto:lexsmith@cox.net))

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Citizens Telecommunications Company of Illinois )  
d/b/a Frontier Citizens Communications of Illinois )  
and New Windsor Cable TV, Inc. )  
Joint Petition for Approval of Interconnection )  
Agreement pursuant to 47 U.S.C. § 252. )

Docket No. 10-\_\_\_\_\_

**NOTICE OF FILING**

**PLEASE TAKE NOTICE** that we have on this 15th day of November, 2010, filed electronically, via E-Docket, with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, the Joint Petition for Approval of the Interconnection Agreement between Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois and New Windsor Cable TV, Inc. a copy of which is hereby served upon you.



Gregg C. Sayre  
Assistant Secretary  
Frontier Communications  
180 South Clinton Avenue  
Rochester, NY 14646-0700  
Tel: (585) 777-7270  
Fax: (585) 263-9986

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that copies of the above Joint Petition, together with copies of the documents referred to therein, have been served upon the parties to whom the Joint Petition is directed by electronic mail on the 15th day of November, 2010.



Gregg C. Sayre

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Citizens Telecommunications Company of Illinois )	
d/b/a Frontier Citizens Communications of Illinois )	
and New Windsor Cable TV, Inc. )	
)	Docket No. 10-_____
Joint Petition for Approval of Interconnection )	
Agreement pursuant to 47 U.S.C. § 252. )	

**JOINT PETITION FOR APPROVAL OF  
INTERCONNECTION AGREEMENT BETWEEN  
CITIZENS TELECOMMUNICATIONS COMPANY OF ILLINOIS  
D/B/A FRONTIER CITIZENS COMMUNICATIONS OF ILLINOIS  
AND NEW WINDSOR CABLE TV, INC.**

Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois (“Frontier”) and New Windsor Cable TV, Inc. (“New Windsor”) hereby request that the Illinois Commerce Commission (the “Commission”) review and approve the attached Agreement for Interconnection between Frontier and New Windsor (the “Agreement”), pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996, 47 U.S.C. § 252(a)(1) through 252(e) (the “Act”). In support thereof, the parties state as follows:

1. The Agreement was arrived at through good faith negotiations between the parties as contemplated by § 252(a) of the Act.
2. Pursuant to § 252(e) of the Act, the Commission may only reject a negotiated agreement if it finds that (1) the Agreement discriminates against another carrier, or (2) implementation of the Agreement would not be consistent with public interest, convenience, and necessity. Neither basis for rejection is present here.
3. As set forth in the attached Verification of Gregg C. Sayre, Frontier will make the Agreement available to any other telecommunications carrier operating within its territory.

Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

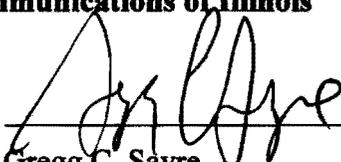
4. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.

5. Copies of the Agreement are available for public inspection in Frontier's and New Windsor's public offices.

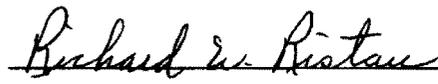
WHEREFORE, Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois and New Windsor Cable TV, Inc. respectfully request that the Commission approve the attached Interconnection Agreement under § 252(e) of the Act as expeditiously as possible.

Respectfully submitted,

**Citizens Telecommunications Company of  
Illinois d/b/a Frontier Citizens  
Communications of Illinois**

By:   
Gregg C. Sayre  
Assistant Secretary  
180 South Clinton Avenue  
Rochester, NY 14646-0700  
Telephone: (585) 777-7041  
Facsimile: (585) 263-9986  
E-mail: Gregg.Sayre@FTR.com

**New Windsor Cable TV, Inc.**

By:   
Printed Name: Richard W. Ristau  
Address 305 S. 5<sup>th</sup> Ave PO Box 488  
New Windsor, IL 61465  
Telephone: 309-667-2150  
Facsimile: 309-667-2888  
Email: wins3@winco.net

**VERIFICATION**

I, Richard W. Ristau do on oath depose and state that I am the **Secretary**, for **New Windsor Cable TV, Inc.**, that I have read the foregoing petition and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.

By: Richard W. Ristau

Name Richard W. Ristau  
Address 305 S. 5<sup>th</sup> Ave PO Box 488  
New Windsor, IL 61465  
Telephone: 309-667-2150  
Facsimile: 309-667-2888  
Email: wins3@winco.net

SIGNED AND SWORN TO BEFORE ME  
THIS 23rd DAY OF September, 2010.

Lori Olson

Lori Olson  
NOTARY PUBLIC



**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Citizens Telecommunications Company of Illinois )  
d/b/a Frontier Citizens Communications of Illinois, )  
and New Windsor Cable TV, Inc. )  
 ) Docket No. 10-\_\_\_\_\_ )  
Joint Petition for Approval of Interconnection )  
Agreement pursuant to 47 U.S.C. § 252. )

**STATEMENT IN SUPPORT OF JOINT PETITION**  
**FOR APPROVAL OF INTERCONNECTION AGREEMENT**

1. I, Gregg C. Sayre, am Assistant Secretary for Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois ("Frontier"), and submit this Statement in Support of the Joint Petition for Approval of the Opt-In Agreement between Frontier and New Windsor Cable TV, Inc. ("New Windsor").

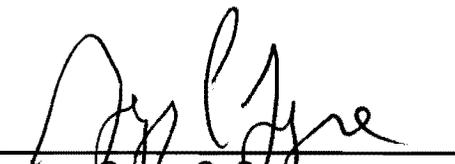
2. The attached Opt-In Agreement for Local Interconnection (the "Agreement") between Frontier and New Windsor was reached through voluntary negotiations between the parties. Accordingly, Frontier and New Windsor request the approval of the Agreement by the Illinois Commerce Commission (the "Commission") pursuant to § 252(a)(1) and 252(e) of the Telecommunications Act of 1996 (the "Act").

3. Under § 252(e)(1) and (2) of the Act, the Commission may reject the Agreement only if the Agreement or a portion thereof "discriminates against a telecommunications carrier not a party to the agreement" or "...implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity." Because the Agreement is the product of voluntary negotiations, it does not have to comply with the standards set forth in § 252(d).

4. The Agreement is not discriminatory. Frontier will make this Agreement available to any other telecommunications carrier who requests it and is operating within Frontier's service territory. Other telecommunications carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

5. The Agreement is the product of good faith, arms-length negotiations between competitors. Overall, the Agreement is acceptable to both parties and it shows that two competitors, negotiating in good faith under the terms of the Act, can arrive at a mutually beneficial business arrangement that overall meets their individual business interests and furthers the cause of competition in the local exchange market. This is precisely the process Congress envisioned in crafting the Act. See S. Rep. No. 23, 104<sup>th</sup> Cong., 1<sup>st</sup> Sess. at p. 19. ("The Committee intends to encourage private negotiation of interconnection agreement.") (The Conference Committee on the Telecommunications Act of 1996 receded to the Senate on § 252(a) and (b), see Joint Explanatory Statement of the Committee of Conference at p. 125.)

6. The Agreement is consistent with the public interest, convenience and necessity, and meets all the requirements of the Act and the Commission should approve it.



Gregg C. Sayre

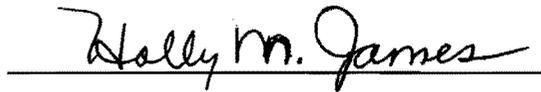
**VERIFICATION**

I, Gregg C. Sayre do on oath depose and state that I am Assistant Secretary for Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois, that I have read the foregoing Statement in Support of Joint Petition for Approval of Interconnection Agreement and the Joint Petition for Approval of Agreement for Local Interconnection and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information and belief.



Gregg C. Sayre  
Assistant Secretary  
180 South Clinton Avenue  
Rochester, NY 14646-0700  
Telephone: (585) 777-7270  
Facsimile: (585) 263-9986  
E-mail: gregg.sayre@FTR.com

Subscribed and sworn to before me,  
a Notary Public, this 15<sup>th</sup> day of  
November, 2010.



HOLLY M. JAMES  
Notary Public, State of New York  
Qualified in Monroe County  
My Commission Expires Nov. 30, 2010

## **OPT-IN AGREEMENT FOR LOCAL INTERCONNECTION**

**Citizens Telecommunications Company of Illinois  
d/b/a Frontier Citizens Communications of Illinois**

**AND**

**New Windsor Cable TV, Inc.**

This Opt-In Agreement sets forth the terms of local interconnection and the exchange of local traffic in the State of Illinois (the "Agreement") and is effective upon execution ("Effective Date"), subject to the Illinois Commerce Commission's approval. The Agreement is by and between Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Communications of Illinois ("Frontier"), an Illinois corporation, with offices at 180 S. Clinton Avenue, Rochester, NY 14646 and New Windsor Cable TV, Inc. ("NWCTV"), with offices at 305 South Fifth Avenue, New Windsor, IL 61465, Illinois. Frontier and NWCTV being referred to collectively as the ("Parties").

**NOW THEREFORE**, the Parties agree as follows:

The Parties agree that this Agreement shall supercede and replace in full any and all prior agreements, written, and oral, between Carrier and Frontier for the transport and termination of local exchange traffic in the State of Illinois.

The Parties agree that the Agreement between the Parties shall consist of the Agreement for Local Interconnection by and between Citizens Telecommunications Company of Illinois d/b/a Frontier Citizens Telecommunications of Illinois and Diverse Communications Inc, for the legal entities of Frontier's listed in the opening paragraph which was approved by the Illinois Commerce Commission on September 14, 2005 in Case No: 05-0393. That Agreement shall herein be referred to as the "Adopted Agreement". The Parties further agree the Adopted Agreement is hereby amended as follows:

### **TERM:**

This Agreement shall be in force for the period commencing with the Effective Date set forth above and continuing until terminated pursuant to the terms of the Agreement. If for some reason the Illinois Commerce Commission rejects all or part of the Agreement, the party may declare the remainder of the Agreement void and be excused for performance within 30 days of the Illinois Commerce Commission's decision.

### **TERMS AND CONDITIONS:**

1. New Windsor Cable TV, Inc. (“NWCTV”) shall be substituted in place of “Carrier” in the Adopted Agreement. Any notice to NWCTV as may be required under the Adopted Agreement shall be provided as follows:

**To New Windsor Cable TV, Inc.:**

New Windsor Cable TV, Inc.  
Troy Nimrick  
General Manager  
305 South Fifth Avenue  
New Windsor, IL 61465,  
Telephone Number: (309-667-2255)

**If to New Windsor Cable TV, Inc., Billing Disputes:**

New Windsor Cable, TV, Inc.  
Troy Nimrick  
305 South Fifth Avenue  
New Windsor, IL 61465,  
Telephone Number: (309-667-2255)  
Email: troy@nwtelephone.com

**Any notice to Frontier shall be provided as follows:**

Frontier Communications  
Attn: AVP Carrier Services  
180 S. Clinton Avenue  
Rochester, NY 14646  
Telephone: (585) 777-7124

**With a copy to:**

Frontier Communications  
Attn: Associate General Counsel  
180 South Clinton Avenue  
Rochester, NY 14646

**If to Frontier for Billing Disputes:**

Frontier Communications  
Attn: Access Billing

P.O. Box 92713  
Rochester, NY 14692

2. New Windsor Cable TV, Inc., represents and warrants that it is a Competitive Local Exchange Carrier in the State of Illinois and that its adoption of the Adopted Agreement will cover interconnection and the exchange of traffic in the State of Illinois.

**New Windsor Cable TV, Inc.**

By: Richard W. Ristau

Typed: Richard W. Ristau

Title: Secretary

Date: September 23, 2010

**Citizens Telecommunications Company  
of Illinois d/b/a Frontier Citizens  
Communications of Illinois**

By: 

Typed: Stephen Levan

Title: VP, Carrier Sales and Services

Date: 10.23.10