

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Frontier Communications Corporation,	)	ISP-PDR-20200624-00005
debtor-in-possession and its wholly	)	ITC-ASG-20200625-00095
owned operating subsidiaries	)	ITC-ASG-20200625-00096
	)	ITC-ASG-20200625-00097
	)	ITC-ASG-20200625-00098
	)	ITC-ASG-20200625-00099
Application for Consent to Assign	)	ITC-ASG-20200625-00100
and Transfer Control of Domestic	)	ITC-ASG-20200625-00102
and International Authorizations	)	ITC-ASG-20200625-00103
Pursuant to Section 214 of the	)	ITC-ASG-20200625-00104
Communications Act of 1934,	)	ITC-ASG-20200625-00105
as Amended, and Authorization to	)	ITC-ASG-20200625-00106
Exceed the 25 Percent Foreign	)	ITC-ASG-20200625-00107
Investment Benchmark in Section	)	ITC-ASG-20200625-00108
310 of the Communications Act, as	)	ITC-ASG-20200625-00109
Amended	)	WC Docket No. 20-197

**PETITION TO ADOPT CONDITIONS  
TO AUTHORIZATION AND LICENSE**

Pursuant to Executive Order 13913, the National Telecommunications and Information Administration (NTIA) submits this Petition to Adopt Conditions to Authorizations and Licenses (Petition) on behalf of the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (Committee).<sup>1</sup> Through this petition, and pursuant to section 1.41 of the Commission’s Rules, the Committee advises the Commission that it has no objection to the Commission approving the above-captioned applications, provided that the

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<sup>1</sup> Exec. Order No. 13913, § 9(h), 85 Fed. Reg. 19643, 19647-48 (2020). The Executive Order directs the Committee to “assist the [Commission] in its public interest review of national security and law enforcement concerns that may be raised by foreign participation in the United States telecommunications services sector.” *Id.* § 3(a), 85 Fed. Reg. at 19643.

Commission conditions its approval on the assurance of Frontier Communications Corporation (Frontier) to abide by the commitments and undertakings set forth in the December 17, 2020 Letter of Agreement (LOA), a copy of which is attached hereto.<sup>2</sup>

Pursuant to section 214(a) and 310(d) of the Communications Act, the Commission must determine whether a proposed assignment of control of any section 214 authorization or transfer radio license will serve the public interest, convenience and necessity. Similarly, section 310(b)(4) of the Communications Act limits foreign investment in and ownership of a parent company of specified radio licensees, unless the Commission determines that a higher level of ownership would be consistent with the public interest.<sup>3</sup> As part of the public interest analysis, the Commission considers whether any such application raises national security, law enforcement, foreign policy, or trade policy concerns related to the applicant's foreign ownership.<sup>3</sup> With regard to these concerns, the Commission has long sought the expertise of the relevant Executive Branch agencies and has accorded deference to their expertise when they have identified such concerns in a particular application.<sup>4</sup>

After discussions with representatives of Frontier in connection with the above-captioned application, the Committee has concluded that the additional commitments set forth in the LOA will help ensure that those agencies with responsibility for enforcing the law, protecting the national security, and preserving public safety can proceed appropriately to satisfy those responsibilities.

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<sup>2</sup> 47 C.F.R. § 1.41.

<sup>3</sup> See *Market Entry and Regulation of Foreign-affiliated Entities*, Report and Order, 11 FCC Rcd 3873, 3888, ¶¶ 38-39 (1995).

<sup>4</sup> *Id* at 3888, ¶ 39.

Accordingly, the Committee advises the Commission that it has no objection to the Commission granting the above-captioned application, provided that the Commission conditions its consent on compliance with the December 17, 2020 LOA attached to this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Kathy Smith".

Kathy Smith  
Chief Counsel

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December 22, 2020