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March 23, 2010

Ms. Julie Orchard
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, Utah 84114

Re: Agreement for Local Resale Service between Citizens Telecommunications of Utah (Moab Only) and BullsEye Telecom, Inc.

Dear Ms. Orchard:

Citizens Telecommunications Company of Utah, Inc., d/b/a Frontier Communications of Utah ("Frontier"), and BullsEye Telecom, Inc. ("BullsEye") hereby submit for approval the enclosed "Agreement for Local Resale Service" signed by Frontier on March 3, 2010, (the "Agreement"), which provides for BullsEye to obtain Frontier's retail services in the Moab Exchange at a wholesale discount. This Agreement was reached through voluntary negotiations without resort to mediation or arbitration and is submitted for approval pursuant to Section 252(e) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("the Act"), and the requirements of Utah Code Ann. 54-8b-2.2(1)(d)(i).

Section 252(e)(2) of the Act directs that a state Commission may reject an agreement reached through voluntary negotiations only if the commission finds that

1. the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
2. the implementation of such agreement or portion is not consistent with the public interest, convenience and necessity.

Frontier and BullsEye respectfully submit that the Agreement provides no basis for either of these findings and, thus, request that the Commission approve the Agreement expeditiously. First, the Agreement does not discriminate against any other telecommunications carrier because Frontier has made the terms of the Agreement available to other carriers. Second, the Agreement is consistent with the public interest as identified in the pro-competitive policies of the State of Utah, this Commission, the U.S. Congress and the Federal Communications Commission. The

Agreement will enable BullsEye to provide service to a greater number of telecommunications customers in Utah than it does today. Expeditious approval of this Agreement will facilitate immediate competition in the wireline telecommunications market.

Frontier and BullsEye further request that the Commission approve this Agreement without a hearing and without allowing the intervention of other parties. Because this Agreement was reached through voluntary negotiations, it does not raise issues requiring a hearing and does not concern other parties not a part of the negotiations. Expeditious approval would further the public interest.

Enclosed are the original and five copies of the agreement. Also included is an additional copy of this letter. Please time and date stamp this extra copy and return it to me in the enclosed self-addressed, stamped envelope. I have also sent electronic copies of this letter and the enclosed agreement via e-mail to Jennifer Joy at jjoy@utah.gov.

If you have any questions regarding this matter, please contact me by telephone at 801-298-0757, by mail at 1387 West 2250 South, UT 84087, or by e-mail at chuttsel@czn.com.

Sincerely,

A handwritten signature in cursive script that reads "Curt Huttsell".

Curt Huttsell, Ph.D.

Manager – Government and External Affairs