

Public Interest Statement

The transfer of the FCC licenses subject to this application is incidental to an underlying transaction involving the transfer of Frontier companies providing local exchange telecommunications (“LEC”) services from Global Crossing to Citizens. As shown below, transferring Frontier’s incumbent LECs (“ILECs”) is in the public interest, and thus the requested transfer of control of the wireless licenses that support the LEC services is also in the public interest.

The proposed acquisition by Citizens will cause no adverse impact upon Frontier's local exchange operations or customers. The purchase will give the Frontier ILECs a parent organization (namely Citizens) that is focused on the local exchange business and shares the Frontier ILECs' history of commitment to excellent customer service.

In addition, there will be no rate changes as a direct result of the transaction. The transaction will be transparent to the customers. It will be "business as usual" for the Frontier ILECs after the purchase. Customers will continue to be served by the same people serving them today, with the same high level of service quality.

The Frontier ILECs have been leaders in deploying an all-digital network with the latest advances in switch software. All Frontier exchanges have SS7 capability, with CLASS features such as Caller ID. The Frontier ILECs are and will remain committed to providing new, advanced services to all of its customers wherever technologically feasible and economically reasonable.

Citizens is a long time participant in the local exchange marketplace focusing largely on rural and suburban communities. In recent years Citizens has determined to both increase its size and emphasize its focus on rural and suburban communities, a market which it believes has been

underserved in the current telecommunications market. The instant transaction will permit both Citizens and the Frontier ILECs to sharpen their focus on the areas where they are best able to provide their customers with innovative and cost effective services, and the combined size and depth of expertise of the companies will enhance their abilities to provide these services in additional areas.

The combined size and depth of expertise of the companies will help create a "critical mass" of employees, customers and technology. Citizens and the Frontier ILECs expect their operations to grow significantly beyond the current size of their separate operations. The companies' increased size will give them an increased ability to focus on growing their customer base through new business opportunities, both inside and outside the Citizens and Frontier ILEC territories.

The driving force behind the proposed transaction is the need to grow the business, not only by acquisitions but also by a focus on internal growth. The companies do not expect to achieve significant cost or employee headcount reductions as a result of the transaction. Instead, the companies expect to increase their overall presence in Alabama, Florida, Georgia, Illinois, Indiana, Iowa, Michigan, Minnesota, Mississippi, Ohio, New York, Pennsylvania, and Wisconsin. With their additional size and expertise and a focus on growth, the combined companies will enhance economic activity in the local economies in the areas that they serve.

Citizens values its customers and is committed to providing the best customer relations in the industry. The Frontier ILECs will continue to utilize Frontier's call centers to handle new service and repair calls originating in the Frontier exchanges.

Citizens will work with the state authorities to develop a customer education outreach to ensure a smooth transition for the existing Frontier customers. This will include newspaper advertising and bill inserts as appropriate. Through this outreach effort, customers will be informed of any important information needed as a result of the transition.

For the reasons set forth above, the proposed transaction is in the public interest.