



August 18, 2010

The Honorable Troy A. Paredes
Commissioner of U.S. Securities and Exchange Commission
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Facilitating Shareholder Director Nominations
Release Nos. 33-9046; 34-60089; IC-28765
File No. S7-10-09 (June 10, 2009)

Dear Commissioner Paredes:

On behalf of the eleven independent directors of Frontier Communications Corporation (NYSE:FTR), I appreciate the opportunity to comment on the release referred to above that was issued by the Securities and Exchange Commission regarding facilitating shareholder director nominations. In doing so, I would like to focus my comments in particular on the topic of Proxy Access under Rule 14a-8.

As the Lead Director of Frontier Communications, I am very proud of our corporate governance practices at Frontier, which I believe result in strong independent leadership on our Board. The Frontier Board is comprised of a diverse mix of business executives with the primary objective of providing long term strategic governance of Frontier in order to foster the creation of long term shareholder value that we believe benefits all of our stakeholders, including employees, customers and investors. With that in mind, we are gravely concerned about the potential negative impact that the currently proposed proxy access amendment will have on public corporations. We believe proxy access encourages management teams and boards to adopt a short term focus on share price performance at the expense of long term strategic vision. We also believe that the proposed proxy access amendment will result in frequent and time-consuming proxy contests that will be costly and highly distracting to management teams and corporate boards. Such distractions will divert company resources away from the current goals of creating long term shareholder value.

Despite our objections above, I understand that the Commission may nonetheless move forward to implement some form of proxy access. In doing so, we strongly encourage you to devise a workable process that serves the interest of mainstream investors who are dedicated to long term investing. To this end, we urge the Commission to adopt a minimum ownership level of 5% and a minimum holding period of at least two years as

part of any amendments to Rule 14a-8. We believe these two provisions will serve the follows purposes:

- Setting a minimum 5% ownership threshold will limit the ability of special interest groups to aggregate their shares to pursue their narrow agendas which are often in conflict with the creation of long-term shareholder value.
- Requiring a holding period of at least two years will limit the nomination of directors to shareholders that have a long term economic interest in the company. It will do so by blocking shareholders who build their share position by simply borrowing shares on a short term basis to meet the eligibility requirement.

Adopting these two provisions will effectively close the loopholes that could allow short term investors and special interest groups to exploit proxy access and hijack the nomination process.

Thank you for the opportunity to comment on this extremely important issue. If you wish to speak further, please do not hesitate to contact me directly at (415) 999-0928 or maawick@aol.com.

Sincerely,

A handwritten signature in black ink that reads "Myron A. Wick III". The signature is written in a cursive style with a small "III" at the end.

Myron A. Wick III
Lead Director on behalf of the
Frontier Independent Board Members