



Citizens Communications
180 South Clinton Avenue
Rochester, NY 14646

June 20, 2008

Amended Transmittal No. 179

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

ATTENTION: WIRELINE COMPETITION BUREAU

Dear Secretary:

On June 16, 2008, Citizens Telecommunications Companies ("Citizens") submitted its 2008 Annual Access Charge Tariff Filing under Transmittal No. 179. Among other actions, this filing introduced Rate Group 5, consisting of Global Valley Networks, Inc. ("GVN"), a company acquired by Citizens Communication Company, the parent of the Frontier and Citizens local exchange carriers ("Frontier"), on October 31, 2007. GVN is converting to price cap regulation effective 7/1/2008, coincident with exiting the NECA pools.

The Commission's Staff has pointed out that while participating in the NECA tariff, GVN offered term discount plans for special access services. In the Citizens tariff, no corresponding term discount plans are offered in Rate Group 5. Staff was concerned about the effect this might have on customers who have term discount plans. Because GVN has no customers taking term discount plans, this change does not affect any customers.

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The following table displays the FCC Registration Number (FRN) and Tax Identification Number (TIN) associated with each company participating in Citizens Tariff F.C.C. No. 1:

<u>Company</u>	<u>FRN</u>	<u>Tax ID Number</u>
Citizens Telecommunications Company of the White Mountains, Inc.	0003-5726-17	06-1473448
Citizens Utilities Rural Company, Inc.	0003-5839-37	06-0798524
Citizens Telecommunications Company of California, Inc.	0003-5743-16	06-1387094
Citizens Telecommunications Company of Tuolumne	0003-5737-06	06-1418451
Citizens Telecommunications Company of the Golden State	0003-5734-17	06-1428831
Citizens Telecommunications Company of Idaho	0003-5745-89	06-1381499
Citizens Telecommunications Company of Montana	0003-5745-63	06-1381501
Citizens Telecommunications Company of Nevada	0001-5968-81	88-0038970
Citizens Telecommunications Company of New York, Inc.	0003-5745-48	06-1381503
Citizens Telecommunications Company of Oregon	0003-5745-22	06-1381505
Citizens Telecommunications Company of Tennessee LLC	0003-5733-91	06-1431902
Citizens Telecommunications Company of the Volunteer State LLC	0004-2605-68	06-1431906
Citizens Telecommunications Company of Utah	0003-5745-06	06-1381506
Citizens Telecommunications Company of West Virginia	0004-0549-38	55-0276420
Citizens Telecommunications Company of Minnesota, LLC	0004-0367-03	06-1554080
Navajo Communications Company, Inc.	0001-6713-20	75-1310073
Citizens Telecommunications Company of Nebraska	0004-3410-95	06-1557684
Citizens Telecommunications Company of Illinois	0003-9342-05	36-4348451
Rhineland Telephone LLC	0002-7227-42	39-0227610
Ogden Telephone Company	0003-4132-42	16-0576170
Global Valley Networks, Inc.	0001-5500-29	94-1212404

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Questions regarding this filing may be directed to me at:

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Respectfully Submitted,

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