Respondent: Susan M. Baldwin
Date: August 28, 2007

1. Please refer to Page 3, lines 13-16 and page 4, lines 1-4 of Susan Baldwin's Direct Testimony. Did the Massachusetts Department of Public Utilities Commission ever undertake a formal docket of NYNEX MA's overall service quality while Ms. Baldwin was the Director of Telecommunications? If so please provide the docket number and any relevant Commission Orders.

Revised Response:

Objection. The request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence regarding whether the proposed transaction with FairPoint in New Hampshire meets the public interest standard. Also, the request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Yes. Please see footnote 3 in my testimony, which provides the requested docket number. The order is available from the Massachusetts Department of Telecommunications & Cable, and may also be available at Verizon Massachusetts regulatory offices.

The order is voluminous. A copy of the order will be available for review at the OCA's office by Monday, September 10.

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2. Please refer to page 57, lines 20-23 and Page 58, lines 1-4 of Susan Baldwin's Direct Testimony. Please identify a specific New Hampshire Commission Order in the last five years where the Commission has found that "...the quality of basic local exchange service in New Hampshire has been deteriorating for several years, and Verizon NH demonstrates no intention of achieving PUC-established service quality...."

Revised Response:

Objection. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a specific New Hampshire Commission Order as the basis for my statement.

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4. Please refer to page 70, lines 1 of Susan Baldwin's Direct Testimony. Please identify specifically where the New Hampshire Commission has made a formal finding that Verizon NH's service is well below acceptable levels. Please provide a copy of the Commission's Order for each instance identified.

Response:

Objection. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a formal finding of the New Hampshire Commission as the basis for my statement.

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5. Please refer to Page 74, lines 1-10 of Susan Baldwin's Direct Testimony. Please identify a specific New Hampshire Commission Order in the last five years where the Commission has found that "Verizon NH's service quality is indisputably in decline." Please provide a copy of the Commission's Order for each instance identified.

Revised Response:

Objection. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a specific New Hampshire Commission Order as the basis for my statement.

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8. Please refer to pages 74-76 of Susan Baldwin's Direct Testimony. Is it Ms. Baldwin's position that the changes in the Telecommunications Act of 1996 and the Commission's pro-competitive policies implementing the Act are not relevant to a Commission review of Verizon NH's overall service quality today? If so, please provide the basis for that position. If relevant, please identify any Commission Order incorporating these policies into the existing service quality measures and standards and provide a copy of each Order.

Revised Response:

Objection. The request is argumentative. Also, the appropriate docket for consideration of this issue is DT 04-019. The merits of Verizon NH's service quality problems and the quality of service standards applicable to Verizon NH are not subject to dispute in this docket. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a Commission Order as the basis for my statements.

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9. Please refer to pages 74-76 of Susan Baldwin's Direct Testimony. Is it Ms. Baldwin's position that the significant growth in cable and CLEC competition is not relevant to a Commission review of Verizon NH's overall service quality today? If so, please provide the basis for that position. If relevant, please identify any Commission Order incorporating these factors into the existing service quality measures and standards and provide a copy of each Order.

Revised Response:

Objection. The request is argumentative. The appropriate docket for consideration of this issue is DT 04-019. The merits of Verizon NH's service quality problems and the quality of service standards applicable to Verizon NH are not subject to dispute in this docket. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a Commission Order as the basis for my statements.

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10. Please refer to pages 74-76 of Susan Baldwin's Direct Testimony. Is it Ms. Baldwin's position that the growth of the Internet, text messaging and VoIP are not relevant to a Commission review of Verizon NH's overall service quality today? If so, please provide the basis for that position. If relevant, please identify any Commission Order incorporating these factors into the existing service quality measures and standards and provide a copy of each Order.

Revised Response:

Objection. The request is argumentative. The appropriate docket for consideration of this issue is DT 04-019. The merits of Verizon NH's service quality problems and the quality of service standards applicable to Verizon NH are not subject to dispute in this docket. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a Commission Order as the basis for my statements.

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11. Please refer to pages 74-76 of Susan Baldwin's Direct Testimony. Is it Ms. Baldwin's position that the growth of wireless services is not relevant to a Commission review of Verizon NH's overall service quality today? If so, please provide the basis for that position. If relevant, please identify any Commission Order incorporating this factor into the existing service quality measures and standards and provide a copy of each Order.

Revised Response:

Objection. The request is argumentative. The appropriate docket for consideration of this issue is DT 04-019. The merits of Verizon NH's service quality problems and the quality of service standards applicable to Verizon NH are not subject to dispute in this docket. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a Commission Order as the basis for my statements.

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16. On page 95 of her testimony, Ms. Baldwin states that Verizon NH should not be permitted to transfer its local operations until it provides a detailed plan and budget to ensure that within a specified time period and with sanctions for non-compliance PUC-established service quality standards are met or exceeded upon transfer. Has the Commission ever imposed a similar condition on the transfer of utility assets? If so, please identify the docket and provide a copy of the order imposing such a condition.

Response:

Objection. The request whether the Commission has "ever imposed" a condition is overbroad and vague. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a Commission Order as the basis for my statements.

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19. On page 155 of her testimony, Ms Baldwin states that Verizon NH "should not be permitted to sell its operations to any entity unless and until it compensates consumers for the value of its spin-off of its operations." Has the Commission ever imposed a similar condition on the transfer of utility assets? If so, please identify the docket and provide a copy of the order imposing such a condition.

Response:

Objection. The request seeks information and/or a review of documents that is equally available to the requester and can be undertaken by the discovering party as readily as by Ms. Baldwin or the OCA, and therefore is unduly burdensome.

Subject to and without waiving the objection, Ms. Baldwin states as follows: Commission orders are publicly available.

I did not rely upon or refer to a Commission Order as the basis for my statements.