

Docket DT 16-872

RESPONSES TO STAFF'S DATA REQUESTS – FIRST SET

Date Request Received: February 17, 2017

Date of Response: March 6, 2017

Request No. Staff 1-79Witness: Gabe Waggoner

1-79. Refer to the Prefiled Direct Testimony of Gabe Waggoner, page 5, lines 12 and 20-22, of his testimony, discussing the Consolidated a physical inspection of a portion of FairPoint's outside plant, cable facilities and central office network in New Hampshire. Please provide a description of the method or methods used to select the areas for review and inspections in its outside and inside plant and other physical assets in its due diligence studies of FairPoint New Hampshire. In particular, please:

- a. Provide details on how the facilities that were physically examined were selected
- b. The fraction of the total facilities in FairPoint's New Hampshire network the examined facilities represent (e.g., percent of central offices visited, percent of cable runs inspected, etc.)
- c. Describe who from and how FairPoint was involved in the process for selecting the sites to visit
- d. Provide a list of FairPoint's facilities that Consolidated physically inspected
- e. Provide any work papers, reports, or other documentation created as a result of these inspections.

RESPONSE: Consolidated management drove throughout all three northern New England states - Maine, New Hampshire and Vermont - and visually viewed the physical plant facilities. This occurred over a two day period with CCI individuals assigned to each state. The intent was to validate the facilities and the markets served by FairPoint. Consolidated then conducted inspections with FairPoint employees of a sampling of central offices, node deployments, and physical cable routes. With both Consolidated and FairPoint being public companies, maintaining the limited number of individuals with knowledge of the possible transaction was considered as to the office locations to be visited and the timing in order to limit the visibility. Both companies determined that visiting the larger Manchester central office, data center, and operations areas was critical as well as visiting a remote central office in Bedford outside of the Manchester area. This was jointly determined by the Consolidated and FairPoint engineering and operations leaders. Additionally, several remote huts/nodes were inspected, as well as the cable facilities in the Manchester and remote market areas surrounding it including Bedford and Goffstown. These inspections were led by the FairPoint leaders over a two-day period. As noted above, CCI employees spent time ahead of this visit driving through the state and reviewing the cable facilities over a two-day period.