

State of New Hampshire
Public Utilities Commission

Docket No. DT 10-025
FairPoint Communications, Inc., et al.

Respondent: Richard Murtha
Title: Vice President of Wholesale
Operations
Objection: By Counsel

REQUEST: Joint CLECS
Set 1
DATED: March 17, 2010

ITEM: CLECS-30 With regard to FairPoint's post-reorganization wholesale operations, please indicate:

- a. the number of employees involved in post-reorganization wholesale operations for the three states of Vermont, Maine and New Hampshire;
- b. whether the post-reorganization wholesale operation employees will have responsibilities unrelated to wholesale operations, including but not limited to retail business operations; and
- c. whether personnel assigned to negotiate ICAs with wholesale customers will also have responsibilities related to retail operations.

REPLY: OBJECTION. FairPoint objects to CLECS-30 on the grounds that it seeks confidential and/or proprietary business information, disclosure of which would provide competitors with a business advantage. Subject to and without waiving this objection, FairPoint will provide information responsive to CLECS-30.

- a. There will be no change with respect to the number of employees involved in FairPoint's wholesale business after effectiveness of the Plan, as may be further amended, compared to the number of employees prior to such effectiveness.
- b. Following effectiveness of the Plan, as may be further amended, all employees assigned to wholesale ordering (including the OCC "Order Completion Center"), sales and billing will be dedicated

to serving wholesale business only, which is the same as prior to such effectiveness. The remaining provisioning, maintenance and repair organizations are cross-functional and will handle all orders regardless of customer (which also will be the same following effectiveness of the Plan.

c. The personnel who negotiate Interconnection Agreements with FairPoint's wholesale customers only work with wholesale customers.