STATE OF NEW HAMPSHIRE

BEFORE THE

PUBLIC UTILITIES COMMISSION

DT 07-011

NORTHERN NEW ENGLAND TELEPHONE OPERATIONS LLC, d/b/a
FAIRPOINT COMMUNICATIONS - NNE

SUPPLEMENTAL STATEMENT CONCERNING NOTICE OF CUTOVER
READINESS

NOVEMBER 18, 2008

AFFIDAVIT OF PETER G. NIXON

I, Peter G. Nixon, do hereby under oath depose and state as follows:

1.   My name is Peter G. Nixon.   I am the President of FairPoint Communications, Inc., a Delaware corporation ("FairPoint").

2.   FairPoint's supplemental statement concerning its cutover readiness is attached hereto as <u>Exhibit A</u>. This supplemental filing has been prepared pursuant to my direct supervision.

3.   FairPoint's supplemental statement attached hereto as <u>Exhibit A</u> sets forth further information concerning FairPoint's readiness to: (i) issue its irrevocable Notice of Cutover Readiness to Verizon Communications Inc. and (ii) cut over to its new systems architecture beginning in January 2009. The supplemental statement is to the best of my knowledge true, accurate and complete.

Respectfully submitted,

Date: November 18, 2008   _____

Peter G. Nixon, President

STATE OF NEW HAMPSHIRE

COUNTY OF ROCKINGHAM

Personally appeared before me on November 18, 2008, the above-named Peter G. Nixon, as President of FairPoint Communications, Inc., a Delaware corporation, and made out that the foregoing statements are true, accurate and complete to the best of his knowledge and belief.

_____
Notary Public/Justice of the Peace
My Commission Expires:

Northern New England Telephone Operations LLC, d/b/a FairPoint Communications - NNE ("FairPoint") provides this supplemental statement concerning its readiness to cut over from the transition support services provided by Verizon Communications to the new FairPoint systems. During the transition process, FairPoint and its primary consultant, Capgemini U.S. LLC ("Capgemini") have been cooperating with the independent, third-party monitoring efforts of Liberty Consulting Group ("Liberty"), the consultant retained to advise utility regulatory authorities in Maine, New Hampshire and Vermont. On November 12, 2008 Liberty filed its latest Cutover Monitoring Status Report. This supplemental statement updates the New Hampshire Public Utilities Commissions and Maine Public Utilities Commission on the current status of FairPoint's cutover readiness.

In the November report, Liberty concludes, "that FairPoint has continued to make progress, and has satisfied the cutover criteria in all but a few areas, which are CLEC testing, business process development, and training. Furthermore, Liberty believes that the status of business process development and training is sufficiently advanced that the lack of full satisfaction of the related cutover readiness criteria does not constitute a significant impediment to FairPoint's declaring cutover readiness." In its Provisional Notice of Cutover Readiness and Rebuttal, FairPoint stated its belief that that it had met all requirements for cutover readiness. Nevertheless, FairPoint and Capgemini have continued to work diligently to address the additional items identified by Liberty in its November report with regard to CLEC testing, and FairPoint is committed to complete them before November 30, 2008. FairPoint will also provide updates regarding other items in the Liberty report.

CLEC TESTING

Liberty's report specifies additional actions necessary for FairPoint to take with regard to CLEC testing. Specifically, Liberty states, "In order to satisfy this criterion, Liberty believes FairPoint must:

- Add and allow the CLECs to execute additional test cases that would provide coverage of the scenarios that are most important for EDI users; this could be accomplished through the addition of seven new test cases which some EDI users have recommended and indicated would meet their business needs and which Liberty understands FairPoint intends to introduce
- Internally test or provide a means for CLECs to test all forms of EDI response messages, including those that can originate in the back-end systems, such as rejects, jeopardy notices, provisioning completion notices, billing completion notices, and design layout records
- Provide evidence to Liberty that the CLEC testing scenarios sufficiently mirror the historical range of wholesale transactions in the northern New England states."

Based on input from Liberty and CLECs using the EDI interface, FairPoint developed and offered seven (7) new test scenarios. The following chart describes each of the tests, when FairPoint made the test scenarios available to CLECs and the results of those tests. The seven (7) tests satisfy the first Liberty recommendation of additional tests that are the most important for EDI users.

Description	Test Available Date	Result of the test
"New" Directory Listing (4 lines) Business w/Caption listing and PLA	11/18	Test case developed. Test case failed due to ALI code error. Test case will be ready for retest 11/18.
Number Portability - Facility-based CLEC orders number porting w/DL from Residential Retail	11/12	Test case passed CLEC testing on 11/13.
Number Portability - Facility-based CLEC porting 2 lines w/DL from Residential Retail	11/12	Test case passed CLEC testing on 11/17.
"Change" Directory Listing CLEC updates 53 Pierce St to 57 Pierce St Business w/Caption listing and PLA	11/17	Test case passed CLEC testing on 11/17.
Parsed Customer Service Record (CSR) Retrieval on a multi-line Telephone Number	11/19	Test case developed, Test case passed internally, Test case material developed.
Migration "as is" w/CHC Business POTS - migrate to CLEC UNE Analog Loop w/Local Number Portability service	11/14	Test case passed CLEC testing on 11/14.
Migration "as is" w/CHC Business POTS - migrate to CLEC UNE Analog Loop w/Local Number Portability service, dual LOA	11/14	Test case passed CLEC testing on 11/14.

The five (5) tests on this next chart address the second Liberty recommendation of providing all forms of EDI responses back to the CLECs.

Description	Test Available Date	Result of the test
PCN Response	11/14	Test case passed CLEC testing on 11/17.
BCN Response	11/19	BCN test failed due to ALI code error. Test case ready for retest 11/19.
Jeopardy Response	11/18	Test case passed CLEC testing on 11/18.
Reject Response	10/13	Test cases have always had a reject response available.
Design Layout Record Response	N/A	Records are not provided via EDI (consistent with today's environment).

To satisfy the third recommendation from the Liberty report, FairPoint provided supporting evidence to Liberty, satisfying the requirement that the testing scenarios sufficiently mirrored the historical range of wholesale transactions in the Northern New England region. Liberty points out that it is not feasible for Capgemini and FairPoint to test every possible scenario. The key question is whether a set of tests has been run successfully to minimize the likelihood of significant failures after cutover. FairPoint's plan to continue to offer these tests to the CLECs as well as its own continual regression testing of the systems will, as stated in the Liberty report, further reduce the probability of serious failures at cutover.

HOT CUT PROCESS

Liberty stated that FairPoint should:

- "Modify its hot cut process to address the concerns raised by the CLECs, providing an acceptable workaround by cutover and a more permanent solution after cutover."

FairPoint outlined its remedy to address the concern Liberty raised for both an immediate and long term solution for hot cuts in its Provisional Notice of Cutover Readiness and Rebuttal submitted on November 12, 2008. A request was made by Liberty to provide additional detail for the immediate process. The following is the detailed response:

Overview

FairPoint has developed the process described below to help facilitate and manage CLEC requested hot cuts. This process brings together the CLEC, WSC (Wholesale Service Center), Frame Technician, and COT (central office technician) in a collaborative environment. The purpose of this process is to ensure timely completion of each hot cut according to the frame due date and time.

The process is designed to organize hot cut orders in ways that assist in identifying service order errors, cable pair mismatches, dial tone problems and other problems that could result in a missed due date.

There are two (2) Hot Cut Scenarios:
- FairPoint customer migrates to a CLEC with a loop and with local number portability (most common)
- FairPoint customer migrates to a CLEC with a loop and without local number portability (rare)

This process does NOT perform the hot cut, but rather, coordinates the effort.

Steps prior to Due Date

The WSC receives a hot cut request by way of a BB LSR (local service request) type of order. The order is processed manually or via flow-through from the Wisor system downstream to the MetaSolv (order management) system. The wholesale customer will receive a single FOC (Firm Order Confirmation) with the scheduled FDD (frame due date) and FDT (frame due time).

The ROC (Regional Operations Center) or screener will receive the order from MetaSolv. The screener will then check the schedule and assign the hot cut to the appropriate COT for processing.

The COT will analyze the order and determine the quality of order, the accuracy of assignment, and whether an equipment change is needed due to IDLC conditions. The COT will contact the appropriate work groups if there are any problems with the hot cut order. The COT communicates with the wholesale customer via a telephone call and documents the communication if there is a problem with the order. The COT schedules the frame personnel to perform the hot cut, opens and schedules a pre-wire and hot cut ticket in Adventyx. The COT verifies that, one or two days prior to the hot cut, there will be a check for CLEC dial tone. The following steps will be performed until dial tone is available:

-   Check the frame technician ticket for this information
-   If there is a problem, notify the CLEC by telephone
-   Create a second frame technician ticket to recheck the dial tone (repeat until dial tone is available)

The COT will contact any other work group to resolve any other discrepancy which may exist on the service order. The COT will then document the status of the order, all contacts made and the actions taken.

Due Date Arrives

When the due date arrives, the COT verifies authorization from the wholesale customer to perform the hot cut ("Go Ahead") and sets a FDT via telephone call to wholesale customer. If the Go Ahead is not received, the order FDT is pushed out, and work teams are contacted to stop work

The COT requests the wholesale customer to submit a supplement order requesting a new FDD and FDT. When the COT receives authorization from the wholesale customer to proceed with the hot cut, the frame technician is notified to proceed with frame work (one hour but no less than 15 minutes prior to FDT). At the FDT, the frame technician performs the physical aspects of the hot cut and moves the jumpers. The frame technician then notifies the COT that the hot cut has been completed. The COT notifies the wholesale customer that the physical work is complete via a telephone call. The COT enters the turn-up information

into the service order and updates the record. The COT then completes the order and marks it "Cut OK". The wholesale customer will then receive the PCN (Provisioning Completion Notice) and the BCN (Billing Completion Notice).

<u>Escalation Process</u>

If the order is in a Pre-FOC or Post-FOC condition but prior to FDT the wholesale customer would follow the escalation process for the Wholesale Service Center. If the order is at FDT or later, the wholesale customer would contact the Regional Operations Center. Escalation contact lists are posted on the Wholesale section of the FairPoint website.

FairPoint believes the process set forth above satisfies Liberty's concerns with respect to hot cuts.

DAILY USAGE FILES

Liberty stated that FairPoint should:

- "Assure that all defects are correctly identified and have assigned fix dates or acceptable workarounds, including those associated with the DUF files."

FairPoint continues to provide test DUF files to all requesting CLECs. The system to process or "mediate" the usage records is a highly configurable, stand-alone application. This is important to understand as it allows FairPoint to quickly correct issues identified by CLECs when test files are produced. Corrections do not require software coding changes; thus, we can turn around corrected files in fewer than 24 hours. There are no system defects, and FairPoint is continuing to work with CLECs to address configuration issues (business rules that are outside of EMI standards) to meet their needs.

FairPoint will continue to test DUF files through December; however, FairPoint expects that open issues will be resolved prior to the end of November. FairPoint's plans for this week include providing files containing call records for the following products:

- UNE and UNE Meet Point Billing
- Resale
- Operator Services & Directory Assistance not related to UNE or RESALE (Independents)
- Tandem Meet Point

LINE LOSS REPORTS

The Liberty report also noted that CLECs have raised a concern about FairPoint's lack of the ability to "push" the daily line loss reports to the CLECs. FairPoint's plan had been to post each CLECs line loss report on the FairPoint portal requiring the CLECs to manually "pull" this data each day to obtain this report. Prior to cutover, FairPoint will

modify this process so that it will be able to "push" the daily line loss reports to requesting CLECs. .

FairPoint understands that there are two CLECs to whom line loss reports are now pushed. FairPoint will contact those two CLECs within 48 hours, as well as other CLECs desiring such reports (by accessible letter and through the Wholesale User Forum), to provide addresses to which the daily line loss reports should be sent. FairPoint will provide a test report to each requesting CLEC within 14 business days following receipt of the address from that CLEC.

TRAINING AND BUSINESS PROCESSES

FairPoint has looked very closely at both its training plan and business process development. Training and business process development do not have a start and stop date but will continue to cutover and beyond. FairPoint will provide regular training to its employees as part of its ongoing business, and will continue to modify and improve its business processes. However, Liberty has noted that there are developments they would like to see in FairPoint's training plan and business processes prior to cutover. FairPoint will continue to provide the updated training curricula, training schedule updated business processes and other regular updates as FairPoint has in the past to Liberty in these areas between the notice of readiness and cutover, for them to inspect and report on, as appropriate.

LIVE NETWORK TESTING

An additional area where FairPoint will continue to provide regular updates to Liberty is in the area of Live Network Testing. Although Liberty concludes in their report, that these tests are not necessary for demonstrating cutover readiness, it is FairPoint's intention to complete these tests in November and regularly present evidence of completion to Liberty.

BILLING

Accurate billing is a critical function that will be performed by FairPoint's systems. Liberty detailed in their report the various additional tests Capgemini and FairPoint have performed to insure accurate billing. As pointed out in their report, this effort has been significant and detailed. A number of the audits have been completed to ensure conformance with appropriate taxing jurisdictions, regulatory requirements and tariff filings. In several cases these audits have resulted in differences as compared to the current billing under the Verizon TSA services. These differences have been reviewed with Liberty, will be shared with each of the state commissions, and will be part of our overall communications plan to our customers.

CONCLUSION

FairPoint believes that, upon completion and passage of the additional test cases as set forth above (expected on or before November 19, 2008), it will have satisfied all of the requirements for cutover readiness as defined in the FairPoint Cutover Readiness Verification Plan, as well as the additional items specified by Liberty in its November 12, 2008 report. Accordingly, FairPoint requests that the regulatory agencies take no action or otherwise prohibit FairPoint from issuing its Notice of Cutover Readiness to Verizon Communications Inc. in November 2008.